

29 August 2017

Mr Dallas D'Silva
Director Policy and Licensing
Victoria Fisheries Authority
Level 19, 1 Spring Street
MELBOURNE 3000

Dear Mr D'Silva

Thank you for the opportunity to make a submission on the Draft Fisheries (Victorian Pipi) Notice 2017. Parks Victoria supports the proposed Notice with some amendments.

Firstly, we are supportive of 4 access points as specified below:

- Swan Lake transit corridor
- Nelson Ocean Beach Walking Track
- Noble Rocks Walking Track
- Lake Mombeong walking track from Lake Mombeong campground to the beach at the eastern side of Suttons Rocks

Secondly, we would like to reinforce that access via these points must be in accordance with the **Land Conservation (Vehicle Control) Regulations 2013** and the **National Parks Regulations 2013**. I note that the *Fisheries Act 1995* specifically provides, in s.152(7)(d)(ii), for a Fisheries Notice to make references to provisions in other legislation. I therefore suggest the following Clause be inserted after Clause 13:

XX. Requirement to comply with all Regulations relating to vehicles

An access licence holder intending to take papis or transport papis in accordance with this Notice must only do so in compliance with the provisions of the Land Conservation (Vehicle Control) Regulations 2013 and the National Parks Regulations 2013.

Finally, it is important that Parks Victoria can monitor compliance with **Land Conservation (Vehicle Control) Regulations 2013** and the **National Parks Regulations 2013**. I am advised that s.152(7)(e) of the *Fisheries Act 1995* provides that a Fisheries Notice may confer powers or impose duties in connection with the notice on any person or body and I request that you consider whether the VFA can advise Parks Victoria of any prior reporting notifications under this Notice. This will provide us with an opportunity to monitor access compliance should we need to do so. Previously the secrecy provisions (s.146) of the *Fisheries Act 1995* prevented this from happening. I would suggest a Clause along the lines of:

XX. Notification of prior reporting to Parks Victoria

In accordance with s.152(7)(e) of the *Fisheries Act 1995*, the VFA may notify any officer authorised under the provisions of the *National Parks Act 1975* of any prior reporting under Clause 12 where the access licence holder intends to access land managed by Parks Victoria.

Parks Victoria understands that a Pipi Management Plan will be developed soon. When this occurs, we request that the environmental sustainability of the fishery at Discovery Bay is reviewed. This will allow us to assess the impact of the fishery on the environment of the park, if any. In that plan we also request that a cultural heritage management plan be undertaken to identify culturally significant sites and potential impacts in relation to the fishery.

Should you require further advice on this matter please contact me Ron Waters, Parks Victoria Senior Manager Enforcement and Regulatory Services on 8427 2907, mobile 0459 844 915, email ron.waters@parks.vic.gov.au.

Yours sincerely



Sally Lewis

Regional Director West Region
Parks Victoria