

Luke O'Sullivan
Director of Fisheries Management
Victorian Fisheries Authority
121 Exhibition Street, Melbourne, VIC 3000

By email: luke.osullivan@vfa.vic.gov.au

Dear Luke,

Re: VRFish Support for Fisheries (Portland Bay Commercial Fishery) Notice 2023

Thank you for the opportunity to comment on the proposed Fisheries (Portland Bay Commercial Fishery) Notice 2023. VRFish has consulted widely with our members and the recreational fishing public and found overwhelming support for the removal of specified commercial fishing activities from Portland Bay.

In line with the 27-year VRFish policy on the removal of all commercial netting from Victorian Bays and Inlets, the VRFish Board fully supports the proposed Fisheries (Portland Bay Commercial Fishery) Notice 2023.

VRFish Comments on the Proposed Notice:

According to the Victorian Fisheries Authority *"The notice seeks to ensure that we continue to see all sectors sharing in this precious resource"*.

Recreational fishing within the Portland Bay area is an important and growing component of the region's socioeconomics¹. For example, the 2018-2019 National Southern Bluefin Tuna Recreational Catch Survey estimated over 9000 recreational private boat fishing trips launched from the Port of Portland² during the survey period, not including hundreds of recreational charter fishing trips. It is worth noting that most trips were for recreational fishing within the waters of Portland Bay.

As drafted, Schedule 1 of the Fisheries (Portland Bay Commercial Fishery) Notice 2023 represents less than 5% in total area of Victoria's currently designated commercial net free fishing zones.

VRFish Recommendation 1: That the landward boundary specified as 'Point Danger' in Schedule 1 of the Draft Notice be amended to reflect latitude and longitude marks and that the line from that landward mark extends through the westernmost point of Lawrence Rocks.

¹ Victorian Fisheries Authority has estimated the importance of recreational fishing to the southwest region economy to be over 300 million dollars annually.

² The catch survey estimated 15, 287 recreational boat fishing trips were conducted in total along the southwest coast from Apollo Bay to Portland (4 ports in total). Over 60% of these trips left from the Port of Portland.

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VRFish Comments on the Proposed Controls:

The proposed controls seek to resolve recent concerns raised by the community regarding changed commercial fishing practices in Portland Bay. It is clear to VRFish that several “agreements” have been in place historically, to limit commercial fishing within Portland Bay. VRFish therefore supports the drafting of a new Notice to reflect the wishes of the community in formally resolving the current spatial conflict between the commercial and recreational sectors.

VRFish is confident that the proposed controls will have negligible impact on commercial fish supply to either local or Victorian consumers. Forty percent (40%) of Victorian commercially caught fish landings already occur at the Port of Portland annually, no Ocean Fishery Access Licence holders have fished Portland Bay waters for the past three decades, until a single operator started netting the inshore area recently and who’s operation in any event, supplies bait to the Rock Lobster industry. Other commercial fishing activities occurring within Portland Bay are not in conflict with recreational fishing and are, in the majority, for products that are exported.

The proposed notice has been drafted to:

a) *prohibit the use of mesh nets, trawl nets, seine nets and long lines, in specified waters of Portland Bay at all times.*

VRFish fully supports this objective.

b) *set a catch limit on the take of yellowtail kingfish in specified waters of Portland Bay by Ocean Fishery Access Licence and Victorian Inshore Trawl licence holders, to prevent targeting of this species.*

The recreational Yellowtail Kingfish (YTK) fishery in Portland Bay is an important component of the Portland region’s recreational fishery. The Eastern Australian biological stock is improving and driving growth¹ in a high value recreational sport fishery, especially located within Portland Bay. While genetic analyses show bi-directional movements of Yellowtail Kingfish between Australia and New Zealand, current tagging studies suggest strong site fidelity for SW Victorian Yellowtail Kingfish and these fish are therefore at risk of localised depletion from targeted commercial net and longline fishing within Portland Bay.

The catch limit specified in the proposed Notice (50kg/day) is in line with recent CPUE within the NSW handline fishery and VRFish notes the lack of conflict between NSW commercial and recreational fishers off important YTK aggregations such as South Head Eden, NSW.

VRFish fully supports this objective.

¹ “The species is an iconic recreational fishing target”. <https://fish.gov.au/report/348-Yellowtail-Kingfish-2020>

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c) Hook and line methods, excluding long lines, would continue to be permitted in this area. Other non-net commercial fishing, including abalone, rock lobster, wrasse and pipi fishing would not be impacted by this notice.

VRFish fully supports these exemptions from the proposed notice.

Other VRFish Comments:

VRFish notes Victorian Fisheries Authority policy guidance in both the **Policy for New Commercial Access to Wild-Catch Fisheries Resources in Victoria** whereby the object is:

*“To allow for the commercial utilisation of fisheries resources, subject to addressing certain matters, including sustainability and resource sharing”, and **Commercial Fishing Guide - Western Port and Port Philip Bay Edition 1. Victorian Fisheries Authority (2023)** whereby “Harmonious sharing of our fisheries resources remains a key focus”.*

VRFish suggests that a Statewide policy guide for commercial OFAL operators may be necessary. The continued loss of social license in the commercial sector will not generate the stated aims of the Andrews Labor government in its commitment to the commercial fishing sector, that it can *“continue providing high value premium fresh seafood to Victorian consumers, restaurants and cafes, ensuring supply remains robust”*.

Lastly, VRFish must register our gratitude for Victorian Fisheries Authority’s response to this issue. We were very pleased with the VFA approach and preliminary investigation of a non-regulatory intervention (i.e., *updated Voluntary Code of Conduct*) and the joint approach of VFA, Seafood Industry Victoria and VRFish to resolve the issue. The timeliness and thoroughness of the VFA response is fully appreciated and commendable.

If you require further information, please contact me via email at ben@vrfish.com.au or call 0416945759.

Yours sincerely,



Ben Scullin
Executive Officer
Victorian Recreational Fishing Peak Body

25.09.2023

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