



16 June 2025

Anthony McGrath
Abalone Fishery Manager
Victorian Fisheries Authority
1 Spring St, Melbourne
3000

Dear Anthony,

Firstly, WADA would like to thank the VFA for another collaborative quota setting process. The annual Total Allowable Commercial Catch (TACC) meeting is an important part of the western zone sustainable harvest approach to ensure that all scientific and diver observations are collated and presented for assessment. These components form the foundational basis for sound decision making and WADA is proud of the conservative approach to setting quota.

In relation to the TACC recommendations developed at the meeting through consensus, WADA supports the draft Further Abalone Quota Order (FAQO) and Fisheries Notice for the 2025/26 season provided in the current consultation package.

As outlined at the meeting, WADA supports maintaining the current Legal Minimum Length arrangements for blacklip and greenlip abalone in the western zone. Furthermore, WADA supports maintaining the current greenlip TACC allocation at 1.05t, and a small change in blacklip TACC from 41.8t to 42.5t for the upcoming 2025/26 season (~+0.7t).

We thank yourself and the VFA more broadly for the opportunity to comment on the TACC recommendations.

Yours Sincerely,

Travis Baulch
WADA - Executive Officer

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Re Western Zone 2025/26 quota setting

MP

Murray Petersen

To

Anthony W McGrath (VFA)

Cc

Vin Gannon

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Hi Anthony,

Murray Petersen here, western zone abalone diver.

Just wanted to submit my thoughts on the Portland quota allocation for next season.

I personally caught more than half of this seasons catch at Portland, 2144 kgs(4diving days) of the 4.1ton to be exact, so I believe I've got a fair understanding of what's going on in this SMU.

Personally I think there should be NO quota allocated to Portland for the 2025/26 season. From what I've witnessed some area have been completely wiped out after the virus, areas such as Out side Nelson, blow hoses, whites have suffered 95% plus mortality! We've lost 100s of tons of stock at Portland, it's very sad to see areas once covered in abalone now barron! If we don't give it time to recover I fair it may never happen!

I'll add some of my notes that were supplied to WADA, these notes show the areas I've worked during this season.

As it stands there was 7.5ton allocated for the 24/25 season, that was 26.78kgs per unit to be caught at Portland. Well that hasn't occurred, clearly some Portland allocation has now been caught at Portfairry which I'm sure will cause issues there in the future!

If you wish to discuss this further please feel free to contact me on [REDACTED]

thank you

Murray Petersen

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Re: **Formal Response to Consultation on 2025/26 WZ Draft Further Abalone Quota Order and Fisheries Notice**

Dear Mr McGrath,

Thank you for the opportunity to comment on the WZ *Draft Further Quota Order* for the 2025-26 season. I write as the Victorian Abalone Industry Adviser for Tasmanian Seafoods Group (TSF), representing the company's quota-holding and processing interests in Victoria.

We acknowledge the complex circumstances facing the Western Zone and appreciate VFA staff efforts to engage industry. TSF endorses science-led, precautionary management and offers the following points to assist VFA in meeting its Harvest Strategy objectives while maintaining stakeholder confidence.

1. Status of Fishery-Independent Survey (FIS) Data

Key point: No validated post-2020 FIS results have been provided to industry to date, creating a five-year information gap in the stock-assessment evidence base.

Without this data, decisions continue to rely on 2020 baselines and fishery-dependent indicators whose biases are well documented. TSF respectfully requests:

- Clarification and presentation of all FIS data & documentation (e.g., raw data, summary tables, completed survey sheets) of FIS since 2020?
- Publication of raw and summarised FIS data from 2020-2025, or confirmation that such data is unavailable;
- Clarification of survey effort completed versus funded, including an outline of how FIS funds administered through WADA have been expended; and
- A timetable (with milestones) for restoring annual, externally audited FIS coverage.
- Clarification on the impacts of a second AVG outbreak (at Portland SMU) which occurred post the 2020 data records. That is, the AVG had significant impacts on Portland SMU abalone stocks, after the 2020 data was collected, so what is the relationship between the data and the realities of abalone stocks.

- Clarification of why were these surveys not completed, especially given repeated industry efforts to assist and the collective investment of time and money?
- It is noted in the workshop notes that 5 years in, not all the survey sites have been installed. Clarification on how many sites have actually been installed?
- Clarification as to if any, surveys as to whether the FIS have they occurred annually?
- Clarification about the WADA assurances given at the 2024-25 workshop of committing to have survey data available for the 2025-26 TACC workshop & why this has not been met. How long is expected that the industry will be required to undertake decision making, without having access to the data that has been paid for?
- Clarification about what has happened to the public and industry funds that have been provided to WADA to undertake the works to provide data and information to the WZ harvest strategy?

These actions are consistent with the governance standards expected of organisations managing public and stakeholder funds and will allow industry to participate in quota setting on an informed basis.

2. Proposed TACC for Portland Spatial Management Unit (SMU)

Portland SMU remains in recovery following two AVG events. With no FIS data available, the available evidence—including a TSF diver impact report (Attachment B)—does not yet demonstrate biological resilience sufficient to support a 6.5 t allocation. Moreover, 4 t of the 2024-25 Portland quota remains uncaught.

Until non-extractive surveys verify recovery, TSF recommends that **no TACC be allocated to Portland** for 2025-26 and that a decision framework be developed for phased reopening, drawing on independent science rather than CPUE alone.

Further, **the industry agreed during the 2024/25 season to work the Portland end of the zone first** as part of a cautious trial process. However, the **majority of divers did not follow this agreement**, and some divers even fished in **areas voluntarily closed by the industry**. (Attachment A)

If such agreed commitments are not going to be respected, then perhaps **the irony is that we should reconsider the value of holding workshops or imposing any voluntary restrictions at all**.

TSF strongly opposes any TACC allocation in Portland SMU until:

- Verified, non-extractive surveys confirm recovery.
- Independent science—not fishery-dependent CPUE—is used to guide reopening.

3. Serial Depletion and Quota Transfer Risk

We note a troubling pattern of:

- **Allocating TACC in unfishable or high-risk areas** (e.g., shark-impacted Julia Percy, virus-impacted Portland).
- **Transferring quota** to other reef codes or spatial units where fishing is assumed to be still viable.

Quota from unfishable or high-risk areas (e.g. shark-impacted Julia Percy, virus-impacted Portland) is routinely transferred and harvested elsewhere, unintentionally inflating effective TACC and potentially masking local depletion trends.

This creates a **false inflation of TACC**, masks depletion trends, and **undermines spatial management integrity**. This practice, especially when paired with the 5-year data void, **increases the risk of serial depletion**, erodes rebuilding strategies, and compromises sustainability goals.

TSF proposes that VFA, in consultation with industry, establish a transparent process to:

- Quantify and publish inter-reef and inter-SMU quota transfers;
- Assess ecological impacts of those transfers; and
- Adjust future TACCs to reflect any displacement effects.

4. Harvest Strategy Implementation & CPUE Validation

The Western Zone Harvest Strategy envisages a multiple-indicator approach. Yet in the absence of recent FIS, **un-validated CPUE** has become the primary benchmark. This process has been borrowed from the CZ & EZ harvest strategy. Inconsistent effort reporting, lack of GPS/depth/temperature loggers, and known CPUE hyper-stability risks undermine confidence in stock status trends.

We recommend an interim validation package (mandatory diver loggers, VMS-logbook cross-checks, and annual peer review) so CPUE can continue to inform decisions with documented confidence limits.

Further, while the WZ Harvest Strategy has, at times, been presented, by some, as a model worth replicating, it appears that it has not been able to be implemented appropriately. With a 5-year gap in survey data, the current WZ harvest strategy seems ineffective.

TSF recommends that;

- a. A new Harvest Strategy is needed to support the WZ abalone fishery.
- b. Any new Harvest Strategy has to be developed and implemented with the involvement of all WZ stakeholders and not imposed after development by some isolated group(s).
- c. The development of a harvest strategy also includes learnings from the FRDC project 2019-118, [Drawing strength from each other: simulation testing of Australia's abalone harvest strategies | FRDC](#)
- d. The new Harvest Strategy should be precautionary, science and evidence-based, closely aligned with MSC principles, focused on fishery recovery, allowing for recovery of the WZ abalone fishery within planned realistic timeframes. (14 to 20 years)

5. Governance & Representation

TSF's nominated representative was not included in the 2025 workshop, limiting our ability to provide timely input, and raises the serious concerns about **governance & financial transparency and the deliberate avoidance of scrutiny**. We request that VFA:

- Take leadership in the conducting of TACC workshops in the WZ.
- Publish clear criteria for workshop participation; and

- Require accredited, independent facilitators at all quota-setting forums to ensure balanced representation and transparent record-keeping.

Further, it is concerning that **industry fees appear to be compulsorily collected** and directed to associations with **poor financial transparency and incomplete deliverables**.

6. Quota-Season Alignment

Ending the quota year on 30 June forces the final quarter into the poorest weather and most illiquid markets. A calendar-year quota season would:

- Align with peak live-market demand over December-February;
- Match Asian export cycles and processing schedules; and
- Provide safer, more predictable diving conditions to complete quota.

TSF supports an 18-month transitional TACC (July 2025 – December 2026) to shift smoothly to a January-December cycle.

7. Summary of TSF Recommendations

1. **Defer Portland** SMU TACC until FIS confirms recovery.
2. **Publish** (or acknowledge absence of) post-2020 FIS data and commission an audit of FIS funding.
3. **Implement CPUE validation** measures and a formal review of quota-transfer impacts.
4. **Ensure broad, documented industry representation** in workshops with independent oversight.
5. **Mandate independent Government oversight** in all future workshops and decision-making forums.
6. **Stop compulsory grant levy fee collection** where governance standards are not met.
7. **Develop and implement an assessment process and decision framework** to assess the risks and management responses associated with the transfer of uncaught or uncatchable quota between SMUs and reef codes.
8. **Transition to a calendar-year** quota season via an 18-month bridge TACC.
9. **Establish a long-term recovery** framework aligned with 14-20 year sustainability goals, rather than annual political cycles.
10. **Develop a new WZ Harvest Strategy**; A new strategy is needed to support the WZ abalone fishery, and this time, it should be aligned closely with MSC principles to ensure that we are MSC certifiable when the time comes. It would also make sense to take guidance from [FRDC 2019-118](#), which compared Australian abalone Harvest Strategies.

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Closing

TSF remains committed to working constructively with VFA, WADA and other stakeholders to achieve resilient, evidence-based management of the Western Zone Abalone Fishery. We would welcome a meeting at your convenience to discuss the above recommendations and to assist in resolving the current data-integrity challenges.

Thank you for considering our submission.



Kind regards,
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Cc: Mr Darwin Hansen