

# VFA analysis of the submissions received during the public consultation period on the draft Corner Inlet Fishery Management Plan (CIFMP)

Note: The Corner Inlet Fishery Management Plan Steering Committee was consulted on all stakeholder submissions and the proposed response including any related amendments to the final management plan.

## Part 1: Amendments made to the final recommended CIFMP based on stakeholder submissions

Topic	Summary of issue raised in submission	Response	Amendment/s made
Seagrass	There is more recent information on seagrass in the site, that makes paragraphs two and three in section 2.4.2 of the draft Plan inaccurate. There was a decline in the extent in Posidonia between 1965 and 1998; an increase by 2011; declines in 2016 that persisted through 2018 and then increases by 2020. Zostera, on the other hand was relatively stable in Corner Inlet from 1998 through 2011; but declined by 2016, again persisting through to 2018, and then increasing by 2020.	The VFA understands seagrass abundance has fluctuated over the years and appreciates this feedback. The Plan has been revised to focus on the importance of seagrass and shared commitment between sectors to maintain healthy fisheries habitat.	<p>The second and third paragraphs in section 2.4.2 of the draft Plan have been removed.</p> <p>The following has been added to that section following Steering Committee discussion "There are clear benefits in increasing seagrass coverage in the fishery and there is a shared commitment from all fishing sectors in Corner Inlet to work together and collaborate on future restoration projects. Together working towards a healthy fisheries habitat will ensure a productive and more resilient fishery for the future."</p>
Name of the fishery	'Corner Inlet' is mostly known as the large bay at the Wilson Promontory end of this fishery and for some is not thought to include areas up towards McLoughlins beach. This can cause confusion.	<p>The fishery is referred to as the 'Corner Inlet fishery' as this has been the name set out in the Fisheries Regulations for decades. However, the fishery's area technically does span both the Corner Inlet bay and the rest of the internal waters inside the entrances which includes the Nooramunga side to McLoughlins beach.</p> <p>The Steering Committee agreed there are benefits in clarifying that the fishery is bigger than the Corner Inlet bay through a name change. For example, community perception may be that 18 commercial licence holders are confined to that area alone, when in reality fishing is much more spread out. A name change will also assist with engaging the public in consultation processes so that local members of the community can readily identify the area of relevance including the Nooramunga end of the Inlet. Potential misconceptions of expanding the fishery will need to be managed carefully on changing of the name.</p> <p>It was not feasible to change the name of the fishery prior to finalising the management plan given the timelines for the project. The name of the fishery in the management plan document should be consistent with the regulations and these will both be updated simultaneously at an appropriate time in future.</p>	<p>An action has been added under Objective 6:</p> <p>iv) Amend the regulations to rename the fishery as 'Corner Inlet – Nooramunga Fishery' to better reflect the fishery area.</p> <p>Performance measure: The fishery name is changed in the regulations and management plan at an appropriate time in future.</p>
Traditional Owner cultural heritage and values	It is requested that the Corner Inlet Plan objectives include an objective specifically for cultural values. This inclusion will assist in driving actions and reporting and strengthen the collaboration between Traditional Owners and the VFA. An example could be: <b>'The fishery will through its strategic direction, management and operation, ensure activities incorporate implementation actions to actively drive protection of tangible and intangible Traditional Owner cultural heritage and values.'</b>	The VFA and the Corner Inlet Fishery Management Plan Steering Committee support this. A new objective has been included with a new strategy underneath it.	<p>New objective 4: Protect Traditional Owner cultural heritage and values</p> <p>New strategy 12. Actively drive protection of tangible and intangible cultural heritage and values of the Traditional Owners of Corner Inlet</p> <p>Actions 9ii), 9iii), 13i), and 14iv) which were in the draft Plan have been moved under strategy 12.</p>
	Distinguish between the cultural values of the Inlet, and its fish, for Traditional Owners, versus the enjoyment of fishing for the broader community.	<p>The VFA appreciates this feedback. The vision at the front of the Plan has been amended to better incorporate Traditional Owner values.</p> <p>Section 2.2.1 (the indigenous fishing sector) has also been reworked.</p>	<p>The vision has been amended to:</p> <p>"Corner Inlet is a productive and sustainable fishery that is managed in a way that supports the interests of all sectors, is respectful of Traditional Owner values, supplies outstanding quality seafood for Victorians, and provides one of the State's best recreational fishing experiences."</p> <p>The following context from GLaWAC's submission has been added to section 2.2.1: "It is understood that fishing at Corner Inlet started many thousands of years ago when Aboriginal people traversed the area on bark canoes after sea levels increased and the low plains – including the Corner Inlet area – were submerged."</p>

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			..."Fishing in the Inlet for Traditional Owners is much more than a recreative activity, rather it is customary practice at the backbone of many cultural values, including place, practice, social, well-being, identity, custodial, relational and future use."
<b>Flathead</b>	The Gunaikurnai Land and Waters Aboriginal Corporation would welcome opportunity to help assess flathead stocks.	<p>The VFA acknowledges the Corner Inlet fishery is an area of immense significance to the Gunaikurnai people and would welcome the opportunity to work with GLaWAC and other indigenous groups to gain knowledge on the history of flathead in the area and indigenous values relating to flathead species.</p> <p>While the VFA does not currently conduct in-water pre-recruit abundance surveys for flathead in the Corner Inlet fishery, the VFA will ensure GLaWAC are consulted in possibly assisting with this type of work or related work if it is needed in the area in future. The target specified for the action 12iii) of the final management plan states that "GLaWAC and other TO groups relevant to Corner Inlet will be approached to lead projects where Cultural Rangers may have capacity to assist with on-ground and on-water habitat or species research/activities (ongoing)".</p> <p>The VFA will also ensure GLaWAC are consulted on future management decisions that have a particular focus on flathead and other culturally significant species (where identified) within the Corner Inlet fishery. A further action relating to this engagement with Traditional Owners has been added to the management plan.</p>	<p>Add action 12ii): "Encourage participation of Traditional Owners to assist the VFA in understanding and factoring in the importance of culturally important species (e.g. flathead) for the VFA's monitoring and assessment activities.</p> <p>Performance measure: Traditional Owners are encouraged to participate in supporting and contributing to the identification of culturally important species of fishery so these can factored in to the VFA's monitoring and assessment process.</p>
<b>Fishery monitoring</b>	Include an action for the VFA and GLaWAC to work together to monitor impacts on fish stocks from a cultural lens (track the health and sustainability of culturally important fish resources).	<p>The VFA supports working with GLaWAC to factor in cultural values when considering important species to prioritise for fisheries monitoring and assessment at Corner Inlet.</p> <p>Action 12ii) has been added and the VFA looks forward to working with GLaWAC on this further.</p> <p>The VFA also notes that action 12i) of the final management plan states "Support GLaWAC and other TO groups relevant to Corner Inlet to engage with the wider Traditional Owner group to identify important cultural sites and/or species within the fishery".</p>	As above.
<b>Commercial fishery management arrangements</b>	Commercial operators should only be able to <u>operate one licence per day</u> to prevent damage to the public perception of the commercial fishing industry (e.g. recreational fishers observing the same boat completing 4 shots).	<p>Under the Fisheries Regulations 2019, a <b><i>licence operator</i></b>, in relation to an access licence, means a person whose name is specified in an access licence as a person permitted to carry out all fishing activities authorised by the licence. There is currently no law prohibiting a person from specifically being listed as an operator on multiple licences, including licences from the same licence class, and this occurs in other Victorian fisheries. However, under the current Fisheries Notice rules for Corner Inlet, if a person chooses to legally operate multiple Corner Inlet Fishery Access Licences on the same day, then they are required to ensure that a trip is fully completed (including landing of catch at port and completion of catch and effort record) before undertaking a further trip on a second licence. This helps to ensure there is no mixing of catch, catch and effort is reported accurately, and enables clear liability for which licence is being operated for a particular trip. It may also support the social licence of the fishery given a boat will not be seen to be doing more fishing effort than is permitted under a single licence during the one trip. It is important to note that under these arrangements, the total fishing effort that can technically be undertaken across the entire fishery is the same and is not increased. It may also result in one less commercial boat on the water at the same time as other licence holders who may be fishing in that area at that time.</p> <p>The release of the management plan will help communicate to the public what the current management arrangements are for each licence (e.g. a maximum of 2 seine shots per day, vessel monitoring system requirements) and the typical enforcement activities that occur to ensure compliance with fishing laws.</p> <p>This was discussed with the Steering Committee and there was consensus that the current management arrangements are satisfactory at present. The minor clarification to the role of the Management Advisory Committee (see right) was also endorsed.</p>	<p>The VFA does not currently support:</p> <ul style="list-style-type: none"> <li>limiting operators to one commercial licence</li> <li>limiting a commercial vessel to being used by one licence per day</li> <li>limiting crew to one commercial licence per day</li> </ul> <p>These are not currently seen as priority issues that need addressing. However, it is recognised that issues relating to community perceptions of commercial fishing are particularly relevant to industry's social licence to operate in bay and inlet fisheries such as Corner Inlet. Therefore, the role of the Corner Inlet Fishery Management Advisory Committee has been clarified in the final Management Plan to ensure social issues and potential solutions are considered in that forum.</p> <p>Part 7 of the plan has been amended so it now reads: "Part of CIFMAC's role will be to review the latest fishery information and provide advice to the VFA on matters relating to sustainability and economic, social and cultural values. This will help to ensure management remains adaptive and responsive."</p>
	A <u>different boat</u> should be required for an operator to conduct 4 seine shots in a day using two licences. That is, one operator, one boat, two shots only.	<p>This arrangement would be inconsistent with legislation applying to other Victorian fisheries. Such arrangements would restrict efficient use and sharing of boats. One example where this would impact fishers is in the case of a boat being repaired and a licence operator then not being allowed to utilise another person's commercial vessel on that day. It is also worth noting that many of the Corner Inlet commercial fishing boats look the same (open, aluminium, 6-8m boats) and such a change may have little to no effect on public perception.</p> <p>Under the current Fisheries Notice rules for Corner Inlet, if a person chooses to legally operate multiple Corner Inlet Fishery Access Licences on the same day, then they are required to ensure that a trip is fully completed (including completion of catch and effort record) before undertaking a further trip on a second licence. This helps to ensure there is no mixing of catch, catch and effort is reported accurately, and enables clear liability for which licence is being operated for a particular trip.</p> <p>It also means logistically that the boat has to go into port to land the catch before it returns to sea and may result in one less commercial boat on the water at the same time as other licence holders who may be fishing in that area at that time.</p> <p>This was discussed with the Steering Committee and there was consensus that the current management arrangements are satisfactory at present. The minor clarification to the role of the Management Advisory Committee (see right) was also endorsed.</p>	

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	Each licence should operate on different vessels and <u>with different crews</u> and operator which would protect social perceptions and increase employment	<p>This arrangement would be inconsistent with legislation applying to other Victorian fisheries.</p> <p>While such a change to management arrangements would possibly result in some additional employment (since crew members could not undertake more than one trip), it is important to note that the total fishing effort that can technically be undertaken across the entire fishery is the same regardless. It may also limit employment opportunities for crew members who may be asked to work on multiple fishing trips in a given day (e.g. to cover for another licence holders crew member who is off sick).</p> <p>It could also be argued that a management change of this kind may see the total number of boats on the water at the same time actually increase and have more negative than positive implications for social licence.</p> <p>This was discussed with the Steering Committee and there was consensus that the current management arrangements are satisfactory at present. The minor clarification to the role of the Management Advisory Committee (see right) was also endorsed.</p>	
	There needs to be a regulation relating to the amount of time that set nets (mesh nets) are permitted to be left to "soak" with a mesh net shot. Nets should not be permitted to be left in the water for a period longer than 6 hours. The longer the nets are left to "soak", the higher the likelihood of damaged fish, reduced quality of the catch & wastage related to water temperature, sea lice & crab damage. When nets are left for a long period of time, it is also a "bad look" & can cause disharmony from the amateur fishing sector.	<p>Minimising unnecessary soak time on mesh nets, while still supporting viable fishing, would align with nearly all objectives of the final management plan. Reducing soak times would contribute to:</p> <ul style="list-style-type: none"> <li>• higher quality seafood coming from Corner Inlet (and may result in higher economic yield)</li> <li>• reduced mortality of discards/wastage (improving sustainability)</li> <li>• reduced bycatch of unwanted species including threatened species, and</li> <li>• improve community perceptions of commercial operations.</li> </ul> <p>It is understood that a soak time is already regulated in similar Tasmanian inshore mesh net fisheries. However, a regulatory change of this nature warrants further discussion and investigation of data and trends in Corner Inlet. The VFA will not implement a significant change to commercial management arrangements, such as regulating soak times, without further consultation with industry first. A voluntary maximum soak time could be added in the commercial fishers' voluntary Code of Practice as a trial. This matter could be considered first through further discussion and analysis with the Corner Inlet Fishery Management Advisory Committee (when established). This could be delayed until action 8ii) of the Plan is complete (this is to improve understanding of efficiency of mesh netting operations and discard mortality associated with soak times).</p> <p>This was discussed with the Steering Committee and there was consensus that it would be appropriate for this to be an early agenda item for CIFMAC. An additional action in this regard has been included in the plan.</p>	<p>New action: 8iv) CIFMAC to investigate the feasibility of a maximum soak times for mesh netting and consider including in the voluntary Code of Practice for commercial fishers.</p> <p>Performance measure: The VFA works with the Corner Inlet Fishery Management Advisory Committee (once established) to investigate the feasibility of maximum soak times for mesh nets on a voluntary basis, for inclusion in the commercial fisher's Code of Practice (to be developed).</p>
	In considering the total fauna and ecosystems within this Ramsar site, we agree with the efforts needed to document but also reduce potential bycatch mortalities associated with the deployment of mesh nets within the inlet, as stated in actions 8(i), 8(ii) and referenced in table 6, item 3a of the draft plan. Potential risk to non-target species requires greater knowledge, coupled with strategies to reduce potential mortalities. To this end, an action seeking implementation of such strategies would strengthen the plan.	<p>The VFA appreciates this feedback. The draft Plan did not explicitly state that some feasible improvements would be implemented if identified but that was the intent. Following consultation with the Steering Committee, the VFA supports inclusion of an additional action 8ii).</p> <p>This will contribute towards objectives relating to:</p> <ul style="list-style-type: none"> <li>• ensuring sustainability</li> <li>• minimising impacts on bycatch</li> <li>• ensuring fishing practices are ethical, responsible and respectful, and</li> <li>• optimal utilisation of the resource</li> </ul>	<p>Add action 8ii) "Implement feasible strategies (if determined, in consultation with stakeholders) to mitigate unnecessary bycatch and minimise mortality of discards while minimising any economic impacts.</p> <p>If feasible mitigation options are identified (see above), the VFA works with the Corner Inlet Fishery Management Advisory Committee to progress their implementation (e.g. on a voluntary basis in the Code of Practice or through regulation where appropriate).</p>

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Marine reserves	The MPAs within Corner Inlet, and their status and regulations are presented well in section 2.4.3 but should also be represented at key points elsewhere in the plan	The VFA appreciates this feedback this. Various edits and actions have been included in the final management plan.	<p>Added action 16v) Ensure values and issues associated with Corner Inlet's no-take marine protected areas are considered and represented in VFA decision-making processes where relevant.</p> <p>Performance measures for the action include:</p> <ul style="list-style-type: none"> <li>Relevant Parks Victoria and VFA staff to meet each year to keep informed of issues and values related to the no-take marine protected areas.</li> <li>Parks Victoria invited to participate in a Corner Inlet Fishery Management Advisory Committee meeting each year.</li> </ul> <p>Added action 17iii) VFA to work with Parks Victoria to educate on marine protected area boundaries and regulations</p> <ul style="list-style-type: none"> <li>The VFA works with Parks Victoria to ensure relevant communication products and messaging can support educating fishers on marine protected area boundaries and regulations.</li> </ul> <p>Added action 17(iv) VFA to work with Parks Victoria on education and prosecution for illegal fishing activities (commercial and/or recreational) within Corner Inlet's no-take marine protected areas.</p> <ul style="list-style-type: none"> <li>The VFA and Parks Victoria appropriately manage risks and incidents related to illegal fishing in no-take areas (ongoing).</li> </ul> <p>Table 4 has been revised to include:</p> <ul style="list-style-type: none"> <li>All fishing is prohibited in the Corner Inlet Marine National Park</li> <li>Recreational fishing is permitted in all other areas of the fishery (gear restrictions may apply)</li> </ul> <p>Table 5 has been revised to clarify</p> <ul style="list-style-type: none"> <li>All fishing is prohibited in the Corner Inlet Marine National Park</li> </ul> <p>Dot point list for Section 8 has been updated to include:</p> <ul style="list-style-type: none"> <li>prohibition on fishing in the Corner Inlet Marine National Park.</li> </ul>
Specific technical comments on the draft management plan	<p><b>Inside cover</b></p> <p>There is not currently an acknowledgement of country at the front of the document (only in the body of the document)</p>	The VFA appreciates this feedback being raised and the final plan has been amended accordingly.	<p>The following has been added to the inside cover of management plan</p> <p><b>“Acknowledgement of Country</b></p> <p>This document acknowledges the Aboriginal Traditional Owners of the Corner Inlet – Nooramunga area and recognises their deep connection to their ancestral lands and waters.”</p>
	<p><b>Section 1.1</b></p> <p>The appropriate recognition throughout the plan of the custodial obligations of Traditional Owners to care for Country, and the cultural values and uses objectives that this embodies applies to the whole of the document, and we would ask for these small but important changes be made accordingly.</p>	<p>The VFA supports this and agrees to the proposed wording change to section 1.1 of the plan suggested by GLaWAC (additions in bold)</p> <p><i>“The objectives, strategies and actions in the Plan provide for continued use and improved management of the Corner Inlet fishery resource, in a manner that is effective, efficient and ecologically sustainable. They also ensure fishing practices are responsible and respectful of <b>Traditional Owner cultural values – tangible and intangible, and to community values and will help maintain public support for sustainable utilisation of the shared resource.</b>”</i></p> <p>This small change acknowledges the importance of cultural values and distinguishes cultural values from what the broader community may want for the area.</p>	<p>Last paragraph in s1.1 amended to “The objectives, strategies and actions in the Plan provide for continued use and improved management of the Corner Inlet fishery resource, in a manner that is effective, efficient and ecologically sustainable. They also ensure fishing practices are responsible and respectful of Traditional Owner cultural values – tangible and intangible - and community values, and will help maintain public support for utilisation of the shared resource.”</p>

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	<p><b>2.1.1</b> It would be good if the map indicated the spatial extent of the fishery</p>	Support. Figure 2 has been added to show the boundary of the fishery.	Figure 2 has been added to show the boundary of the fishery.
	<p><b>Section 2.1.1</b>, paragraph 5, “Tidal variance can be as much as 2 meters”, tidal predictions for Port Welshpool show a 2.7 meter tide in May this year, I have personally observed a 10 feet (3+meters) at Port Franklin. I expect Gippsland Ports would be able to provide accurate information, they have a tide gauge at Port Welshpool.</p>	The VFA appreciates this feedback being raised and the final plan has been amended accordingly.	Sentence adjusted to “The tidal variances can be large and at times can differ by around three metres.”
	<p><b>Section 2.2.1 and 3.1.1</b>  Additional Gunaikurnai background provided in GLaWAC submission</p> <p>The Gunaikurnai are the recognised rights holders over about 1.33 million hectares in Gippsland – spanning from Warragul in the west, to the Snowy River in the east, and from the Great Divide in the north to the coast in the south, including 200 metres of offshore sea territory. Corner Inlet is an area of immense significance to the Gunaikurnai people, with many stories surrounding the marine and coastal landscapes around Wilson’s Promontory, reflecting right back to many thousands of years ago when Victoria was connected to Tasmania and sea levels were an estimated 50 metres lower than they are today.</p> <p>Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC), as the prescribed body corporate on behalf of the Gunaikurnai people, for the purposes of the Native Title Act 1993 (Commonwealth). GLaWAC is a Registered Aboriginal Party for the purposes of the Aboriginal Heritage Act 2006 (Victoria). The State of Victoria has also entered into Recognition and Settlement Agreement with the Gunaikurnai People. The Recognition and Settlement Agreement, executed under the Traditional Owner Settlement Act 2010, affords Gunaikurnai people rights relating to the use of public land within their Agreement area.</p> <p>Fishing at Corner Inlet started many thousands of years ago when the Gunaikurnai people traversed the area on bark canoes after sea levels increased and the low plains – including the Corner Inlet area – were submerged.</p>	This content from GLaWAC’s submission has been fit into the management plan where the VFA thought it was most appropriate.	<p>Section 2.2.1 (Indigenous fishing sector) has been updated to include: “Corner Inlet is an area of immense significance to the Gunaikurnai people, with many stories surrounding the marine and coastal landscapes around Wilson’s Promontory, reflecting right back to many thousands of years ago when Victoria was connected to Tasmania and sea levels were an estimated 50 metres lower than they are today. It is understood that fishing at Corner Inlet started many thousands of years ago when Aboriginal people including the Gunaikurnai traversed the area on bark canoes after sea levels increased and the low plains – including the Corner Inlet area – were submerged.”</p> <p>Section 3.1.1 (Aboriginal rights in Victoria) has been updated to include: “The Gunaikurnai are recognised as Traditional Owners over about 1.33 million hectares in Gippsland – spanning from Warragul in the west, to the Snowy River in the east, and from the Great Divide in the north to the coast in the south, including 200 metres of offshore sea territory. “</p> <p>A paragraph in s3.1.1 has also been revised to: “The Victorian Government has entered into a Recognition and Settlement Agreement with the Gunaikurnai People. The Recognition and Settlement Agreement, executed under the Traditional Owner Settlement Act 2010, affords Gunaikurnai people rights relating to the use of public land within their Agreement area. The Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) is the “traditional owner group entity” appointed by the Gunaikurnai People for the purposes of the TOS Act. GLaWAC is also the Registered Aboriginal Party for the same area for the purposes of the Aboriginal Heritage Act 2006 (Victoria). GLaWAC is also the prescribed body corporate on behalf of the Gunaikurnai people, for the purposes of the Native Title Act 1993 (Commonwealth).”</p>
	<p><b>2.2.2 Rec fishing sector</b>  paragraph 6, Calamari probably should be included in species targeted by boat-based anglers.</p>	The VFA appreciates this feedback being raised and the final plan has been amended accordingly.	Paragraph adjusted to “In general, the recreational sector primarily targets flathead (blue-spotted and sand), gummy shark, King George whiting, calamari and snapper in Corner Inlet, with flathead and whiting understood to make-up a significant component of the catch. Not all fishing activity is boat-based, with land-based fishers (e.g. those fishing off jetties) catching many of these species and various others.”
	<p><b>2.3: Catch History in the Fishery</b> this historical background section should also acknowledges the Australian flat oyster (<i>Ostrea angasi</i>) dredge fishery that operated in Corner Inlet in the mid 1800’s.</p>	The VFA appreciates this feedback being raised and the final plan has been amended accordingly.	The following has been added to section 2.3.3: While Corner Inlet is known predominantly as a finfish fishery, there is some evidence that an oyster fishery operated intensively in the area during the mid-1800s whereby small oyster dredges were towed behind a small sail vessel.



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	<p><b>2.4.1 Ramsar</b></p> <p>Suggest change first para of section 2.4.1 to:</p> <p>The Corner Inlet-Nooramunga area (Figure 10) was listed as a “Wetland of International Importance” under the Ramsar Convention in 1982. This affords it protection as a matter of national environmental significance under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).”</p>	The VFA appreciates this feedback being raised and the final plan has been amended accordingly.	Section 2.4.1 updated to “The Corner Inlet-Nooramunga area (Figure 10) was listed as a “Wetland of International Importance” under the Ramsar Convention in 1982. This affords it protection as a matter of national environmental significance under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).”
	<p><b>2.4.:1 Ramsar</b></p> <p>the subtidal environment of the Ramsar site has been substantially altered since European settlement and is not considered a 'near natural' state. It is recommended that the history of shellfish reefs is acknowledged, despite the conclusion of BMT WBM (2011), to accurately depict the history of the now functionally extinct shellfish reef ecosystems of Corner Inlet</p>	<p>The VFA supports minor revisions to the wording from 'near natural condition' to 'represents a near natural wetland'. The plan has been adjusted accordingly. This adjustment aligns with the advice included in BMT WBM (2011) which states:</p> <p><i>Corner Inlet is a substantially unmodified site that is considered to represent an example of a near natural wetland. According to the Ramsar definition, near natural wetlands are those “which continue to function in what is considered an almost natural way”. The definition includes clarification that the wetland is not required to be in pristine condition, only that it retains values of international importance. Activities occurring within Corner Inlet and the surrounding catchment (port activity, catchment run off, wastewater discharge and tourism) have potential to impact the condition of the inlet and do affect isolated areas of the site. However, these activities are small in scale, scope and area compared to the size of the inlet and do not prevent the inlet as a whole from continuing to function in an almost natural way.</i></p> <p><a href="https://rsis.ramsar.org/RI/Sapp/files/525/documents/AU261ECD.pdf">https://rsis.ramsar.org/RI/Sapp/files/525/documents/AU261ECD.pdf</a></p>	Executive summary and section 2.4.1 updated to “represents a near natural wetland”.
	<p><b>2.4.1 birds</b></p> <p>Suggest replacing the third paragraph with the following. While the shorebirds are important, it is fish eating birds that are more relevant to a fisheries management plan.</p> <p>“A total of 95 species of waterbird have been recorded within the Corner Inlet Ramsar site, including 26 international migratory species listed under international agreements (JAMBA, CAMBA and ROKAMBA). The barrier islands and south-east sector of the Ramsar site support the greatest diversity and abundance of shorebirds and the shallow waters provide foraging for a diversity and abundance of fish-eating species such as cormorants and terns.”</p>	The VFA appreciates this feedback being raised and the final plan has been amended accordingly.	Section 2.4.1 updated to “A total of 95 species of waterbird have been recorded within the Corner Inlet Ramsar site, including 26 international migratory species listed under international agreements (JAMBA, CAMBA and ROKAMBA). The barrier islands and south-east sector of the Ramsar site support the greatest diversity and abundance of shorebirds and the shallow waters provide foraging for a diversity and abundance of fish-eating species such as cormorants and terns.”
	<p><b>2.4.1 birds</b></p> <p>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.</p> <p>“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 <a href="https://www.birdlife.org.au/projects/beach-nesting-birds/tern-resources">https://www.birdlife.org.au/projects/beach-nesting-birds/tern-resources</a>)</p>	The VFA supports encouraging identification and reporting of threatened birds to Birdlife Australia and the plan has been amended to reflect this.	<p>The following has been added as a footnote under section 2.4.1 “The VFA is committed to working with BirdLife Australia and other organisations to help educate fishers on the threatened bird species and vulnerable nesting areas (such as at the barrier islands) in order to support minimising any unnecessary interactions with birds in the Inlet.”</p> <p>The following has been added as a footnote under section 2.4.1 “Including for threatened species such as the Fairy Tern and Hooded Plover. Fishers are encouraged to report sightings of rare, threatened birds to Birdlife Australia. Further details, including the flip guide for identifying birds, can be found at: <a href="https://www.birdlife.org.au/projects/beach-nesting-birds/tern-resources">https://www.birdlife.org.au/projects/beach-nesting-birds/tern-resources</a>”</p>
	<p><b>2.4.1 birds</b></p> <p>A useful report to reference under the Ramsar section is a dedicated plan around conserving the migratory shorebirds using Corner Inlet: <a href="https://birdlife.org.au/projects/shorebirds/saps">https://birdlife.org.au/projects/shorebirds/saps</a> (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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	The VFA is happy to include a couple snippets of this information acknowledging the significance of birds in the area and include a reference where the shorebird action plan for Corner Inlet can be accessed. The VFA appreciates this feedback being raised and the final plan has been amended accordingly.	<p>The following has been added to section 2.4.1 “The abundance of shorebirds using this site is of international significance and flocks of tens of thousands of shorebirds can be observed in a single visit.”</p> <p>A footnote has also been added (pg 25) “BirdLife Australia has also developed a dedicated Corner Inlet Migratory Shorebird Action Plan which can be accessed via: <a href="https://birdlife.org.au/projects/shorebirds/saps">https://birdlife.org.au/projects/shorebirds/saps</a></p>

Topic	Summary of issue raised in submission	Response	Amendment/s made
	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Curlew Sandpiper, Grey Plover, Black-tailed Godwit, Sanderling, Common Greenshank, Whimbrel, Ruddy Turnstone have been recorded in nationally significant numbers.</li> <li>•</li> </ul>		
	<p><b>2.4.2 saltmarsh and mangroves</b></p> <p>Recognise saltmarsh and mangroves as important habitats for fish. These ecosystem components are proven to be important habitat for juvenile species of fish that are commercially important.</p>	The VFA appreciates this feedback being raised and the final plan has been amended accordingly.	Section 2.4.2 had added “Saltmarsh and mangroves are also important habitat for maintaining a healthy fishery, providing important habitat for juvenile species of fish and crustaceans, and they also contribute to productivity of the broader coastal ecosystem through outwelling of organic matter and nutrients.”
	<p><b>Table 4.2</b></p> <p>Look for potential to include main avian TEP species that fishers are likely to encounter in Corner Inlet in any education materials</p>	<p>There is an action (5iii) in the final management plan to: Revamp education materials for all Corner Inlet fishers in relation to TEP interactions and minimisation. This includes TEP birds.</p> <p>The VFA would welcome the opportunity to work with BirdLife Australia in future updates of the protected species ID guide, commercial fishing guide for Corner Inlet, and Corner Inlet fishery webpage updates. These would be the most effective tools for listing threatened species and bird ID guides.</p>	<p>A performance measure for the existing action 5iii) has been added:</p> <ul style="list-style-type: none"> <li>• The VFA works with Birdlife Australia in developing guidance for minimising fishers interactions with TEP birds</li> </ul>
	<p><b>In Appendix 4</b>, the graph labeled “Rock Flathead Mesh Net”, has “Catch per unit effort rock flathead by seine net” in the explanation paragraph below.</p>	<p>This was an error and the note at the bottom is in fact meant to refer to mesh net rather than seine net, as per the title. The VFA appreciates this feedback being raised and the final plan has been amended accordingly.</p>	Description for top graph in Appendix 4 changed from seine net to mesh net.

## Part 2: Submissions which did not result in amendment to the final recommended CIFMP

Topic	Summary of issue raised in submission	Response
<b>Commercial licences</b>	Believes there are too many commercial fishers in the Corner Inlet fishery and that the load should be shared across all areas of Victoria including Port Phillip Bay and Western Port.	<p>The majority of commercial wild catch fisheries in Victoria are managed as limited-entry fisheries with a maximum number of licences available for each licence class. Under these arrangements, existing licences may be transferred to another owner, but no new licences may be issued. This limits the amount of fishing effort that can be applied to a fishery and helps to promote the economic stability of commercial fishing.</p> <p>There are currently a total of 18 Corner Inlet Fishery Access Licences (CIFALs) issued and this is the maximum number that may exist under the cap which is set in the <i>Fisheries Regulations 2019</i>. Eighteen commercial licences is considered sustainable and economically viable under the management arrangements set out in the Corner Inlet Fishery Management Plan as at the time of its publication.</p>
	Believes part of the license fees paid by recreational fishers was meant to buy back commercial fishing licenses and questioned why this has not occurred for Corner Inlet.	<p>Revenue derived from the sale of Recreational Fishing Licences (RFLs) in Victoria is held in the Recreational Fishing License Trust Account (RFLTA), for funding projects and services that improve recreational fishing outcomes in Victoria. Close to \$100 million of RFL funds have been invested in projects to improve fishing since the licence regime commenced in 1998.</p> <p>There has also been record Victorian Government spend in recreational fishing from non RFL sources. Roughly \$40 million has been spent on commercial fishing buy-outs in Port Phillip Bay and Gippsland Lakes. It is important to note that these buy-outs were not funded by RFL licences. There has also been no commitment in relation to any buy-out for the commercial Corner Inlet fishery. The VFA supports these businesses and is working hard to ensure they are viable, profitable and sustainable for future generations.</p>
<b>Recreational licences</b>	Believes recreational fishers should not have to pay a license fee to fish in a jurisdiction that is shared with commercial fishers.	<p>A Victorian Recreational Fishing Licence (RFL) enables access to authorised recreational fishing activities across the State of Victoria and is not location specific. The RFL is a critical element of recreational fishing management in Victoria and the RFL system is totally independent of whether there is any commercial fishing present in an area or not.</p> <p>Every year the Victorian Government, through the Recreational Fishing Licence Trust Account, disburses revenue derived from fishing licence sales to projects that improve recreational fishing in Victoria (e.g. building fishing platforms, improving access to key fishing</p>

Topic	Summary of issue raised in submission	Response
		locations, improving fish habitat and undertaking important research). The fees also contribute to enforcement and education costs. Without these fees, many of these projects would not be possible and compliance operations would be limited.
	Suggests recreational fishing licence should be free like it is for Indigenous fishers.	<p>The VFA acknowledges and respects Aboriginal Victorians as the original custodians of Victoria's land and waters. The VFA also recognises the unique ability of Aboriginal Victorians to care for Country and the resources within it. The VFA exempt persons who identify as Aboriginal or Torres Strait Islander from the need to obtain an RFL. This does not have a material impact on the amount of fishing that occurs or on the availability of fish resources for other users. It is important to note that all other recreational fishing management arrangements still apply, including controls on equipment, catch limits, size limits and restricted areas.</p> <p>The Recreational Fishing Licence (RFL) system is a critical element of recreational fishing management in Victoria. Every year the Victorian Government, through the Recreational Fishing Licence Trust Account, disburses revenue derived from fishing licence sales to projects that improve recreational fishing in Victoria (e.g. building fishing platforms, improving access to key fishing locations, improving fish habitat and undertaking important research). The fees also contribute to enforcement and education costs. Without these fees, many of these projects would not be possible and compliance operations would be limited.</p>
Area access arrangements	Believes commercial fishing should be banned from all estuary waters in Victoria.	Commercial fishing is already not permitted in the majority of estuaries in Victoria, except for some commercial eel fishing and bait collection which occurs in particular areas. The VFA acknowledges there are some recreational fishers in Victoria who would like to see a ban on commercial fishing in inshore marine waters such as Port Philip Bay / Western Port and Corner Inlet. The Port Philip Bay / Western Port snapper long-line fishery and the Corner Inlet commercial netting fishery are situated in large marine systems whereby recreational and commercial fishing sectors currently co-exist in sharing the fisheries resource. These commercial fishers play an important role in providing high value, premium seafood for Victoria's restaurants and cafes. The Corner Inlet management plan seeks to implement arrangements to ensure that commercial and recreational fishing can sustainably co-exist into the future.
	Believes that professional fishing should be banned from enclosed waters in Corner Inlet to maximise recreational opportunities and tourism in the area.	<p>The <b>Fisheries Act 1995</b> provides for the use of Victoria's fisheries resources in an efficient, effective and ecologically sustainable manner and facilitates access to fish resources for commercial (and other) purposes.</p> <p>Corner Inlet's commercial fishers work hard to supply high value, premium seafood to Victoria's restaurants and cafes with an extensive variety of the world's finest fisheries products including King George whiting, rock flathead, calamari, garfish and many more. The VFA supports these businesses and is working hard to ensure they are viable, profitable and sustainable for future generations. The Corner Inlet management plan seeks to implement arrangements to ensure that commercial and recreational fishing can sustainably co-exist into the future.</p>
	Believes there should be a ban on commercial netting in some areas within the Corner Inlet system.	The VFA acknowledges there are some recreational fishers who believe there should be a further ban on netting in some areas of the Corner Inlet fishery. However, at the time of declaration of the management plan, there is no clear justification to implement closures for a particular area/s of the fishery. The Corner Inlet management plan seeks to implement arrangements to ensure that commercial and recreational fishing can sustainably co-exist into the future.
Marine reserves	Believes more areas of marine reserves could be added.	<p>Around five per cent of the Victoria's coastal waters are protected by marine national parks and sanctuaries. It is important to note that marine parks are not designed to be a fisheries management tool, however they may have flow on benefits to fisheries.</p> <p>Marine national parks and activities permitted within each reserve are defined and managed under the <b>National Parks Act 1975</b>. Changes to the arrangements under the National Parks Act are outside the scope of the Corner Inlet Fishery Management Plan. Parks Victoria is the agency responsible for management of these marine parks in Victoria. Under a service agreement, the VFA is responsible for the delivery of fisheries compliance in these areas.</p>
Authorised gear	Believes the use of long lines is not ethical in catching target species, does not align with objective 3 of the draft Plan and needs to stop.	<p>Authorisation of different gear types in the Corner Inlet fishery allows commercial fishers to provide a range of fresh, quality seafood products to Victorian consumers.</p> <p>Long-lines have rarely been used in Corner Inlet and are typically only used by a minority of commercial fishers who occasionally target snapper during the summer months. There has been only approximately 2 tonnes of fish in total caught from 2013 up to 2022 using this gear type.</p> <p>Under the current management arrangements set out in the <i>Fisheries (Further Corner Inlet Fishery) Notice 2022</i>, commercial fishers can only use one gear type at a given time inclusive of longline, mesh net and seine net. This means that longlines are not left in the water for excessive periods (as these fishers cannot focus on other activities such as netting at the same time) and helps to minimise impacts on bycatch.</p> <p>Action 8 i) of this Plan seeks to implement a bycatch monitoring program for both commercial and recreational fisheries and this may help improve our understanding of longline activities in Corner Inlet and impacts on bycatch.</p>
Cockles	Believes there should be a total ban on collection of cockles in Corner Inlet	The VFA acknowledges the concerns raised by the local community regarding the observed increase in recreational fishers harvesting of cockles at locations such as McLoughlins beach. One of the key actions in the management plan is to reduce the recreational daily bag and possession limit for cockles from 5 litres (or, if shucked or split, 1 litre) to 2 litres (or, if shucked or split, 0.5 litre). The VFA does not deem a total ban necessary. The reduced bag limit will ensure that cockles are better shared amongst the harvesting community whilst maintaining this sustainable and important multicultural fishery which provides enjoyment to many families. This type of management change (reducing the bag limit) has proven successful in similar recreational fisheries including for pipis at Venus Bay in South Gippsland.



Topic	Summary of issue raised in submission	Response
	Very concerned with the over harvesting of the Blood Cockles at McLoughlins beach and destruction of all marine species to near depletion in this area.	Action 14ii) within the final management plan is to reduce the recreational bag limit for cockles in Corner Inlet from 5 litres to 2 litres to better share the resource in popular harvest areas such as McLoughlins Beach. The intention would be for this to occur towards the end of 2022, including updated signage. Further details on this change can be found on page 46 of the final management plan.
	Concerned about the impact that escalating cockle collection activity will have on the inlet	Action14ii) within the final management plan is to reduce the recreational bag limit for cockles in Corner Inlet from 5 litres to 2 litres to better share the resource in popular harvest areas such as McLoughlins Beach. The intention would be for this to occur later this year including updated signage. Further details on this change can be found on page 46 of the final management plan.
	Believes lack of signage and adequate policing of cockle collection is a serious problem.	The VFA, along with partner agencies, will review signage at popular harvesting areas such as McLoughlins beach in late 2022 and will consider the need for additional signs as part of this work.
	Believes there needs to be strict re-enforcement of "per person" versus "spread across the family/group" for cockle bag limits.	The bag limits specified in the <i>Fisheries Regulations 2019</i> are the maximum number of each type of fish/species that a person may be authorised to take on any one calendar day while in, on or next to Victorian waters and possess in, on or next to Victorian waters. Once a person has taken their bag limit, they must not catch more of that species/type for other people to keep. This means that it is prohibited for a person to take more than the bag limit of cockles to share with others, including any family or friends who are also fishing at that time.  Fisheries Officers from VFA’s station based in Yarram are predominantly responsible for conducting enforcement and education activities in the Corner Inlet fishery. There is currently a strong focus on compliance with species catch limits, including for cockles. This can include conducting patrols and officers may operate in uniform or plain clothes.
	Mud cockles are vacuumed up until none are left.	Action14ii) within the final management plan is to reduce the recreational bag limit for cockles (all species combined) in Corner Inlet from 5 litres to 2 litres to better share the resource in popular harvest areas such as McLoughlins Beach. The intention would be for this to occur later this year including updated signage. Further details on this change can be found on page 46 of the final management plan.  The VFA will continue to closely monitor recreational harvest levels of this species and enforce all regulatory restrictions on take (e.g. gear restrictions, catch limits) to ensure that fishing does not have any major or long-term impact on the sustainability of cockles and the environment and that the arrangements continue to provide for quality fishing opportunities.
Estuary perch	Schooling/breeding estuary perch are netted ferociously and I have noticed a decline in size and abundance of these fish.	Estuary perch are generally not a target species for Corner Inlet commercial fishers. Small amounts are taken as by-product, while some larger catches (>100kgs) are rarely reported and targeted occasionally by a minority of licence holders. An annual average catch of approximately 1 tonne of perch (estuary or unspecified) has been taken across the entire commercial fishery over the last 10 years (2013-2021 inclusive).  The VFA will continue to monitor harvest levels of this species and enforce all regulatory restrictions on take (e.g. gear restrictions, catch limits, size limits) to ensure that fishing does not have any major or long-term impact on the sustainability of the stock and that the arrangements continue to provide for quality fishing opportunities.
King George whiting	Believes it is harder to find whiting since more netters have been let in.	The number of commercial fishing licences/endorsements to fish in the Corner Inlet fishery has decreased significantly over the last 50 years. Commercial fishing in the Inlet has been managed as a stand-alone, limited-entry fishery for over 50 years (meaning that no new additional licences have been issued and new entrants can only acquire licence by transfer from an existing licence holder.). Today, 18 Corner Inlet Fishery Access Licences (CIFALs) are held and this is the maximum number that may exist under the cap which is set in the <i>Fisheries Regulations 2019</i> . There have been a total of 18 CIFALs since 2006. Section 2.3.3 of the management plan provides further details.
	Is concerned the average take of King George whiting by commercial fishers has risen astronomically and is not sustainable.	While 2019/20 and 2020/21 were large catch years for King George whiting for the commercial fishery, the VFA can confirm this corresponds with strong recruitment events observed in Victoria’s bays and inlets in years prior through its annual pre-recruit abundance survey.  The commercial fishery is managed with a series of input controls (controls of fishing effort). Examples include a cap of 18 licences within the fishery, weekend closures and restrictions on net length. Additionally, following a recent shift in practices, new management arrangements were introduced in June 2020 and March 2021 to further manage commercial fishing effort (e.g. a limit of 2 seine net shots per day under each licence, restrictions on use of rope attached to the net).  Neither the commercial fishery catch-per-unit-effort (CPUE) or pre-recruit time series show persistently declining trends. This provides reassurance that the poorly known and lightly fished adult stock in coastal waters (i.e marine waters outside of Corner Inlet) has continued to be replenished at rates that are sufficient to prevent declines in recruitment potential/egg production.  The <i>Status of Australian Fish Stock Reports</i> are a series of assessments of the biological sustainability of a broad range of wild-caught fish stocks against a nationally agreed framework. The Reports examine whether the abundance of fish and the level of harvest from the stock are sustainable. The latest assessment for the Victorian King George whiting stock was classed as ‘sustainable’. Further details can be found here: <a href="https://www.fish.gov.au/report/338-King-George-Whiting-2020">https://www.fish.gov.au/report/338-King-George-Whiting-2020</a>
	Believes recreational catch rates for KGW over the last 3 -5 years have declined despite significant experience.	The VFA conducts creel surveys, which are detailed assessments of recreational angler catches and effort at the main boat ramps, which provide good indicators for how the fishery is operating. While not reflective of all recreational fisher views, the data collected over the first three years of creel surveys (which commenced in 2017-18) suggests most recreational fishers are either “quite” or “very” satisfied with their experience fishing the Inlet. This program is still relatively new and the catch rate data for particular species such as King George whiting will become reliable for some analysis over coming years.

Topic	Summary of issue raised in submission	Response
		<p>Importantly, neither the commercial fishery catch-per-unit-effort (CPUE) or pre-recruit time series for King George whiting show persistently declining trends. This provides reassurance that the poorly known and lightly fished adult stock in coastal waters (i.e marine waters outside of Corner Inlet) has continued to be replenished at rates that are sufficient to prevent declines in recruitment potential/egg production.</p> <p>The <i>Status of Australian Fish Stock Reports</i> are a series of assessments of the biological sustainability of a broad range of wild-caught fish stocks against a nationally agreed framework. The Reports examine whether the abundance of fish and the level of harvest from the stock are sustainable. The latest assessment for the Victorian King George whiting stock was classed as ‘sustainable’. Further details can be found here: <a href="https://www.fish.gov.au/report/338-King-George-Whiting-2020">https://www.fish.gov.au/report/338-King-George-Whiting-2020</a></p>
	Questioned what science is behind the VFA’s claim that KGW is sustainable.	<p>In Victorian bays and inlets most King George whiting are harvested as immature fish from about 2.5 to 5 years of age. Juvenile whiting migrate out of bays and inlets at 4–5 years of age to complete their adult lives in coastal waters where they can live to approximately 20 years old and reach lengths of at least 60 cm. Offshore spawning and a long-larval dispersal phase prior to settlement in bay and inlet nursery areas mean that settlement rates of larvae are highly variable from year to year depending on ocean currents. This variability coupled with a short residence time for juveniles within bay and inlet nursery areas (i.e. two-three years when most fish are available for harvest) means that fisheries production and catch rates are naturally highly variable.</p> <p>Section 6 of the management plan details the VFA’s general approach to monitoring and assessment of the fishery’s species. The Victorian King George whiting stock is evaluated using harvest and catch rate data obtained from the commercial (e.g. from catch and effort reporting) and recreational fishing sectors (e.g. from creel surveys), data from length composition sampling of retained fish and pre-recruit abundance information gained from fishery independent-netting surveys. Further details and methods can be found in the <i>Review of key Victorian fish stocks — 2019</i> (Conron et al., 2020).</p> <p>The <i>Status of Australian Fish Stock Reports</i> are a series of assessments of the biological sustainability of a broad range of wild-caught fish stocks against a nationally agreed framework. The reports examine whether the abundance of fish and the level of harvest from the stock are sustainable. The latest assessment for the Victorian stock of King George whiting was classed as ‘sustainable’. Further details can be found here: <a href="https://www.fish.gov.au/report/338-King-George-Whiting-2020">https://www.fish.gov.au/report/338-King-George-Whiting-2020</a></p>
<b>Flathead</b>	Requested additional information regarding flathead, a culturally important species for Aboriginal people, which is listed as undefined/not assessed in the management plan.	<p>There are multiple types of flathead found in the Corner Inlet fishery, with the most common retained by fishers including:</p> <ul style="list-style-type: none"> <li>rock flathead (<i>Platycephalus laevigatus</i>)</li> <li>southern bluespotted flathead (<i>Platycephalus speculator</i>), and</li> <li>southern sand flathead (<i>Platycephalus bassensis</i>)</li> </ul> <p>Rock flathead and southern bluespotted flathead are understood to be the main species of flathead harvested within the Corner Inlet fishery. While there are flathead species listed as ‘not assessed’ or ‘undefined’ in the most recent Status of Australian Fish Stocks assessment (2020) (Table 1 of the management plan), the VFA does assess these important fish stocks regularly by analysing available data and the latest scientific information. Further details and methods can be found in the <i>Review of key Victorian fish stocks — 2019</i> (Conron et al., 2020). While a clear stock status determination has not been confirmed under the SAFS process, the VFA does not consider these stocks to be in or near a depleted state. Available recent data of the primary key performance indicator (catch-per-unit effort) for these stocks is provided in Appendix 4 for the commercial fishery and demonstrates catch rates are close to or above the reference period average.</p> <p>Research priorities 4 and 4a listed within the Management Plan (pg 50) relate to key flathead species and will increase the level of available data and enhance future stock status determinations.</p>
<b>Commercial catches in Corner Inlet</b>	Believes 400+ tonnes is a lot for the commercial sector to take in Corner Inlet.	<p>The commercial fishery’s total annual catch and composition of that catch fluctuates between years due to a number of factors such as natural variations in recruitment of species to the fishery, environmental conditions and other influences such as market prices, fishing methods used and persons operating the licences.</p> <p>Since 1998,when the Corner Inlet Fishery Access Licence class was established, total catches have generally fluctuated between 275 and 375 tonnes of fish. Total annual commercial catch peaked in the 2018-19 financial year at 446 tonnes, followed by 438 tonnes in 2019/20. These unusually high catch years were influenced by both a natural period of high King George whiting abundance, but also a recent increase in commercial fishing effort. Part of the latter was associated with a change from usual fishing practices in Corner Inlet which were being undertaken by a minority of operators only. A number of commercial and recreational fishers quickly raised concerns regarding the increased catches and shift in practices. The VFA, with the support from the majority of Corner Inlet Fishery Access Licence holders and other key stakeholders, issued Fisheries Notices in 2020 and 2021 for the commercial fishery that implemented important management changes to help reduce total fishing effort to ensure fishing remained sustainable and to ensure fishing practices were safe. The Fisheries Notice rules are currently being reviewed every year to ensure catches from the commercial fishery are sustainable.</p>
	Questioned what has gone wrong with the previous code of conduct to see commercial catches of whiting increase so significantly.	<p>Total annual commercial catch peaked in the 2018-19 financial year at 446 tonnes, followed by 438 tonnes in 2019/20. These unusually high catch years were influenced by both a natural period of high King George whiting abundance, but also a recent increase in commercial fishing effort. Part of the latter was associated with a change in fishing practices by some operators who were reportedly operating outside of the voluntary Code of Practice.</p> <p>A number of commercial and recreational fishers raised concerns regarding these increased catches and requested part of the voluntary code of practice be placed into regulation. In light of this, and with the support from the majority of CIFAL holders, the VFA issued Fisheries</p>

Topic	Summary of issue raised in submission	Response
		Notices in 2020 and 2021 for the commercial fishery that implemented management changes to help reduce total fishing effort to ensure fishing remained sustainable and to ensure fishing practices were safe.
<b>Commercial catches outside Corner Inlet</b>	Believes Corner Inlet is being heavily fished outside in the breeding grounds by professional fishers from the Ninety Mile down.	Commercial Corner Inlet Fishery Access Licence holders are only permitted to fish within the Corner Inlet fishery (i.e inside the entrances of the Inlet). The area and definition of the Corner Inlet fishery is detailed on pg 9 of the management plan. While there are some exceptions, fishing in marine waters that extends past three nautical miles from the low-water line is generally managed by the Australian Fisheries Management Authority (AFMA) (Commonwealth Government).
	Believes Commonwealth licensed trawlers targeting spawning aggregations of King George Whiting off Wilson's Promontory in Eastern Victoria will have adverse impact on the standard of whiting fishing in Victoria and needs to be considered in the management plan.	<p>There are currently no restrictions or limits on the amount of King George whiting that Commonwealth commercial trawlers can take in waters adjacent to Victoria. This situation is alarming as this species completes its life cycle by migrating out of Victorian bays and inlets to spawn and the potential for unregulated take of migrating populations poses a significant sustainability risk. The Victorian Government is currently seeking to resolve this issue with the Commonwealth Government and has factored this into the management plan.</p> <p>Action 2ii) of the management plan is to “Advocate for management change to limit take of King George whiting catch by Commonwealth licensed trawlers”.</p> <p>The VFA’s position on this matter is that Commonwealth commercial fishing licence holders should not be taking unlimited quantities of King George whiting off the Victorian coast as part of their entitlement. The VFA has met with and written to AFMA on this matter seeking urgent action. The Victorian Government is currently seeking to resolve this issue with the Commonwealth Government and has factored this into the management plan.</p> <p>The VFA is also seeking to enhance its understanding of the King George whiting stock as it relates to the Corner Inlet fishery. Research priorities 5 and 6 on page 55 of the management plan reflect this intent.</p>
	Believes the VFA needs to advocate to the Commonwealth Government to stop the Commonwealth trawlers.	<p>The VFA’s position on this matter is that Commonwealth commercial fishing licence holders should not be taking unlimited quantities of King George whiting off the Victorian coast as part of their entitlement. The VFA has met with and written to AFMA on this matter seeking urgent action. The Victorian Government is currently seeking to resolve this issue with the Commonwealth Government and has factored this into the management plan.</p> <p>To date, the Commonwealth has not implemented any management changes. The Victorian Government will continue to advocate for management arrangements that are more consistent with those in Tasmania and South Australia, where Commonwealth trawlers are not permitted to take King George whiting.</p> <p>The VFA understands that VRFish, FutureFish Foundation and the Australian Recreational Fishing Foundation also made representations to former Commonwealth Senator Duniam on this matter.</p>
<b>Commercial fishing practices</b>	Believes sorting through catch while it is still in the water would be a great improvement over meshing.	<p>Seine netting in Corner Inlet is characterised by slow tow speeds, short tow duration and operation in shallow depths. These characteristics mean that fish are slowly herded into the bag or cod end and are not exhausted or overtaken by the net. During the seine netting operation, the fish are sorted with the bag or cod end still in the water, allowing juvenile and unwanted species to be released alive back to their environment. The shallow depths from which fish are caught also means that captured fish are also not subject to the large temperature and pressure changes that can occur with other types of fisheries operating offshore.</p> <p>In determining the effects of seine netting in Corner Inlet, research by Knuckey et. al (2002) found that no mortalities of bycatch species occurred during their study, including for ornate cowfish, globefish, barred toadfish and smooth toadfish. These and other undersized fish that are returned to the water generally have high survival rates, particularly when captured using a seine net, which is the predominant fishing method in Corner Inlet.</p> <p>There is currently limited information on bycatch from other fishing methods, including from commercial mesh netting. However, to address this knowledge gap action 8 i) of this Plan seeks to implement a bycatch monitoring program for both commercial and recreational fisheries, and action 4v of the Plan aims to improve collection of bycatch data through transitioning the commercial fishery to electronic reporting. This information will assist in determining feasible options to minimise bycatch and any wastage.</p>
	Believes the removed ability to mesh and seine net at the same time reduces efficiency of operation and impacts quality of life for fisherman	<p>This management arrangement was introduced in June 2020 through a Fisheries Notice. Feedback from Corner Inlet licence holders indicates that there is a majority of licence holders that support this restriction which has benefits in ensuring nets are not left for excessive periods (in the past nets were at times left for periods of more than 24 hours to soak) as there is an incentive to pull the net to conduct a seine operation. There are a range of factors that supported implementation of this rule which relate to sustainability, fish quality and the social licence of the commercial fishery. The relevant Fisheries Notice was reviewed in May 2022 and re-made.</p> <p>This matter was discussed with the Steering Committee and there was consensus that most businesses have adjusted to the Fisheries Notice rules now. It was also noted that changing the single gear rule again could actually create more uncertainty and issues (and stakeholder concerns) than it would solve and would be a step backwards for the fishery at this time.</p>
	When set nets are put in the water overnight, they need to be marked by a flashing light on the buoys. Also questioned who would be held responsible if a mishap or damage occurred in a scenario where vessel (Professional or Amateur) were to become caught in a licence operators commercial mesh nets left in the water to soak at night.	<p>Under regulation 75 of the Fisheries Regulations 2019, all licence holders must ensure that a mesh net that is used by the licence holder is attached to a surface buoy, flag, stake or other object that is clearly and legibly marked with the licence number of the licence holder's licence. However, there is currently no requirement to mark nets with lights at night for inshore fisheries such as Corner Inlet.</p> <p>This matter was discussed in detail with the Steering Committee and there was consensus that there is not currently a need for marking mesh nets with lights at night. Fishers advised the safety concerns were minimal and marking with lights would increase interference from others and can actually cause safety issues of its own (confusing navigation of boaters).</p>

Topic	Summary of issue raised in submission	Response
		<p>Responsibility for commercial fishing in a safe manner rests with the licence holders themselves, as employees or employers (including self-employed) under the Occupational Health and Safety Act 2004 and through common law liability. All commercial fishers have a responsibility to protect the health, safety and welfare of any employees (and themselves where self-employed) when operating and to ensure that the health and safety of the public is not put at risk by any work activities.</p> <p>Corner Inlet commercial fishers are encouraged to continually review their current fishing practices to ensure they are not putting the health and safety of themselves, any employees or any other member of the public at risk.</p>
Bycatch and discards	Believes more careful monitoring of fishing practices could occur.	<p>All commercial fishing vessels in Corner Inlet are now also required to have a Vessel Monitoring System (VMS) installed on the board the boat and operating during a commercial fishing trip. The VMS uses small on-board transceivers to log a vessel's position and uploads this information to the Australian Fisheries Management Authority (AFMA) servers. This information is then accessible to VFA officers who can view it on computers and portable devices and provides some insights into current fishing practices.</p> <p>Additionally, action 8 i) of this Plan seeks to implement a bycatch monitoring program for both commercial and recreational fisheries.</p>
	Believes there needs to be a clear understanding of how much bycatch the commercial fishers are discarding.	Action 8 i) of this Plan seeks to implement a bycatch monitoring program for both commercial and recreational fisheries.
	Is concerned by the lack of information on bycatch that the management plan is based on. The most recent study of the effects of seine netting was completed nearly twenty years ago, while there is no information on mesh netting practices, quantities and species.	<p>Action 8 i) of this Plan seeks to implement a bycatch monitoring program for both commercial and recreational fisheries.</p> <p>Action 8ii) of this plan seeks to improve understanding of efficiency of mesh netting operations and discard mortality associated with soak times.</p>
	Believes longlining is not a selective process to catch the desired fish and at times would result in return of dead bycatch to the water.	<p>Long-lines are rarely used in Corner Inlet, with a total of only 2 tonnes of fish caught using this gear type since 2013. These are occasionally used by commercial fishers to target snapper during the summer months. Authorisation of different gear types in the Corner Inlet fishery allows commercial fishers to provide a range of fresh, quality seafood products to Victorian consumers. The VFA supports the limited use of long-lines in Corner Inlet at present and in other fisheries such as the non-net snapper fishery in Port Philip Bay.</p> <p>Under the current management arrangements set out in the <i>Fisheries (Further Corner Inlet Fishery) Notice 2022</i>, commercial fishers can only use one gear type at a given time inclusive of longline, mesh net and seine net. This means that longlines are not left in the water for excessive periods (as these fishers cannot focus on other activities such as netting at the same time) and helps to minimise impacts on bycatch.</p> <p>Action 8 i) of this Plan seeks to implement a bycatch monitoring program for both commercial and recreational fisheries and this may help improve our understanding of longline activities in Corner Inlet and impacts on bycatch.</p>
	Believes not enough is being done to protect the general biodiversity of the Corner Inlet fishery and that the focus is currently short-sighted by focusing on edible species only.	<p>Objective 2 of the management plan is to ‘Maintain the ecological integrity of the fishery ecosystem’. There are a number of new strategies and actions under this objective shown on page 39 of the Plan which contribute towards protecting biodiversity of Corner Inlet fish. For example, action 5i) relates to undertaking a new project to improve understanding of TEP (threatened, endangered or protected) species interactions and mortality risk from fishing methods in Corner Inlet. Additionally, action 8 i) of this Plan seeks to implement a bycatch monitoring program for both commercial and recreational fisheries.</p> <p>The findings of these bycatch projects will support discussion with stakeholders to help determine feasible mitigation options in future so than any impacts of fishing can be reduced.</p> <p>In Victoria, all native mammals, birds, reptiles and amphibians, fish listed under the FFG Act and sygnathids (sea horses, sea dragons etc) are TEP (Threatened/endangered/protected) species. Victorian commercial fishers who inadvertently interact with protected wildlife while lawfully operating under their fishing licence must report the interaction. Commercial operators are provided with the Protected Species Identification Guide for Victoria’s Commercial Fishers to assist them in reporting interactions. The VFA will continue to discuss TEP interactions annually with the Victorian Department of Environment, Land, Water and Planning (DEWLP) every year.</p>
	Believes there has been a massive decline in porcupine fish near Yanakie over the last 25 years.	<p>The VFA understands that mortalities of porcupine fish are quite rare during commercial seine netting operations which is associated with the majority of catches in Corner Inlet. Past research (Knuckey et. al, 2002), when determining the effects of seine netting in Corner Inlet, found that there were no mortalities to globefish (also known as porcupine fish) during their study.</p> <p>However, it is important to note that there are a number of actions to improve this understanding including:</p> <p>Action 8 i) of this Plan seeks to implement a bycatch monitoring program for both commercial and recreational fisheries.</p> <p>Action 8iii) of this plan seeks to improve understanding of efficiency of mesh netting operations and discard mortality associated with soak times.</p>
Fish / animal welfare	Believes fishing practices for killing of bycatch species such as porcupine fish is shocking.	<p>There are laws in place aimed to prevent unnecessary harm/damage being caused to bycatch. Regulation 63 of the Fisheries Regulations stipulates that a licence holder who takes a fish that is not of a noxious aquatic species, and that is not to be retained by the licence holder, must immediately return that fish to the water with the least possible injury or damage. Penalties may apply.</p> <p>The VFA has a 24/7 reporting hotline 13 FISH (13 3474) and members of the community are encouraged to report any incidences where they suspect someone is breaking the fishing rules.</p>

Topic	Summary of issue raised in submission	Response
	Sighting of porcupine fish with a hole in it and a seal with a severed neck	<p>Under the current Fisheries Regulations, commercial a licence holder who takes a fish that is not of a noxious aquatic species, and that is not to be retained by the licence holder, must immediately return that fish to the water with the least possible injury or damage. Additionally, a licence holder must also ensure that any other animal taken incidentally while undertaking fishing activities is immediately returned to its natural habitat with the least possible injury or damage or is otherwise dealt with in accordance with the <b>Flora and Fauna Guarantee Act 1988</b>, the <b>Wildlife Act 1975</b> and any regulations, orders, licences or authorisations under those Acts.</p> <p>Similarly, it is also an offence for recreational fishers who takes a fish that is not of a noxious aquatic species, and that is not to be retained by the person, if they do not immediately return that fish to the water with the least possible injury or damage.</p> <p>The VFA has a 24/7 reporting hotline 13 FISH (13 3474) and members of the community are encouraged to report any incidences where they suspect someone is breaking the fishing rules.</p>
<b>Code of Practice / Code of conduct</b>	Believes some commercial fishers have a total disregard for rec fisherman and the Code of Practice is not effective	<p>There is currently no commercial fishers’ voluntary Code of Practice in place for Corner Inlet. Key parts of the previous Code of Practice were transferred into a Fisheries Notice in 2020 and this is now enforced.</p> <p>There are two key actions in the management plan which are designed to enhance respectful fishing practices and relationships between the commercial sector and the recreational sector:</p> <p>Action 10 i) of the management plan is for “i) Recreational and commercial sectors to independently pursue a Memorandum of Understanding about future resource sharing and access”.</p> <p>Action 10ii) is for “Commercial sector to develop a new voluntary Code of Practice inclusive of measures that support ethical, responsible and respectful fishing practices.</p>
	Believes the commercial fishers code of practice and recreational fishers code of conduct should include a section on minimising impacts to coastal shorebirds and seabirds.	<p>The Corner Inlet commercial fishers’ Code of Practice is a voluntary arrangement designed to minimise conflict between licence holders and other sectors and to promote best practice fishing operations. Signatories to the Corner Inlet commercial fishers’ Code of Practice operate in accordance with agreed principles for the fishery. This is set to be renewed as per action 6 i) in Table 3 of this Plan.</p> <p>The Victorian recreational fishers voluntary code of conduct detailed in section 5.1.5 was developed by VRFish and aims to provide guidelines to minimise conflicts on the water, encourage local stewardship, demonstrate best practice for responsible fishing and result in a more enjoyable fishing experience for all. This Code is designed to be applied state-wide and is not specific to the Corner Inlet fishery.</p> <p>This recommendation relating to birds has been brought to the attention of key commercial fishing sector representatives including the Corner Inlet Fisheries Habitat Association and Seafood Industry Victoria, and VRFish. The VFA is happy to facilitate further discussions between BirdLife Australia and Seafood Industry Victoria, the Corner Inlet Fisheries Habitat Association and VRFish regarding possible inclusions for the new Code that could help to minimise impacts to coastal shorebirds and seabirds.</p>
<b>Enforcement</b>	Believes there is a lack of enforcement and commercial fishing management arrangements need to be policed better than they currently are.	<p>Fisheries Officers from VFA’s station based in Yarram are predominantly responsible for conducting enforcement and education activities within and around the Corner Inlet fishery. They conduct at-sea (by vessel) and land-based patrols and can operate in uniform or plain clothes. In Corner Inlet, there is currently a particularly strong focus on compliance with the following elements of fisheries legislation:</p> <ul style="list-style-type: none"> <li>• licensing requirements;</li> <li>• equipment limits and permitted use;</li> <li>• species size and catch limits;</li> <li>• bycatch – safe return of unwanted fish;</li> <li>• accurate protected species interaction reporting (commercial fisher requirement only);</li> <li>• accurate catch and effort reporting (commercial fishery requirement only); and</li> <li>• VMS requirements (commercial fishery only).</li> </ul> <p>There are currently cost-recovered inspection targets set for on-water and landing inspections for the Corner Inlet commercial fishery each year. Targets may be adjusted each year dependent on the compliance risk associated with the fishery.</p> <p>Fisheries Officers also conduct compliance under other legislation to promote responsible fishing and boating, such as wildlife, environmental and maritime safety legislation.</p>
	Questioned why commercial fishers are not being checked.	<p>This is incorrect. There are a number of points where commercial fishing activities are checked by the VFA. Fisheries Officers from VFA’s station based in Yarram are predominantly responsible for conducting enforcement and education activities within and around the Corner Inlet fishery. They conduct at-sea (by vessel) and land-based patrols and can operate in uniform or plain clothes. In Corner Inlet, there is currently a particularly strong focus on compliance with the following elements of fisheries legislation:</p> <ul style="list-style-type: none"> <li>• licensing requirements;</li> <li>• equipment limits and permitted use;</li> <li>• species size and catch limits;</li> <li>• bycatch – safe return of unwanted fish;</li> <li>• accurate protected species interaction reporting (commercial fisher requirement only);</li> <li>• accurate catch and effort reporting (commercial fishery requirement only); and</li> <li>• VMS requirements (commercial fishery only).</li> </ul>



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		<p>There are currently cost-recovered inspection targets set for on-water and landing inspections for the Corner Inlet commercial fishery each year. Targets may be adjusted each year dependent on the compliance risk associated with the fishery.</p> <p>In addition to the daily catch and effort reporting requirement, each commercial fisher must also ensure the fishing vessel has Vessel Monitoring System (VMS) which logs a vessel's position. This allows Fisheries Officers to know where all commercial boats are at all times when fishing and understand when a commercial boat is coming into port for potential inspection.</p>
Education	BirdLife Australia would like to be involved in any events that are fishing centric to include bird values and broader coastal/marine environmental awareness.	BirdLife Australia is thanked for their interest to be involved with such future fishing events at the Corner Inlet fishery. Further discussion with the VFA is welcomed on how to build this connection. The VFA intends to run Vic Fish Kids events and plans to support the existing Seadays festival (run by the Port Welshpool Working Group) in coming years, which may provide some opportunities.
	Outreach materials developed for Corner Inlet could include small snippets of vital information about the birds and doing no harm when using the Inlet.	The VFA is happy to work with BirdLife Australia to, where feasible, enhance any future outreach materials for fishers so they include information on protecting important bird species. The VFA is keen to discuss this matter in further detail within the next 12 months. Such education material is likely more appropriate and more effective to include in future flyers and other education materials (where feasible) than the fishery management plan document itself. The VFA would also be happy to welcome BirdLife Australia to participate in a meeting with the Corner Inlet Fishery Management Advisory Committee once established to discuss key interests and issues relating to birds with key stakeholders of the fishery.
Fishery management advisory committee	Believes there should be a committee of management established as this could involve all fishing stakeholders and ensure that the fishery remains sustainable for all interested parties	The VFA has committed to doing this by establishing the Corner Inlet Fishery Management Advisory Committee. This will include participation of key representatives from all relevant sectors to continue the partnership and co-management approach with the VFA. Part of CIFMAC's role will be to review the latest fishery information and, importantly, will help to ensure management remains adaptive and responsive. This is expected to commence in late-2022. Further details can be found in section 7 of the Management Plan.
Birds (other)	BirdLife Australia would welcome the opportunity to seek more information from recreational fishers (e.g. during the planned survey) on the current knowledge of threatened, endangered and protected birds, Ramsar values, and about the use of the system more broadly.	The recreational fishing survey has already commenced and unfortunately there is not currently scope to include additional questions. The VFA supports working with BirdLife Australia to enhance their connection to the fishing sector through other means to obtain fishers views on birds and the environment.
	<p>Believes the management plan needs to include a risk related to decline of bait-sized fish species and subsequent collapse of protected fish-eating birds. Believes this could be supported with an action to document and understand collection rates of the key prey species for fish-eating birds in Corner Inlet, especially threatened and protected tern species.</p> <p>Further info from submission: 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 Plan, an action to measure/improve knowledge of the health of these key prey fish species. Key prey species include hardyheads (Atherinidae spp.), Blue Sprat (Spratelloides robustus), Tailor (Pomatomus saltatrix), garfishes (Hyporhamphus spp.), Beaked Salmon (Gonorynchus greyi), flying fishes (Exocoetidae spp.), Yellow-eye Mullet (Aldrichetta forsteri), small squid and others.</p>	<p>The suggested risk here appears to be focussed on decline of fish which are not usually retained by fishers. It is understood that most bait-sized fish in Corner Inlet are either:</p> <ol style="list-style-type: none"> <li>1) not caught at all (e.g. the smaller fish escape through the mesh of the net or are rarely caught on hooks),</li> <li>2) are released due to being under the legal minimum size limit, or</li> <li>3) are released as they are not a sought-after species.</li> </ol> <p>However, improvements to data collection, including the bycatch monitoring program (action 8i of the management plan), will help improve our understanding on this further and help monitor any impacts on non-retained species for future management considerations to mitigate risk of decline of bait fish. Further insights on impacts of fishing on bycatch will be available once the monitoring program is well underway.</p> <p>It is also important to note that most marketable species have a legal minimum size limit. Regardless, for species such as calamari and garfish which do not have a minimum size limit, these are regularly monitored and their stocks assessed regularly to ensure sustainability and ongoing recruitment of juveniles to the fishery. Information on these species is obtained through commercial catch and effort logbooks and creel surveys of recreational fishers.</p>
	Believes Objective 2, Strategy 5 (Minimise interactions with threatened, endangered and protected (TEP) species) needs to include avian TEP species and not just fish species.	The VFA is happy to confirm that this Strategy includes avian TEP species. In Victoria, all native mammals, birds, reptiles and amphibians, fish listed under the FFG Act and syngnathids (sea horses, sea dragons etc) are TEP species.
	Questioned whether there is a current requirement to report on TEP bird species interactions. If not, this should be integrated in the reporting framework. 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.	<p>The VFA is happy to confirm that commercial fishers are required to report all inadvertent interactions with TEP bird species and to immediately return protected species to their natural environment as quickly as possible and with minimum injury, if the interaction results in a requirement to handle the animal.</p> <p>Mandatory protected species interaction reporting is one of the key tools used to manage commercial fishing in Victoria. This reporting provides important information on the number and nature of commercial fishing interactions with protected species.</p> <p>Under this system, commercial fishers are required to report on any inadvertent interactions with a protected species on any given fishing day and, if they had an interaction, provide information on where the interaction occurred, the number of each species involved, their age class, the nature of the interaction (e.g. accidentally caught in a net, entangled in gear, boat strike) and what happened to the animal as a result of the interaction. If fishers interact with 10 or more of any protected species in one incident, they are also required to report this to the operations duty officer as soon as possible.</p> <p>Commercial licence holders are provided with the Protected Species Identification Guide for Victoria's Commercial Fishers to assist them in reporting interactions. Data from the commercial fishery indicates interactions with TEP birds rarely occurs. The VFA would be happy with work with BirdLife Australia in future updates of this guide.</p>
Shellfish reef restoration	Include shellfish reef restoration as a priority, for improving fish stocks and the overall ecological value of Corner Inlet in line with the objectives of the management plan and principles of ecologically sustainable development	The VFA supports healthy fisheries habitat and restoration and acknowledges shellfish reefs have potential to provide great enhancements to our marine ecosystems. There is no funding for shellfish reef restoration available at this stage. The VFA, along with a number of key fishing stakeholders including Seafood Industry Victoria, commercial fishers, VRFish, FutureFish see seagrass restoration (as opposed to shellfish restoration) as the higher priority in the short to medium term to support a healthy and sustainable Corner Inlet fishery.
	<b>Section 4, Objective 2: Maintain the Ecological Integrity of the Fishery Ecosystem</b> <b>Strategy 6</b> – In order to support the ongoing seagrass restoration and to further support Objective 2 of the management plan, shellfish reef restoration works are recommended in addition to seagrass restoration works	The VFA supports healthy fisheries habitat and restoration and acknowledges shellfish reefs have potential to provide great enhancements to our marine ecosystems. There is no funding for shellfish reef restoration available at this stage. The VFA, along with a number of key fishing stakeholders including Seafood Industry Victoria, commercial fishers, VRFish, FutureFish see seagrass restoration (as opposed to shellfish restoration) as the higher priority in the short to medium term to support a healthy and sustainable Corner Inlet fishery.

Topic	Summary of issue raised in submission	Response
	<p><b>Section 6.2.2 Future Research Priorities</b></p> <p>Conduct shellfish reef restoration suitability modelling to identify potentially suitable sites for shellfish reef restoration. Restoration suitability modelling is a process used to assist in site selection for shellfish reef restoration, while limiting potential negative impacts to existing habitats and minimising user conflicts</p>	<p>The VFA, along with a number of key fishing stakeholders on the Corner Inlet Fishery Management Plan Steering Committee, have considered this proposal and have not identified shellfish restoration as one of the higher research priorities to include in this management plan. However, there is potential to look at reprioritising research projects in future through the Corner Inlet Fisheries Management Advisory Committee.</p>
Ramsar concept	<p><b>Section 4, Objectives, strategies and actions</b></p> <p>It would be good to see recognition of the Ramsar Convention concept of “wise and sustainable use” in these actions. Recognising that the fishery operates within a Ramsar site, but that the Convention allows for that if the fishery is sustainable and does not impact ecological character.</p>	<p>While the Ramsar site is acknowledged in various parts throughout the management plan (e.g. Sections 2.1.1, 2.4.1, 2.4.2, action 6iii). it was difficult to specifically incorporate the concept of ‘wise and sustainable use’ into the current fishery objectives/strategies/actions framework, however it should be acknowledged that together the objectives in the Plan should contribute to supporting the concept of wise and sustainable use.</p>
General comments	<p>Believes the management plan falls well short of developing a true management strategy for managing the sustainability of the fishery.</p>	<p>Corner Inlet is a multi-species, multi-gear fishery enjoyed by different fishing sectors including recreational, commercial and indigenous fishers. The fishery is diverse, with more than 20 different species retained on a regular basis. The management plan recognises that species abundance can fluctuate widely between years due to a number of factors such as natural variations in recruitment, environmental conditions and other influences. The final management plan, which is the first ever fishery management plan declared for the Corner Inlet fishery, sets out objectives, strategies and actions to ensure that management of the fishery is sustainable. It also ensures management is precautionary and focused on advancing the fishery by ensuring adequate scientific information is collected, new technologies are implemented, and that economic, social and cultural aspects are enhanced. The need for additional strategies will be considered by the Corner Inlet Fishery Management Advisory Committee on an ongoing basis.</p>
	<p>Suggested that if the self-regulation of the fishery (code of practice) no longer works (e.g. due to new technologies or new entrants), then a plan with teeth or enforceable regulation might be a step forward.</p>	<p>Parts of the commercial fishers code of conduct have been transferred into Fisheries Notices. Fisheries Notices provide an important management tool to implement fisheries management measures promptly and in response to emerging fisheries management issues. These typically have a life of 12 months until they are reviewed and either revoked or re-made with any required amendments. If proven effective over multiple years, the enforceable laws within the Fisheries Notices will eventually be transferred into the Fisheries Regulations 2019.</p> <p>Best-practice management tools such as harvest strategies were considered during the development of the management plan, however these are not proposed to be implemented at this time. The need for further management tools or changes will be continually assessed through the stakeholder-based Corner Inlet Fishery Management Advisory Committee.</p>