

Joanne E Klemke (VFA)

From: [REDACTED]
Sent: Tuesday, 5 November 2024 8:44 PM
To: Have Your Say (VFA)
Subject: Draft fisheries (Inshore Trawl Bycatch Management) notice 2024

3/11/2024

**Travis Dowling
Chief Executive Officer
Victorian Fisheries Authority**

RE: Draft Fisheries (Inshore Trawl Bycatch Management) Notice 2024

Dear Travis,

I hope this message finds you well. My name is [REDACTED] and I am the owner-operator of licence number [REDACTED], previously operating under licence [REDACTED], with [REDACTED]. I conduct inshore trawling out of Lakes Entrance year-round, with crustacean fishing being seasonal for approximately five months.

I am writing to express my strong opposition to the latest fisheries notice concerning Inshore Trawl. This is the fourth time we have submitted our ideas and concerns, yet they seem to have gone unaddressed.

Since the 2023 Notice, I have yet to receive satisfactory answers to several questions posed in my previous submissions:

1. Why is this issue arising now when we have historically fished without significant problems?
2. If octopus sustainability is a concern, why was an octopus fishery established without adequate research?
3. Why do our logbooks include gear codes for finfish if our licence is designated for crustacean use only?
4. How was the Total Allowable Catch (TAC) for octopus licence holders determined and allocated?
5. What relevance do the pot fishing practices in Tasmania and Western Australia have to do with our Inshore trawl operations in Victoria?
6. What scientific research has been conducted on the sustainability of trawl fishing for octopus prior to drafting these changes?
7. Can you clarify the administrative error mentioned?
8. Why was there no investment warning issued to stakeholders?
9. Where is it specified that our licence is exclusively for crustacean and that finfish are considered bycatch?
10. If it's a crustacean only license why do we need a bug endorsement on a crustacean only licence?

During my knowledge test, I was not informed that state fish would be categorized as bycatch. I would also like to highlight that in the last eleven years, I purchased two licences, and at no point was it stated that they were restricted to crustacean fishing only. This lack of clarity raises concerns about the legitimacy of the current proposed restrictions.

It is important to note that it's my understanding octopus have a lifespan of roughly 18 months, with females laying eggs in crevices/pots and remaining with them until they hatch, while males forage. This suggests that trawl fishing primarily catches male octopus, unlike pot fishing, which tends to capture females and once the females are removed from the pots the eggs die potentially contributing to stock depletion.

To date there has been no scientific research done on octopus catches from trawl fishing. It seems that you're highlighting a gap in scientific research regarding octopus catches, as well as the reliance on self-reported data from pot fishermen. This situation raises several important considerations:

1. **Data Accuracy:** Self-reported data can be prone to biases and inaccuracies. Fishermen might underestimate their catches, which can lead to **poor management decisions**.
2. **Research Need:** The lack of scientific research on octopus catches indicates a need for systematic studies that can provide reliable data on population dynamics, habitat preferences, and the impact of fishing methods on octopus stocks.
3. **Sustainable Practices:** Understanding the effects of trawl fishing on octopus populations is essential for developing sustainable fishing practices. Research could help in establishing quotas, and other regulations to ensure that octopus stocks remain healthy.
4. **Ecosystem Impact:** Pot fishing often has broader ecological consequences that can affect not only octopus populations but also the entire marine ecosystem. Research can help assess these impacts and inform better fishing practices.

I am also concerned about the lack of discussion regarding pot fishermen's TACs while the VFA proposes restrictive measures that would significantly impact my business.

Additionally, I would like to address the meeting held in August 2024, where I felt unaddressed and disrespected. Despite requesting a meeting prior, this was not arranged. During the August meeting, it was troubling to see a non-trawl licence holder [REDACTED] participating in the meeting and VFA allowing this to happen.

Furthermore, we were told not to refer to individual fishermen by name. However, when [REDACTED] identified "active trawl fishermen" by name, no action was taken. This inconsistency raises questions about the VFA's impartiality and whether these changes are a personal attack on active trawl fishermen.

No minutes were sent out afterward from VFA and there has been no follow-up on the questions raised, particularly those questions VFA were unable to answer. This lack of communication undermines trust and transparency.

In light of these concerns, I reiterate our proposal of a 500 kg trip limit, consistent with Southeast trawl limits. I urge you to make this submission public for transparency.

Thank you for your attention to these matters. I look forward to your prompt response.
Sincerely,

[REDACTED]

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