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6 November 2024

Travis Dowling
Chief Executive Officer
Victorian Fisheries Authority (VFA)
GPO Box 2392, Melbourne, Victoria 3001

Sent via email to: haveyoursay@vfa.vic.gov.au

RE: PROPOSED FISHERIES (INSHORE TRAWL BYCATCH MANAGEMENT) NOTICE 2024

Dear Travis,

Seafood Industry Victoria (SIV) welcome the opportunity to respond to the Victorian Fisheries Authority (VFA) regarding the draft Fisheries Notice for Inshore Trawl By-Catch Management. Given SIV's position as peak body for both the quota managed Octopus Pot Fishery and Inshore Trawl Fishery, it is not appropriate for SIV to take a position regarding resource allocation of octopus that impacts both sectors. We have summarised a series of points raised by Inshore Trawl Access Licence holders regarding the draft Fisheries Notice that we ask the VFA to consider before any further action is taken on this matter. The points outlined may not represent the views of all licence holders or stakeholders and we encourage you to consider each submission provided to the VFA in response to the proposed Fisheries Notice.

Sustainability

- A request was made to the VFA in August 2024 for a summary of evidence that Pale Octopus populations in Victoria are vulnerable to depletion under current exploitation rates. As of the date of this submission that summary has not been provided.
- It is unclear why the trip limit for Commonwealth trawlers is to remain at 500 kg if Victorian Pale Octopus populations are indeed vulnerable to depletion. Over the 10-year period 2013 – 2022 the Commonwealth fleet landed an average of approximately 58 tonnes of octopus in Victorian ports annually, which equates to almost twice the cap on total catch proposed for the Inshore Trawl Fishery (30 tonnes) under the draft Fisheries Notice.

Fishery management

- A request was made to the VFA in August 2024 for a summary of relevant legislation confirming the VFA's assertion that it does not possess the authority to endorse trawling for species other than crustacea (i.e. prawn, bug, crab) and by-catch. As of the date of this submission that summary has not been provided.

Daily trip limit

- The Inshore Trawl Fishery catches both Māori and Pale Octopus. Currently there is no requirement to log catch by species, however this could be introduced.
- The life-history of Māori Octopus suggests this species may be moderately resilient to fishing pressure (Tasmanian Octopus Stock Assessment 2020/21).
- The VFA has only cited concerns regarding risk to localised depletion of Pale Octopus; therefore, any proposed trip limit for octopus associated with the Inshore Trawl Fishery should relate to Pale Octopus only.

Investment warning

- Any proposed change in allowable catch for a Victorian Access Licence class should be preceded by a formal investment warning.
- Parties have raised that the VFA has not effectively affirmed over time what can be caught under an Inshore Trawl Access Licence, suggesting that people may have invested in purchasing a licence or expanded their existing fishing business under the belief that the take of species such as octopus is unconstrained.

SIV looks forward to receiving a response from the VFA regarding how the points raised via this submission have been considered.

Yours sincerely,



Matthew Wassnig
Chief Executive Officer

For more information on the contents of this document, please contact:

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