

24 February 2022



Dear Mr Smith,

I am writing on behalf of BirdLife Australia to provide feedback on the Draft Corner Inlet Fishery Management Plan. We congratulate you on preparing this plan and are highly supportive of a Management Plan for this important fishery as BirdLife Australia is heavily invested in the conservation of environmental values of Corner Inlet due to its international and national significance for shorebirds and seabirds.

Our main points of feedback are the following (with extra detail in Appendix 1):

Interactions with TEP

The draft plan understandably is centred around interactions with threatened fish species, however, there are many threatened, endangered and protected avian species that occur in Corner Inlet where there is high potential for interactions with recreational and commercial fisheries activities. We believe that the Corner Inlet Fisheries Management Plan should seek to list the avian TEP found in Corner Inlet with some information about potential interactions. There is scope to include some key threatened shorebirds and seabirds as priority TEP in the awareness raising objectives for recreational and commercial fishers, as well as to attempt to record and evaluate these interactions. BirdLife Australia can assist by providing a list of avian TEP in Corner Inlet, and the most useful interactions to record and evaluate would include: accidental avian bycatch (if this occurs), boat strikes, and close encounters with avian TEP as a proxy for disturbance (especially during bait pumping).

Minimise fishing impacts on the ecosystem

We feel this needs to include seeking to document and understand collection rates of the key prey species for fish-eating birds in Corner Inlet, especially threatened and protected tern species. A number of threatened seabirds nest in Corner Inlet on the barrier islands including the threatened Fairy Tern (*Sternula nereis nereis*). They feed predominantly on juvenile and bait-sized fish including hardyheads (Atherinidae spp.), Blue Sprat (*Spratelloides robustus*), Tailor (*Pomatomus saltatrix*), garfishes (*Hyporhamphus* spp.), Beaked Salmon (*Gonorynchus greyi*), flying fishes (Exocoetidae spp.) and Yellow-eye Mullet (*Aldrichetta forsteri*). In addition to bait-sized fish, terns also feed on small squid. The health of these fish populations and the squid fishery directly impacts the future suitability of Corner Inlet for breeding terns, and also the success of their breeding efforts. Given the significance of the area (and protections under the Ramsar convention), and the tenuous future of species such as the Critically Endangered Fairy Tern, it is essential to build into the Corner Inlet Fishery Management

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Plan, an action to measure/improve knowledge of the health of these key prey fish species.

Education and Awareness opportunities

There are multiple objectives and activities outlined in the draft Fishery Management Plan that present opportunities to work with BirdLife Australia towards jointly beneficial outcomes. For example, where surveys of fishers are carried out, we would be very grateful for the opportunity to seek more information on current knowledge of avian TEP. We can also see an opportunity for the code of conduct advice to include a section on minimising impacts to coastal shorebirds and seabirds. Given so many of these bird species using the inlet and barrier islands are prone to human disturbance and the potential for negative interactions, it would be wonderful to see some of the outreach materials developed for Corner Inlet extend to include small snippets of vital information about the birds and doing no harm when using the inlet. We would be more than happy to provide this information and any photographs or content required to successfully integrate with your planned outreach. The work you have planned presents a collaborative opportunity to educate fishers simultaneously on the suite of issues around them in Corner Inlet and the ways to responsibly use the inlet. For example, we have already invested in a waterproof flip guide on the key bird species found in Corner Inlet with advice for fishers and boaters on minimising harm. This flip guide also seeks participation from this group in assisting with improving our knowledge of and helping to conserve these birds: https://www.birdlife.org.au/documents/BNB-Fairy-Tern_flip_guide-2021.pdf

We would welcome an opportunity to work together with the Victorian Fisheries Authority to improve appreciation and sustainable use of Corner Inlet, and to ensure its incredible values as a fishery, as critical bird habitat, as culturally significant and as a favourite recreational location, are maintained for all to enjoy in the future.

Kind regards,

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Appendix 1. Additional detailed comments:

Page 12: “While fishing satisfaction typically relates to catching fish, for many it is also the undisturbed nature and clean environment which add considerably to their fishing experience in Corner Inlet.” We agree and maintaining these values also helps to address many threats to the avian species in Corner Inlet. This presents an opportunity for outreach around Corner Inlet to address multiple issues and BirdLife Australia would be one organisation who would welcome a collaborative approach to educating users of Corner Inlet.

Page 22. Threatened, Endangered and Protected species interactions – is there a current requirement to report on TEP bird species interactions? If not, this should be integrated in the reporting framework. There are likely to be interactions with non-fish TEPs, such as with terns that dive and forage in areas where fishers would be operating. The following interactions would be useful to have record of to understand if there is a potential for impact on these avian species: accidental avian bycatch (if this occurs), boat strikes, and close encounters with avian TEP as a proxy for disturbance (especially during bait pumping). This also presents an opportunity to educate fishers about the threatened birds they will encounter, which would greatly assist in mitigating impacts and improving their conservation outlook.

Page 23. Under the Ramsar section it would be worthwhile including 1-2 sentences on the potential for interactions between recreational and commercial fishers and threatened birds – namely around disturbance and any land mooring/incursions on the barrier islands including near vulnerable nesting shorebirds, nesting tern colonies and roosts of migratory shorebirds.

“provides important habitat for beach nesting birds” – worthwhile expanding this to say including threatened/protected species such as the Fairy Tern and Hooded Plover. This may be an opportunity to refer to a current initiative to engage fishers in reporting sightings of rare, threatened birds as their high use of the inlet means they are more likely to encounter these species than researchers who have less frequent access (see <https://www.birdlife.org.au/projects/beach-nesting-birds/tern-resources>)

A useful report to reference under the Ramsar section is a dedicated plan around conserving the migratory shorebirds using Corner Inlet: <https://birdlife.org.au/projects/shorebirds/saps> (click ‘download PDFs’ and select the document entitled: HMST Corner Inlet MS SAP). Some fantastic snippets of information could be included in the Fishery Management Plan such as:

- It is estimated that nearly 50 percent of the overwintering migratory shorebirds in Victoria occur in Corner Inlet, making it the most important site for migratory shorebirds in Victoria.



- The abundance of shorebirds using this site is of international significance. Flocks of tens of thousands of shorebirds can be observed in a single visit.
- In Corner Inlet, Bar-tailed Godwit, Red-necked Stint, Red Knot, Sharp-tailed Sandpiper, Double-banded Plover, and Eastern Curlew have been recorded in internationally significant numbers. Curlew Sandpiper, Grey Plover, Black-tailed Godwit, Sanderling, Common Greenshank, Whimbrel, Ruddy Turnstone have been recorded in nationally significant numbers.

Page 31-22 3.2 ECOLOGICALLY SUSTAINABLE DEVELOPMENT RISK ASSESSMENT:

There is potential for competition for resources within the Ramsar site between fishery activity and between fish eating birds. In particular, several species of terns rely on Corner Inlet for breeding and this is one of the few locations in Victoria offering such valuable breeding habitat. Fairy Terns have been documented as eating juvenile Tailor (listed as a commonly retained species) in Gippsland and have the potential to be eating juveniles of other species as well as bait-sized fish species. A recent study in WA found the prey items of highest significance to be hardyheads (*Atherinidae* spp.), Blue Sprat (*Spratelloides robustus*), Tailor (*Pomatomus saltatrix*), garfishes (*Hyporhamphus* spp.), Beaked Salmon (*Gonorynchus greyi*), flying fishes (*Exocoetidae* spp.) and Yellow-eye Mullet (*Aldrichetta forsteri*). In addition to bait-sized fish, terns also feed on small squid. We believe that Table 2, under 'Retained species' or possibly more appropriately under 'Non-retained species', a risk could include that bait-sized fish species (such as those listed above) are overfished or discarded leading to collapse of populations of protected fish-eating bird species in Corner Inlet. Or alternatively the risk already listed under 'non-retained' "A lack of monitoring of commercial bycatch, including dead discards, results in unforeseen and unacceptable decline of non-retained species in the Inlet" could be expanded to say "including collapse of protected fish-eating bird species in Corner Inlet dependent on these prey."

Page 33 Objective 2, Strategy 5 – needs to include avian TEP species and not just fish species.

Page 36 Objective 1, strategy 4 (ii) includes a survey of recreational fishers: BirdLife Australia would welcome the opportunity to include a few questions about use of the system more broadly and knowledge of the birds/Ramsar values so we can learn simultaneously about this. This collaborative effort would meet both our objectives and ensure that we aren't embarking on separate survey efforts with the same user group, which could fatigue that user group.

Page 37 Objective 2



Minimise interactions with threatened, endangered and protected (TEP) species.

- (i) Should include avian TEP too – we can assist by providing identification booklet for threatened birds in the inlet
- (ii) Ability to record interactions with avian TEP species
- (iii) Revamp education materials – look for potential to include main avian TEP fishers are likely to encounter in Corner Inlet

Strategy 7 – Minimise fishing impacts on the ecosystem: needs to include an understanding of the impacts on fish-eating birds – especially breeding tern species. There could also be scope to broaden education to include minimising disturbance to breeding shorebirds and tern colonies, and roosting migratory shorebirds, by keeping a distance from large flocks and avoiding landing on the barrier islands.

Page 39 - Ensure optimal economic utilisation of the Corner Inlet resource, Strategy 14 (ii) Grow awareness and promote the community benefit of the fishery to the broader public: BirdLife Australia are keen to be involved in any events that are fishing centric to include bird values and broader coastal/marine environmental awareness. This would particularly help grow our project to engage fishers in helping us collect information about rare tern sightings!

Page 43 5.1.5 Victorian recreational fishers voluntary Code of Conduct – can we look to include something here about minimising interactions with threatened birds/reducing disturbance to nesting colonies?

Page 46: TEP species interactions reporting requirement – as above, the need to include avian TEP in this.