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Dr Sonia Talman
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Dear Sonia

Re: Draft Fisheries (Victorian Pipi) Notice 2017

The Victorian National Parks Association (VNPA) welcomes the opportunity to express our concerns about the nature and implications of the Draft Fisheries (Victorian Pipi) Notice 2017. We are the state's leading community nature conservation organisation that exists to protect Victoria's unique natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

In recent years VNPA has become increasingly concerned with the environmental impacts of pipi harvesting in Victoria's coastal parks. Along with declining pipi stocks, the collateral impacts of pipi harvesting are damage to coastal dune habitats and cultural heritage, the loss of food for shorebirds such as the pied oystercatcher, and the disturbance of beach nesting birds like the endangered hooded plover.

The Draft Fisheries (Victorian Pipi) Notice 2017 proclaims that with the exception of a small area at Venus Bay designated for recreational harvesting, 'All Victorian marine waters are open to commercial pipi fishing except for the Venus Bay Closed Area. Open waters extend offshore for three nautical miles'.

On the face of it, the notice applies to those beaches and intertidal areas in the two-thirds of the coastline managed by Parks Victoria, but in particular the coastal parks at Venus and Discovery bays, where most pips are found, along with the waters of marine national parks and marine sanctuaries, which together comprise 5.2% of state marine waters. As such, we believe that the notice fails to recognise the relevant park management plans, with the Victorian Fisheries Authority overriding the management responsibilities of park, marine and coastal management agencies.

The Fisheries Notice is premature and should be abandoned and only be considered after genuine consultation with Parks Victoria, DELWP, Traditional Owners and the community, and the completion of a comprehensive ecological assessment of pipi harvesting.

Ecological sustainability of pipi harvesting

There have been four field studies of pips in Victoria, with a fifth, a three-year project by John Morrongiello of the University of Melbourne now in its second year. Three (Lewis; Early and Lewis; Parry) of the initial four studies have focused on the pips of Venus Bay, largely in response to concerns expressed by local residents about the impacts of recreational pipi harvesting. The fourth (Versace *et al*) focussed on Discovery Bay. The Versace *et al* study acknowledged there had been pipi stock declines in Venus Bay and Discovery Bay. It stated that:

In Victoria, pipi stocks in the Venus Bay area have experienced a dramatic decline prompting the implementation of reduced catch limits and stock assessment research by fisheries managers. Similarly, evidence of stock declines has also been detected in Discovery Bay in south western Victoria. This region has a long history of amateur pipi collection and as of 2011 this area is now supporting a commercial fishery. Anecdotal evidence suggests a reduction in abundance and average size has occurred during the last decade highlighting the need for stock assessments in the area.

One of the key findings from the Venus Bay analyses was a marked difference in the size structure of the populations in heavily fished and lightly fished areas. In the heavily fished areas the population was dominated by small pipis, whereas in the lightly fished area, the pipis were larger. The lightly fished area at the southern end of the Venus Bay beach, which is seen by scientists as a refuge area that could support pipi recruitment in the heavily fished area to the north, will be available to commercial harvesters under the notice.

When reviewing Lewis and Early and Lewis, students from Victoria University, Dr Greg Parry of Marine Ecological Solutions stated in 2013 that:

As neither Lewis (2010) nor Early et al. (2013) provide any analysis of temporal changes in population size, or any estimate of the total recreational catch, it is unclear how they were able to conclude this fishery is sustainable.

Even so, Fisheries Victoria used the results of the first two studies to claim sustainability for pipi harvesting in Venus Bay, to underpin its Pipis Now and Forever campaign and to justify its promotion of commercial harvesting. The two earlier studies were not assessments of ecological sustainability of pipi harvesting on Venus Bay beaches. Nor was the report by Greg Parry, but he freely acknowledged that was not its purpose.

The current three-year study by John Morrongiello is close to half way though. ABC News reported on 28 March 2017 (Pipis: The unassuming shellfish at the heart of a racially fuelled debate at Venus Bay) that:

'Every time we harvest a population, we're impacting on the biology there, so yes we are having an impact on the pipis', he said.

'What we don't know is how much of an impact that is. So what we've found so far is that there are really good abundance of pipis in certain spots on the beach, but we're tending to find that around the access points there is less pipis available.

'Whether that's a seasonal pattern, or whether that's a harvesting pattern, our research over the next two years will allow us to know what's going on there.'

He said results from this study would help inform how the area was managed.

Based on the available data from the studies mentioned above, there is clearly insufficient information to assess pipi harvesting as ecologically sustainable, contrary to claims by the Victorian Fisheries Authority, and its predecessor, Fisheries Victoria. To assess that requires an ecosystem-based approach, not a narrow single species approach. Now that the notice refers to all of Victoria's coastline and marine waters, such an assessment should be far broader in scope than just Venus Bay and Discovery Bay. As a minimum, the following should be evaluated:

- Status of wild stocks: current population to unfished levels; the extent of overfishing; long-term trends; the habitat range of the species; the current and pre-fished age, size and sex distribution; the effectiveness of management (including management track record, monitoring and enforcement)
- Impacts of fishing on habitats and ecosystems: trophic impacts, physical effects on habitats, spatial and temporal scale of impacts; the effectiveness of management. This would include the physical impacts of beach access on sand dune habitats, the loss of food for shorebirds and the disturbance of beach nesting birds.

Managing coastal parks

Along with preserving and protecting the natural environment, allowing natural processes to continue and maintaining biodiversity, the Venus Bay and Discover Bay two coastal parks aim to provide opportunities for appropriate recreation, education and tourism, including recreational fishing and bait collection. Neither management plan refers to commercial harvesting.

The ecological impacts of pipi harvesting on the values of the Venus Bay and Discovery Bay coastal parks include damage to sand dune habitats and cultural heritage sites, and risks to the enjoyment of other park users. At Discovery Bay, quad bikes have been used across sand dunes causing damage to coastal habitats and cultural heritage sites. Although fines have been issued, the practice continues. The designation by the Authority of three access points in Discovery Bay for commercial harvesters is pre-empting the management responsibilities and decisions of the park manager, Parks Victoria. The notice is also silent on the types of vehicles and haulage devices to be allowed in the fishing operation. Although there are penalties for breaches of the notice conditions, there is no indication of who and what resources will be available to ensure compliance.

VNPA is very concerned that the Victorian Fisheries Authority is making decisions about conservation estate management, in particular in allowing and encouraging pipi harvesting in the parks (and other areas along the coast and in marine waters out to 3nm) and designating access points, without reference to Parks Victoria and the coastal park management plans or the conservation values and needs of Victoria's marine and coastal estate.

The Fisheries Notice is premature and should be abandoned and only be considered after genuine consultation with Parks Victoria, DELWP, Traditional Owners and the community, and the completion of a comprehensive ecological assessment of pipi harvesting.

Parks Victoria must continue to be the sole manager of coastal conservation estate park values and uses with sufficient resources and powers to manage pipi harvesting should it eventually be decided that it as an appropriate use of the coastal parks. The Victorian Fisheries Authority should be consulted on future management approaches but it should not be the decision maker on such matters.

Yours faithfully



Chris Smyth
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Victorian National Parks Association

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