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Via email c/o: michelle.wenner@vfa.vic.gov.au

Dear Travis

Proposed Fisheries (Western Port/Port Phillip Bay Fishery Catch Limit) Notice 2023

Seafood Industry Victoria (SIV) welcomes the opportunity to provide comment on the draft Fisheries Notice on Western Port/Port Phillip Bay fishery catch limits.

The 2022/23 fishing year was the first following the introduction of new catch limits for species other than snapper. The 8 commercial fishing licence holders in Western Port/Port Phillip Bay are now able to provide comment on the implication of those restrictions.

The purpose of this communication is to propose alternative structures to catch limits for the 2023/24 fishing year that would facilitate increased business viability for existing license holders, whilst providing the Victorian public greater access to fresh local seafood and offering the recreational fishing community confidence that stocks of key species are well managed for the future.

Catch limits for shark

Gummy shark is a popular fish with consumers who prioritise this local species over alternatives. Recent research conducted by the University of Adelaide¹ showed that only 27% of 'flake' purchased across 104 food service and retail outlets was gummy shark, in accordance with the Australian Fish Names Standard. The remaining 73% comprised other species, several of which were either imported or caught elsewhere in Australia, including four threatened species. These findings suggest insufficient supply of local gummy shark to meet demand in food service and retail outlets.

1. Sharrad, A et al. (2023), Umbrella terms conceal the sale of threatened shark species: A DNA barcoding approach. *Food Control*, Vol 148.

Fisheries Notice 2023 includes the continuation of a combined annual catch limit for gummy and school shark of 1 tonne per licence. Gummy shark is commonly caught when fishing for Snapper via longline, resulting in the 1 tonne limit being met early in the fishing year for several license holders, after which any gummy shark by-catch must be discarded and returned to the water.

The status of gummy shark fish stocks has been deemed as sustainable, with commercial fishing in Victoria unlikely to impact overall stock biomass². The management advice agreed between the Australian Fisheries Management Authority (AMFA) and Victoria with respect to gummy shark and school shark provides a combined annual commercial take from Victorian waters of 40 tonne. Commercial catch data since 2018 indicates an average total take for the two species of less than 20 tonne/annum, allowing for the retention of more shark by-catch without posing a threat to stocks.

SIV asks that consideration be given for increasing the annual catch limit per license for gummy and school shark combined in Western Port/Port Phillip Bay to at least 3 tonnes. This will decrease unnecessary wastage associated with discarding shark by-catch while providing Victorian residents with greater access to sustainable, locally sourced shark.

Catch limits for fish other than snapper and shark

Independent consumer survey research conducted by Macroplan on behalf of SIV in November 2021³ shows Victorian consumers have a strong preference for fresh fish over frozen seafood. The current focus on country-of-origin labelling of seafood suggests we can expect greater scrutiny on seafood provenance into the future with enhanced demand for local product. Sadly, access to fresh fish for Victorian consumers from local bays and inlets has been significantly constrained in recent years.

Fisheries Notice 2023 includes continuation of the combined annual 2-tonne catch limit per license holder for fish other than snapper and shark. The absence of contemporary published stock assessments suggests an arbitrary approach was taken when setting the 2-tonne limit in 2022. This constraint has threatened the ability for the 8 remaining commercial fishers to maintain cash flow and meet operational costs, particularly outside of the typical snapper season. As a result, the value of their licences has been significantly diminished.

Further, licence holders remain confused as to why King George whiting, calamari, kingfish and mullet are now prohibited when there is no scientific rationale to suggest stocks are under threat. These species were allowed to be caught at a time when the number of active commercial fishing businesses in Western Port/Port Phillip Bay was much higher.

Catch Per Unit Effort (CPUE) data remains the primary information source to support scientific modelling regarding projected future stock levels of key commercial species. More comprehensive modelling achieved through greater CPUE data would provide licence holders with the certainty they need to maintain business viability whilst giving both the public and recreational fishing community confidence that fish stocks are well managed and secure.

2. Woodhams, J et al. (2018), Status of Australian Fish Stocks Report – Gummy Shark (2018). Australian Bureau of Agricultural and Resource Economics and Sciences.

3. Victorian Seafood Consumption Survey. Macroplan, November 2021

SIV asks that consideration be given for the following annual catch limits per license using non-net methods, which represent a fraction of the total commercial catch supported by Western Port/Port Phillip Bay historically and amount to less than half the total volume discussed prior to the 2022/23 fishing year.

- 2 tonne King George whiting
- 2 tonne calamari
- 1 tonne combined kingfish and mullet
- 3 tonne other species (excluding abalone, jellyfish, rock lobster, giant crab, scallop and sea urchin)

SIV supports rigorous monitoring of catch limits and an ongoing annual review process.

Concluding comments

At a time when Victoria is seeking to rebound and recover from the effects of COVID-19 and fragile global markets, the state's trade performance has suffered from the loss of valuable seafood income sourced by commercial fishers. Consumers are no longer able to enjoy locally caught seafood to the same extent and are increasingly reliant on imported products.

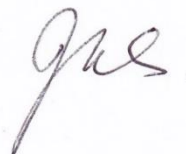
Further, the limited allowable catch of species other than snapper effectively renders the commercial fishing businesses in Western Port/Port Phillip Bay unviable. The impact on the mental wellbeing of licence holders not able to practice their trade in a way that provides a sustainable income to support their families should not be underestimated. These small business owners who have invested both emotionally and financially in safe and responsible operations are now left feeling disenfranchised by government and pessimistic about the long-term future of their fishery.

The 8 commercial licence holders in Western Port/Port Phillip Bay are motivated to preserve fish stocks for generations to come. Along with SIV they are committed to continuing to work constructively with all fishing interests to co-exist responsibly and maintain supply of fresh fish for the benefit of Victoria's seafood consuming public. SIV calls on the VFA to support this approach by revoking the draft Fisheries Notice 2023 and replacing it with one specifying revised catch limits for shark and other species other than snapper that considers the information presented within this submission.

Yours sincerely,



Matthew Wassnig
Chief Executive Officer
Seafood Industry Victoria



Joanne Butterworth-Gray
Independent Chair
Seafood Industry Victoria