

SEAFOOD INDUSTRY VICTORIA

Fishing for the community

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12 March 2020

Mr Travis Dowling
Chief Executive Officer
Victorian Fisheries Authority
Level 19, 1 Spring Street
Melbourne VIC 3000

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

Dear Travis

I am writing to you in response to your letter of 5 March 2020, seeking SIV's comment on the Draft Fisheries (Commercial Rock Lobster Western Zone and Recreational Bait Net) Notice 2020.

Firstly, I express concerns with these 'administrative error's being contained in the Fisheries Regulations, and then being fixed with annual Fisheries Notices. As you are aware, industry sought many amendments to the 2009 Regulations however these were always postponed to the 'review' of the regulations, which was due in 2018, but extended to 2019. With then the majority of industry comments, requests and amendments were not included, and now feedback from industry is that we are under further regulatory burden and red tape.

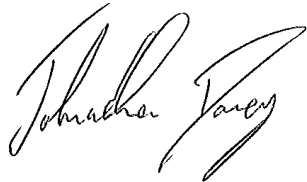
The 'administrative error' for the Western Zone Rock Lobster fishery as it is presented in your letter, in fact provides a red tape reduction for industry, and was widely communicated to all licence holders. And now, through the recent 2020/21 TACC port visits, industry were briefly informed that this was an 'error' that would see amendments implemented.

As far as SIV is aware, there has been no formal communication or consultation with Western Zone Rock Lobster licences by the VFA (aside from the port visits), and therefore SIV has used comments and feedback from licence holders to develop our response. Industry do not see this as an administrative error, and do not support the implementation of the proposed fisheries notice. In current circumstances, we continue to seek opportunities for the VFA and industry to work collaboratively to bring more local Victorian seafood to market, which this allows to happen.

So, while we understand the VFA view this as an 'administrative error', we would like to see this retained as is written in the Regulations as was formally communicated to industry and delivers a red tape reduction.

We hope this is supported by the VFA, and are happy to discuss this with you should wish to. We are here to working behalf of industry, with the VFA to continue to deliver regulation reduction and removing red tape burden.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Johnathon Davey', written in a cursive style.

Johnathon Davey
Executive Director

Cc Mr Dallas D'Silva, Director of Policy, Management, Research and Licencing - VFA