



**SEAFOOD INDUSTRY VICTORIA**  
*fishing for the community*

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10 October 2024

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Chief Executive Officer  
Victorian Fisheries Authority (VFA)  
GPO Box 2392, Melbourne, Victoria 3001

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Dear Travis,

### **Draft Fisheries (Portland Bay Commercial Fishery) Notice 2024**

The VFA cited community concerns regarding fishing practices as the reason for issuing a Fisheries Notice in 2023 prohibiting use of mesh nets, trawl nets and seine nets in a large area around Portland Bay. Seafood Industry Victoria (SIV) advocated for a more appropriate resource sharing arrangement in 2023 and now wish to provide comment on the 2024 Fisheries Notice which proposes continuation of current restrictions. It should be noted that the contents of this submission may not reflect the views of all commercial licence holders, and that SIV supports the VFA considering all views when determining appropriate fisheries management.

The restrictions introduced in 2023, in conjunction with the VFA not refuting unsubstantiated claims that commercial fishing was damaging Portland Bay, confused the public regarding the legitimacy of long-standing fishing methods endorsed by the Victorian Government. This submission seeks to highlight the importance of resource access for the commercial fishing industry and recommend amendments to the 2024 Fisheries Notice that will reduce constraints on sustainable fishing and support availability of local seafood. The VFA endorsing fair access for the commercial fishing industry in Portland Bay will reassure the broader community that the fishing methods in question do not pose a threat to sustainable fish stocks.

Regular seafood consumption is known to support a healthy diet and be effective in reducing the likelihood of several health issues, including heart disease, stroke and depression<sup>1</sup>. The Australian Dietary Guidelines advise eating one or two fish based meals per week, however according to a National Dietary Survey only one in four of us eat fish at least once a week<sup>2</sup>.

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<sup>1</sup> Jayedi A, Shab-Bidar S. Fish Consumption and the Risk of Chronic Disease: An Umbrella Review of Meta-Analyses of Prospective Cohort Studies. *Adv Nutr.* 2020.

<sup>2</sup> The Australian seafood user's manual: making the most of the world's best. Dept. of Primary Industries and FRDC, 2000.

A large portion of Victorian residents consume seafood regularly with most preferring local products based on perceptions of them being fresher and of higher quality<sup>3</sup>. Victorian's who enjoy local seafood who do not hold an interest in recreational fishing or possess the means to engage in fishing activities are dependent on our seafood supply chain. Strong availability of local seafood is also highly valued by tourists. Ninety percent of Victorian tourism operators say tourists expect to eat local seafood when visiting the coast<sup>3</sup>. This in turn contributes significantly to enhancing regional economic resilience and creating employment opportunities. Eighty-five percent of professional fishing's economic contribution to Victoria occurs outside the major urban cities of Melbourne and Geelong<sup>3</sup>.

Sustainable wild caught seafood harvested from Victorian coastal waters using low impact nets includes a wide range of popular species in retail and food-service such as Gummy Shark, Snapper, Flathead (Various), Southern Garfish, Whiting (various), Silver Trevally, Octopus (various), Southern Calamari, Prawns (various), Bugs and Crabs (various)<sup>4</sup>. The catch also includes lesser known and underutilised varieties of finfish that provide a diverse seafood offering across a broad range of price points, such as Australian Salmon, Boarfish, Leatherjackets, Gurnard, Flounder, Tailor, Jack Mackerel, Mullet (various), Blue Warhou and Pike. There is significant potential for sustainable fisheries to meet growth in demand of these underutilised species as they gain greater recognition amongst consumers.

Fundamental to effective fisheries management is the concept of long-term secure access rights that provide confidence to those willing to invest in the industry to continuously evolve operations in response to best practice guidelines. When access to areas that support sustainable fisheries are constrained, viability of those businesses is challenged due to reduced efficiency and increased costs. An unintended consequence for Victorian seafood consumers can be reduced availability of local seafood and a higher dependence on imported product. Approximately 67% of the seafood handled by Melbourne processors, wholesalers or retailers is already imported<sup>3</sup>.

SIV recognises that the marine estate is a shared resource and that management of sustainable fisheries operating near the coast needs to recognise the value that both amateur fishing and professional fishing offer to the Victorian community. The commercial fishing industry supported elements of the 1994 Code of Conduct between local amateur and professional fishers in Portland (Attachment C) being incorporated into the *Fisheries Regulations 2019* - including use of mesh nets being prohibited in an area of Portland Bay, and all nets being prohibited in that same area during peak periods over summer holidays (24 Dec - 22 Jan), Easter and long weekends. Professional fishers also agreed to additional concessions such as respecting local recreational fishing competitions and not proactively harvesting Yellowtail Kingfish.

SIV requests that the draft Fisheries (Portland Bay Commercial Fishery) Notice 2024 be amended to reflect an equitable resource sharing arrangement that ensures the Victorian public and visitors to the State continue to benefit from supply of locally harvested seafood. The following recommendations expand on restrictions to area and gear types reflected in the *Fisheries Regulations 2019*, without

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<sup>3</sup> Valuing Victoria's Wild-Catch Fishing and Aquaculture Industries: measuring the economic and social contributions, University of Technology Sydney, 2020

<sup>4</sup> Victorian Fisheries Authority Commercial Fish Production Information Bulletin, July 2022 to June 2023

prohibiting total access to a very large area that is rarely utilised by recreational fishers outside of school holidays and weekends.

Recommended amendments to Fisheries (Portland Bay Commercial Fishery) Notice 2024:

1. decrease the area where mesh nets, trawl nets and seine nets are prohibited from that specified in Attachment A to that specified in Attachment B, and
2. increase the number of hooks that can be attached to a longline from 50 to 100.

SIV also requests that the VFA communicate with angling clubs and licenced recreational fishers that the legitimate and traditional practices of professional fishers are to be respected. This should encompass a social media campaign highlighting that professional fishers engaged in State endorsed legal activities have the right to operate harassment free.

SIV hopes to work with the Government to grow the supply and diversity of local seafood for Victorians and tourists to our State, rather than see an increasing reliance on imported product from places where fisheries are often not as well managed. This includes support for Victorian commercial fishing licence classes and specialised gear types used to sustainably harvest lesser known and underutilised varieties of seafood that provide a diverse seafood offering to the public. Support for a diverse array of viable fisheries in turn meets the VFA's goal of greater supply of fresh, high-quality Victorian seafood to Victorian consumers.

SIV asks that the VFA consider the recommendations made within this submission to amend the proposed Fisheries (Portland Bay Commercial Fishery) Notice 2024 in a way that supports a fairer outcome for the commercial fishing industry, seafood supply chain and seafood consuming public.

Yours sincerely,



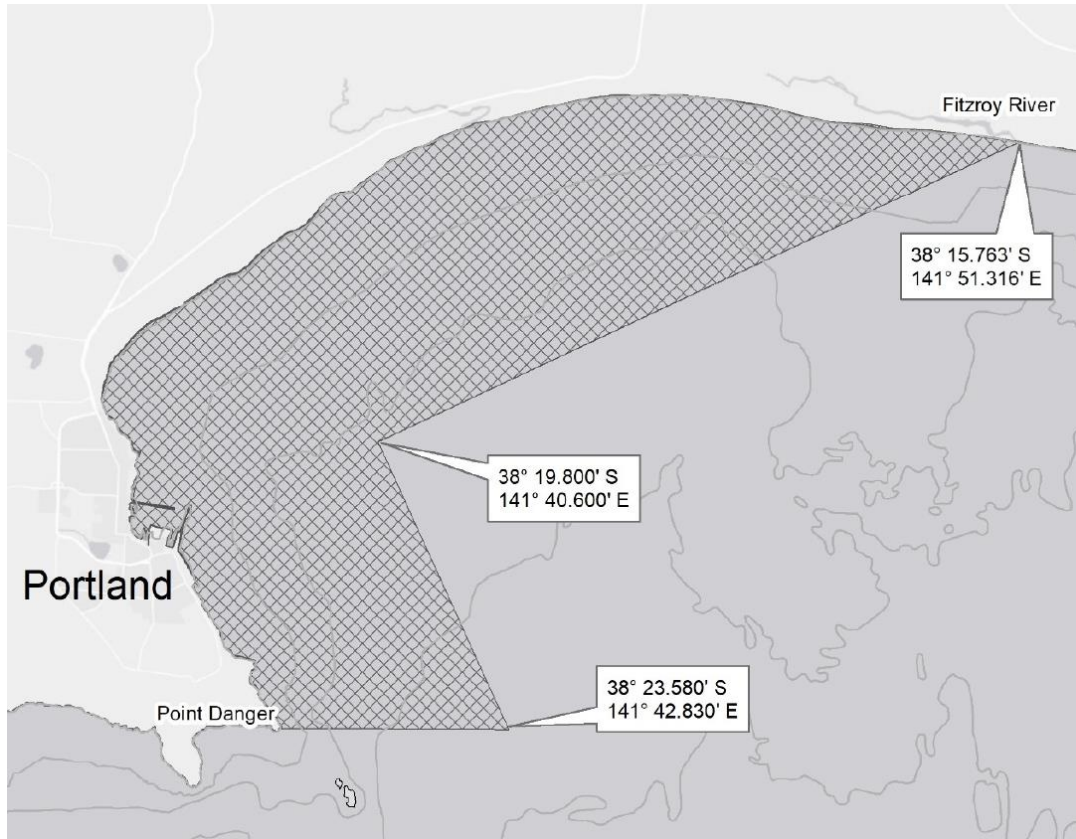
Matthew Wassnig  
Chief Executive Officer

For more information on the contents of this document, please contact:

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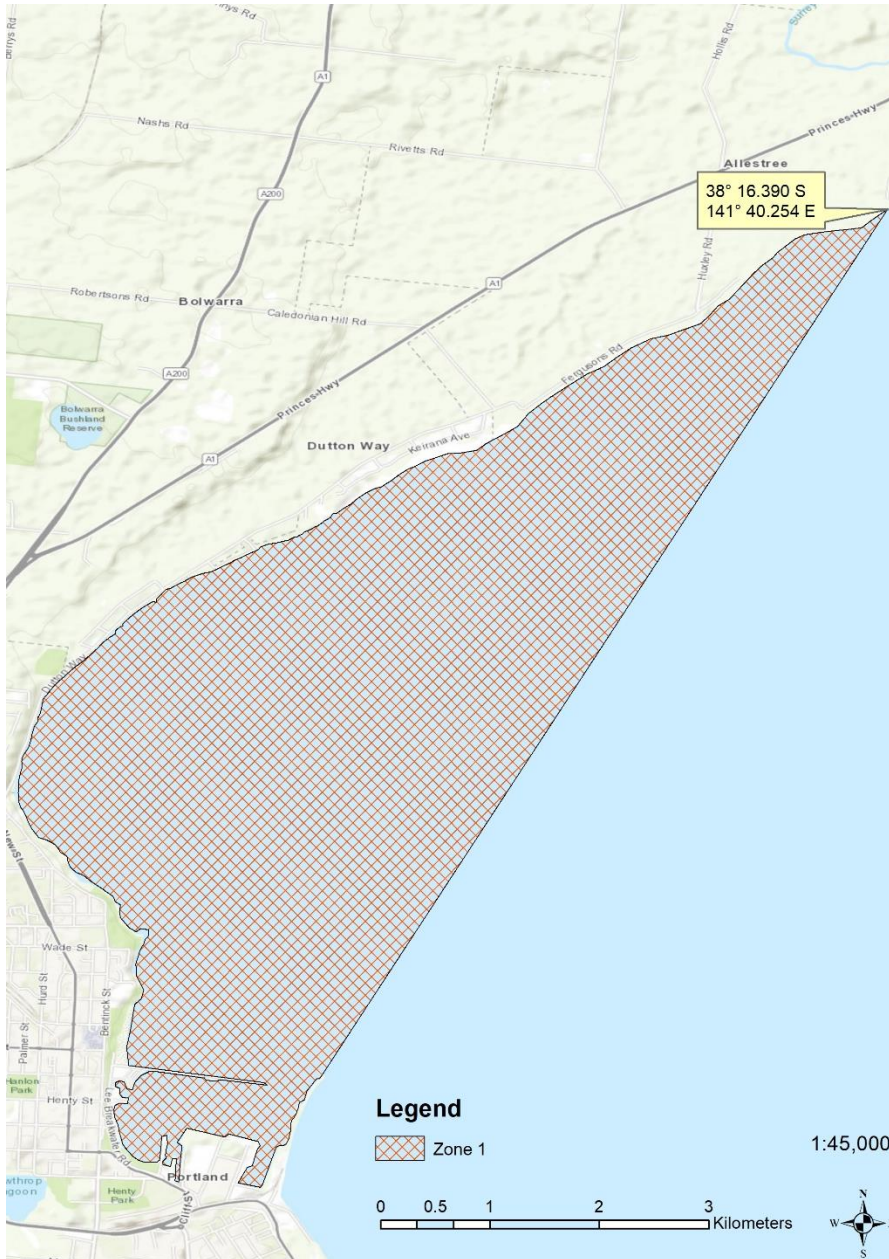
**ATTACHMENT A**

Area around Portland Bay where mesh nets, trawl nets and seine nets were prohibited under Fisheries (Portland Bay Commercial Fishery) Notice 2023.



**ATTACHMENT B**

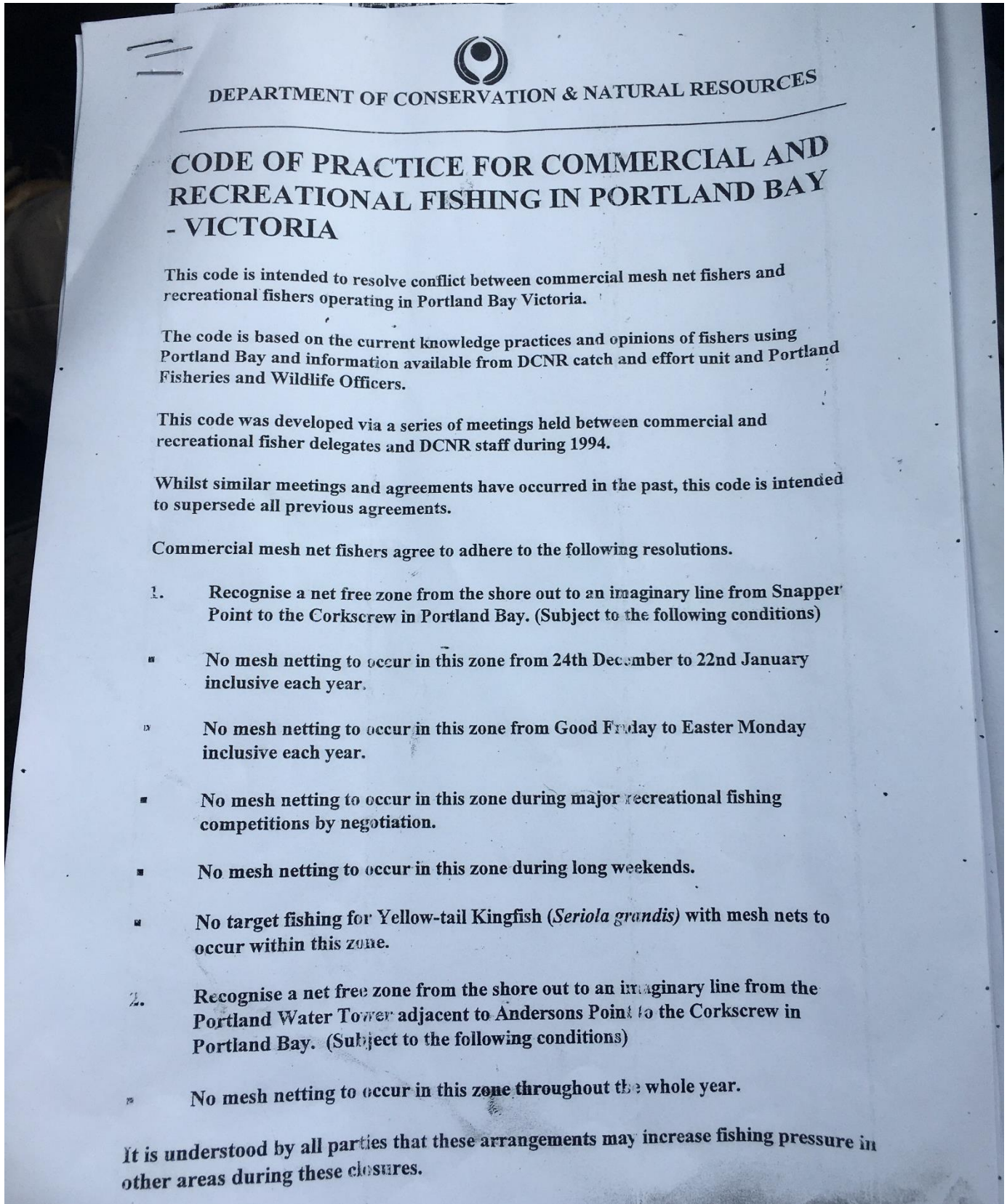
Recommendation for a reduced area around Portland Bay where mesh nets, trawl nets and seine nets are prohibited.





**ATTACHMENT C**

Copy of 1994 Code of Practice for commercial and recreational fishing in Portland Bay.



Recreational fishers agree to support the following practices.

- Foster and encourage others to practice good fishing ethics i.e. take only as many fish as needed.
- Return unwanted fish alive to the sea.
- Dispose of all litter (including fishing line) in an environmentally acceptable manner. i.e. land based disposal.
- Foster and encourage others to recognise the value of commercial fishers in their community.
- Respect the legitimate and traditional fishing practices of commercial fishers.

All delegates support this code of practice and recommend it become state fisheries legislation.

