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Via email c/o: travis.dowling@vfa.vic.gov.au; luke.osullivan@vfa.vic.gov.au

Dear Travis,

Management arrangements for the Victorian sea urchin fishery

Seafood Industry Victoria (SIV) welcomes the opportunity to provide comment on the letter provided by the VFA referencing management arrangements for *Centrostephanus rodgersii* (black sea urchin) following the meeting between the VFA and Victorian sea urchin licence/quota holders on 28 February 2024 in Lakes Entrance. SIV appreciates the VFA having extended the consultation period to May 17th to provide time for the SIV Board of Directors to offer input into this submission.

SIV shares the VFA's concerns about the impact of increases in distribution of black sea urchin on Victoria's marine ecosystem. It is important that effective long-term management of urchin populations is achieved to preserve kelp forests that provide an important habitat for an array of marine animals, including commercially important species.

To SIV's understanding, despite a large biomass of black sea urchin in Eastern Victoria, the areas that produce urchins with high quality, commercially valuable roe are limited¹. The VFA has provided estimates for harvestable (marketable roe) black urchin biomass of around 4,400 tonnes. Victorian sea urchin licence/quota holders believe that figure is an overestimate given

¹ Worthington, D.G. and Blount, C. (2003). Research to develop and manage the sea urchin fisheries of NSW and eastern Victoria. Final Report to the Fisheries Research and Development Corporation. Project No. 1999/128

volumes of harvestable urchin have already been fished down. To achieve effective decision making that will enhance reef vegetation through commercial fishing effort, the VFA first requires a comprehensive understanding of the spatial dynamics of the fishery. This includes verifying urchin populations on each reef system before those areas are included in distribution or biomass estimates.

Victorian sea urchin licence/quota holders are adamant that limitations on total harvest volumes of black sea urchin to date have been primarily market driven. The viability of urchin fishing is reliant on sufficient market demand to offset the expense of diving operations. The 2016 introduction of subsidisation for commercial black sea urchin harvesting in Tasmania resulted in average annual catch for that State increasing from 50-100 to 550-600 tonnes/annum². The increased availability of urchin roe in the domestic market continues to impact returns for established urchin fisheries on the mainland, although Victorian licence/quota holders have reported a recent positive trend in demand following export approval for multiple urchin processors. Victorian licence/quota holders feel they are well placed to respond to any increases in demand moving forward (see Attachment A – Victorian Sea Urchin Divers Association draft *Centrostephanus rodgersii* strategy).

The Victorian urchin fishery was established in 2014 by creating Individual Transferable Quota units (ITQ's) that provide urchin licence holders with secure access to the resource, offering confidence to invest in their operations and develop a market for their product. The premise of the fishery was to use data-based modelling to set an appropriate total allowable catch (TAC) per quota unit in response to changing species abundance. SIV is concerned that the VFA's proposal to now 'dissolve' ITQ's for black sea urchin will leave Victorian licence/quota holders financially disadvantaged for the following reasons:

- Their fishing rights (ITQ's) and associated financial worth will no longer exist.
- Future access to the resource is not guaranteed. New entrants could monopolise the resource, shutting existing operators out.
- Time spent by sea urchin licence/quota holders over the past 10 years developing their businesses, including efficient methods for harvesting urchins and the creation of suitable markets, may not be of future use.
- Prior investment in equipment and infrastructure to harvest black sea urchin based on secure access to the resource may no longer be of use.

² Cresswell, K., *et al.* (2019). *Centrostephanus* Subsidy Program: Initial Evaluation. Institute for Marine and Antarctic Studies, University of Tasmania.

For SIV to fully understand and assess the implications of the VFA's proposal for the Victorian urchin fishery, and those holding ITQ's for other Victorian fisheries, we ask that the VFA:

1. Demonstrate that robust science/stock assessments are being used to formulate biomass estimates and understand distribution patterns of *Centrostephanus rodgersii* in Victorian waters (both of harvestable and non-harvestable urchin).
2. Provide further detail of the legislative mechanism by which the VFA proposes to remove Individual Transferable Quota units (ITQ's) for *Centrostephanus rodgersii*.
3. Provide further detail on how the VFA proposes to ensure Victorian sea urchin licence/quota holders are not disadvantaged by any future changes to management of the fishery in which they hold commercial fishing rights.

Following provision of the detail above, SIV requests that further discussion be held with members of the Victorian sea urchin fishery to determine a direction that supports effective long-term management of black urchin populations without the removal of commercial fishing rights.

Our PURPOSE: To facilitate, a collaborative network of key stakeholders – across industry, government, researchers and community – to protect our precious kelp forests and marine ecosystems for their important environmental values and the sustainable fisheries they support, through an integrated set of strategies for managing urchin populations.				
Our Pillars	Urchin Industry Development	Research and Data	Technology	Leadership and Partnership
Economic/ Business outcomes	Supporting sustainable business models across the supply chain that deliver shared value.	Gathering market information to support better understanding of demand and capacity to supply.	Exploring the potential of digital solutions to support supply chain efficiency and resilience.	Building trusted relationships across the supply chain that support shared value.
	Exploring opportunities for further value-creation through product innovation (niche shelf stable products, powders, nutraceuticals, etc).	Partnering with research organisations to support product innovation.	Exploring advanced manufacturing/processing technologies.	Facilitating new connections to support innovation and new value-creation.
	Exploring different ways of working to support better supply chain efficiencies (harvesting and processing). Developing new capabilities.		Exploring digital technologies to support better communications across the supply chain.	Facilitating connections to support learning and knowledge exchange.
Environmental Outcomes	Supporting data capture/diver observations for optimised information and knowledge management. Supporting accelerated targeted harvesting as determined by reef/resource assessments and agreed decision-making frameworks	Partnering with researchers to identify key knowledge gaps and build better understanding of the state of our marine ecosystems and management requirements.	Exploring a range of digital technologies for improved data capture, management and shared access (i.e. data platforms). Exploring the effectiveness and efficiency of ROVs and AI to support data capture, harvesting and culling in accordance with agreed locations and strategies.	Working with key stakeholders to support improved resource/reef assessments and decision-making frameworks for managing environmental values and a sustainable urchin fishery. - Exploring Take-All harvesting and other population thinning methods to enhance quality. - Exploring the potential need and role for financial incentives. - Exploring the applicability of the Tasmanian Abalone Investment fund for the Victorian context.
Social / Community Outcomes	Creating a range of new local employment opportunities. Partnering to align niche (sea)food experiences with the local visitor economy – particularly ‘regenerative tourism’.	Supporting collaboration across researchers including community access to research and data and encouraging ‘citizen science’ (proposed Mallacoota Environmental Education and Research Centre)	Supporting community aspirations (through Mallacoota Wilderness Collective) to be a ‘pilot town’ for a range of digital technologies	Aligning as relevant with community plans and interests
Governance and Financial Outcomes	Diversity and stakeholder representation on a governance body to ensure appropriate decision-making and accountability that defines and controls the outputs, outcomes and benefits from projects. A dedicated Eastern Zone Network Facilitator in place to foster connections and collaboration, and develop and deliver projects that support our purpose. A trust fund established to support efficient allocation of resources to projects.			Partnerships supporting access to funding and resources to enable our purpose and strategic focus. Proactively leading, as well as supporting, a range of other relevant partner initiatives.
VALUES				
	COLLABORATION Working together to support shared benefit whilst recognising that sometimes there will be competitive tensions.	INNOVATION Identifying, trialling, implementing and evaluating new ideas to solve problems and leverage opportunities	SUSTAINABILITY Supporting our proud heritage as a fishing community whilst protecting, rebuilding, and maintaining the environment for generations to come	RESPECT Acknowledging that diversity of thinking and deep listening is essential