East Gippsland wild caught fisheries eels and carp group

Submission for draft E.M.P.

1. The E.M.P. does not recognise that there are 4 different eel fisheries in Victoria and that these 4 fisheries should and need to be governed by different regulations. This was acknowledged in the 2002 E.M.P. and should be inclusive in 2017 E.M.P. The 4 are, Public culture, Private culture, Wild shortfin predominantly in west vic., and Wild Longfin in East Gippsland. All these different fisheries cannot be governed under the same regulations.

The lonBfin fishery operates in Gippsland mainly on inlets connected to the sea. These fish can grow to 10 kilo plus and different nets are required to shortfin which mainly sell uP to 1:2 kilos. By catch is also different to by catch in west vic. With many estuaries in Gippsland, garfish,

flathead, small bream, bass and many other recreational species become entangled in the traditional west vic. Eel designed nets which cause conflict with recreational fishers. With synthetic nets, instead of nylon and a larger mesh size, many of these recreational species will survive undamaged in the nets while many will swim through the larger size mesh and back into the environment undamaged. These nets have been used in Gippsland for approximately 15 years and have the support of local fisheries officers.

We believe this gives support to enforce these larger mesh and synthetic nets in East Gippsland in the form of regulations. Mesh sizes should range from cod end 25mm, mouth to cod end 37.5mm, wings 50mm. As the longfin are predominantly in east Gippsland, a boundary for the enforcement of these nets is necessary. The franklin river to the south Gippsland highway, with a direct line to the Morwell P.O. and the Princess highway to the NSW border. AII waters internally of those lines should be regulated as a longfin fishery with appropriate nets only excluding permits allocated for the collection of re stock. The area covered is approx. 15% of Victoria.

2.The E,M.P. fails to recognise the difference of permit allocations. Currently there is only a general permit available for the collection of eels excluding glass eels etc, 2 types of permits are needed to ensure fairness in the fishery. A general permit for taking of market eels and a permit for the taking of re stock eels for culture waters in west Vic, with grills to be reduced to 35mm not left at 75mm only for catching of restock permits for short fin not long fin. For too long, permits have been issued to supposedly collect re stock for culture waters but market fish are also being taken at a big rate at the same time including longfin which cannot be cultured under the Western District culture permits, and is sold on the open market competing directly with longfin fishermen in Gippsland. The local longfin market is only small and prices can be seriously affected when longfin is a secondary consideration for some. ln fact, permits issued to collect restock are really another allocated water for some as general permits allow for unlimited operators on these permits which should be limited to 2 operators as is with EA licences, as well as 50 nets per permit, e.g.: if one permit holder has more than one permit this allows the said holder including their EA licence access to a formidable amount of gear in the water at one time. There are 18 EA licences which adds up to 900 nets in the wild caught fishery and under permit there is nine which are active and two under discussion this adds another 550 nets to the fishery, to have a healthy, sustainable, long term industry, industry shouldn't have any more nets than the 900 at any given time, not add more nets to the fishery. The food chain of the longfin is greatly affected by re stock capture of shortfin as shortfin is part of the longfin staple diet. Therefore, restock permits should be granted anywhere in Victoria providing it does not affect the longfin diet. The E.M.P. does not take this into consideration. Proper allocation of re stock permits can rectify this issue without having an impact on the longfin fishery.

3. To close 30% of all waters for migration purposes is a copy of many failed eel fisheries policies including New Zealand. lt has proven inadequate and is only proposed due to the lack of history in Victoria. A total closure of the eel fishery in Victoria through the migrating period would guarantee escapement and in return, waters designated as closed could be reopened for the balance of the year.

4.We should not jeopardise the long fin and short fin in East Gippsland, a percentage of restock for the west should first be sourced from waters there and 30% then sourced from East Gippsland as this affects the food source of the long fin. The Department needs to identify what are restock waters.

5. The Eel management plan must make the Fishery the number one priority not the appeasement of any user group, that is industry or recreational. Without a properly regulated fishery, there will be no fishery in years to come" The only favouritism that should be placed is on the fish stocks themselves to ensure a viable commercial and recreational fishery for our children.

6.As we are the only commercially licenced eel fishermen in Victoria with an export facility and accreditation, we believe that without proper regulation and protection of the fishery, it will be impossible for industry to restore previous overseas markets so badly damaged by our predecessors. With a total of 80 years' experience in aquaculture and wild catch fisheries in Victoria, we believe it essential that both the long fin fishery and shortfin fishery be regarded as a finite source and regulated accordingly. The FISHERY must come ahead of politics and jobs to be viable for future generations.

7. Our main worry is if Appendix 2(section) includes connectivity of EA waters. We understand the issue of culture waters but do not believe that written endorsement from the relevant licence holder, this should not apply to wild caught as EAs are different as the fish are not owned by the fisherman. They are wild stock which is owned by the people of the state. EAs are given the right to fish those waters.

We hope it stays this way.

Ron Porto

Peter lngram

East Gippsland wild Caught Eels and Carp Group

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