**Public submissions on the 2020/21 Central Zone Abalone Total Allowable Commercial Catch (TACC)**

| ***Submitter*** | ***Submission*** |
| --- | --- |
| Joel Theodore | This is my response to the proposed TACC and management arrangements for draft. Further Abalone Quota Order (FAQO) and Fisheries (Central Abalone Zone) Notice for the 2020/21 commercial abalone fishing season.  As I stated to Kate Simpson back on the 18th of March 2019 (see emails below) the size limit increase in Cape Liptrap East (16.04 16.05 16.06) and Prom West on the main land (17.02 17.04 and 17.05) would be a disaster and now with less than two months to go in the 19/20 TACC season this has been proven correct.  I again confirm the size limits for Cape Liptrap East (16.04 16.05 16.06) must be 105mm. I confirm the size limits for Prom West on the main land (17.02 17.04 and 17.05) must be 115mm. I am dismayed at a proposed size limit of 130mm at Warrnambool. This area which I fished this year is improving at a size limit of 125mm, why would there be a change? The proposed size of 130mm will exclude a lot of the areas I fished this year. This change would be another stuff up. The size limit at Warrnambool must be no greater than 125mm. |
| Craig Millar | I confirm the size limits for Prom West on the mainland (17.02 17.04 and 17.05) must be 115mm. I haven't been able to fish there at the current size of 120mm.  I don't agree with Cape Liptrap East (16.04 16.05 16.06) being 110mm. We can't fish it at that size. Cape Liptrap East (16.04 16.05 16.06) must be 105mm to allow fishing there.  The same principle for Warrnambool, the proposed size limit of 130mm is too high. This area is getting better at a size limit of 125mm, it does not need to be changed. We need to learn from the mistakes at Prom West, Cape Liptrap East and leave the size limit at 125mm.  Ps. If the sizes go up why do we need closures you can't possibly know what each reef is capable of producing each year. Reefs change every year if the size is right it will protect the reef anyway. The science is there use it maybe ring Duncan. |
| Jason York | Can you please put this into the Central zone consultation process  The reduced catches and catch rates in the Liptrap and prom west mainland smu’s now show some evidence backing my Email.  Further more jumping up 5mm on the shipwreck coast too 130mm will shut down some fishing areas and I strongly oppose  I also oppose increasing the Otway size limit it is getting better really fast with regular catches 700kg up to a tonne a day it’s not broken please don’t try fix it.  **Subject:** **Fwd:  Size limit changes liptrap and prom west**  This was circulated last year about size limits please read and make contact via phone to those who couldn’t attend the meeting mentioned in the email. Their opinion is necessary in this consultation some have lost multiple houses and won’t have computers and currently only two deliveries of mail for the year so phone may be the only contact. On commencing your roll do you get access to all past information Such as this sent to Kate?  **Subject:** **Size limit changes liptrap and prom west**  ﻿ I’m writing this email on behalf of a few divers that work Liptrap, East and Prom West mainland regularly they are Joel Theodore, Doug Boyle, Sean Buck, Toby Hoskin and myself in response to your email Friday with grave concerns about the proposed size limit changes at Cape Liptrap East and Prom West Mainland.  Cape Liptrap East (16.04 16.05 16.06) this season had a combined catch of 9561kg.  Between the divers mentioned above we had a combined catch of 9414kg or 98.4% of the TAC  NONE of these guys want the size increase as we all feel 110mm will shut the Liptrap east Fishery   The same goes for Prom West on the main land 17.02 17.04 and 17.05 we had a combined total of 10tonne of the 14tonne caught or 71.4%  we all feel 120mm will shut the mainland too! And move all efforts to the Islands that won’t sustain 20tonne TAC for the SMU Both these areas have been stable or improving over the last 8 years so our recommendation would be to leave them as they have been.  Liptrap East at 105mm Prom west mainland 115mm  It was made very clear at the TAC work shop that the status Quo should be maintained in these areas for size limits and quotas  Regards Jason York |
| Aylene Springall | Re Size limit changes Prom West, Cape Liptrap and Warrnambool.  I do not agree with the proposed size limit increase in the above areas. Although I am not a diver, I have spoken to many experienced divers and they have Informed me that if these size increases go ahead, it will make the areas unviable to fish. |
| Natalie Bilborough | I would like confirm that the ***size limits for Prom West on the mainland (17.02 17.04, &17.05) must be 115mm.***  My diver Craig Miller hasn't been able to fish there at the current size of 120mm as those sizes are unattainable.  ***I don’t agree*** with ***Cape Liptrap East (16.04, 16.05 & 16.06) being 110mm.***  This size is unattainable.  Cape Liptrap East (16.04, 16.05 & 16.06) must be 105mm to allow successful fishing there.  The same for ***Warnambool*,** the proposed size limit of 130mm is too high for this area… the abalone aren’t that big there for commercial fishing.  This area is getting better at a size limit of ***125mm, it doesn't need to be changed.***  We need to learn from the mistakes at Prom West, Cape Liptrap East  and ***leave the size limit at 125mm.***  I would also like to mention/confirm that My diver and myself believe that ***reef closures need to stop***. There is no reason to close a reef because someone thought up an amount to close it at…(Not sure where fisheries got that scientific  information from). It seems fitting that when there are no more Abalone at the predetermined  size limits, fishing would cease automatically not requiring the entire reef closure. (self closure you might say).  It sounded, at the last meeting with fisheries, someone was given incorrect or outdated information?  to make TACC, reef closure, and size limit decisions.  I have true faith in the ability of my diver (of 27 years) to give me true and accurate information in regards to the health and sustainability of the Abalone on the reefs he dives. It would be very much appreciated if you would take my above suggestions and bring them to fruition. |
| Jase Swain | The size limit for Prom West on the main land (17.02 17.04 and 17.05) should be 115mm. I havent been able to fish there at 120mm. This change has been completely wrong.  The same with Cape Liptrap East (16.04 16.05 16.06) being 110mm. It is not the correct LML for this SMU. This area is a stunted stock and can only be accessed at 105mm LML.  I disagree with the Warrnambool SMU proposed size limit of 130mm. At 125mm LML the stock is recovering extremely well. The proposed 130mm LML will slow the recovery by putting more pressure into less area as there will be less biomass availible at 130mm. The LML in this area cant be any higher than 125mm |
| Reinhard Strauss | I have just emailed myself & Doug Boyle’s size limit responses shutting industry out of sustainable stocks is unnecessary, all party’s loose quota holders,DPI,divers.  The size limit of 120mm for Prom West is incorrect. My divers are excluded from working the main land (17.02 17.04 and 17.05). **The LML** should be 115mm.  I dont agree with the Warrnambool SMU proposed size limit of 130mm. All the science will tell you it is the wrong LML for this area. The LML has to be 125mm.  I dont agree with Cape Liptrap East (16.4 16.05 16.06) being 110mm. This is the same as the Prom West. 110mm excludes access to the stock. The LML must be 105mm LML. |
| Doug Boyle | The size limit of 120mm for Prom West is incorrect. Coming from Mallacouta, Prom West is a spot I would normally fish but I havent been able to diver there at 120mm. The main land (17.02 17.04 and 17.05) should be 115mm, there is a lot of stock there and 120mm excludes access to the stock.  Same with Cape Liptrap East (16.04 16.05 16.06) being 110mm. I havent been able to dive there because the LML is to high. There is a lot of stock there and 110mm excludes access to the stock. The LML must be 105mm LML.  I dont agree with the Warrnambool SMU proposed size limit of 130mm. Fishing is good at 125mm LML and the stock is recovering well. The LML in this area cant be any higher than 125mm. |
| Sean Buck | The rationale behind a minimum size limit is that it ensures that there is sufficient egg production provided by the abalone population that is smaller than the size limit to sustain the population, even at intensive levels of fishing (Tarbath and Officer 2003). 1  Last year I wrote a commentary on the size limit rational questioning the changes in size limits, sustainability and the absence of best available science used to inform the decision. The size limits below where changed by the Victorian Fisheries Authority (VFA) between the *Draft Fisheries Notice 2019 and the Further Fisheries Notice 2019.*   1. The PROM WEST SMU (reef codes 16.07, 17.02, 17.04 & 17.05) from 115mm to 120mm; 2. CAPE LITRAP SMU (reef codes 16.06, 16.05 & 16.04) from 105mm to 110mm and 3. KILCUNDA SMU (15.03, 15.04 & 15.05) from 110mm to 115mm “2   I stated that the Central zone Abalone Fishery would not be managed in an *ecologically sustainable way* with the VFA increasing size limits in 10 reef codes without the consideration of due process. This has proven to be correct with displacement of fishing effort into half of the Spatial Management Units (SMU’s) triggering upper thresholds and upper limits. This displacement of fishing effort has caused overfishing of the Optimum Targets(OT) in Warrnambool SMU, Cape Otway SMU, Flinders SMU, Phillip Island SMU, Cliffy Islands and Prom East SMU. 50% of SMU’s where fished above the Optimum Target and upper threshold, this is not *ecologically sustainable*. A major cause of the displacement of fishing effort was due to the size limit increases stated above.  *Maintain consistency with current size limits where possible to minimise the impact on catch per unit effort (CPUE) estimates, especially considering that the CPUE is proposed to be used as a performance measure in the future Central Zone harvest strategy*. 3  The changing of size limits without the consideration of the Harvest Strategy reference points leaves the harvest strategy incorrectly informing the catch per unit effort and subsequent biomass estimates.  So what has been learned from 2019 5mm increase in 10 reef codes, very little it seems with the proposed Draft Fisheries Notice 2020:  The PROM WEST SMU (reef codes 16.07, 17.02, 17.04 & 17.05) ***proposed correction from 120mm back to 115mm;*** this will correct a displacement of approximately 13 tonnes of Abalone.  CAPE LITRAP SMU(reef codes 16.06, 16.05 & 16.04) 110mm. The proposed continuation of 110mm will continue to displace 8 tonnes of abalone into other SMU’s. These reef codes must have ***a LML of 105mm*** to support sustainability.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_   1. SIZE LIMIT REVIEW CZ – VFA-2016 2. Legal Minimum Length Ratinal 2019 3. SIZE LIMIT REVIEW CZ – VFA-2016   Warrnambool SMU is proposed to have a 5mm increase in LML, this appears to be a guess and considering the 2019 5mm increases that failed to ensure the *fishery is managed in an ecologically sustainable way* ***1∙25 mm is a appropriate LML considering the Warrnambool SMU is recovering at that 125 LML.***  In conclusion:  I support the The PROM WEST SMU (reef codes 16.07, 17.02, 17.04 & 17.05) ***proposed correction from 120mm back to 115mm:***  ***CAPE LITRAP SMU(reef codes 16.06, 16.05 & 16.04) must be 105mm.*** Last years increase to 110mm has displaced 8 tonnes of abalone into other SMU’S.  The Warrnambool SMU is proposed to have a 5mm increase in LML this will decrease the available area to harvest the proposed OT. This will put more fishing pressure on the high growth areas within this SMU. The proposed 130mm LML is not ***ecologically sustainable. 125mm LML is the appropriate minimum size to promote recovery and sustainability.*** |
| Peter Johnston | I write to convey some very strong views in relation to a number of the proposed LML changes listed in the Draft Fisheries Notice 2020.  For many years I have been a strong supporter of proposed process and the application of the best available science when making decisions affecting the sustainability of our abalone fishery. I welcomed the recent joint decision between VFA and AVCZ to appoint Dr. Ian Knuckey to the position of chair of our Fishery Resource Assessment Group (FRAG). His consummate knowledge of proper process and the application of best available science is clearly what is needed to assist the Central Zone Abalone Fishery on to the optimal path in the future. Along with our Data Collection Program and valuable input from Dr. Duncan Worthington and other experts where necessary, the Central Zone should be able to achieve world’s best practice in research and decision making.  Unfortunately however, prior to the appointment of Dr. Knuckey, we witnessed the introduction of some new LMLs which had not been put through the proper process, with no rigorous science applied. These LML changes just appeared in the final 2019 Fishery Notice. The intention to implement new LMLs without considering the best available science has continued into the current draft fishery notice 2020. I strongly believe that if implemented a number of those new LMLs will cause damage the fishery.  Of the three abalone zones, the Central Zone has a greater range of differing biological abalone sizes interspersed throughout its reef areas. LMLs set without careful consideration to the spatial distribution of varied natural abalone sizes simply focuses effort into smaller areas, while denying access to valuable fishing grounds. This creates the opposite effect to that which was intended.  The specific LML changes I wish to comment on are as follows:  **Shipwreck Coast SMU – Proposed LML 130 (5mm increase)**  There is no justification for altering the LML for this SMU. The existing size at maturity and growth increment data clearly shows that the current LML of 125 is above L50+4.  The current LML at 125, is already set at a very high bar.  Further to this, increasing a size limit in any area by 5mm is a single jump is very poor management, even if an increase was justified, which in this case is not. Our Harvest strategy requires consistency with LML’s over the years in order to provide meaningful outcomes. To propose large incremental increases to any LML, at any time, demonstrates scant understanding and regard for our Harvest Strategy, which took many people many years to develop.  **Flinders SMU – Proposed LML 112(2mm increase)**  This SMU has the greatest range of biologically smaller abalone interspersed throughout lesser areas of slightly larger fish. A 2mm increase in this area can take away access to substantial reef areas. There is nothing to be gained from focusing fishing effort onto smaller areas. It is also worth noting that at the present LML of 110, fishing only really begins at 2-3mm above that limit. Very few fish would ever be taken under 112-113.  I strongly believe that the proposed LML will have a negative impact on the sustainability of this SMU.  **Cape Liptrap SMU – Proposed 110 for both East and West Liptrap. (5mm increase for East Liptrap)**  I strongly oppose the increase in LML to the east side of Cape Liptrap.  The current LML of 105 was determined after careful consideration in a join effort by Fisheries Vic. and Industry following the Cap Liptrap Eastern Side Stunted Stock Survey, undertaken in 2007. To date there has been no further study to supersede that project. The only reason I have seen for altering the 105 LML is to achieve the notion of a single LML for each SMU. Convenience and small cost savings are no valid reasons for reducing fine scale management, adversely affecting sustainability by focusing fishing to smaller areas.  **Prom West SMU – Proposed return to 115 for Prom West Mainland.**  I fully support the proposed LML of 115 as I believe this will allow a more balanced spread of fishing effort between the mainland and the islands. The alternative 120 will only create a shift of effort to the islands which is detrimental to the sustainability of this SMU.  I believe all other LMLs altered for the new fishing year should be subject to a proper science review undertaken by the FRAG in the near future. |
| Murray Petersen | I am writing this submission regarding the size limit change at Prom West from 120mm back to 115mm.I feel that the 5mm increase last year was to much to quick and a 2mm increase would have been more appropriate to let the fish grow through at their own pace.I read with dismay that it is being reduced back to 115mm for the coming quota year.I believe this is too far and my reasons are as follows:  The area has essentially been closed for 12 months and a large percentage of those 115mm fish would have grown through during the course of the last 12 months.We will never be in a position to take advantage of this growth again.I have witnessed it first hand at Flinders and Phillip Island and the Back Beach.Divers do the hard yards and then it was reduced and 5 years of regrowth was just trashed within 12 months because of peoples greed.I do not want to see 12 months wasted on an area that is showing signs of becoming tired.               The catch out of the Prom this year is way down and while the size increase on the mainland has contributed to it there is still going to be a dramatic shortfall that people will no doubt put down to the virus in China as well.Both will be blamed but the reality is a lack of fish on the bottom.A 117mm size will afford that little bit more protection and will not waste 12 months of regrowth.               I am a diver who listens to people and already divers are talking about going down there and “smashing it out” before the cream is gone.I am hoping to stay in this industry for many years yet and my thoughts are to the future; not a quick injection to my wallet.Its a pity everyone didn't have the same thought process.               As it stands we are roughly down 15 ton on where we were last year.The figures speak for themselves, even with the size increase on the mainland.This time last year it was closed because it had reached its limit so China will be a very convenient excuse that just should not stack up.               I hope you take these comments into reason when looking at this submission. |
| Wayne Preston | Mark thank you for the opportunity to respond to the proposed changes.  My name is Wayne Preston I have been working as an abalone diver in central zone since 1987. In that time I have witnessed mini ebbs and flows of stock, stock assessment and changes within the industry resulting in 33 years of experience.  I would like to express some deep concerns with regards to the increase in size limits in particular Cape liptrap area and the Warrnambool area.  Having been in the industry back around the 2007 years and experiencing the then increase in size limits we found the increases to be most unsuccessful in what was trying to be achieved.  By increasing size limits we found that the diving intensity in small particular areas was increased dramatically as the diving effort worked mostly over the faster growing areas that produced the larger abalone.  When this occurred many of the smaller bays and protected areas were left alone with no fishing effort at all.  Even at the current size limits many of these smaller and weather protected bays struggle to produce reasonable quantities of size abalone. Having said that at least some of them can be harvested and some distribution of effort can be attained.  By increasing size limits we will find that indeed the harvesting effort will be pushed into faster growing areas and the effort in these areas intensified.  This is precisely what has happened in the past. It has resulted in less distribution of effort across the zone.  The theory behind size increases is an attractive one in thought but having experienced it before it doesn't compliment a thorough distribution of effort. By increasing the size limit around the Cape liptrap area will render this particular reef code unfishable.  The stocks of this year's abalone are the best that I have seen for the past few years and seems to be at a stable point.  I think size limits as they are at present reflect good fishing practices with distribution of effort of high importance.  I also think that the biomass of abalone on the bottom should be controlled and governed by quota as has been done in the past. In my 33 years of experience I think this to be is a much more effective path forward. |
| Ric de Vries | Just wanted to let you know that in regards to Prom mainland and dropping the size back to 115mm, does not not make sense to me. I believe that the size should drop to 117mm since the hard work of not fishing there for 2019-2020 has already been done. This at least will leave a little bit more biomass on the bottom for less hardship. Also we already have measures  already made for 117mm. |
| Josh Cahill | Thank you for your letter dated 28th January 2020 regarding the draft Further Abalone Quota Order and Fisheries (Central Abalone Zone) Notice for the 2020/21 commercial abalone fishing season.  Abalone Victoria Central Zone appreciate the opportunity to have input on these important changes.  Please see the attached submission which AVCZ have put together highlighting areas supported and areas we propose changes be made.  I once again thank you for the opportunity to comment and look forward to seeing the final Fisheries (Central Abalone Zone) Notice.  ***AVCZ TACC Submission 2020 attached separately*** |
| Rachelle Quarrell | After consultation with my diver and other industry members, I felt it necessary to outline my concerns. I don’t agree with the Warrnambool SMU proposed size limit of 130mm. My diver advises me the right LML for Warrnambool SMU is 125mm, the same as this year.  The Cape Liptrap East (16.04 16.05 16.06) LML of 110mm has not allowed my diver to work that area. The LML must be reinstated to 105mm.  The same with the size limit of 120mm for Prom West mainland (17.02 17.04 and 17.05). My diver has not been able to work that area at 120mm. The LML should be 115mm.  If you have any questions or concerns, please let me know. |
| Ryan Springall | I dont agree with the Warrnambool SMU proposed size limit of 130mm, it is to high. This area is improving at 125mm LML there is no need to change this LML from 125mm.  The size limits for Prom West on the main land (17.02 17.04 and 17.05) has to be 115mm. There has been very little fishing there at the size of 120mm.  Cape Liptrap East (16.04 16.05 16.06) being 110mm is completely incorrect. There has been very little fishing there this year at that increased size…..  Cap Liptrap East (16.04 16.05 16.06) must be 105mm. |
| Rohan Smith | The size limits for Prom West on the main land (17.02 17.04 and 17.05) should be 115mm. There has been very little fishing this season on the mainland at the size of 120mm  I disagree with the Warrnambool SMU proposed size limit of 130mm, it is to high. This area is recovering at a 125mm LML. 125mm is the appropriate LML for this area.  I disagree with the Cape Liptrap East (16.04 16.05 16.06) being 110mm. There has been very little fishing there this year at that increased size  Cap Liptrap East (16.04 16.05 16.06) must be 105mm to allow us to fish this area. |