**Submissions on the 2018/19 Abalone Total Allowable Commercial Catch (TACC)**

| ***Zone*** | ***Submitter*** | ***Submission*** |
| --- | --- | --- |
| Central | Abalone Victoria [Central Zone] | No Director feedback provided on the draft FAQO or Fisheries Notice.  AVCZ Directors support revised threshold and limits for the three SMU however this is concern that such change have the potential to create confusion and therefore AVCZ requests that the VFA commits to effectively communicating any proposed changes if implemented. |
| Eastern | Chris Daniel | I write in reference to the above and thank the VFA for the opportunity to engage in the current quota setting process. Whilst the quantum of quota forgiven (potentially) was commercially relatively minor it is the way in which it was arrived at to me is concerning.  I state this because as you know, in a wild and dynamic environment all our reefs fluctuate from year to year, as well as the effort applied due to all the usual reasons. Abalone reefs are not producing widgets as if on some biological production line. They ebb and flow. However, when we come to our reef by reef assessment in early December( remembering this is only 2/3 rds of the way through a quota year) it has become blatantly clear that a reef which is producing above its projected output from 12 months hence, we simply say we’ll leave that one as is. Alternatively, when we discuss a reef which is under its projected output, alarm bells start ringing and we reduce our projected output for the following quota year. This naturally imparts a negative bias on any quota outcome achieved at these meetings. We leave the peaks and take the troughs. I have no doubt that if these workshops had been in place since 1988 (the introduction of quota based management) we’d be in a lesser position than the one in which we find ourselves at present.  Another aspect which is concerning is the aged information brought to the meeting by VFA. A clear example of this is the Reefcode 22.04 which in season 15/16 fished beneath its allocated target. This year however its 7 ton over with quota still in the water. This more than outweighs the cuts made at the Benedore and the Gunshot, and is simply a natural rotational feature of the fishery. This amount more than balances the 6 ton lost on the other prementioned reefs however we still get a quota cut. This issue needs to be addressed in order to optimise the functioning of the Workshops.  There are also errors in the Workshop Summary as supplied by VFA. Table 4 in the EZ Summary states in the commentary in the Marlo SMU that “The size reduction has made fishing easier as there is no locking out of effort” . This is diametrically incorrect. Fishing is more sustainable now as there is no locking IN of effort. Whoever wrote that down got it wrong. Locking in occurs when a reef is by Fishery Notice an “island” site and effort can’t move on once CPUE drops beneath a normal level. This creates abnormal effort which is less than ideal ( whilst coming from different approaches, it has the same effect as targeting big abalone where low CPUE’s are ignored in order to highgrade). Also, the wrong size limit is listed in the Mallacoota West SMU. My copy has it at 120, when in actual fact it’s 125. It’s important to get this stuff right. It is also important to note here as well that returning Pearl Point (22.08) to its normal size is a big tick. Yield has spiked a bit, but the beauty of a TAC managed abalone fishery means somewhere else is getting a rest. For every 3 or 4 slower growers taken there’s two large ones left somewhere. This is how we optimise this fishery.  Whilst on this point, I would like to further discuss changes made in 2002 which continue to dog this fishery. Whilst increasing sizes may be a legitimate management intervention in a non quota controlled fishery (eg a recreational estuarine fishery whereby if a size is increased it may indeed correspondingly increase a spawning biomass. If fishers encounter difficult fishing conditions they in all likelihood elect to forego further effort. There is obvious risk of higher mortality however due to increased catch and release but that’s a separate issue. Assuming a lineal growth rate, and everything else remaining equal, median sizes should increase thereby negating this problem).  Unfortunately though, in a quota controlled fishery, effort is compulsory. In an abalone fishery, with a highly heterogeneous growth characteristic, unless a quota cut is introduced at the same time as elevating entry level fishing effort, an unbalanced effort overlay arises. Also, the incidence of remove and replace is increased with further negative outcomes. Graphing this out is the easiest way to visualize this. Draw a zonal length frequency curve. Start at 120mm and move it through to, say, 200 mm. Plot the curve with size on the x-axis and frequency on the y-axis. That curve is a function of all the collective premium CPUE’s of a fishery over a quota year. In the case of the EZ, the integral under this curve in 2002, was 460 ton. The introduction of habitat loss and Marine Parks scales the whole graph down by a factor which I’ll nominate as 10%. Now move the y-axis to the right and park it at 127mm. [This is what we did in 2002 as well on the back of some gonad development science which has since been recalculated to be roughly 10mm on average less than what the original advice was. This has never been questioned.] The new integral under the LF curve is no longer capable of producing a sustainable TAC. Then frustrate that curve with Fine Scale Management. Anticipated escalation of sizes throughout the resource to refill this integral doesn’t occur. Abalone have too many growth characteristics. This is the precise reason why the former management plan was more sustainable. To the abalone manager, and VFA’s credit, we looked at this last year and at the first meeting it was virtually unanimous just to put it back to how it was before we got led up the garden path. Not sure what happened then but the end result was we ended up with a compromise, “whaddya reckon” outcome that was probably politically acceptable to the broader membership but still maintains a prevailing sizing regime (well over the so called L50 plus 2) with its inherent mis-fishes and skewed fishing pressure. There are latent abundances of abalone stock at Point Hicks, Mueller, Petrel Point, Big Ramme , Sandpatch and the Benedore that simply aren’t being fished, with the corresponding doubling up of fishing effort on both these, and other reefs across the zone. It beats me. Doesn’t it make sense that if you make a critical management intervention and the opposite outcome arises then the changes made would be reversed. I would have thought running an optimized sustainable fishery would have been our first and foremost objective but I honestly believe we aren’t. Some argue the counter-negative “ah well, at least we know what we’ve got under the current system, better that than reverting into an unknown”. Incorrect. We had an existing effort system in place for 30 years, and once combined with a TAC the biomass grew. Even reefs such as Cape Howe, which was fished at 115mm to match the adjoining NSW fishery, fished well even though from my observation had a good sized median sized abalone. Size plays second fiddle. Elapsed time between fishing events (brought about by TAC Management) and cryptic habitat are the major drivers of sustainability of the EZ Blacklip Fishery. No doubt size is in the mix, but the increased focus on it in our zone has been nothing but detrimental. Frustrating effort in order to facilitate size based management is just as problematic.  On a more positive note, I welcome the current increased level of interest of attempting to track the success, or otherwise, of abalone spawning events. Hopefully we will be able to use any factual outcomes from such investigation as an important lead indicator in future decision making management decisions akin to what they do in other high value fisheries. Paul McShane started this work back in the 80’s so hopefully we can build on this platform using 2018 technology to drill right into this. To me, in this era of increased climate variability, knowledge around rises in temperature and acidification will become more critical as we go forward. We know that in general growth rates slow down as temperature rises, however it doesn’t seem we’re to sure of what happens to spawning in a global warming/acidification scenario. Further, and in particular to the Marlo “block” do high levels of sediment with the consequent algal bloom event, have a negative impact on spawning or settlement? Is there competition? If so, do we lose a year class in abalone stock?  Anyway, I’ve worn out my computer attention span so I will wrap it at that. I understand fully the difficult situation the VFA is in with various views (potentially) that you will receive around this, and any, commercial quota order consultation process. However, above all else, I hope you pay close attention to the historical record (facts) particularly since TAC was introduced in 1988, in assessing how modern fisheries management has impacted on the output of the fishery. |
| Central and Eastern | VRFish | I am writing on behalf of VRFish, the peak body representing Victoria’s 838,000 recreational fishers.  Thank you for the invitation to the advisory forums and opportunity to provide comment. The recreational fishing sector is committed to supporting the rebuilding of Victoria’s abalone stocks.  The stock assessment and deliberations relating to quota setting were consistent and in accordance with the management plan and stock recovery objectives. The proposed changes to quota are very minor and reflect the positive indicators being reported in western waters of the Central Zone. We commend the commercial sector for their commitment towards rebuilding abalone stocks through an evidence-based and precautionary approach. Examples of this attitude is a reduction in Eastern Zone blacklip abalone TACC by 6 tonnes from last year, maintaining the TACC setting for the Central Zone and an increase in the minimum size of commercially caught blacklip abalone from 123mm to 125mm.  As you are aware, the Victorian recreational abalone fishery takes less than 1% compared to the entire TACC when last estimated in 1999/2000. VRFish continues to maintain a policy position to sustainably increase recreational fisher access to abalone alongside improvements to stock levels.  Therefore, it is important to reiterate in these discussions that our sector has long-standing frustration there is no pathway to optimise and enhance our recreational abalone fishery as detailed in our Abalone Open Days (Central Zone) Draft Fishery Notice 2017 submission.  Nevertheless, I would like to thank the VFA in the preparation of the stock assessment reports and conducting industry consultation on this matter. |
| Western | WADA | Please take this email as the official response from the Western Abalone Divers Association to the draft further abalone quota order dated 24/1/18. Our Association fully agrees with the proposed quota amounts for both blacklip and greenlip for the forthcoming season |
| Western | VRFish | I am writing on behalf of VRFish, the peak body representing Victoria’s 838,000 recreational fishers. Thank you for the opportunity to provide comment.  The recreational fishing sector is committed to supporting the rebuilding of Victoria’s abalone stocks abalone stocks. The 2017/18 stock assessment data is demonstrating very positive indicators for the recovery of the Western Zone blacklip stocks. Based on these indicators it is justifiable for an increase in the commercial TACC in accordance with recovery and management plan principles.  We expect the positive outlook for blacklip abalone stocks in the Western Zone to benefit recreational abalone fishers through better catches and satisfaction rates, however there is no data available to demonstrate this. Through our consultation with recreational abalone fishers, we have noted our sector is seeking increased confidence and certainty that the recreational sector is equally benefiting from overall stock recovery during a trend of increasing the commercial TACC. The abalone fishery is a shared community resource and more work is required to demonstrate shared benefits. Therefore, we recommend that recreational abalone fishers are surveyed for their satisfactions rates and management aspirations, in light of a recovering fishery.  There is still uncertainty what is the ‘new normal’ for this fishery post-virus. The recreational fishing sector again reiterates that a cautious approach must be applied to the recovery of the fishery and the setting of harvest levels. |