



16th July 2026

Mr. Luke O'Sullivan
Director of Fisheries Management and Boating
Victorian Fisheries Authority
Level 20, 1 Spring Street
MELBOURNE VIC 3001

Dear Luke,

I am writing to you regarding the currently proposed *Draft Fisheries (Abalone Data Logging System) Notice 2026*.

Abalone Council Victoria support the implementation of Succorfish GPS boat loggers and diver in/out loggers for enhancing fine scale data collection in the Victorian Wild Harvest Abalone Fishery.

The success of fine scale management has been clearly demonstrated in the Western Zone, where divers have utilised Succorfish fine scale loggers for a number of years to not only sustainably harvest, but rebuild abalone biomass following two AVG outbreaks.

The ACV Committee support VFA in mandating the use of Succorfish GPS boat position loggers to ensure data is collected by all fishery participants, allowing for a robust, fishery-wide data set to be developed. Having such a detailed data set incorporated into the stock assessment across all Zones will not only increase stakeholder confidence in assessments, but also provide regulators with greater certainty when making important management decisions.

ACV support the inclusion of sub-clause (3)(e), and (4) for operational feasibility. Divers travel immense distances to capitalise on weather windows, especially late in the season when SMU's are closed. In the event of a unit malfunction which cannot be repaired on the spot, divers must retain the ability to undertake fishing operations. Ultimately, the purpose of these units are to log data for science and research purposes, not for compliance monitoring purposes. This should be reflected when authorisations are provided under sub-clause (3)(e), and (4).

To ensure a smooth implementation process, ACV are willing to assist VFA with arranging the logistics and functionality testing of devices. Allowing industry to manage this process and provide the required details to VFA will increase efficiency and reduce administrative burden.

Thank you for the opportunity to comment on the proposed *Draft Fishery Notice*, and if you require any further information from ACV, please contact either myself or ACV Executive Officer Josh Cahill at any time.

Yours sincerely,

Craig Fox
Chairman
Abalone Council Victoria Inc.