



**Eastern Zone Abalone
Industry Association Inc.**

19th January 2023

Travis Dowling
Chief Executive Officer
Victorian Fisheries Authority
Travis.dowling@vfa.vic.gov.au

**RE: 2023/24 Draft Further Abalone Quota Order and Fisheries Notice comments from
EZAIA.**

Dear Travis

On behalf of EZAIA I acknowledge receipt on 23 December 2022, of 2023/24 Draft Further Abalone Quota Order and Fisheries Notice and other attachments detailing the results of the stock assessment held in Mallacoota on 6th December 2022.

In relation to the results and the workshop proceedings, I would like to make the following comments as a submission relating to the consultation period which ends on 20 January 2023.

Firstly, I was asked by VFA staff to provide comments on the Eastern Zone TACC Meeting Summary document which I did but these comments were mostly ignored and not included in the final Eastern Zone TACC meeting summary issued on 23rd December 2023. Attached please find my version, showing tracked changes. I believe my track changed comments on the meeting summary were a more accurate reflection of the meeting than what has been presented.

One area in particular related to: *There was strong criticism from an eastern zone member on the MRAG presentation, that Cameron had “**whipped attendees into a frenzy**” with scare talk of getting ahead of the curve, while the concept resonated with others.*



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It was mentioned by Cameron Dixon several times during the meeting and his initial presentation, that the suggested stock reduction was his opinion, noting that the stock assessment information was lacking. It has been clearly shown now by succorfish data that the existing FIS sites in eastern zone no longer correlate well with the modern-day fishery.

During the stock assessment meeting under Spatial Management – At the request of those in the meeting, VFA were to consider setting 10% flexibility for all SMUs except Mallacoota Large including for this season. The 10% flexibility urgently needs to be actioned for this season to prevent further fishing pressure in SMUs that are currently under performing. This year is the problem, next year the relevant SMU targets have been adjusted downwards and the quota is much lower.

During the workshop Petrel Point and Island Point – were two reefs identified as not fishing well with the decision made to apply a zero-catch allocation (Optimal Target) to Island Point effectively closing the reef for 12 months. The intent of this intervention was for it to be on a temporary basis with the reef open to fishing the following season. An undertaking was given by the VFA to implement a review of the abalone stocks at Island Point that may facilitate a catch allocation the following quota season, however it was left unclear how this process would be carried out.

Island Point and Petrel Point are the major (catch) contributors to the Mallacoota West SMU. The poor performance (stock levels) at Island Point and Petrel Point could not have been foreseen at the start of the quota year. There is not enough capacity at the much smaller reefs (Whaleback and Mueller) to make up the catch for the SMU. Under the current management arrangements, every SMU must reach its Optimal Target in order for the TACC to be caught.

These circumstances highlight the need for an adaptive management approach, industry have recommended the immediate implementation of an Upper Limit 10% above the Optimum Target across all SMUs with the exception of Mallacoota Large. This will relieve fishing pressure on underperforming SMUs, spread the effort more naturally whilst maintaining control and enabling the TACC to be caught.



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Closing SMUs at the Optimal Target (OT) was brought in specifically to facilitate the implementation of the quota rollovers. However, it has had the unintended consequence of effectively creating what is akin to sub-zonal quotas, something which industry cannot abide by. At the TACC workshop industry decided to forgo the remaining quota rollover on sustainability grounds. There is no longer the same imperative for hard closures at the SMU Optimal Target.

It appears that VFA will only listen to stakeholders and respond when there is a closure or quota cut on the table but are quick to dismiss other equally valid industry requests born from the same intent. VFA has listened to MRAG's opinion despite the lack of scientific evidence and their arm's length experience of the resource. This type of decision making only increases lack of trust and frustration.

In the DRAFT Stock Assessment report MRAG were not aware of decisions made about the allocation of the 19.6t quota carry over for season 2021/22 where it was all allocated to Airport SMU. It was initially going to be split equally between Airport and Marlo, however continued bad weather made Marlo unfishable with very poor visibility creating an OHS issue. MRAG throughout the report noted that the carryover had been split between all SMU's, which was not correct. MRAG's interpretation of the stocks coming into the TACC workshop was influenced by this false information. Clearly there has been a breakdown in communication between VFA management and MRAG. This is not good enough when people's livelihoods are at stake.

During the TACC workshop a substantial quota reduction of 14% was agreed, reluctantly by some, and others agreeable based on little scientific evidence other than **"getting ahead of the curve"** - a hypothesized declining curve which could not be substantiated.

Once again, a consensus was achieved by the workshop despite the lack of scientific rigor. The EZAIA membership responded primarily based on diver observations and their own personal experiences. It was to our members' credit and capacity to negotiate with respect that acceptable outcomes were achieved.

The importance of the TACC workshop as the key forum for industry consultation and fishery management decision making was once again highlighted. We commend this process going forward.



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MRAG is not the first to mention a “*hypothesis*”. The 2015/16 stock assessment also suggested that evidence presented was consistent with a “*hypothesis*” that high catches in 20018/09 depleted breeding stock of abalone populations that contributed to a decline in recruitment levels.¹

The 2016/17 Victorian Abalone Stock Assessment, Eastern Zone, November 2017 Victorian Fisheries Science Report Series No. 03 referred to the “*hypothesis*” of the previous year as to why a reduction in the TACC was required to allow rebuilding of the abalone biomass.

The 2017/18 Draft Victorian Abalone Stock Assessment, November 2018 Victorian Fisheries Authority Science Report Series No. 7 Draft found that “*the fishery does not appear to be in any immediate crisis and there is no compelling need for further zone-wide reduction in catch.*”

Clearly the Fisheries Authority science reports have been inconclusive for some time, this is not helpful for decision making in the TACC workshops. The continued ignoring of recommendations of the “Review of fixed sites surveys used by the Victorian Abalone Science Program (Dr Anthony Hart, Principal Research Scientists, Western Australian Fisheries and Marine Research Laboratories, 2016)” has extended the period of time creating a “*crisis in confidence*” of assessments which will continue due to the lack of belief in the FIS survey results.

This was pointed out by MRAG in the Draft stock assessment for the Eastern Zone of the Victorian Abalone Fishery 2019/2020 (Nov 2020). The Hart review provided 18 recommendations for changes to the FIS program and that to maintain the status quo was not viable. It has taken six years but at least a review is now under way. We commend the FIS review process and look forward to better data and working with VFA to implement changes.

¹ 2015/16 Victorian Abalone Stock Assessment Eastern Zone November 2016, Fisheries Victoria Science Report Series No 15.



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Of concern in any decision-making process throughout the MRAG report it has noted the following issues:

- the complexity and uncertainty in any accurate assessment of the status of stocks at the SMU or Zone scale ²
- the TACC is set using data that lags by two years from the time the future quota year begins and no ability to adjust that TACC's with season ³
- FIS data were not collected during 2022 ⁴
- The primary sources of data to inform the assessment were 1) commercial catch and effort data and 2) abundance data from FIS. ⁵ As noted from the last point above the FIS was not carried out, **this left one source of data to inform the assessment!**
- Declines in CPUE are generally considered to reflect declining abundance and the stock may be declining as a faster rate than the CPUE index would suggest, but such declines could be attributed to other influencing factors such as changes in market forces – changes in market forces should have been understood in more detail both by VFA and MRAG. ⁶

The bushfires of 2019 destroyed the abalone processing facility. The facility has operated since in a very disjointed manner compared to when CPUE was stable. The processor in rebuilding has set conditions on divers not experienced previously which included: only permitting divers to work on a roster system and catch 200kg at a time with a limit of 5 divers per day. Processing had to be shipped to a processor in Melbourne and this practice continued from December 2019 up to when the new factory was built and officially opened in July 2022. Catch rates did not return to normal by the official opening as MAL struggled with the commonwealth government to reobtain its export licence and to find labor to work in the factory.

The labor shortage was only resolved in December with the arrival of Pacific Labor workers and the purchase of a local motel for subsidized housing of staff.

² Refer Executive Summary, Page 1 in last paragraph, second sentence.

³ Refer Executive Summary. Page 1 in last paragraph, third sentence.

⁴ Refer 3.2.1 Airport, Page 12, start of 2nd paragraph.

⁵ Refer 4. Conclusions and recommendations, Page 63, first paragraph, third sentence

⁶ Refer 4.1.1 CPUE and CPUE standardization, Page 63, various in second paragraph



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Market demand for larger live abalone has also had an impact on CPUE with some quota owners' preference being for divers to fish the large live market and quite often sell to external abalone processors.

- Critically, the assessment in the stock assessment report relied heavily on the assumption that trends in standardised CPUE reflected trends in biomass, which appears unfounded.⁷
- It was considered plausible that the declines in CPUE observed in 2021 reflected declines in abundance of the stock at some SMU's. However, this was impossible to conclude with certainty because CPUE declined in a similar manner at Marlo where less than half the OT has harvested compared to Mallacoota Large which was substantially overcaught. This should not have occurred if CPUE was a sensitive index of abundance in the short term.⁸

This indicates that the one primary set of data used for the stock assessment, being CPUE, is not a reliable indicator and CPUE trends that are stable or increasing do not necessarily reflect stable or increasing abundance, throwing more doubt on the stock assessment and is not a reliable indicator on its own.

- Confirms that the degree to which survey sites are representative of the current fishing grounds is a major factor that requires clarification and a review, noting that a review is underway.⁹
- The purpose of the performance indicators for this fishery are not clearly defined and therefore there is no clear pathway either.....usefulness of performance indicators would improve considerably if they were determined with an explicit objective in mind (e.g. maintenance of biomass, recovery or return stocks to levels of a particular reference year. An explicit biological objective regarding stock status should be included in the revised management plan.¹⁰
- TACC carry-over rules were determined following the low catch in 2019/20 that resulted from issues associated with Covid-19. The carry-over was ~23.5 t, however the 2020/21 catch was ~78.5 t short of the allocated TACC. On this basis, an agreed carry-over of ~58.5 t was agreed to be spread as ~19.5 t additional catch over each of the following three quota years: 2021/22, 2022/23 and 2023/24. On this basis, the TACC set for 2021/22 was a baseline of 337.5 t and 357 t including carry over.¹¹

⁷ Refer 4.1.1 CPUE and CPUE standardization, Page 64, start of first paragraph

⁸ Refer 4.1.1 CPUE and CPUE Standardization, Page 64, last paragraph before 4.1.2, starting at the second sentence

⁹ Refer 4.1.2 Fishery-independent abundance, Page 64, start of last paragraph

¹⁰ Refer 4.2.2 Performance Indicators, Page 66, second paragraph various comments

¹¹ Refer 4.4.1 TACC setting, TACC carryover and Optimal Target catches, Page 69 start of second paragraph



Table summary of TACC x season, with quota carry over

Season	TACC	Uncaught quota	Quota carried over	TACC with carry over	Notes
2019/20	337.5t	29.4t			
2020/21	337.5t		+ 23.5t	361t (only 282.5t caught)	23.5t not caught so was dropped off
2021/22	337.5t	54.5t	+ 19.6	357.1t	Full quota caught
2022/23	331t	??	+ 19.6t	350.6t	Industry agreed to drop the 19.6t
2023/24	284.6t		+ 19.6t		Reduction in TACC of 14%. Industry agreed to drop the 19.6t

The table above shows that EZAIA has demonstrated responsible stewardship of the resource, supporting decisions to reduce quotas and drop rollovers to the effect of 109.1t representing approximately \$3,273,000 in recent years, all without the assistance of reliable scientific data.

It's time VFA started to work with industry to apply appropriate tools and data that will give industry confidence in stock assessment decisions.

VFA has expended \$747,500 as at 2021 on MRAG ¹² for 3 years' worth of stock assessments for the Eastern and Central zones. With almost \$1 million coming from industry cost recovery fees and no confidence in the data or recommendations that are put forth, EZAIA is extremely disappointed in the whole process that lacks transparency. This needs to dramatically improve otherwise industry is being asked to sacrifice too much without proper scientific justification.

¹² https://vfa.vic.gov.au/data/assets/pdf_file/0004/820570/VFA-Annual-Report-2020-21.pdf



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The current approach is not how we want the fishery to be managed and VFA needs to provide scientifically robust data that will start to build stakeholder confidence in what is being presented at workshops. Our zone will agree to adopting some additional tools if this will help to support more reliable data and we will need to be convinced of the purpose and use of any such tool prior to adoption.

The EZAIA membership agreed to reduce the TACC for season 2023/24 by 14% in response to diver observations of the stocks in the absence of any reliable scientific data to the contrary. We ultimately want to be managing the fishery based on reliable indicators from independent data in association with the consensus views of attendees at the annual workshop.

Actionable items

- We want the 10% SMU variability urgently reinstated for the remainder of this season as detailed above it is the EZAIA's committees view that not to do so will cause damage to abalone stocks in the Mallacoota West SMU. Remembering that the Optimal Targets were set 14 months ago.
- The fishery is dynamic and needs more flexible adaptive management.
- That in future the TACC workshop be held towards the end of February each year. This is closer to the end of the quota year to provide a better picture of the fishery.
- We need urgent action now, including financial assistance from VFA to help control and manage the spread of urchins which has been highlighted to VFA on numerous occasions as far back as 2009.
- We need a formal assessment process for Island Point and clarity on how a catch allocation will be determined for the next quota season.
- We have requested voluntarily for 2 years to adopt depth loggers; we have identified the type industry are willing to use and we are ready to adopt them using the unspent FIS money for our zone. Preferred loggers are Reefnet. SENSUS Ultra.
- We have requested for the last 3 years that individual reef targets and limits be re-implemented for the Airport SMU to bring it into line with all the other SMUs..
- We have completed a trial of Orbcomm 9100 units with a few to collecting higher resolution spatial data but are yet to see a trial report from VFA.
- We are willing to trial 2 shell measurers on 2 boats in the zone and are working on this as well as working with MAL to commission the unit at the processing facility.



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Industry Association Inc.**

All the points above are fundamental management actions that VFA could be doing much more to assist industry with. Together these actions demonstrate the positive stewardship by industry and the benefits which can be gained from both self and co-management of the fishery.

We request that when considering future scientific tenders, the VFA include a requirement for practical management and engagement with industry throughout the entire year.

To conclude the submission – we look forward to working with VFA throughout 2023/24 season to future proof the eastern zone abalone industry.

Yours sincerely

Helen Burvill

Helen Burvill
Executive Officer.

Attached: Eastern Zone TACC Meeting Summary showing tracked changes.



Mr Travis Dowling
Chief Executive Officer
Victorian Fisheries Authority
GPO Box 4509
Melbourne Vic 3000

By email: travis.dowling@vfa.vic.gov.au

Dear Travis,

Re: VRFish Support for the draft Further Abalone Quota Order and draft Fisheries (Eastern Abalone Zone) Notice for the 2023/24 commercial abalone season

VRFish welcomes the opportunity to comment on the draft Quota Order and Fisheries Notice. The VRFish Dive Fisheries Reference Group has considered the documents pertaining to quota management arrangements and VRFish provides the following advice:

Table 1: VRFish Support for Proposed Management Arrangements EAZ 2023/24

VFA proposed 2023/24 TACC and managements arrangement for the eastern abalone zone:	VRFish Comment
Blacklip Abalone TACC of 284.6 tonnes	<i>Supported</i>
No carryover to be applied	<i>Supported</i>
Closure of all Spatial Management Units (SMU) at 10% above the Optimal Target, except for Mallacoota Large which will remain closed at the Optimal Target	<i>Supported</i>
Closure of all reef codes at the Upper Limit specified in the draft Fisheries Notice, consistent with the allowances in the 2022/23 season	<i>Supported</i>
Minimum sizes for blacklip abalone, as specified in the draft Fisheries Notice	<i>Supported</i>
Management of the Airport SMU at the reef code level based on five-year average catches	<i>Supported</i>

***Let's make fishing
better, for everyone.***



Further Comments:

DRAFT HARVEST STRATEGY FOR THE EASTERN ZONE OF THE VICTORIAN ABALONE FISHERY 2022

VRFish shares concern that the FIS was not undertaken in 2022 and therefore Harvest Strategy results relied on limited data (*ie. only CPUE data*).

Further, VRFish supports improvements in the data gathered to inform CPUE though notes the stability of primary and secondary indicators across SMU (4-year trends).

VRFish therefore supports and encourages VFA's conservative approach in the proposed management arrangements.

Yours Sincerely,



Ben Scullin
Executive Officer

20th JAN 2023

SCUBA DIVERS FEDERATION of VICTORIA

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email: sdfvexec@sdfv.org.au



20 Jan 2023

Toby Jeavons

Manager of Marine and Estuarine Fisheries,
Victorian Fisheries Authority,
@A Bellarine Highway,
Queenscliff. VIC. 3225

via: toby.jeavons@vfa.vic.gov.au

re: 2023/24 Draft Further Quota Order and Fisheries Notice (Eastern Abalone Zone)

Dear Toby,

The SCUBA Divers Federation of Victoria (SDFV) represents recreational divers who fish for abalone, and we take a deep interest in the health of the stock and the management of the fishery.

We were not aware of the TACC workshop in Mallacoota on 6 Dec 2022 and did not attend. Our submission is therefore based on the stock assessment report and the summary information of the workshop that you have subsequently provided via email.

The Stock Assessment by MRAG Asia Pacific raises strong concerns about the data available upon which to assess the fishery and the subsequent uncertainty as to the status of the stock. The report canvasses many worrisome issues such as an over-reliance on CPUE as a proxy for abundance, the apparent inconsistency of stable or increasing CPUE with declining biomass, higher exploitation of many SMUs than should have occurred and a shift of fishing effort to shallower waters. Notably, the assessment concludes that the current harvest strategy is inadequate.

In our view, the Stock Assessment is comprehensively authoritative and provides important information about addressing data inadequacies for future assessments as well as strongly advising a precautionary management response in setting the TACC parameters for the 2023/2024 fishing period due to the assessment uncertainty generated by the data issues. We note that in the workshop, MRAG suggested a substantial TACC reduction, in the order of 25-50%, across the Eastern Zone to arrest the decline in biomass.

We acknowledge that the Draft Quota Order and Fisheries Notices largely reflect the outcomes of the workshop. We understand the pragmatism by VFA in adopting industry 'agreed' positions. We also acknowledge that the elements of the Fisheries Notice go some way in addressing the concerns espoused in the Stock Assessment.

cont....

SCUBA DIVERS FEDERATION of VICTORIA

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email: sdfvexec@sdfv.org.au



In this context, we support the management responses. However, we also understand the subjective mechanism by which the workshop arrived at their TACC, and on any other day, it may easily have delivered a higher or lower figure. To an observer, the process whereby the setting of catch-caps at the SMU level by the beneficiaries of that future catch would appear to exclude consideration of the independent scientific advice that tinkering with the catch reduction at the reef-scale around the 10% level is insufficient, and so ignores the 'big-picture' call for a significant zonal reduction. Indeed, we think it significant that it was reported that 50% of the commercial fishers at the workshop advocated for an additional 10% reduction in the TACC.

Further, addressing the current uncertainty in relation to stock assessment relies on collection of certain data which, in itself, is not guaranteed by the quota order or the Fisheries Notice. That is, the current uncertainty of the stock status and level of sustainable fishing remains without delivery of adequate data for the next assessment. Surely this is a situation which demands an overlay of conservatism beyond that 'agreed' by the fishermen.

In this context, we believe VFA has missed an opportunity to practice a very defensible precautionary approach by declaring a lower TACC which was more in-line with the sentiment and concern implicit in the independent advice.

Thank you for the opportunity to comment.

(signed)

Mike McCarthy,
Chair, SDFV.

Ewan A Flanagan (VFA)

From: Brett Menke [REDACTED]
Sent: Thursday, 19 January 2023 2:18 PM
To: Ewan A Flanagan (VFA)
Cc: Toby A Jeavons (VFA)
Subject: Re: Consultation - Draft 2023/24 Eastern Abalone Zone Total Allowable Catch
Attachments: image001.png; image002.jpg; image003.jpg; 1_Letter_EZ Stakeholder_Draft Abalone FAQO Eastern + FN_22Dec22.pdf; Draft Fisheries Notice (Eastern) 2023-24.pdf; Draft Further Abalone Quota Order (Eastern) 2023-24.pdf; Draft Harvest Strategy Eastern Zone 2022 Sent to VFA 11 Nov 22.pdf; Eastern Zone TACC meeting - 6.12.22 - Meeting Summary - v.4.pdf; EZ Stock Assessment 2022 - final report.pdf

Hello Ewan,

I own abalone access licence A65 and 5 units and am also an owner and representative of A62 and 20 units.

The recommendations by MRAG should be held in the highest regard and the input by quota and licence owners at the TACC workshop be held in low regard. In saying this EZAIAs current committee is not a true representation of its membership and concern is extremely high in regards to our stock.

I would like the quota for the 2023/24 season be reduced to the minimum 25% that MRAG has suggested. As Cam Dixon has conveyed, our resource is at a tipping point that will likely end following other states into disrepair.

It is the inherent responsibility of the governing body the VFA to exercise its authority and take steps needed to protect our resource and do what the expert scientists are telling us and not bow to the financially driven focus of those that want a minimal quota cut.

These step down cuts have consistently been shown to fail. We need to get ahead of the curve and get drastic. This should have happened 5 years ago if not more and I am distressed watching the demise of a resource for selfish people.

Regards. Brett Menke

On 23 Dec 2022, at 2:37 pm, Ewan A Flanagan (VFA) [REDACTED] wrote:

Dear Eastern Zone Abalone Stakeholders,

Please see attached documentation pertaining to the consultation for 2023/24 Eastern Zone Abalone Total Allowable Commercial Catch.

I hope you had a great Christmas and look forward to working with you in the new year.

Kind Regards,

EWAN FLANAGAN

Fisheries Manager | Marine and Estuarine Fisheries

Victorian Fisheries Authority

2A Bellarine Highway, Queenscliff, Victoria 3225

[REDACTED]
vfa.vic.gov.au

Maddison J Watt (VFA)

From: cam armstrong [REDACTED]
Sent: Tuesday, 27 December 2022 3:59 PM
To: Toby A Jeavons (VFA)
Subject: Eastern Zone Abalone quota 2023/24

Hi Toby hope you have had a great Xmas

Thanks for the quota setting meeting the other day, I think it went fairly well, I think a few of the reefs had the right amount of quota taken off them but I still have concerns with some others.

I have dived Pearl Point for a lot of years now and feel the size reduction to 120mm was wrong and has affected the biomass on the bottom, the reef copped a lot of pressure when the carryover was added late last season. I feel its only about a 15 ton reef and could possibly be even less, it would bounce back with a bigger quota decrease. The Whaleback and the Mueller have both struggled to catch the QRP over the pastor 5 years, at the meeting they were over looked because of the large reductions in the SMU, I feel there only 3 ton reefs now with the urchin damage, and if we wont to build the biomass back.

I also believe Big Rame is only good for 10 ton, and is going to be under pressure from divers chasing large live fish for a better price, we need to be carful.

I now a few other owners were in favour of a bigger decrease in quota (10%) at the end of the meeting and there was a bit of a split between the room (which has never happened before).

Happy to have another chat on the phone when you get back after your break, have a great new year

Regards Cam

Maddison J Watt (VFA)

From: Chris Daniel [REDACTED]
Sent: Friday, 20 January 2023 7:28 AM
To: Toby A Jeavons (VFA)
Cc: Ewan A Flanagan (VFA); Helen Burvill
Subject: RE: Consultation - Draft 2023/24 Eastern Abalone Zone Total Allowable Catch

Dear Toby,

Thankyou for the opportunity to respond to the Draft 2023/24 Eastern Zone Total Allowable Catch.

Whilst it is a disappointing result for the fishery, I do believe a temporary reduction of fishing pressure is a good outcome whilst the present “disruptors” work their way through the fishery. That said, I do believe that a TAC of around 340 ton is sustainable once circumstances return to normal. Undoubtedly, and as you are well aware, Covid markets as well as unusual and extremely prolonged poor environmental conditions have played havoc with our traditional fishing patterns. This has been exasperated by the roster based dive timetabling resulting in the focussing of effort into reefcodes not having the same rotations as historically the case. As a result some reefs need a bit of a rest in order to get going again. Once again, our stakeholders have demonstrated a strong level of stewardship by voluntarily, and temporarily, withdrawing effort for an entire season to enable this at Island Point. On our own. We assume normal fishing here will recommence in 24/25.

However, it needs to be said that the attitude and delivery of the presentation given by MRAG at the workshop in my view was very unprofessional. From mistakes in the interpretation of rollover data to the “timing” graph which attempted to illustrate difficulty in catching the TAC (which from my observation wasn’t even adjusted to reflect reduced TAC’s which theoretically would have made this point even stronger) to the continued reliance on the FIS sites which are now exposed as having a low correlation to Succorfish data. This should have been scrutinised prior to going off on a tangent at a formal workshop (with serious outcomes) and indeed debases much of what MRAG had to deliver. I don’t know why MRAG’s views have changed dramatically recently or if there are any third parties involved yet all its done is create a chasm between where the fishery is and where MRAG thinks it is. We know we have problems at the moment, and that the fishery is going through a difficult phase at present, but instead of having a decent, honest and collaborative discussion this was made impossible once the “we recommend a reduction of 25-50% to get in front of the curve” message was delivered. Management subsequently fell in line with this – even trying to reduce the Airport SMU by 25%. Further, examples were cherry picked to reinforce this argument. Again, in my view, these are not comparable given where the EZ fishery is and the highly cryptic nature of abalone habitat within the zone.

In my view, the fishery deserves better than this. We need adaptive management which is able to respond to the real time performance of the highly variable meta-population of the Eastern Zone. This needs to be unbiased in its delivery – so interventions can go either way in terms of effort based decisions. An equal hand needs to be applied across the fishery.

Thanks for your time,

Chris Daniel

Maddison J Watt (VFA)

From: Dot Hawkins [REDACTED]
Sent: Friday, 13 January 2023 3:44 PM
To: Toby A Jeavons (VFA)
Cc: Ross Davis
Subject: Changes to Annual Quota and Size Limits

Submission regarding changes to Annual Quota and Size Limits

- I agree with an Annual Quota, however, I believe that the Quota for 2023 has been cut too severely.
- I would like to see the re-instatement of a Daily Quota like we had in the beginning
- Divers should be allowed to fish 1 size limit on any reef on any fishing day, this will allow divers to fish on the reefs that are fishing well
- It doesn't appear that to be anyone in Fisheries that can look back at how it was working before fine scale fishing was introduced, this is when the industry started to slip.
- In my opinion fisheries will not recover under the present management scheme.
- This year's quota setting meeting was a joke. No research had been done and Cameron Dixon's behaviour was a disgrace. He put fear into the room without any scientific research to support his statements.

I would be pleased to discuss this further in person if anyone in Fisheries would like to meet.

Regards

Ross Davis

Ewan A Flanagan (VFA)

From: Paul Menke [REDACTED]
Sent: Thursday, 19 January 2023 3:41 PM
To: Ewan A Flanagan (VFA); Toby A Jeavons (VFA); Travis J Dowling (VFA)
Subject: Eastern Abalone Wild Harvest 2023/24 Quota Setting Consultation

Dear Ewan et al,

I, Paul Menke, own 5 units attached to Abalone Access Licence A62.

I would like to see a quota reduction in excess of 25%, depending on the confidence this level of reduction will cause a reversal in the unsustainable harvesting pressure that is currently causing severe decline in the Eastern abalone public resource.

If it is recommended that 50% reduction should be implemented for a robust recovery in the overall biomass, then this should be strongly considered.

MRAG have been contracted to provide experienced recommendations based on factual evidence.

Although EZAIA, CZ and WZ influence has cause last years FIS to not be conducted, past FIS data has shown alarming figures relating to the decline in the overall Eastern Abalone biomass.

MRAG has advised in between 25-50% quote cut in the Eastern Abalone Quota.

These figures have not been given explanation.

By this, is it recommended that a 50% reduction be implemented for a 99% confidence that the over biomass will recover to a benchmark harvest of 20t/20unit licence per annum? etc

I would like to see the overall biomass recover to this figure mentioned above, ie 20t/20unit licence.

This is easily achievable, as the carrying capacity of the overall zone could accommodate 3 times this amount if properly managed and stock and reef recovery programs implemented.

I would like to see stock enhancement programs implemented including re-stocking, closed season for breeding, slot fishing trials, crop rotation (annual reef closures) and tagged brood-stock trials.

It seems highly irregular, that in the past and present, that recommendations from highly experienced scientists who work in the abalone field, are constantly argued down by un-educated and inexperienced industry members and representatives, to the detriment of the abalone public resource.

A small step down quota reduction management technique is NOT effective, and is very much represented in the declining biomass.

Now the VFA should be taking a hard-lined stance and implementing the key recommendations by MRAG as stated in the stock assessment reports.

Data and information is vital in decision making.

FIS should be expanded and refined (and not dictated by Industry involvement which is clearly detrimental), and VMS and diver data loggers should be mandatory on each vessel/diver.

This resource is at a tipping point and the VFA need to manage the resource appropriately if there is any chance of resource recovery.

In conclusion a quota reduction of the eastern abalone zone should be 25% or higher for any form of suitable recovery. This should be coupled with appropriate rebuilding techniques (not controlled by industry!), anything less in the decision making process would be negligent.

Warm Regards,

Paul Menke
Director



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Ewan A Flanagan (VFA)

From: Rob O'Neill [REDACTED]
Sent: Thursday, 19 January 2023 3:25 PM
To: Ewan A Flanagan (VFA)
Subject: Marlo SMU

Good afternoon Ewan its Rob O'Neill from Marlo diver for John O'Neill lic A64
There are two reefs in the Marlo smu which need a bit of consideration
Most importantly pearlpoint i think that 20t is to much in the current climate and could have a few ton taken off it for next year.
Cape conran could also have a couple of ton less for next year
Both reefs aren't fishing as well as previous seasons and will most likely get some pressure between now and seasons end
Cheers Rob 🐼

Sent from Yahoo Mail on Android