**Draft Victorian Pipi Fishery Management Plan**

**Submissions received during consultation period 13 May to 13 July 2018 – for publication**

*1.*

From: J. Hackel

I support a "recreational" size limit for pipi of 35mm to maintain and improve a sustainable recreational pipi fishery.

I do not support  vehicle  access to beaches for commercial pipi harvest due to impacts to environment and cultural values.

Costs for a CHMP or associated infrastructure upgrades to support commercial pipi harvesting at Discovery bay should be paid upfront by individual commercial licensees who bennefit - not government/ tax payers!

I do not support  commercial pipi harvest from August to April   due to impacts to beach nesting birds (such as disturbance to Hooded Plovers) during their breeding season.I therefore support a seasonal closure period for commercial pipi harvesting.

I do not support commercial pipi harvest being undertaken during peak visitor periods on the beaches to minimise conflicts with recreational activities such as during weekends, public holidays or school holiday periods.

Thank you,

J. Hackel

*4.*

From: R. Allardice

Maintaining and not downgrading the interest of recreational anglers in comparison with other stakeholders in being able to access pipi should be important to the VFA. The VFA readily acknowledge that pipi as bait is used by many anglers especially those targeting KG Whiting.

I understand that markets and price are beyond the control of the VFA, however, based on my own experience it is obvious that current trends have made it more and more difficult for many anglers to purchase pipi as to has the price that one is called upon to pay.

With the above in mind, perhaps VFA could consider authorised pipi suppliers being authorised to advertise and deal with supplying pipi directly to anglers.

What are your thoughts?

Regards,

R. Allardice

*7.*

From: R. Ronchi

Thank you for allowing me to comment, Ive seen what can only be people destroying the pipi beds along the Victorian coast.

For years I would with my children go to the likes of Golden Beach, Sea Spray and Loch Sport to collect a bag of good size pipi’s to have for dinner. WE would leave the immature pipis as they were next years food.

Ive noticed more and more often immigrants taken everything, I mean everything from pipis no larger that your thumb nail to acceptable sixe pipis and getting away with the destruction of the environment.

At no point have I see have I seen a Fisheries person or actually heard of anybody being fined for this damage. The immigrants are of area and seem to think its funny that there is nothing left. They have destroyed their own countries fisheries and will do the sane here unless controlled.

Please bring in controls, commercial, fisher people care about the resource and will maintain and improve it if possible.

The general public should be targeted and if caught should be made an example of and fined heavily to deter the destroyers that they are.

Thanks

R. Ronchi

*8.*

From: L. Florakx

I’m writing to you to express my concerns regarding the draft Pipi Management Plan as well as the lack of consultation in the process of formulating the Plan.

The recommendation to upgrade the various access tracks to Discovery Bay to allow easy access for motorised vehicles is totally unacceptable. These tracks are part of the iconic Walk known as the Great South West Walk (GSWW) and should remain pedestrian only track. The steering committee has not consulted with the volunteer organisation known as the Friends of the Great South West Walk, who have for decades maintained, improved and promoted the GSWW.

Allowing motorised vehicle access to the beaches along Discovery Bay goes against all the principles of protecting our beaches and is in conflict with existing regulations overseen by various other government bodies. Also by upgrading the walking tracks to allow easy motorised vehicle access for the pipi fishermen will also provide easy and uncontrollable access by anyone else that wishes to do so.

Why should a small number of commercial fishermen improve their financial gain at the expense of the Victorian taxpayers, the local tourism industry and individuals who wish to have an enjoyable experience walking the GSWW?? It is also interesting to note that some of these commercial pipi fisherman have over recent years had a total disregard for the existing regulations and public property and have been prosecuted for doing so.

The steering committee has conveniently ignored the negative impact that motorised vehicles will have on the “experience” of the thousands of walkers who walk on the GSWW annually. This in turn will have a significant negative impact on the tourism industry for the Glenelg Shire.

And finally, where will all this lead to? It is the thin edge of the wedge and the precedent for allowing motorised vehicle access to the Discovery Bay will pave the way for allowing the same to be done at any or all of the beaches along the Victorian coastline!!!

Yours faithfully

L. Florakx

*11.*

From: B. Murrell

I have reviewed the draft pipi management plan and commend you for work
put in to produce the draft.  In saying that I would like to make the
following submission:
Section 5.2 Commercial Fishing - looks to be a comprehensive plan that
was badly needed after observing previous operation by commercial
fishers at Discovery Bay Coastal Park (DB) and should address the issues
re - take and number of harvesters.
Section 5.3 Recreational Fisheries - has only been skimmed over and
needs more consideration re: bag/possession limits and enforcement
having witnessed vast exploitation of bag limits by members of our asian
population at DB.
I believe a vehicle possession limit could address this issue as
complete families of 10 or more, (most not harvesting), arriving in mini
buses and are currently using hand carts, plastic tubs, bags and eskies
to cart out their vast quantities of pipi.  They mostly arrive and are
gone by early morning avoiding detection by fisheries officers and or by
the time fisheries arrive if report is made.
Section 5.3 Traditional Owners - No specific regulations need to be
introduced for this section, (other than to retain no licence for
recreational take), as they are covered by either of the above.
Traditionally they did not harvest for commercial gain, (if they wish to
commercially harvest they obtain a licence), and current recreational
limits is sufficient for recreational use like all other members of the
community.
Thanks for chance to comment.
Regards,
B. Murrell

*12.*

From: M. Hoog Antink

This so-called Draft Management Plan developed by the Fisheries Department leaves very much to be desired. It is cobbled together with a single purpose in mind: facilitating the taking of pipis from Victorian beaches on a professional basis. Pipis first, pipis last, with no consideration of land status. Land managers have been blindsided. It does not mention the environmental, scenic, social, tourist, ecological and biological impacts for good reason, as it is detrimental to all of these. It is dismissive of legal issues in terms of access by not mentioning them.

Locally much of the land is coastal park, which is administered under the National Parks Act and managed by Parks Victoria under the umbrella of the Ngootyoong Gunditj Ngootyoong Mara South West Management Plan developed by Parks Victoria with the assistance of many stakeholders over a number of years. Has this existing Management Plan been taken into account? Not a bit! Has there been consultation with Parks Victoria, DELWP, GHCMA, the Windamara Corperation and other stakeholders? Not at all! Is Fisheries acting as a law unto themselves? It certainly looks that way.

At the heart of this plan and the only thing that makes professional pipi fishing practically feasible and profitable is **vehicular access** **to and vehicle driving on the beach**. This is illegal in Victoria and has been illegal for decades. I have no doubt if it ever would come to a referendum the people of Victoria would want to remain the status quo. Right now and for the last 4 years the law has been blatantly ignored by the professional fishermen and effectively by the department. This is an ongoing issue addressed by Parks Victoria rangers but ignored by the local fishery officers as directed by their managers. Here you have a situation where the National Parks Act is applied by one government agency and arrogantly disregarded by another, two government agencies working against each other.

Vehicles on the beach have a wide ranging impact on the values and issues listed in the first paragraph. Waders like the endangered Hooded Plover, the vulnerable Red-capped Plover, Pied and Sooty Oystercatcher rely for their breeding and feeding - the numerous waders returning from their Siberian and Alaskan breeding grounds in Spring just for their feeding - and consequently their survival, not only as individual specimens, but also as a species, on an undisturbed habitat. That is impossible with constant and regular traffic going to and fro along the beach. Vehicles will not only crush nesting sites and young, but also the micro-biota in the sand parents and young depend on for food. Research elsewhere is very clear on that. Allowing pipi fishermen vehicular access will open the flood gates for the rest of the population. It will drastically impinge on the enjoyment of visitors and walkers of the GSWW. This decision once made would be irreversible.

It is utterly unconscionable what is proposed in this Draft Management Plan, as the environment will invariably suffer severely. Discovery Bay is a coastal park and should be managed primarily for conservation, protection and visitation. It is not the fiefdom of a few pipi fishermen or the Fisheries Department.

This plan is shoddy, incoherent and has many loose ends. They are left hanging, because the proponents themselves are unable or don’t care to come up with solutions. Their only thought is pipis. The fact that they did not work together with the other relevant government agencies on this draft sums up their attitude, which has soaked into the text and the spirit of this document.

M. Hoog Antink

*13.*

From: R. Bartlett

As a recreational angler and Pipi collector in the Discovery Bay area for the 50 years that I been in the area and as the coordinator of volunteer work crews maintaining the Monibeong Inland walking Track between Lake Monibeong Beach and Nobles Rocks Beach for 30 years for the Great South West Walking Group Volunteers.[GSWW]

I am definitely not against the commercial Pipi Fishery but am absolutely against Motorised Pipi Fishery Vehicles [Table 2] crossing the primary dune system and travelling along the beach in the Discovery Bay area. In all of my time fishing in this area there has been no one allowed to legally do as your draft plan assumes right throughout to allow Professional pipi fishers to do .That would be absolutely unfair. Currently these fishers are illegally doing just that every suitable day without your authority and others prosecuting these people.

My Reasons are.

1.I cannot believe that these so called licences were given out in the belief that Motorised Vehicles be allowed without any consultation with the stakeholders in the area.

2. If M.V. are disallowed it would have 2 beneficial effects . It would have a self regulating effect on the industry plus have an enormously beneficial effect on the environment in that given area.

3.If M.V.are allowed legally it will be an absolute disaster for the area and G.SWW. for very little economic gain compared to the detrimental effects it would have.

4. If M.V. are allowed legally the flood gates will open because there will be that much discontent between Rec Fishers and the Pros. for obvious reasons.Illegal use will be worse than it is now, and for these past few years since this industry started and further more who would police the illegal users. From what I see Parks Vic.are that much understaffed it would be impossible for them to do. So as a consequence the public asset would suffer quite badly.

5.As a volunteer for the above group in that area I have witnessed the wilful damage that has occurred to our track infrastructure that this industry has brought since it started with total disregard for the public asset, plus the erosion damage illegal M.V have caused.

6.If Pipi industry M.V. are legally allowed to run on the GSWW it would be disastrous for this world renowned Walking Track.

 Approximately 40kms will be affected. The two are just not compatible. As stated all sorts of vehicles will be traversing this delicate wild remote area.

7.If this Pipi Industry was to cease today it would have very little economic effect on the community. In fact it would be quite beneficial because of environmental grounds.

This industry appears to have no feel for the future just plunder and greed of a public resource.

8.I have walked this wild remote beach many times and am always amazed at what I see each time .This will be spoilt I believe if M.V are allowed, because each legal fisherman is allowed 16 crossings a month by the Draft reasoning. Multiply that by any number of pros it is not hard to work out it could be quite busy on given days .

9.Another concern of mine is the security of lone walkers sometimes female and international will be compromised by legal and illegal M.V. if Pipi industry M.V are allowed.

Thankyou for the opportunity to participate in the Feedback to the Draft Plan of yours.

Could you please acknowledge the receipt of my submission.

R. Bartlett.

*15.*

From: G. Maguire, BirdLife Australia

BirdLife Australia is pleased for the opportunity to comment on the Draft Victorian Pipi Fishery Management Plan 2018.

BirdLife Australia (formerly Birds Australia) is a highly respected, science-based, not-for-profit conservation organisation. BirdLife Australia is the country’s largest bird conservation organisation, committed to the conservation of over 200 threatened native bird species through multi-species, landscape-scale adaptive management programs. We work closely with natural resource management bodies to improve the trajectory for priority threatened species. With our specialised knowledge and the commitment of our Australia-wide network of 12,200 members, and more than 120,000 volunteers and supporters, we are dedicated to achieving outstanding conservation results for our native birds and their habitats.

We have an extensive ongoing program of research, including our National ‘Beach-nesting Birds’ Program, developed to address the severe impacts of recreational activities on beaches on the breeding of Australia’s native resident shorebirds, and the Shorebirds 2020 program, designed to improve our understanding of shorebird populations in Australia and work towards their conservation and management. Both of these programs are active across the Victorian coast with over 900 registered participants.

The beach-nesting birds program is a model example of achieving balance between coastal access and management of recreationists, and conserving natural values of beaches. Hooded Plovers are a threatened, beach-nesting bird endemic to southern Australian ocean beach habitats. In Victoria, the species is listed (Vulnerable) on the Threatened Species Vertebrate Advisory List (DELWP 2013), with approximately 600 individuals in the population, and is listed as nationally Vulnerable under the Australian Government’s Environment Protection and Biodiversity Conservation Act 1999. Since August 2006, BirdLife Australia’s Beach-nesting Birds program has trained and coordinated citizen scientists to monitor and protect 120 Hooded Plover breeding sites along the Victorian coast. With breeding success lower than 2.5% on unmanaged beaches due to a range of direct and indirect human impacts, the involvement of coastal residents and beach users in conservation of this beach flagship species has boosted breeding success tenfold. The awareness of coastal areas as ‘habitat’ created through this program is having flow on effects for the entire ecosystem and education about a broad range of coastal issues.

The Shorebirds 2020 program has recently been transformed through the development of a Migratory Shorebirds Conservation Action Plan involving multiple stakeholders across Australia. The program works with volunteers and land managers to monitor shorebird populations and the condition of coastal and wetland habitats. Some of the aims relevant to management of the Victorian coast are to:

• Report on both long and short-term population trends of shorebirds in Australia as indicators of coastal and wetland health

• Better understand the relationship between habitat quality and threats to the distribution and abundance of shorebirds

• Make results widely accessible to managers, planners and the community, to aid the conservation and management of shorebirds and coastal habitats including but not limited to RAMSAR sites

BirdLife Australia’s comments on the draft Victorian Pipi Fishery Management Plan

The Victorian Fisheries Authority has an opportunity via the Victorian Pipi Fishery Management Plan to provide a sustainable framework for pipi fisheries in Victoria and to ensure this practice operates responsibly in the broader coastal landscape and minimises conflict with coastally-dependent fauna.

The Pipi Fishery Management Plan should aim to consider the complete suite of impacts of Pipi harvesting in the entire ecological, cultural and social landscape. It is disappointing however that this plan fails to do so in its current draft form. The plan largely considers cultural and social risks, as well as managing the fishery to ensure pipi stocks are sustainable so as to support an ongoing industry. However, the definition of sustainability should be extended to encompass the sustainability of the practice within the coastal environment. Pipi fisheries should be managed in a way that maintains critical habitat values and ensures persistence of populations of coastally-dependent fauna, namely migratory and beach-nesting shorebirds.

The main risks and actions to mitigate these risks considered in the plan are around ‘conservation organisations impacting on social licence for commercial and recreational harvesting’ and around ‘Coastal management legislation or policy preventing/restricting access points for a viable fishery’. Framing this plan around tackling these threats overlooks the source of these risks. Coastal management legislation is in place to manage risks to coastal environmental values and threatened species to ensure their persistence and protection. Conservation organisations are concerned with the broader ecological impacts of harvesting not being adequately addressed and mitigated. If the source of these risks were instead emphasised and appropriately addressed in the plan, potential conflict with existing land management and conservation efforts would be overcome. The definition of sustainability of fisheries needs to be broader than the fishery itself, but to include the sustainability

of harvesting within the coastal environment to ensure persistence of ecosystem function and coastally-dependent fauna.

We recommend that:

The plan increase the risk assessment rating of the following risk to ‘high’ and include a proposed management response for this threat:

• Non-retained species: Commercial harvesting results in unacceptable interactions with threatened, endangered, protected (TEP) species

The interaction between pipi fisheries and threatened species such as Hooded Plover is significant and more common than most other fisheries. Pipi harvesting occurs directly within the zones where shorebirds and seabirds are breeding, foraging and roosting. See image below that outlines the key habitat zones of coastally dependent fauna (taken from Ehmke et al. 2016):

It also typically occurs, for example recreational harvesting within Venus Bay, at the time of year which is the peak nesting period for resident shorebirds and seabirds, and when Northern Hemisphere migratory shorebirds are present in these habitats.

It poses significant threat to these birds via:

- Disruption to the sediment where the birds forage, causing short term loss of foraging opportunities and food availability. For species which are breeding on territories, this short term disruption can have lethal impacts on the survival of breeding birds and their flightless chicks, as they are spatially bound to these territories.

- Direct competition for resources (Purnell 2018). Pipis are a food source for shorebirds, in particular a key prey item for Pied and Sooty Oystercatchers and species of knot.

- Direct crushing of the highly camouflaged eggs and chicks by harvesters on foot or in a vehicle during the breeding months of August to April. There are many breeding pairs of Hooded Plovers, as well as Pied Oystercatchers, Red-capped Plovers and terns which nest on Victorian beaches.

- Disturbance to nesting birds: If the nesting adult birds perceive a threat to their eggs and their young, they adopt the strategy of moving away from the nest or chick hiding location so as to lure away the threat. So, for example, if someone is walking along the beach, the adult birds are likely to move away from the nest and will only return once the person has gone. The eggs and flightless young are vulnerable during this disturbance period to lethal events of exposure, predation and starvation.

- Disturbance of feeding or roosting birds (Purnell 2018). Migratory shorebirds travel tens of thousands of kilometres around the globe to access the Victorian shoreline to feed and roost. Energy intake is critical to making a successful return journey to their breeding grounds to then mate, nest and rear chicks in a narrow window of time. The timing of arrival on the breeding grounds can have significant impacts on the birds’ opportunity to breed and success of the attempt. Thus disruptions to the energy levels of these birds can have significant impacts on their survival and breeding, and impacts at the population level. Disturbance to flocks of these shorebirds generally operates in a cumulative manner to impact the energetic expenditure of the birds.

The main two geographical locations that are mentioned in this plan are Discovery Bay Coastal Park and Cape Liptrap Coastal Park (Venus Bay). In 2014, the twenty-eight parks and reserves managed by Parks Victoria were ranked according to the number of Hooded Plovers they contain (Maguire et al. 2014). Discovery Bay Coastal Park and Cape Liptrap Coastal Park are in the top five parks in Victoria where the species occurs, containing 5.6% and 5.2% of the Victorian population respectively. This is approximately 1% of the total species population and triggers critical habitat criteria under the Environment Protection and Biodiversity Conservation Act. Given human disturbance and impacts of vehicles have been identified as major threats to the species, it is critical that the Victorian Pipi Fisheries Management Plan include risk management responses for operating in zones of threatened species habitat where interactions will be unavoidable. We urge VFA to liaise with shorebird experts including our team of experts who coordinate recovery actions for the species across Victoria and South Australia to establish and communicate best practice protocols for recreational and commercial harvesters to mitigate risk.

While coastal legislation and land management policies have been flagged as barriers to access for the fishery, it must be acknowledged in the plan that these regulations and policies are in place to protect the broader values of these fragile areas, namely environmental, cultural and broader recreational values, and that managing Pipi Fisheries needs to operate within this context. A sustainable fishery should not be at the expense of habitat protection efforts for threatened shorebirds and cannot conflict with current land management requirements, e.g. beach driving is illegal in Victoria.

On page 6 it is noted that “Recreational fishing is primarily confined to the summer months when it is particularly popular and many fishers can be observed doing the ‘pipi shuffle’. Over the 2014/15 summer holiday, Fisheries Officers inspected more than 2,000 people in Venus Bay, which was only a snapshot of those harvesting pipi during this time.”

This level of visitation causes high impact to the nesting Hooded Plovers in this area and occurs at the time of year when these birds have eggs and chicks. It poses a human-wildlife conflict and requires high levels of management intervention. There is a need for better education of recreational pipi harvesters to understand the impact they can have when harvesting as awareness is likely to be very low. This is a pivotal step in shaping more sustainable harvester behaviours. We would hope to work with VFA to ensure better avenues for education and mitigating risks posed by harvesting in the key breeding areas of a threatened species. If the fishery is to be sustainable in these areas, it is critical that:

- All harvesters encounter education about the presence of nesting shorebirds and understand how to behave in proximity to signed nesting zones.

- Nesting and chick zones need to be fenced and signed according to BirdLife Australia’s best practice management protocols (see Maguire 2008 and Maguire et al. 2014) so that these are protected from direct crushing, and so that this is a no-take zone according to a buffer around this fenced/signed area.

- A buffer no-take zone exists that is at least 100 metres in either direction of the nest/central point of the chick zone. The buffer zone may need to be increased based on flight initiation behaviours and the distance limits of disturbance to individual pairs in these zones.

- Preventing harvest within the buffer zone needs to be enforceable.

There needs to be a Threatened Species Threat Mitigation Plan led by the VFA that identifies who the responsible organisations are for monitoring these encounters and responding to install signage and fencing so that buffer zones can be identified and maintained. We are happy to work with VFA to establish such a plan.

Additional comments:

Page 1. Executive summary: “The Victorian Pipi Fishery Management Plan (the Plan) establishes a framework for managing the pipi fishery in a way that ensures that all Victorians can enjoy the resource for generations to come.”

We believe that it is important to include in the Executive summary an aim of the plan to manage Pipi Fisheries sustainably in terms of maintaining and protecting the health of the broader coastal ecosystem, noting that pipis form an important part of the food chain for coastal wildlife and that harvesting occurs directly within key habitat of coastally dependent fauna such as shorebirds and seabirds. This draws attention to the need to balance potential impacts of the fishery from the outset, better educating participants in the fishery.

We support the statement on Page 3 of “adopting a precautionary approach to management, particularly for fisheries with limited data” but think this should also apply to the impacts of the Fishery on the broader coastal environment. Knowledge gaps exist around the Pipi Fishery itself (e.g. how the pipi population responds to different harvesting regimes and size limits, maturity and persistence, etc), but also around the impact of harvesting on the food chain and on shorebirds that forage, roost and breed in these areas. We recommend that this is acknowledged in the plan and that research priorities include impacts on shorebirds.

On Page 3, a key strategy that should be also included is the Victorian Coastal Strategy 2014 (http://www.vcc.vic.gov.au/assets/media/menu\_files/VCS\_2014.pdf).

On Page 5. it is great to see the graphs of days fished against catch, but will there be simultaneous monitoring of estimated population size of pipis to determine whether any identified decrease in pipis being harvested is related to an actual decrease in pipi availability? In 2016/17, days fished was similar to 2013/14, however catch appears significantly lower. This may indicate that the pipi population has decreased in availability.

On Page 6, “The main challenges concerning the recreational fishery in Venus Bay relate to the influx of recreational fishers from Melbourne and elsewhere into small towns with minimal infrastructure (e.g. carparks, toilets, litter facilities). While these matters are not directly related to the sustainability of the fishery, the VFA will work with land managers and local councils to ensure high quality fishing experiences can be enjoyed into the future.”

We would ask that an additional challenge is included in this paragraph to raise awareness of the conflict with threatened species. We would like this paragraph to acknowledge the challenge of establishing and managing a people-free buffer zone around the nesting areas of threatened Hooded Plovers so that they can successfully breed in this high recreational zone.

Page 7, the Risk Assessment process (as mentioned in our main comments above) did not rate the risk of “Non-retained species: Commercial harvesting results in unacceptable interactions with threatened, endangered, protected (TEP) species” highly enough and the plan needs to ensure that there is a risk management response for this risk given its significance.

In particular, the main ‘ecosystem impact’ that a risk management response was formulated for was “Use of motorised vehicles results in disturbance of cultural values.” Use of motorised vehicles will have significant risks on threatened species nesting success and given Discovery Bay and Cape Liptrap coastal parks both contain critical habitat and at least 1% of the entire national population of the Hooded Plover, this will impact on persistence of the population at a national scale.

It is concerning that instead risks of “External factors affecting fishery” are listed as:

• Coastal management legislation or policy prevents/restricts access points for a viable fishery

• Conservation organisations impact on social licence for commercial and recreational harvesting

These statements can be interpreted as though managing the fishery in line with mitigating coastal impacts and maintaining sustainable coastal habitats are social impacts that are barriers to viable fisheries – this is a concerning attitude to relay to recreational and commercial fishers as it perpetuates a negative attitude toward conservation values, land managers and protective legislation. Instead, the risk of ‘Conservation organisations impact on social licence for commercial and recreational harvesting’ could be overtaken by the actual risk to conservation values and by mitigating these risks, the ‘perceived’ social risks of conservation organisations would be negligible.

“Some of the ‘moderate’ risks also identified an impact of the fishery on the ecosystem (i.e. interactions with threatened, endangered, protected (TEP) species, litter from the recreational fishery) and of external factors on the functioning of the fishery (i.e. PrimeSafe requirements, water quality and flow, Ramsar listing etc.). These risks are managed through advocacy and consultation with relevant authorities, where possible, although consultation on ‘high’ risks is the immediate priority for the fishery (Table 2).”

The risks of threats to wildlife are not moderate in our expert opinion based on 12 years of research in to the impacts of disturbance and vehicle impacts. This risk assessment process should have included shorebird experts in order to be accurate and inclusive of key coastal stakeholders. We would request that this impact is escalated to high risk and appropriate management responses are formulated. We are happy to assist Victorian Fisheries in devising appropriate buffer zones and management strategies to ensure threatened wildlife needs are adequately managed. We have already made some suggestions in this submission to assist the VFA.

It is concerning that the proposed management responses for overcoming risks do not offer any mitigation actions for reducing impacts to coastal wildlife, including research to overcome knowledge gaps and to monitor impacts on bivalve dependent fauna, on-ground protection actions such as buffer zones around threatened wildlife nesting sites, and mitigation and buffers around vehicles on beaches.

Legislation in Victoria currently prevents driving on beaches with the exception of accessing boat ramps and management vehicles that are authorised. This has made Victoria’s coastal management superior to that of other states which are currently undergoing intensive reviews of vehicle impacts to coastal habitats, social and cultural values and coastal wildlife, and requiring high levels of investment of resources to mitigate these threats.

Strategy 2 2. “Allow fishing for pipi in a manner that has acceptable ecological impact” needs to consider actual ecological impacts as well as cultural impacts. There has been no effort made to outline mitigation measures for threatened species nor for the broader ecology/coastal fauna dependent on onshore habitats. As mentioned above, we have offered ideas on mitigating risks through formulation of buffer zones and educational strategies.

It has been mentioned that these are “high-energy environments that quickly recover from disturbance” – however it must be noted that if harvesting is occurring regularly in sites where there are nesting shorebirds or key foraging sites for shorebirds, then this disruption has significant and cumulative impacts on the breeding and foraging success of these birds. For example, hundreds to thousands of pipi harvesters operating at Venus Bay in the vicinity of nesting Hooded Plovers lead to complete nest failure and as has occurred already, abandonment of sites.

The Risk Assessment process identified ‘conservation organisations impact on social licence for commercial and recreational harvesting’ as a high-risk scenario. The management response was outlined as “The VFA, in conjunction with SIV, will advocate for the commercial fishery, highlighting management arrangements including limited access and controlled sustainable harvest, benign harvesting methods and high-energy environments that quickly recover from disturbance.”

These are not sufficient actions to mitigate this risk as they are not addressing the source of the impacts to shorebirds and their habitats, so that conservation organisations such as BirdLife Australia will continue to seek legislative interventions and advocate for greater protections to mitigate risks to ecological communities. It is critical that Victorian Fisheries Authority work together with organisations such as BirdLife Australia to work towards an effective management plan that will address

and mitigate these risks. We have offered some suggestions in this submission but look forward to an opportunity to work with you more closely to find solutions.

We support the action “Promote the use of Recreational Fishing Licence funds to support pipi research” as this is highly worthwhile and critical for maintaining a sustainable fishery as well as monitoring impacts on the ecology. We would hope that it also includes research in to the impacts on the food chain and shorebirds more specifically.

We support the action “Provide opportunities for regular engagement with industry, Indigenous, recreational and conservation sectors with fisheries managers” as it is important to ensure there is information exchange between these sectors to enable a sustainable model for the pipi fishery.

Page 13 “The Victorian Pipi Fishery Management Plan Steering Committee (Pipi SC) was established to progress the development of the Victorian Pipi Fishery Management Plan. The Pipi SC was comprised of representatives from Seafood Industry Victoria, VRFish and the VFA. The VFA also invited Traditional Owner Corporations (who provided input via letters and meetings with the VFA), relevant Catchment Management Authorities and the Victorian National Parks Association (who provided input via correspondence) to participate.”

The steering committee has no representation by scientists or experts who can inform and liaise with the group about ecological impacts, in particular on key coastal fauna. On page 13, there is reference to contacting scientists but it is critical to ensure that shorebird specialists have been consulted. This would explain why risks to ecology including threatened shorebirds and seabirds were underestimated and why there have been no adequate mitigation measures included in the current Pipi Fishery Management Plan. We recommend that the steering committee include some representation by experts or at least consult with experts regarding matters that the group does not have the expertise to adequately consider.

Under ‘Section 5.2.6 Gear’ on Page 19 “Mechanical harvesting would remain undesirable, however, considering that the prime harvesting areas are located in Ramsar listed areas and coastal parks and that ‘conservation organisations impact on social licence for commercial and recreational harvesting’ is identified as a ‘high’ risk for the fishery.”

It would be more accurate to provide as reasoning for mechanical harvesting being undesirable the ecological impacts rather again than promoting the idea that concerns are all about the social risks. The risks that should be highlighted are risks of vehicle strike to shorebirds, disturbance of nesting habitat, crushing of camouflaged eggs and chicks, and destruction of foraging habitat and loss and compaction of benthic infauna which are a critical prey source for shorebirds.

Section 5.2.11 considers the application of The Environment Protection and Biodiversity Conservation (EPBC) Act 1999. There is no mention of the impacts on EPBC listed threatened species, namely the Hooded Plover, for which Discovery Bay and Venus Bay form areas of critical habitat for the species, and where the Australian Government’s Conservation Advice for the Hooded Plover specifies “Manage the use of (and access to) key beaches for recreation when plovers are breeding – e.g. discourage or prohibit vehicle access, horse riding and dogs from beaches; implement temporary beach closures; erect fencing to prevent people entering” as key management actions required.

Page 23 5.5 Managing ecosystem interactions

“These coastal environments have significant natural and cultural values, including nesting sites on the beach for threatened shorebirds like the Hooded Plover, Sanderling and Little Tern.”

Please revise wording to reflect the fact that Sanderling do not nest in Australia. Alternative wording should be:

These coastal environments have significant natural and cultural values, including nesting sites on the beach for threatened shorebirds like the Hooded Plover and seabirds like the Little Tern, as well as internationally significant foraging and roosting sites for migratory shorebirds such as the ocean specialists, Sanderling.

Apart from nesting in the areas where pipi are harvested, some species of shorebird, including migratory species, also utilise pipi as a food source.

This needs to be emphasised more because the impacts on shorebirds for which bivalves form a large part of the diet (e.g. Oystercatchers) have the potential to be significant and are a high risk that needs to be considered by the plan. Here, harvesting directly competes with wildlife for the same resources.

Furthermore, and more broadly, disturbance of the upper layers of sediment of the beach, which form the primary feeding zone for shorebirds, is likely to have a significant impact on food availability/accessibility for shorebirds and competition levels within the ecosystem.

We support the actions within the Ngootyoong Gunditj Ngootyoong Mara (NGNM) South West Management Plan to “Adopt measures to prevent impacts to Hooded Plovers and other threatened shorebirds, Aboriginal middens and safety of visitors on access tracks and beaches, such as access restrictions to areas and during the Hooded Plover breeding season from July-August to March-April”.

“The Glenelg-Hopkins Catchment Management Authority, which oversaw the process, has stated that ‘businesses, land owners and day-to-day land users won't be impacted by a successful Ramsar listing, as every element nominated in the application is already protected.” This means that the important natural elements of the park, like threatened shorebirds, are already protected, so existing regulations don’t change with the listing.”

We disagree with this statement as our findings are that the Hooded Plover population within Discovery Bay is experiencing declines (see BirdLife Australia biennial count reports dating from 1980-2014) and we have identified this as a critical knowledge gap. The declines that are being documented over the past decade indicate that the current management of this species within the park is ineffective. It must be noted that while tenure can provide some level of protection to threatened species, it does not act as a blanket protection against all threats these shorebirds experience. Human recreation, vehicle access, dog and horse access are threats that are often increasing in high tenure parks and need to be actively managed.

Page 23. “A key issue for commercial and recreational fishing in Discovery Bay Coastal Park and Cape Liptrap Coastal Park is effective access to the fishing grounds. In Discovery Bay, motorised vehicles have been utilised by some commercial fishers to transport the pipi catch along the beach and from the beach to the car park since 2012. Other commercial fishers have continued to use hand trolleys or to transport the catch in backpacks. In Venus Bay, fishers utilise hand trolleys.

Vehicle access on public land falls within the portfolio of the Minister for Environment, Climate Change and Water and is managed by Parks Victoria and the Department of Environment, Land, Water and Planning. Discovery Bay Coastal Park includes the beach to the low water mark (an ambulatory boundary). Fishers are, therefore, operating in boundaries of the park while transporting their catch through the park and on the beach and are subject to relevant legislation and regulation. The use of motor vehicles off-road in Discovery Bay Coastal Park is prohibited under the Land Conservation (Vehicle Control) Regulations 2013 unless permitted. The use of two-wheel drive and four-wheel drive vehicles, bicycles and motor cycles is prohibited on tracks that are closed to the public under the National Parks Regulations 20133 unless permitted. There is also a long-standing policy of no private vehicle access to coastal Crown land and beaches in Victoria, which was re-stated in the Victorian Coastal Strategy 2014.

There are a number of concerns associated with use of vehicles in coastal parks including the potential impact on threatened species and damage to dunes and native flora.”

“The VFA, in conjunction with Seafood Industry Victoria and land managers will work to improve beach access points, beach access method and beach use by commercial fishers while minimising the impact on the cultural and conservation value of coastal sites.”

It appears as though improving vehicle access to sites is high on the agenda for VFA. However, note that on page 24, it is stated that the sustainability of Venus Bay pipi harvesting is assumed because “There is little recreational fishing, and minimal

commercial fishing, for pipi in this less accessible area.” Access to remote parts of Discovery Bay Coastal Park and Cape Liptrap Coastal Park have offered sanctuary for threatened species and for foraging shorebirds, which otherwise are being heavily impacted by recreational pressures and ease of access elsewhere. Even when access to these remote sites is permitted for a limited number of individuals, the impacts those individuals can have can be devastating to the breeding success of species such as the Hooded Plover.

Vehicle use in Discovery Bay and the Glenelg River estuary has multiple impacts on birds including the Hooded Plovers, the most severe being on the survival of adults and on the survival of eggs and chicks. In this context, a vehicle may be a 4-wheel drive (4WDs), a trail bike, a quad bike, a kite car, a horse drawn cart and sulky, as well as management and research vehicles.

Vehicles also impact the suitability of habitat through compression of the sand and crushing of the invertebrate fauna below the surface, decreasing food availability over time.

Vehicles driven above the high tide mark have a high likelihood of crushing eggs or the crouching, highly camouflaged chicks. Adult birds are also susceptible to being struck by vehicles as they typically run along the sand rather than fly, and are small and cryptic. In low visibility, at night and in inclement weather, the risks of striking the birds is increased (Weston 2003). Chicks are also known to shelter in vehicle ruts, leaving them more vulnerable to being run over.

The Hooded Plover, along with other beach-nesting species, face multiple threats from beach users. In Victoria, the banning of driving on beaches has been highly beneficial to the species conservation plight. In South Australia, vehicles account for multiple nest failures and add to the volume of pressures these birds are facing. In western Victoria, extensive efforts have been made by Parks Victoria, Victoria Police, Moyne Shire and BirdLife Australia to limit illegal vehicle access due to the severity of impacts on shorebirds and their habitat. This has been highly effective and the birds have flourished in the absence of vehicle pressures.

For these reasons, it is very important to limit the use of vehicles along beaches and throughout sand dunes in coastal areas that are habitat to our beach-nesting shorebirds, like Discovery Bay, in line with legislation in Victoria that prevents driving on beaches. It is also important for people who do have limited rights to use a vehicle along the beach to understand the risks of doing so, and to follow BirdLife Australia protocols to limit the threats to nesting birds. Strategies to manage beach access by illegal vehicles are also important to limit impact on birds.

**To conclude**

We hope that the Victorian Fisheries Authority will incorporate our comments to strengthen the effectiveness and sustainability of Pipi Fishery Management. BirdLife Australia works with the key land managers and over 900 volunteers across the entire Victorian coast. We would be pleased for any opportunity to work more closely with the Victorian Fisheries Authority to achieve positive outcomes for maintaining coastal health and sustainability of recreational fisheries. We look forward to working with you in future and hope our comments are viewed as useful and constructive.

Kind regards,

G. Maguire



*16.*

From: D. Langmead

Pipi harvesting in coastal parks may be inappropriate.

VFA should proclaim a moratorium on the commercial harvesting of pipi in all coastal parks across Victoria.

There should be an independent review including:

* The appropriateness of pipi harvesting in coastal parks;
* research into coastal ecological impacts from pipi harvesting – recreationally and commercially on coastal parks and the species protected within them – such as Cape Liptrap and Discovery Bay.
* Ensure Parks Victoria is the sole manager of coastal parks with sufficient resources to ensure parks are protected, and a veto over Fisheries plans.
* Develop a proposed management response to moderate risks identified in the draft plan including the impact on beaches, interactions with threatened and endangered species and cultural sites other than Discovery Bay.

There needs to be an ecosystem-based assessment of pipi harvesting to establish baseline data, and an ongoing monitoring program to enable an ecological sustainability assessment of the fishery (commercial and recreational sectors).

There should be a review of:

* The current bag limits for recreational harvesting
* Introducing a minimum size limit on recreational pipi harvest (in line with other states)

D. Langmead

*17.*

From: S. Dwyer

|  |  |
| --- | --- |
| **Comment** | **Relating to:** |
| What about community members, traditional owners etc. impacting on the 'social licence' for pipi harvesting? Harvesting of pipis (or any activity) only has a 'social licence' if it is considered to be socially acceptable amongst the broad community. In places like Venus Bay, most residents (regardless of their views on broader conservation issues) withdrew the social licence for harvesting pipis almost 20 years ago when it started to become a problem - well-before any 'conservation organisations' even realised what was going on. As has been acknowledged already in the plan, these concerns aren't all centred on conservation, but also relate to lack of infrastructure and other social issues arising from a large influx of people to a small town over a short period. However, if VFA has evidence-based and defendable controls on the fishery (such as bag, size and seasonal limits etc.) the community may just embrace it and give back the social licence for the activity. | Table 2 Risk 4 |
| How can potential of 'localised depletion' of the species possibly be ranked as a 'moderate risk' when it has already been proven to have occurred (section 5.6) with existing regulation in place and 90% compliance? Statements like this are VERY questionable when the risk assessment itself isn't even presented in the document. Either provide some substantive evidence for why this is a 'moderate risk' rather than 'reality' or 'fact' by providing your assessment for public scrutiny, or elevate the risk, to the level it most likely should be. | Footnote to Table 2 |
| The current bag-limits are not supported by any scientific work undertaken to date. In fact, under current bag limits and a 90% compliance rate, the fishery at Venus Bay has been found to be locally depleted, with far-fewer mature individuals in the heavily fished areas. This would suggest to most scientifically-minded people that something in the current regulation needs to change to curb the over-fishing. Of course regulations can be changed in future, but the work done to date shows that current regulation is inappropriate. As such, it should be updated as part of this plan. | Table 3 Strategy 1, Action iv |
| Advocacy will not work until the regulations being enforced are considered to be scientifically supported. 'Conservation organisations' (or concerned individuals not belonging to organisations) will continue to be vocal on this issue until the fishery is secured by sensible, science-based regulation. | Table 3 Strategy 6, Action i |
| As per above comment. | Table 3 Strategy 6, Action ii |
| Yes, correct. Then why has this work not been completed? It seems that a conservative approach is being taken, but how do we know that it really is conservative? How will the review take place? Are we expecting to have further data to base decisions on by then? Where from? I didn't see any research actions above to provide the basis for these periodic reviews... | Section 5.2.3 paragraph 2,3 & 4 |
| This should equally apply to recreational fishers. | Section 5.2.8 |
| This Plan is the opportunity to instate a more conservative approach. And it so far fails to do it. There are a small number of changes that could benefit the sustainability of this fishery both ecologically and socially:1. Seasonal fishing. Allow recreational fishing of pipis outside of peak holiday periods - say, May to October. This would reduce strain on infrastructure and ecological impacts such as litter and erosion from increased visitation from short bursts of high intensity activity on beaches.2. Size limit - The rate at which pipis are taken on the beaches of Venus Bay would arguably compare to commercial harvesting some years. Limiting the size of animals allowed to be kept (in line with the commercial limit of >35mm) would result in a more sustainable outcome for the fishery, and would result in a better outcome for all recreational fishers into the future.Both actions here would go a long way to improving perception of sustainability, as well as providing actual sustainability to the fishery | Section 5.3 |
| This is a bold, and unsupported statement. Reference some work that concludes that current recreational harvesting is sustainable and this statement might be believable. With the scant research done so far, this statement does not hold up. And for that reason, a more conservative approach to regulating the fishery should be taken now. | Paragraph 2 of section 5.5 |
| This is all great, but it also serves to undermine the misguided statement above. | Paragraph 3 of section 5.6 |
| No scores. No decision-making matrix. Not good enough. I am completely unable to see the rationale for how the severity of these risks have been determined - as mentioned in an earlier comment. At least some of these 'risks' are objective realities. I find it simply impossible that an existing issue could be considered a 'moderate risk' without any further controls being put in place. This is a fundamentally flawed risk-assessment.  | Appendix 1 |

*18.*

From: M. Quartley

As a householder at Venus Bay I have seen the enormous pressure placed on the beach environment and the pipi population by recreational harvesters. The prospect of more or less unregulated access for commercial fishermen to beaches on reserves like Cape Liptrap is very alarming. I support the recommendations of the VNPA, that there should be a review looking into the feasibility of:

The current bag limits for recreational harvesting (to reduce recreational harvesting for commercial use).

Introducing a minimum size limit on recreational pipi harvest (in line with other states)

Investigation into the number of recreational harvesters at Venus Bay which could feed into the ecological sustainability of pipi harvesting.

Thanks for your attention to this.

M. Quartly

*19.*

From: B. Harrold

I am more than happy to support the above plan and as outlined on your website.

Sadly I have seen first hand the wanton pillage of our local beach at Venus Bay and am so glad that something is being proposed to manage this problem.

B. Harrold

*21.*

From: M. Buckley

We are residents of Venus Bay and have noticed the downturn in quite a few different species of birds and other wildlife  around our home on the Internet of the Tarwin river in the third estate. Sightings of the hooded plover are now very rare. Stingrays are much fewer along with pelicans and other creatures too many to list. The degradation of our surf beach is not always apparent to the occasional visitor but to local residents we are constantly aware of the radical changes to our shoreline. The wildlife has decreased and the sand has been dug over leaving dirty sand not the pure white squeekey sand that was there before. The sand dunes are littered with nappies toilet paper and human excrement forcing the local wildlife to recede further away from the shore leaving no habitat for existing locals and forcing them nearer to the roads ie swamp wallabies and echidnas .

Our concerns have largely been ignored by the appropriate authorities.

M. Buckley and R. Richards

*22.*

From: A. Diamond

I would like to comment on the Pipi situation in Venus Bay.

I am a daily surfer on Beach 5 and I would like to comment on what I observe.

Harvest amount:

The daily limit may be 2k, but mini buses full of people arrive ( children, grandparents) which enables a family to take 50K+ ‘legally'

I have seen people at the top and bottom of the steps with phones to check all is clear before the haul is brought up in eskys that can hardly be carried by two people.

Environment

Rare Hooded Plovers nest on this beach, and big numbers digging along the foreshore are very disturbing to their habitat. Pipi hunters stretch right up to Coastal Reserve Point Smythe.

Our fragile environment is not planned for hundreds of cars full of people to arrive.I have seen no locals pipes gathering.

Many Pipi gatherers seem oblivious to the environmental rules, often with unleashed dogs, and unaware/uncaring that dogs are defecating on the beach with no clean-up.

Big piles of garbage are left on the cliff car park. Compost toilet left in a revolting mess.

Thank you

A. Diamond

*24.*

From: K. Hadingham

My concerns with the strategy and action plan relate to the limited baseline data available to predict sustainability, the impacts of the proposed increased beach access and commercial operations, and limited engagement with coastal management and conservation entities.

**Limited baseline data of current pipi stocks across the Victorian coastline.**The 2014 FRDC report classified pipi in Victoria as undefined stock due to insufficient information. The background paper also does not provide substantive data of the current stock levels of pipi in all areas to prove widespread pipi harvesting is sustainable. However the strategy 1 actions anticipate that improved catch reporting and VFA overview will provide better information to ensure the overall harvest in the fishery is sustainable. To achieve this, the overview of compliance of the harvesting of pipis across the Victorian coastline would appear a significant task, requiring additional resources. Is this possible?

Without the baseline data for the pipi fishery, it would seem prudent to limit the breadth of the strategy to specific areas.

The Executive summary of the strategy refers “There are also existing, and planned, research projects that will provide information on the stock, including connectivity between pipi populations within Victoria and the broader region.” Inclusion in the Action Plan of information on the specific research program could give the reader some understanding of the work being undertaken to address baseline data deficiencies, provide potential milestones for progressive implementation of the strategy and possibly allay some concerns.

**Social and Environmental Impacts on coastal areas**

I am concerned by the potential impacts on the coastal ecosystem, particularly nesting areas, the food chain for marine life and threatened bird species, coastal vegetation, and aesthetics and amenity for other beach users arising from:

* + increased access points to otherwise pristine beaches
	+ Increased vehicular and equipment access to and operation on beaches
	+ Potential for increased mechanisation to achieve increased harvest yields

The ability of local authorities to enforce the restriction of such vehicular access and operations to licensed pipi harvesting operators would be a significant issue. In particular, the impacts of increased accessibility enabling illegal, unlicensed and uncontrolled vehicles on the beach could well be greater than the impacts of compliant licensed pipi harvesters.

There is also a potential conflict of commercial pipi harvesting operations with recreational activities and tourism attracted by the passive experience of pristine coastal aesthetics.

**Engagement with Coastal Management and Conservation entities**

The strategy and action plan have been developed by stakeholders within the industry for development of the industry; however the draft plan does not appear to address managing the impacts of the industry on coastal management and conservation issues. The strategy appears dismissive of such concerns.
The statement that “Conservation organisations impact on social licence for commercial and recreational harvesting “is seen as a “high risk”” implies to me that (a) commercial operators feel that they have a social right to access and operate on all beaches and (b) conservation organisations are a risk to the pipi fishing industry, rather than that the pipi fishing operations may be a risk to aspects of conservation of the coastal environment. The strategy would benefit from liaison with organisations involved in the management and conservation of Victorian coastal areas, which are not recognised in the background paper.
K. Hadingham

*27.*

From: Victorian National Parks Association

The Victorian National Parks Association (VNPA) is a leading community conservation

organisation and has been advocating for the protection of Victoria’s biodiversity for over

60 years.

We welcome the Victorian Fisheries Authority for this opportunity to comment on the draft

Victorian Pipi Fishery Management Plan and look forward to being engaged further in the

roll out of the final plan.

General Comments

The VNPA recognises the challenges in managing the pipi fishery, particularly in the absence

of a plan, and questions the ecological sustainability of the fishery.

Promoting new pipi fisheries zones for what could be an unsustainable fishery is premature,

without a detailed understanding of the ecological health and sustainability of the fishery.

Cape Liptrap and Discovery Bay coastal parks have long been under pressure from

recreational harvesting and in more recent years, new management arrangements for

commercial pipi fishing. Pipi used to be known just for use as bait until the then Fisheries

Victoria program Pipi Now and Forever campaign, which have been widely promoted as a

tasty table addition, further driving catch and consumption.

Even if the fishery were judged to be healthy and ecologically sustainable, the draft plan

would fail to appropriately manage the fishery’s impacts to protect the social,

environmental and economic values of coastal ecosystems.

VNPA is particularly concerned about the impacts the fishery has had and will continue to

have within coastal parks. Coastal management legislation is in place to manage risks to

coastal environmental values including the protection of threatened species. In addition to

other conservation organisations, we are concerned with the broader ecological impacts of

pipi harvesting not being adequately addressed and mitigated.

To avoid much of these concerns regarding ecosystem impacts, when there is

inconsistencies between coastal park management plans and fisheries management plans –

coastal park plans need to override fisheries management plans.

The draft plan largely covers concerns over “managing the fishery to ensure pipi stocks are

sustainable so as to support an ongoing industry” however we believe this needs to be

expanded to incorporate concerns to the wider ecological impacts from the fishery. It

should not be about ‘sustained yield’, but rather the long term health and sustainability of

the fishery.

Furthermore, the lack of research available on the status of pipi stocks at a state wide level

to inform the sustainability of and management of the fishery is of concern – considering

most of the coast is being subject to commercial fishing. There should be more rigorous

consultation with conservation and Indigenous representatives across the state through the

draft plan development. Continuing to promote the fishery with minimal consideration of

the environmental impacts, are the cause for many of our concerns.

VNPA believes the following are gaps in the plan that need to be addressed:

1. Pipi harvesting is currently and poses future inappropriate uses of coastal parks

2. Commercial pipi harvesting Victoria wide may not be ecologically healthy or sustainable

3. Victoria’s proposed regulation is out of step with other State’s

4. The draft plan is not reflective as a state wide plan as much of the consultation

reflected is location specific, not replicated state wide

5. Little ecosystem wide impacts taken into consideration and mitigated appropriately,

particularly for species protected by coastal parks

To elaborate on our concerns:

1. Pipi harvesting is currently and poses future inappropriate uses of coastal parks

Pipi harvesting could take place both commercially and recreationally in many coastal parks

across the state - two parks already identified under the draft plan – Cape Liptrap and

Discovery Bay coastal parks. Harvesting not only impacts pipi, but also:

impacts from trolleys or other vehicles that illegally operate within these fragile

coastal parks to haul their huge catches up the beach i.e. commercial operation;

other species such as shore birds that use the parks for feeding and breeding;

damaging fragile coastal dune habitats from recreational harvesters accessing the

beach;

loss of food for shorebirds such as the pied oystercatcher;

disturbance of beach nesting birds like the endangered hooded plover

impacts of litter;

recreational uses potentially used for commercial purposes

There is a long-standing policy of no private vehicle access to coastal Crown land and

beaches in Victoria, which was re-stated in the Victorian Coastal Strategy 2014, with the

exception of accessing boat ramps and management vehicles that are authorised. We

support Birdlife Australia statement: “This has made Victoria’s coastal management

superior to that of other states which are currently undergoing intensive reviews of vehicle

impacts to coastal habitats, social and cultural values and coastal wildlife, and requiring high

levels of investment of resources to mitigate these threats.”

As outlined in the draft plan, access points have been developed for commercial fishers to

more easily access the Discovery Bay fishery, and these have been abused by the illegal use

of motorised vehicles on beaches, which is an inappropriate use under the reserves original

purpose. The draft plan states that the VFA will work to improve beach access points and

methods across the state. The illegal use of vehicles on beaches and in the case of Discovery

Bay, sets a bad precedent for coastal management across Victoria - in which 96 per cent of

the coast is publically managed land and vehicle use has been heavily restricted for decades.

Furthermore this also creates issues regarding car parking, road access and increased litter.

The other issue that this raises is where does access for other uses stop. Our coasts are

protected as coastal parks to protect coasts environments, many of which are

representative across the state. As an example, The Cape Liptrap Coastal Management Plan

states:

“The park is assigned the International Union for the Conservation of Nature Category II of

the United Nations List of National Parks and Protected Areas. Category II areas are

managed primarily for conservation and appropriate recreation.”

Some of the management aims for the park worth mentioning are consistent with the

government accepted LCC recommendations and legislation, are as follows:

Preserve and protect the natural environment.

Allow natural environmental processes to continue with the minimum of

interference.

Maintain biodiversity.

Conserve features of archaeological, historical and cultural significance.

Coastal parks were not set up to handle large amounts of commercial activity in the first

place, and were not in operation at the time many coastal park management plans were

created. For example at the time the management plan was completed for Cape Liptrap

Coastal Park, there was no commercial fishery in operation and still the plan does not

specifically address commercial pipi harvesting within the plan.

There doesn’t seem to be adequate consideration in the draft plan of how the fishery

impacts will be managed in the current listed coastal parks where fishing takes place (Cape

Liptrap & Discovery Bay), let alone other coastal parks around the state. Nor is there any

consultation with other Native Title holders or Traditional Owner groups about the potential

impacts on cultural values for areas other than Discovery Bay.

Further evidence to show there has been no adequate consideration of coastal parks is that

there is no mention in the draft plan of the Special Protection Area within the Cape Liptrap

Coastal Park - where no pipi fishing is permitted, see image below.

When there is inconsistencies between coastal park management plans and fisheries

management plans – as there is in this instance, coastal park plans need to override fisheries

management plans, which would avoid ecosystem impacts that conservation groups are

concerned about.

Furthermore, reports from community members to VNPA are suggesting that recreational

harvesters are moving further east to areas such as Nooramunga Coastal Park (McLoughlins

Beach) and adding increased pressure on shellfish populations. Harvesters are also believed

to be bagging large quantities up for sale commercially. Even though these are believed to

be other species of cockle, what is occurring here is a concern of what could happen more

with the pipi. See photo below:

Due to our concerns above VNPA recommends the following management actions:

Establish a moratorium on the commercial harvesting of pipi in all coastal parks

across Victoria including Cape Liptrap and Discovery Bay coastal parks where a

history of fishing occurs. In the time of the moratorium commission an independent

review on:

\_ appropriateness of pipi harvesting in coastal parks;

\_ Research into coastal ecological impacts of pipi harvesting –

recreationally and commercially on coastal parks and the species

protected within them – such as Cape Liptrap and Discovery Bay.

\_ This would include:

\_ The importance of pipi to wildlife as a food source;

\_ Ecology of beach systems in Victoria and the life they

support which helps to recognise the values of beach

environments, not just as a resource to be extracted;

\_ Social, economic and environmental values that are

impacted by harvesting.

Ensure Parks Victoria is the sole manager of coastal park values and uses, with

sufficient resources to ensure that values are protected, and at a minimum a

veto over Fisheries plans.

Develop a proposed management response to moderate risks identified in the

draft plan including the impact on beaches, interactions with threatened and

endangered species and cultural sites other than Discovery Bay.

2. Commercial pipi harvesting Victoria wide may not be sustainable

Commercial pipi harvesting is continuing to be opened up across the state (excluding the

Venus Bay ‘recreational only’ area), when previously there has been little pipi harvesting

done. Our concerns are that these unexplored areas will be promoted and remain open to

commercial fishing, despite the lack of scientific biological baseline data to tell us if the

fishery is sustainable or not.

A report from the Fisheries and Research Development Corporation (FRDC) ‘Status of key

Australian fish stocks reports 2014’ and on their website, has classified pipi in Victoria as

an ‘undefined stock’, as there is insufficient information available to confidently classify the

status of this stock. In South Australia on the other hand it has been classified as

‘sustainable stock’.

It is unclear as to how VFA can conclude that the pipi fishery is sustainable based on very

limited research that has been done, even despite the above FRDC listing. There is only very

limited completed research to date that tells us information about the stock status of pipi,

and that suggest the pipi stocks are sustainable. Most has to do with recreational harvesting

in Venus Bay, and none did a thorough ecosystem-based assessment of pipi harvesting to

establish baseline data of the fishery.

There have been four field studies of pipis in Victoria. Three have focused on the pipis of

Venus Bay, largely in response to concerns expressed by local residents about the impacts of

pipi harvesting. The first was a 2009 study by Zac Lewis for his Honours thesis. The second

was a Recreational Fishing Grants Program project by students Jacinta Early and Zac Lewis,

with Dr Mark Scarr and Dr Carol Scarpaci, published in January 2013 and based on field

surveys in 2011. The third was commissioned by the Venus Bay Community and carried out

by Dr Greg Parry, Director of Marine Ecological Solutions, in 2013. Versace et al conducted

the fourth study at Discovery Bay in 2011 and acknowledged there had been pipi stock

declines in Venus Bay and Discovery Bay.

When reviewing the two previous studies by students from Victoria University in 2013, Dr

Greg Parry of Marine Ecological Solutions stated:

As neither Lewis (2010) nor Early et al. (2013) provide any analysis of temporal changes in

population size, nor any estimate of the total recreational catch, it is unclear how they were

able to conclude this fishery is sustainable. According to the Fisheries and Research

Development Corporation (FRDC) website, the stock of pipis in Victoria is undefined i.e. it

cannot be said to be sustainable under past, current or future fishing pressure because there

is insufficient information on the stock.

It is also noted that Greg Parry’s study was not mentioned in the draft plan.

A previous study that Early et al 2013 acknowledged that developing new access points in

Venus Bay may have implications on stock levels, particularly in the abundance of mature

pipis. Given that providing access to the commercial fishery seems to be a high priority for

the draft plan, we would like to this risk looked at and addressed.

Listed in the appendix 1 for retained species, the draft plan acknowledges the risks to

commercial harvest and recreational harvest are unsustainable as a moderate risk only (score

6-10). We suggest that these two risks are elevated to high risk, as we cannot know from the

limited research of the sustainability status of the fishery. We acknowledge the Melbourne

University study, however this is only looking at Venus Bay. If the rest of the state is going to

continue to be open to commercial fishing, there needs to be baseline data to assess the

sustainability of the fishery on.

VNPA recommendation:

Without knowing if the fishery is sustainable or not, there should be a precautionary

management approach taken until known. There needs to be an ecosystem-based

assessment of pipi harvesting to establish an historical ecological baseline, and an ongoing

monitoring program to enable an ecological sustainability assessment of the fishery

(commercial and recreational sectors).

3. Victoria proposed regulation is out of step with other State’s

South Australia has set a minimum legal length of 3.5 centimetres for recreational pipi

harvesting. New South Wales has a bag limit of 50 pipi in total. Victoria does not have any size

restrictions on the harvest of pipi for recreational use, and the current bag limit is 2 litres in

Venus Bay and 5 litres elsewhere. Given that:

Pipi are already under pressure from both commercial and recreational harvesting;

The absence of size at maturity estimates for Victoria,

There should be a review looking into the feasibility of:

The current bag limits for recreational harvesting across the state (which would also

help to reduce recreational harvest being used for commercial sale);

Introducing a minimum size limit on recreational pipi harvest (in line with other

states);

Investigation into the number of recreational harvesters at Venus Bay which could

feed into the ecological sustainability of pipi harvesting as mentioned earlier.

There have been reports of up to 2,000 recreational fishers in one day at one location at

Venus Bay. If every harvester collects the maximum allowable limit, that is up to 4,000 litres

per any one day that could be taken at a single beach.

4. The draft plan is not reflective as a state wide plan, due to much of the consultation

reflected being highly location specific

The draft plan includes management strategies and actions for Discovery Bay, and to some

extent Cape Liptrap, but lacks the management direction to guide actions across the rest of

the state. How the pipi fishery be managed in coastal parks across the state and the range of

impacts listed above, is a key question of concern.

5. Little ecosystem wide impacts taken into consideration and mitigated appropriately,

particularly for species protected under coastal parks

Along with declining pipi stocks, the collateral impacts of pipi harvesting include damage to

coastal dune habitats from recreational harvesters accessing the beach, the loss of food for

shorebirds such as the pied oystercatcher, and the disturbance of beach nesting birds like the

endangered hooded plover. These impacts have not been adequately addressed in the draft

plan and they need to be.

We support the recommendation from Birdlife that:

The plan increase the risk assessment rating of the following risk to ‘high’ and include a

proposed management response for this threat: Non-retained species: Commercial harvesting

results in unacceptable interactions with threatened, endangered, protected (TEP) species

The interaction between pipi fisheries and threatened species such as Hooded Plover is

significant and more common than most other fisheries. Pipi harvesting occurs directly within

the zones where shorebirds and seabirds are breeding, foraging and roosting. See image

below that outlines the key habitat zones of coastally dependent fauna (taken from Ehmke et

al. 2016):

It also typically occurs, for example recreational harvesting within Venus Bay, at the time of

year which is the peak nesting period for resident shorebirds and seabirds, and when Northern

Hemisphere migratory shorebirds are present in these habitats.

It poses significant threat to these birds via:

- Disruption to the sediment where the birds forage, causing short term loss of foraging

opportunities and food availability. For species which are breeding on territories, this short

term disruption can have lethal impacts on the survival of breeding birds and their flightless

chicks, as they are spatially bound to these territories.

- Direct competition for resources (Purnell 2018). Pipis are a food source for shorebirds, in

particular a key prey item for Pied and Sooty Oystercatchers and species of knot.

- Direct crushing of the highly camouflaged eggs and chicks by harvesters on foot or in a vehicle

during the breeding months of August to April. There are many breeding pairs of Hooded

Plovers, as well as Pied Oystercatchers, Red-capped Plovers and terns which nest on Victorian

beaches.

- Disturbance to nesting birds: If the nesting adult birds perceive a threat to their eggs and

their young, they adopt the strategy of moving away from the nest or chick hiding location so

as to lure away the threat. So, for example, if someone is walking along the beach, the adult

birds are likely to move away from the nest and will only return once the person has gone. The

eggs and flightless young are vulnerable during this disturbance period to lethal events of

exposure, predation and starvation.

- Disturbance of feeding or roosting birds (Purnell 2018). Migratory shorebirds travel tens of

thousands of kilometres around the globe to access the Victorian shoreline to feed and roost.

Energy intake is critical to making a successful return journey to their breeding grounds to

then mate, nest and rear chicks in a narrow window of time. The timing of arrival on the

breeding grounds can have significant impacts on the birds’ opportunity to breed and success

of the attempt. Thus disruptions to the energy levels of these birds can have significant impacts

on their survival and breeding, and impacts at the population level. Disturbance to flocks of

these shorebirds generally operates in a cumulative manner to impact the energetic

expenditure of the birds.”

Comments on the draft management plan

Executive Summary

On page 1 ‘Improving information on the status of pipi stocks in Victoria is a key focus of the

Plan’

The VNPA acknowledges this is much needed, however what this statement lacks is the

need to also improve information about ecosystem based knowledge and impacts that the

fishery will have, not just on the status of pipi stocks alone, but on the surrounding

ecosystem. Our suggestion is for this statement to say “Improving information on the status

of pipi stocks and the impacts the fishery has on key ecosystem processes in Victoria is a key

focus of the Plan” and then have this reflected as objectives, strategies and actions in the

plan.

This draft plan is a single species plan. The final plan needs to have a broader ecosystem

approach for our beaches and species, and be developed with or by Parks Victoria in coastal

parks. Pipi harvesting could be a potential component if deemed ecologically sustainable.

Due to the VFA single species approach in this draft plan, there is not the expertise to

prepare the needed ecosystem approach. The final plan needs to reflect the importance of

the ecological role of pipi and beaches and not just be a single species plan.

Given that that improving information regarding the status of pipi stocks is a key focus of

the plan, it is surprising that only one Melbourne University research project is being done –

and only looking at Venus Bay. We acknowledge the mention of the proposal to study

demography and stock structure of pipi in Victoria, however there is no mention if this will

go ahead.

To assess the ecological sustainability of pipi harvesting requires an ecosystem-based

approach, not a narrow single species approach. See our recommendations for further

research further in this submission.

2.3 Legislative and policy framework

The draft plan states that Victoria has made a commitment along with all other states to

manage fisheries according to the principles of ecologically sustainable development

‘Improving information on the status of pip stocks in Vic is a key focus of the plan’

‘adopting a precautionary approach to management, particularly for fisheries with limited

data’

And ‘ensuring that fishing is carried out in a biologically and ecologically sustainable manner’

To achieve ecologically sustainable development there needs to be ecosystem-based

management - which is not reflected in the draft plan.

The new Marine and Coastal Act has as one of its purposes to establish objectives and

guiding principles for ecologically sustainable planning, management and decision-making

under this Act.

VFA must prove that pipi harvesting is ecologically sustainable and look at the interaction

with threatened and species, damage to habitats; impacts of litter (including plastic), trophic

impacts, and conflicts with other users.

2.4.3 The Indigenous fishery

VNPA supports the strategies to recognise and develop better opportunities for all

Aboriginal people.

It is recognised in the plan of the presence of extensive pipi shell middens in Cape Liptrap

Coastal Parks. Yet in the plan there is limited mention of working with Traditional Owners

groups here and other parts of the state, (other than Discovery Bay) to ensure protection

heritage sites from access to fragile dune environments.

3 Risk Assessment

The ESD risk assessment process that was completed for the draft plan identified four risks.

One of those ‘impact of ecosystems risk’ identified as high risk - the use of motorised

vehicles results in disturbance of cultural values. VNPA agrees that this risk is identified as

high, however believe that impacts on natural values from the pipi fishery need to also be

considered as high.

VNPA supports Birdlife Australia view regarding the risk assessment process:

The process did not rate the risk of “Non-retained species: Commercial harvesting results in

unacceptable interactions with threatened, endangered, protected (TEP) species”

highly enough and the plan needs to ensure that there is a risk management

response for this risk given its significance.

The use of motorised vehicles will have significant risks on threatened species

nesting success and given Discovery Bay and Cape Liptrap coastal parks both contain

critical habitat and at least 1% of the entire national population of the vulnerable shore

nesting bird, the Hooded Plover, this will impact on persistence of the population at a

national scale.

“Some of the ‘moderate’ risks also identified an impact of the fishery on the

ecosystem (i.e. interactions with threatened, endangered, protected (TEP) species,

litter from the recreational fishery) and of external factors on the functioning of the

fishery (i.e. PrimeSafe requirements, water quality and flow, Ramsar listing etc.).

These risks are managed through advocacy and consultation with relevant

authorities, where possible, although consultation on ‘high’ risks is the immediate

priority for the fishery (Table 2).”

The risks of threats to wildlife are not moderate in our expert opinion based on 12

years of research in to the impacts of disturbance and vehicle impacts. This risk

assessment process should have included shorebird experts in order to be accurate

and inclusive of key coastal stakeholders. We would request that this impact is

escalated to high risk and appropriate management responses are formulated.

4 Management objectives, strategies and actions

Strategy 1.1(iv). Ensure that the harvest is consistent with the ecological sustainability of the

resource

VNPA has concerns about the ecological sustainability of the recreational harvest and the

current Victorian bag limits and lack of minimum legal size limits for recreational catch.

Given that pipi are already under pressure from both commercial and recreational

harvesting, and given the following, there is an absence of size at maturity estimates for

Victoria; other states have setting either minimum legal size limits for recreational catch,

and smaller bag limits, we recommend reviewing Victoria’s current recreational regulations

as mentioned above.

Strategy 2.2(i, ii). “Allow fishing for pipi in a manner that has acceptable ecological impact”

We welcome the actions “to work with the Gunditjmara native title holders and land

managers (DELWP, PV) to reduce the disturbance to cultural values and to develop the Cultural

Heritage Management Plan for Discovery Bay Coastal Park”

However, we would like ensure that the VFA has full consent with the Native Title holders and

Traditional Owners for access to the fishery given the risk to cultural values.

Given the draft plan is a state wide plan, it lacks any detail about consultation with other

Native Title holders or Traditional Owner groups across other areas of the state, which the

fishery operates. We would like to see consultation with all necessary parties, including areas

where there is a history of pipi fishing and where there is not.

Additionally, this strategy needs to consider actual ecological impacts as well as cultural

impacts. There has been minimal effort to outline mitigation measures for threatened species

or other coastal fauna dependent on onshore habitats. We support Birdlife Australia’s’

suggestions of “mitigating risks through formulation of buffer zones and educational

strategies.”

VNPA also suggests an additional appropriate action would be to commission an

independent study looking into the ecosystem impacts of the pipi fishery on species

protected under coastal parks, as mentioned earlier; develop a proposed management

response to moderate risks identified in the draft plan including the impact on beaches,

interactions with threatened and endangered species and cultural sites other than Discovery

Bay.

A further comment is what are the limits of acceptable change to the beach ecosystems in

the case of pipi and what level of change is acceptable.

Strategy 2.3. “Maintain access to the fishery for recreational, commercial and Indigenous

fishers, taking regulations and legislation relating to access in coastal Crown land (including

coastal parks) into account”

Legislation in Victoria currently prevents driving on beaches with the exception of accessing

boat ramps and management vehicles that are authorised.

Access points have been developed for commercial fishers to more easily access the

Discovery Bay fishery, and have been abused by the illegal use of motorised vehicles on

beaches, which is an inappropriate use under the reserves original purpose. Impacts from

the illegal use of vehicles and trolleys on coastal reserves are not limited to:

damaging fragile coastal dune habitats from harvesters, their trolley’s and

vehicles accessing the beach;

disturbance of endangered shore birds that utilise the beach during nesting time

and for feeding with huge number of people at Venus Bay (up to 2,000 reported

in a single day at one beach at Venus Bay!) vicinity of nesting Hooded Plovers

Venus Bay shows there have already been reported nest failure and

abandonment of sites.

The draft plan states that the VFA will work to improve beach access points and methods

across the state. The illegal use of vehicles on beaches sets a bad precedent for coastal

management across the state, in which 96 per cent of the coast is publically managed land,

where vehicle use has been heavily restricted for decades.

VNPA is concerned with opening up access, particularly within coastal parks. The control of

and minimisation of access points is a critical element of coastal management. Poor access

management has resulted in damage to many coastal locations. It is inappropriate for VFA

to be developing access point to public land that for which there is a primary manager in

Parks Victoria.

Coastal parks were not set up to handle large amounts of commercial activity in the first

place, activities that were not being conducted at the time many coastal park management

plans were created. There doesn’t seem to be consideration in the draft plan of how the

fishery impacts will be managed in other coastal parks around the state. Nor is there any

consultation with other Aboriginal communities on impacts on cultural values for areas

other than Discovery Bay. We would like to see this addressed in greater detail in the final

plan.

Strategy 2.6(i). “Promote the benefit of the fishery to the broader community”

“The Risk Assessment identified ‘conservation organisations impact on social licence for

commercial and recreational harvesting’ as a high risk issue. The VFA, in conjunction with SIV,

will advocate for the commercial fishery, highlighting management arrangements including

limited access and controlled sustainable harvest, benign harvesting methods and high-energy

environments that quickly recover from disturbance.”

We agree that this is an issue, however it is only an issue as we feel that ecological impacts

have not been taken into consideration at the appropriate level needed to ensure minimal

impact. A suggested action here is as mentioned earlier in strategy 2.2. Until we see sufficient

action to mitigate important ecological impacts, conservation groups such as the VNPA will continue

to advocate for ecological impacts to be addressed and will oppose expansion of the fishery.

5.2 The future management of the commercial fishery

5.2.1 Target Species

The draft plan outlines that another species has previously been reported as catch for Pipi

(Donax deltoids). We are interested in how this issue will be addressed.

5.2.2 Spatial management

Managing the fishery by spatial zones can be beneficial in areas along the coast which have

previously been subject to pipi harvesting. We stand by our previous recommendation of the

moratorium within coastal parks until more is known about the ecosystem impacts. We have

concerns over the WZ and EZ zones to pipi harvesting when there has not been a history of

pipi harvesting in many areas and there has been no scientific monitoring of the stocks to

suggest ecological sustainability. Promoting these as areas for pipis harvesting – either

commercial or recreational – is inconsistent with Victoria’s commitment to manage fisheries

according to the principles of ecologically sustainable development:

“ensuring fishing is carried out in a biological and ecologically sustainable manner”

“adopting a precautionary approach to management, particularly for fisheries with limited

data”

In our view, the precautionary approach would not involve allowing fishing in these areas

when there is no stock sustainability assessment.

Similarly, the previous Fisheries Notice implemented in September 2017 to open up of all

marine waters to commercial fishing (excluding recreational pipi fishing only in eastern

Victoria) has overlooked the lack of scientific data to support the fishery across the state.

In regards to these zones being the basis for setting and managing the Total Allowable

Commercial Catch (TACC) for the fishery, we would like to ensure the zone as a whole will be

managed to the most conservative level accounting for the more depleted areas within that

zone i.e. the draft plan states that areas within a zone (for example Venus Bay) have been

more depleted than other areas within that zone. The TACC should be based on the more

depleted area of the zone rather than the less depleted.

Figures 3, 4, & 5. Require more detailed maps of the management zones with landmarks to

enable the general public to better determine zone boundaries. Indicating relevant land

marks on the maps, particularly the access points would be helpful.

We are concerned that by promoting most of the coast for pipi fishing when lack of data is

available on the ecological sustainability of the fishery, may cause possible depletion of the

stocks.

5.2.3. Total Allowable Commercial Catch (TACC)

The use of a TACC to inform management of the fishery can be valuable if based on sufficient

biological, economic and social information. However, of significant concern is the lack of

biological data available on the abundance of pipi across all areas of the state, in particular

those zones which will have heavy commercial and recreational harvesting. Our concern is

how the TACC will be set at a conservative enough level to ensure it is ecologically sustainable.

EOI process

Opening up previously unexplored areas in the Western & eastern zones to an increased level

in commercial pipi harvesting when there is no science estimating stock status in these areas

is concerning.

Conducting an independent and ecosystem-based assessment of pipi harvesting to establish

a historical ecological baseline and an ongoing monitoring program to enable an ecological

sustainability assessment of the fishery (commercial and recreational sectors) would help to

determine the areas of the coast where pipi harvesting may possibly be ecologically

sustainable.

As mentioned earlier, the impacts this will have on coastal parks, and other cultural, social

and natural values, which is barely addressed in the draft plan is our main concerns

5.2.6 Gear

In response to the draft plan that states “The VFA supports an innovative approach to gear

types and new equipment may be allowed, based on trials and criteria/assessment” we urge

that whole ecosystem impacts are included in this assessment to ensure minimal impacts

within coastal parks and Ramsar areas.

5.2.8 Minimum size limit

The plan mentions that there is “high genetic variation between populations of pipi on either

side of Bass Strait suggesting at least two biological stocks (Miller et al 2013)”. Furthermore,

NSW and SA have different minimum size limits, and SA has a minimum size limit for

recreational and commercial catch. If the Victorian minimum size limits are based on South

Australia at 35mm, and NSW has set their minimum legal size limit as 45mm, we could be

underestimating the size of commercial minimum size limits for part of the Victorian fishery.

It seems appropriate given this information that a review be done looking into the

appropriateness of the one size limit for commercial pipi fishing across Victoria, and whether

this should be different within different zones i.e. on either side of Bass Strait.

South Australia pipi minimum legal length -

5.2.9 Reporting requirements

The new real time reporting can be an effective tool to ensure compliance with the TACC. Our

concern is how this will be managed for those that do not have smart phones, whether it is a

requirement for commercial fishers to have the smart phone technology. We hope that this

new technology does not replace traditional on-ground compliance activities.

5.3 The recreational fishery

Due to community concern over up to 2,000 people a day that could be at Venus Bay on any

one day, see our recommendations for reviewing regulations into size and bag limit.

5.4 The Indigenous fishery

We Support the recognition of the importance of Aboriginal Victorians engagement in

decision making processes and in use of the fishery, and believe this should be allowed to

continue across all of Victoria. Our concerns in opening up the EOI process to those areas

where Native Title holders or Traditional Owner consultation has not occurred and the impact

this have on cultural values. Consultation needs to happen before the whole state is subject

to commercial fishing – and it is not too late to do that now.

5.2.11 The Environment Protection and Biodiversity Conservation Act 1999

This plan needs to take into consideration the EPBC listed species that will be impacted by the

operation of the pipi fishery such as the Hooded Plover for which Discovery Bay and Venus

Bay form areas of critical habitat for the species. The Australian Government’s Conservation

Advice for the Hooded Plover specifies “Manage the use of (and access to) key beaches for

recreation when plovers are breeding – e.g. discourage or prohibit vehicle access, horse riding

and dogs from beaches; implement temporary beach closures; erect fencing to prevent

people entering” as key management actions required.

5.5 Managing ecosystem interaction

We support that the “Ngootyoong Gunditj Ngootyoong Mara (NGNM) South West

Management Plan, adopts measures to prevent impacts to Hooded Plovers and other

threatened shorebirds, Aboriginal middens and safety of visitors on access tracks and beaches,

such as access restrictions to areas and during the Hooded Plover breeding season from July-

August to March-April.”

Our concern is that the ecosystem impacts are still not being managed adequately, specifically

within coastal parks shown by the use of vehicles still operating illegally on beaches as pointed

out in the draft plan. “In Discovery Bay, motorised vehicles have been utilised by some

commercial fishers to transport the pipi catch along the beach and from the beach to the car

park since 2012. Other commercial fishers have continued to use hand trolleys or to transport

the catch in backpacks. In Venus Bay, fishers utilise hand trolleys. “

However later in the plan mentions “Vehicles also have the potential to damage Aboriginal

cultural sites, although this is now mitigated in Discovery Bay as fishers can only access the

beach via designated access points.”

This later statements seems contradictory when illegal driving on beaches is still occurring.

Furthermore we support Birdlife views:

Vehicles driven above the high tide mark have a high likelihood of crushing eggs or the

crouching, highly camouflaged chicks. Adult birds are also susceptible to being struck by

vehicles as they typically run along the sand rather than fly, and are small and cryptic. In low

visibility, at night and in inclement weather, the risks of striking the birds is increased (Weston

2003). Chicks are also known to shelter in vehicle ruts, leaving them more vulnerable to being

run over.

For these reasons, it is very important to limit the use of vehicles along beaches and

throughout sand dunes in coastal areas that are habitat to our beach-nesting shorebirds, like

Discovery Bay, in line with legislation in Victoria that prevents driving on beaches. It is also

important for people who do have limited rights to use a vehicle along the beach to understand

the risks of doing so, and to follow Bird Life Australia protocols to limit the threats to nesting

birds. Strategies to manage beach access by illegal vehicles are also important to limit impact

on birds.

Cape Liptrap Coastal Park does have its own management plan, however in the plan it does

not specifically mention commercial pipi fishing – in which part of the coastal park will be

subject to. As stated earlier, there is no mention in the draft plan for the Special Protection

Area within the Cape Liptrap Coastal Park - where no pipi fishing is permitted. This is an

example which shows there has not been adequate consideration for coastal parks and the

legislation throughout the draft plan.

Refer to earlier comments regarding our views on commercial pipi harvesting within coastal

parks.

5.6 Scientific research to support fishery management

We refer to our views mentioned earlier of past and current research being undertaken.

See below for a list of recommended research.

To assess the ecological sustainability of pipi harvesting requires an ecosystem-based

approach, not a narrow single species approach. In such an assessment, at least the following

should be evaluated:

Status of wild stocks: current population to unfished levels; the extent of

overfishing; long-term trends; the habitat range of the species; the current and

pre-fished age, size and sex distribution; the effectiveness of management

(including management track record, monitoring and enforcement.

Impacts of fishing on habitats and ecosystems: trophic impacts, physical effects on

habitats, spatial and temporal scale of impacts; the effectiveness of management.

This would include the physical impacts of beach access on sand dune habitats,

the loss of food for shorebirds and the disturbance of beach nesting birds.

A good place to start is: research into coastal ecological impacts from pipi

harvesting – recreationally and commercially on coastal parks and the

species protected within them – such as Cape Liptrap and Discovery Bay.

Estimate of total numbers of pipis harvested annually by recreational fishers. The

TACC cannot established without this level of harvesting being factored in.

An investigation into the number of recreational harvesters at Venus Bay is

completed.

Other comments

The plan lacks significant mention of compliance, and we are concerned that this does not

seem to be a priority in the draft plan. We would like to see more strategies and actions

addressing compliance activities, particularly with the potential for the increased pressure

from the operation of the fishery.

Summary of VNPA recommendations:

Park Management Recommendations:

Establish a moratorium on the commercial harvesting of pipi in all coastal parks

across Victoria including Cape Liptrap and Discovery Bay coastal parks where a

history of fishing occurs. In the time of the moratorium commission an

independent review on:

\_ appropriateness of pipi harvesting in coastal parks;

\_ Research into coastal ecological impacts from pipi harvesting –

recreationally and commercially on coastal parks and the species

protected within them – such as Cape Liptrap and Discovery Bay.

Ensure Parks Victoria is the sole manager of coastal park values and uses, with

sufficient resources to ensure that values are protected, and at a minimum a

veto over Fisheries plans.

Develop a proposed management response to moderate risks identified in the

draft plan including the impact on beaches, interactions with threatened and

endangered species and cultural sites other than Discovery Bay, and impacts on

social values of beaches

Fishery Ecological Sustainability Recommendations:

Without knowing if the fishery is ecologically sustainable or not, there should be a

precautionary management approach taken until known. There needs to be an ecosystembased

assessment of pipi harvesting to establish historical ecological baselines, and an

ongoing monitoring program to enable an ecological sustainability assessment of the fishery

(commercial and recreational sectors).

The current bag limits for recreational harvesting (to reduce recreational

harvesting for commercial use).

Introducing a minimum size limit on recreational pipi harvest (in line with

other states)

Investigation into the number of recreational harvesters at Venus Bay

which could feed into the ecological sustainability of pipi harvesting as

mentioned earlier.

Compliance

For this to be addressed more as strategies and management actions within the draft plan.

Further research recommendations:

To assess the ecological sustainability of pipi harvesting requires an ecosystem-based

approach, not a narrow single species approach. In such an assessment, at least the following

should be evaluated:

• Status of wild stocks: current population to unfished levels; the extent of overfishing; longterm

trends; the habitat range of the species; the current and pre-fished age, size and sex

distribution; the effectiveness of management (including management track record,

monitoring and enforcement.

• Impacts of fishing on habitats and ecosystems: trophic impacts, physical effects on habitats,

spatial and temporal scale of impacts; the effectiveness of management. This would include

the physical impacts of beach access on sand dune habitats, the loss of food for shorebirds

and the disturbance of beach nesting birds.

A good place to start is: research into coastal ecological impacts from pipi

harvesting – recreationally and commercially on coastal parks and the

species protected within them – such as Cape Liptrap and Discovery Bay.

Thank you again for the chance to comment on the draft plan. I would be happy to discuss

any questions you may have. I may be contacted on the following details.

Regards,

Victorian National Parks Association

*28.*

From: E. Doig

I am writing to you with concerns about the draft Victorian Pipi Fishery Management Plan. My concerns about the draft plan are as follows:

1. Pipi harvesting is currently (and poses future) inappropriate use of coastal parks. I have a holiday house at Venus Bay, and have witnessed the impact of large numbers of pipi harvesters at peak holiday times. The infrastructure that is currently provided at these coastal parks in terms of parking spaces, beach access, toilet and garbage facilities etc., is in no way adequate to deal with the huge influx of visitors on these occasions. The fragile coastal dune habitat is being damaged by inappropriate access, and endangered shore birds such as the hooded plovers are put at risk by such large numbers.

The VNPA has recommended that a moratorium on the commercial harvesting of pipis in all coastal parks across Victoria, including Cape Liptrap and Discovery Bay coastal parks. It has also recommended that research into coastal ecological impacts from recreational and commercial pip harvesting be carried out, and that Parks Victoria be the sole manager of coastal park values and uses.

1. Commercial pip harvesting Victoria wide may not be sustainable. There is a need for scientific biological baseline data to determine whether pipi harvesting is sustainable in the short and long term. There is significant concern that ongoing harvesting practices will directly result in loss of food for shorebirds such as the sooty and pied oystercatcher, and indirectly result in a decline in population of endangered shore birds such as the hooded plover, through increased disturbance of its nesting areas.

The VNPA has recommended an ecosystem-based assessment of pipi harvesting to establish baseline data, and an ongoing monitoring program to ensure sustainability of the fishery (commercial and recreational).

1. Victoria’s proposed regulation is out of step with other states. Victoria currently does not have any size restrictions for pipi harvesting (South Australia has set a minimum length of 3.5 centimetres for recreational pipi harvesting).

The VNPA has recommended a review looking into the feasibility of:

* the current bag limit of 2 litres,
* introducing a minimum size limit on recreational pipi harvesting, and
* investigating the number of recreational harvesters at Venus Bay.

Kind regards,

E. Doig.

*29.*

From: Portland Field Naturalists

Issues we have noticed in the VPFMP that need addressing are-

1. A lack of consultation with Non-fishing stakeholders, e.g. Bushwalkers, birdwatchers, photographers etc. and NGOs such as Birdlife Australia, Vic Wader Study Group, Nature Glenelg Trust etc.
2. No plan to protect endangere and resident and migratory shorebirds. More than a million dollars of tax payers’ money has been spent by State and Federal governments on protection of resident shorebirds including the iconic Hooded Plover, and 24 species of migratory birds in Discovery Bay and the adjoining RAMSAR site. All these species require undisturbed access to the whole beach including the intertidal zone to safely raise chicks or double their weight for travel to the Northern Hemisphere breeding grounds. Without that undisturbed access from late September to late April these species will continue to decline and become extinct.
3. There is a lack of Victorian data on pipi biology including breeding cycle and spawning events.
4. All high risk factors are biased toward risks to the pipi fishery industry. Risk factors of pipi fishing on others species are considered low or are ignored, despite a huge wealth of scientific research that proves human activity on beaches destroys wildlife.
5. Recreational fishers are an unknown quantity which could quickly rise to thousands as your own data on Venus Bay has proven.
6. Harvesting pipis all year round does not allow for the breeding cycle to maintain the species, nor allow for the breeding cycle of any other intertidal marine fauna to be successful.
7. There is scientific data to prove that vehicles on the beach cause sand impaction, destruction of beach fauna and prevention of birds feeding.
8. Electronic monitoring is unreliable due to sporadic mobile reception and remoteness of Discovery Bay. Fisheries staff are 50 Km away and cannot respond to or monitor reported fishing incidences efficiently.
9. No mention has been made of monitoring pipis for diuretic shellfish poison which appeared in Venus Bay in mid 2017.
10. . This is a documented high risk fire area. There is no fire plan included or even the mention of fire risk. No consideration for mass evacuation or emergency vehicle access in an emergency. There is no evidence that the CFA was consulted by the VFA steering committee.

What we want –

1. No recreational pipi fishers in Discovery Bay because of the need to protect shorebirds. People also bring dogs and leave rubbish which attracts foxes, rats and gulls which predate on shorebird eggs and chicks. Recreational pipi fishers will come in ever increasing numbers, a therefore requiring ever increasing toilet services and rubbish removal. In a known high risk bushfire area, large unknown numbers of people requiring evacuation is a highly risky and possibly litigious situation.
2. No pipi fishing at all during the shorebird breeding and fattening times of late September to late April. Commercial pipi fishing should only occur during the winter months when there will be less impact on protected shorebird survival.
3. Licenses and quotas must be non-transferable.
4. No vehicle access from the beginning of the dune system to the intertidal zone and along the beach. Vehicles cause sand impaction and consequently destruction of marine biota and the destruction to the fragile RAMSAR protected Dune system in the Coastal Park.
5. Constant physical monitoring of pipi catches and catching sites is necessary due to unreliable mobile reception for app use and reporting. This will avoid a repetition of the disaster of Venus Bay.
6. VFA must abide by the regulations of other government bodies and respect the scientific research of NGOs whether this draft is ratified or not.
7. A quota of 2 litres of unshucked pipis for recreational pipi fishers statewide with a minimum size limit of 35mm, until researchers indicate otherwise. It is possible that the largest pipis need to be preserved as breeding stock.

Yours faithfully

Portland Field Naturalist Club

*30.*

From: K. Cox

I note comments from the general public have been invited regarding the current discussion on the issues surrounding the collecting of pipis.

My pragmatic side suggests this E mail will be ignored,archived or deleted.My optimistic side hopes that if enough people do submit their thoughts the result will be an equitable outcome.

Over the last eight years I have witnessed the collection of pipis from the beaches at Venus Bay.Initially it was an innocuous pastime of a few groups which escalated into a mammoth assault on the pipi population resulting in the decimation of this creature.

This in itself is disturbing but the ancillary problems are a concern.

At the height of this destruction I regularly collected large amounts of rubbish from the beach cognisant of the fact that the rubbish I missed potentially ended up in the bay which is frequented by seals,dolphins and whales along with other diverse fish species.

The impact on the shore birds is also significant particularly in the case of the Hooded Plover which tries to nest on the beach during the peak of the pipi season.

We all have an impact on the environment every person's aim should be to mitigate their impact.The needless destruction of the eco system at Venus Bay could be redressed with the simple implementation of a halt to the collection of pipis.We are the the current custodians of our planet,which is a huge privilege but this also implies a responsibility.

Future generations should be able to enjoy what myself and others have at places such as Venus Bay but in order for that to happen we must respect and protect this environment NOW.

K. Cox

*32.*

From: Victorian Wader Study Group Inc.

The Victoria Wader Study Group (VWSG) is a not-for-profit organisation that conducts long term shore bird monitoring in Victoria. The group has been active since 1978 and has around 140 volunteers with collective expertise across all shorebird species (and their habitats) that occur in Australia. The VWSG makes a significant contribution to the Australasian Wader Studies Group and the Birdlife Australia Shorebirds 2020 program through the provision of field expertise,monitoring data and expert advice.

Response to the draft Pipi Fishery Management Plan

This plan lacks consultation with Non-fishing stakeholders. There appears to have been no consultation with groups interested in the birds and other wildlife in this area. Some of these have been noted as “risk factors” but no satisfactory management plan to deal with these has been provided Discovery Bay is home to the endangered Hooded Plover as well as other resident Shorebirds. It also provides important feeding grounds for migratory Shorebirds. These birds spend time in Australia from September to April before attempting the flight back to Siberia for breeding. These are international birds protected by international treaties, which are not able to be overruled by one government body. Many of these birds are in serious decline due to disturbance of feeding sites all over the world, their numbers are generally declining and much needs to be done to preserve habitats.

Some of the issues that need addressing in the VPFMP

1. No plan to protect migratory Shorebirds as above

2. There is no data on the breeding and biology of pipis in this area, and no plan to investigate

this. The year around harvesting will limit the ability for breeding to occur.

3. All risk factors discussed refer only to Pipi fishing, totally ignoring all other life on the beach, despite an enormous amount of evidence that human activity on beaches has a detrimental effect on wildlife.

4. There is scientific evidence to show that vehicular access to beaches causes sand impaction, direct destruction of beach breeding birds nesting sites and severe impact on other beach fauna and flora.

5. No real plan for monitoring recreational fishers. There is poor o no mobile reception in the area, and there are insufficient staff in government agencies to adequately monitor the beach. This will likely be known to Pipi harvesters.

6. Recreational fishers are an unknown quantity, and could easily amount to the thousands that has been shown by your own data that challenged the viability of Pipi harvesting at Venus Bay.

What needs to be done

1. No recreational Pipi fishing in Discovery Bay. This is because it will be impossible to monitor their takes appropriately, they will mostly harvest in the summer months when the Shorebirds are using the beach. There is a likelihood of rubbish been left on the beach and nearby bush areas, increasing the risk of fire in a remote area.

2. No Commercial Pipi fishing from September to April. Fishing should only occur during the

winter months when impact on Shorebirds is less likely.

3. Licenses and quotas must remain non-transferable

4. No vehicular access to the beach due to impaction (as is the law generally in Victoria). No

vehicles in the RAMSAR protected fragile dune system. Vehicles cause destruction of life on

the beach, and fragile dune systems supporting the beach.

5. Physical monitoring will be required. Lack of mobile coverage will not enable community

members to contact fisheries when they see illegal activity. Portland is 50 kilometres away

6. VFA must abide by other government bodies rules and regulations and respect other scientific research

7. A quota of 2 litres of unshucked pipis for active Recreational fisherman. Aged relatives sitting in vehicles not to count as fishermen

The Victoria Wader Study Group

*34.*

From: J. Misso

Thank you for the opportunity to comment and these are a few comments as local person in this community.

* There has been a definite depletion in the size of pipis and the number of colonies over the last 10 years
* The last few years there appears to be very few and in some beaches any presence of pipe colonies
* There needs to be an implementation of a minimum pipi size as there is with other seafood. At the moment people are taking any size
* Pipi harvesters appear to ignore current regulations re amount that can be taken
* There appears to be an impact on marine and birdlife ecology
* There is a significant seasonal impact on access to beaches as hundreds of people come in droves to take pipis. i.e. parking, litter (particularly during warmer months, holiday periods)

Thank you for the opportunity to comment.

J. Misso

*36.*

From: Glenelg Hopkins Catchment Management Authority

Late addition:

*As the Risk assessment strongly influences the Plan’s content, it would be helpful if the plan included names, positions and area of expertise of those participants who scored the risk to the  various components and sub-components.*

Glenelg Hopkins CMA welcomes the opportunity to comment on the Draft Victorian Pipi Fishery Management Plan (the Plan). The CMA is responsible, along with others, for undertaking and promoting integrated natural resource management within the region. The CMA notes the commitment of the Victorian Government to manage fisheries according to the principles of ecologically sustainable development.

The Plan identifies two main harvesting areas within Victoria, including Discovery Bay in south-west Victoria, and notes the site is primarily a commercial fishery but with increasing recreational pressure.

Discovery Bay is a recognised East Asian-Australasian Shorebird Site and is an internationally important non-breeding area for Sanderling (*Calidris alba*). The site provides habitat for 64 species of threatened fauna including 25 bird species listed under the Japan-Australia Migratory Birds Agreement (JAMBA) and the China-Australia Migratory Birds Agreement (CAMBA). Discovery Bay Coastal Park is an important breeding area for the threatened Hooded Plover (*Thinornis rubricollis*). In addition, Glenelg Estuary and Discovery Bay (GEDB) was listed as a Ramsar site in 2018. Ramsar sites are wetlands of international importance listed under the Ramsar Convention on Wetlands Water bird diversity and abundance was recognized as a critical component of the GEDB Ramsar site. Monitoring this critical component, specifically sanderling numbers, to ensure they remain within the limits of acceptable change, is an obligation of the state government and funding has been sought by the CMA to undertake this work in partnership with Birdlife Australia.

Shellfish, including Pipis, are a food source for many of these migratory bird species. Pipi harvesting could potentially have an impact on the abundance and diversity of water birds through a reduction in availability of pipis, or by-catch species if they are utilized as a food source. Compaction of shellfish habitat through vehicle use and disturbance of feeding birds by activity associated with harvesting could also affect bird numbers. The Plan notes that the risk assessment is based on the National Ecologically Sustainable Development (ESD) Reporting Framework for Australian Fisheries. The Framework suggests that an assessment should cover the following agreed National ESD Components for Fisheries:

o Contribution to Ecological Well-being  Retained Species (those species that the fishery wants to capture and use)

 Non-Retained Species (those species caught or directly impacted by the fishery but not used)

 General Ecosystem Impacts (this covers the potential indirect and more general environmental impacts the fishery may have)

o Contribution to Human Well-being  Indigenous Community Well-being (How does the fishery affect indigenous communities in the area where the fishery operates?)

 Community Well-being (Are there local or regional communities that are dependent on the fishery, and whether they are supportive or negative about its operation?)

 National Well-being (How does the fishery contribute to national issues such as employment rates, supply of fish, economic returns, reductions in trade deficit)

o Ability to Achieve  Governance

 Impact of Environment

The CMA makes the following general comments on the Plan.

• The executive summary would be strengthened by a statement to reflect the commitment of Fisheries management to consider each of the National ESD components when assessing the sustainability of the fishery.

• The Plan would benefit from further information about how each sub-component was included in the risk assessment. A full list of issues assessed, within each sub-component, and the assigned scores, would be a valuable addition to the Plan. Specifically, the CMA is keen to understand how the potential impacts to shorebirds were assessed in development of the draft management plan.

• The risk assessment considers the issue of ‘Disturbance of cultural values’ in the ‘Impact on Ecosystem’ component. The CMA suggests that Indigenous cultural values should be considered within the separate sub-component ‘Indigenous Community Well-being’.

• Some information could be included to explain how confidence in the data, used to inform the risks, is incorporated into the assessment. For example, to what extent did a lack of reliable, quantitative data influence the risk score?

The CMA looks forward to further discussion about issues raised in submissions to the draft Plan. Please do not hesitate to contact Helen Arundel if you wish to discuss any aspects of the response further.

Yours sincerely

A. Bester

*40.*

From: VRFish

Thank you for your inclusion of VRFish as a member on the Pipi Fishery

Management Plan Steering Committee. VRFish commends the Victorian Fisheries

Authority (VFA) on the inclusive and consultative manner in which they have

engaged stakeholders in the development of the Draft Victorian Pipi Fishery

Management Plan.

Overall, VRFish is confident that the Draft Plan is a positive step towards the longterm

sustainable management while fostering stewardship over the resource for the

benefit of recreational fishers and other user groups.

Significantly, VRFish believes that the management framework will mitigate against

the risk posed by the activation of latent effort in the commercial fishery. The

transition to secure, quantitative commercial fishing entitlements also provides the

foundation for the sustainable growth of the fishery in a viable and economically

efficient manner which is able to respond to market demand for pipi for consumption

and pipi bait by a growing population of recreational fishers.

Please see the following sections for our detailed comments on the Draft Plan.

**Recreational fishery management arrangements**

Recreational fishing controls

VRFish is largely supportive of transitioning the existing recreational fishery

management arrangements, including current catch limits and recreational fishing

only areas, into the Draft Plan.

In relation to Venus Bay, there is little scientific evidence to suggest a reduced bag

limit is required on sustainability grounds, and these limits seem to have been

introduced as a resource sharing measure and to reduce conflict. In support of the

evidence-based management of the fishery, VRFish recommends that the bag limit

of 2 litres whole/0.5 litre shucked that applies to Venus Bay be reviewed in light of

research on pipi biomass and the impacts of fishing mortality soon to be made

available from Dr John Morrongiello (University of Melbourne, per. comm) in late

2018.

Section 5.3 refers to the modification of recreational fishing controls and bag limits.

This section is not sufficiently clear or robust and must provide further transparency

and clarity around the process and performance indicators that will be used to modify

or adjust existing recreational management controls.

Supporting quality recreational fishing opportunities

Section 2.4.2 notes that recreational fishing access arrangements and conflict

between users does not relate directly to the sustainability of the fishery. These

issues adversely impact on the quality of recreational fishing and relate to the social

values and wellbeing of recreational fishers under the triple-bottom line approach to

the ecological sustainable development of the fishery. On this basis, VRFish strongly

recommends that the Draft Plan be expanded to integrate the following:

• Management objectives (and associated actions under Table 3) which

promote quality recreational fishing opportunities, including through improved

access (such as through enhanced facilities, parking and access tracks) and

access to new fishing locations (including recreational pipi fishing only areas);

and

• Risks (within Table 2) associated with the impact on quality recreational

fishing opportunities as a result of lack of, or impaired, access and

recreational fishing infrastructure.

Further, VRFish suggests that recreational fishers could be involved in the comanagement

of the fishery through promoting participatory, community-based

monitoring and research on the location and extent of pipi populations along the

Victorian coastline. VRFish believes this has the potential to yield a range of benefits

to the fishery, including: encouraging greater stewardship and contributing to the

social licence of the fishery; identifying alternative quality fishing opportunities and

reducing concentrated fishing effort and associated potential conflict.

An opportunity that has been raised is reseeding of areas that historically supported

abundant pipi populations. There may be merit, both for supporting accessible

recreational opportunities and improving the economic efficiency of the commercial

fishery, in exploring the viability of this concept leveraging previous investigations

conducted in NSW.

3

**Commercial fishery management arrangements**

Commercial fishing entitlements

Currently, demand for pipi in Victoria surpasses pipi harvest by Victorian commercial

fishers. The majority of this demand is for bait for recreational fishers, which drives

inflated prices for locally sourced pipi.

VRFish is confident that the proposed commercial fishery management

arrangements, including a separate licence class and quantitative property rights

under a quote management system (QMS), will support a viable commercial fishery

which provides the right incentives for sustainable and efficient fishing practices.

VRFish trusts that the proposed framework, supported by ongoing data collection

and research, will facilitate the fishery moving towards maximum biological

sustainable yield in the long-term.

VRFish questions the use and the impact of permits in the commercial fishery,

particularly transitioning to a management regime which supports secure and

ongoing property rights. VRFish understands that permits will function to encourage

exploratory commercial activity in currently unexplored and unfished areas whilst

providing an equitable solution to commercial operators who are not granted a

fishery access licence and quota. Providing for the operation of permits alongside

access licences and quantitative entitlements may undermine the security of these

rights, the incentives for efficient and sustainable fishing practices, stewardship and

impair the viability and sustainability of the fishery in the longer term.

Setting the Total Allowable Commercial Catch (TACC) and spatial management

One point of clarification sought is level at which the TACC limits will be set for the

individual fishery management zones. The initial TACC setting process prior to

commencement of fishing under the Draft plan needs to specify individual zonal

TACC’s which should be consistent with current limits and fishery-dependent data

and continue to take a conservative approach in line with the developing and

exploratory nature of the fishery under the management plan.

**Summary**

To summarise, VRFish broadly supports the proposed Draft Plan and encourages

transition of the commercial fishery towards a secure, quantitative fishing entitlement

under a QMS which incentivises and is enabling of economically efficient and

sustainable fishing practices.

To further enhance the Draft Plan and the outcomes for the fishery, VRFish would

like to suggest the following revisions and additions:

Revision of the recreational catch limits in Venus Bay in response to the most

recent and best available science, estimates of abundance and research on

impacts from fishing mortality;

2. Inclusion of more detail and clarity around the process for adjusting

recreational fishing controls, including associated performance indicators and

triggers;

3. Expansion of recreational fishing management objectives and risks in support

of securing and promoting quality recreational fishing opportunities, including

through enhanced access and identification of new fishing locations; and

4. Exploring options for co-management and participatory, community-based

monitoring by recreational fishers in support of the sustainability of the fishery

and identifying new fishing opportunities.

Please don’t hesitate to contact us if we can be of further assistance or clarify any of

the points raised in our submission.

Yours sincerely,

Victorian Recreational Fishing Peak Body

*41.*

From: K. Auchetti

Important comments for the DRAFT Pipi Fishery Management Plan for Victoria:

I have run a petition for closed season for pipi harvesting at Venus Bay (Victoria) with over 2700 signatures & a pipi website since 2013.  In the past our voice has gone unheard from Fisheries, Parks VIC & the Victorian Government for change.  This has to stop.  Our community & other communities need to be heard & changes made.

The Petition link is here:

[https://www.communityrun.org/petitions/seasonal-pipi-collection-restrictions-for-venus-bay-beaches](https://urldefense.proofpoint.com/v2/url?u=https-3A__www.communityrun.org_petitions_seasonal-2Dpipi-2Dcollection-2Drestrictions-2Dfor-2Dvenus-2Dbay-2Dbeaches&d=DwMFaQ&c=JnBkUqWXzx2bz-3a05d47Q&r=tBW-81WOeSv3jnecLAaP-lAzRsFaC-BDpJs9wjEZBRA&m=t8XVJBIHRVtyoeTkydMb4byHATkNqVbYRzDHwrdzWUM&s=l2rwF-E9NtkOZSTHASCULejVFOPyWMR4j5Sg0PzI0oE&e=)

VBpipis website is here:

[https://www.vbpipis.info](https://urldefense.proofpoint.com/v2/url?u=https-3A__www.vbpipis.info&d=DwMFaQ&c=JnBkUqWXzx2bz-3a05d47Q&r=tBW-81WOeSv3jnecLAaP-lAzRsFaC-BDpJs9wjEZBRA&m=t8XVJBIHRVtyoeTkydMb4byHATkNqVbYRzDHwrdzWUM&s=rDl_SOpvHGDIjZ0fNMI0QbfhKtipQCLvrQRM6_M5UuY&e=)

Concerned citizens from all over Australia & even people from New Zealand have contacted me in regards to risks that have unfolded in their local area due to over harvesting of pipis.  These voices & concerns are relevant & the effects of over harvesting everywhere in Australia, but have been a very visual concern at Venus Bay (Victoria) over many years.

Venus Bay's current pipi stock is only in its infancy of regeneration after the horrendous over harvesting of recreational fishing in the years 2013, 2014 & 2015. Our voices have gone unheard because we do not have the science behind the visual effects, however the latest study confirmed that the bulk of the remaining pipis are immature & small. This study also recommended continued harvesting of immature pipis, how does this happen? If we can see that this is wrong, then the rest of the world can too.

The following should be considered & included into any future Pipi Management plan - these are just common sense:

1.  Better research to understand the full measures of harvesting & this includes recreational fishing as well as commercial.

2.  Closed season - as adopted by SA government.  Follow the SA Government lead, they have researched & developed a good plan unlike the NSW Government who acted too late.

3.  Pipi size limit, anything under a certain size can not be harvested - as adopted by SA Government

4.  Reduce the catch limit per car/person for recreational pipi harvesting/fishing to reduce over harvesting possibilities.  History & other Australian States research shows pipi stock is not a infinite resource.

5.  DO NOT permit vehicle access on beaches as requested by commercial pipi harvesters.  We need to protect the biodiversity & wildlife of the beach, foreshore & ocean (especially the Hooded Plovers & other birds), vehicle access destroys beach biodiversity as proven in many beaches around the country.

6.  Commercial harvesting must ensure meticulous catch records are maintained & made public.

7,  Only one form of harvesting - Commercial or Recreational.  Commercial fishing should have meticulous records of catches, whereas recreational fishing goes unchecked without data available.  Recreational fishing poses a larger threat to potential over harvesting as we have seen at Venus Bay.

8.  The public & environmental groups must be heard & supported, not rebuffed & belittled as Venus Bay community has experienced in the past by Fisheries Victoria, Parks VIC & the Department.  We are concerned citizens who care about our environment & where we live - we are not your enemy.

9.  Maintain a healthy biodiversity of our beaches, foreshore & ocean for our future.   Birdlife Australia & the Victorian National Parks Association (VNPA) & many other groups have put forth arguments as to what is needed or expressed their concerns about the environment in regards to pipi harvesting in the past that has gone unheard.

10.  Possible rule for recreational surf fishing/fisherpeople can only use what they harvest while fishing, pipis can not leave the beach - as per NSW Government law, you can only harvest what you are using while on the beach.

We all must remember that this is about maintaining the future of our environment & beaches.  How can we continue to deplete a natural resource & expect it to be there for the future if we do not manage it correctly.  Lets work together to ensure our environments future.

Please include these comments in the public response to the draft management plan.

Thank you for your time!

K. Auchettl

*43.*

From: Seafood Industry Victoria

*Have provided an annotated plan*

*44.*

From: Friends of the Great South West Walk

The following comments are provided for consideration in finalising the Victorian

Pipi Fishery Management Plan 2018.

**1.**            **Proposed Current Plan**

               Acknowledged is the current plan focused on the  8 commercial fishing licences

extracting pipis from the beach along the Discovery Bay Coastal Park in consultation with

key stakeholder groups which appear to have been commercial fishing representatives.

               The documentation provided suggests the non-sustainable nature of commercial

pipi fishing through reducing tonnages extracted and need relocate licence areas and conditions.

               The plan does identify risks to the implementation and operation of commercial

extraction of pipis and makes presumptions about access along "walking tracks"  for what

may be assumed to be side by side vehicle access required for an indicated two operatives

per licence.

**2.            Access by Walking Tracks**

               Please note walking tracks are not available for vehicular access as proposed.

Attached is an outline of the Road Safety Act 1986, Land Conservation ( Vehicle Control) Act 1972 and Land Conservation (Vehicle Control)  Regulations 2013 for your consideration. Our committee do not agree to any vehicular access along any walking track which includes beaches in Victoria. Reference may also be made to  instructions issued by 4x4 vehicle clubs/association confirming no vehicles are permitted on to travel on Victorian beaches and to reported court fines imposed a commercial fishing licence holder  in 2017 for using a vehicle in contravention of the above. Such breaches lead to damage to property and a signal to a wider community that illegal vehicleaccess and driving on the beach is acceptable. This has resulted in increased vandalising of restrictive barriers and walking tracks.

Our volunteers put in over 6,000 volunteer hours per year maintaining  the Great South West Walk currently valued at $180,000 per year. This includes repairing barriers and damaged walking tracks from illegal vehicular access.

Our information circular on this matter is attached for reference.

**Recommended is that current commercial fishing licences adhere to their current licence conditions which do not permit vehicular access and no relaxation of this access be granted or permitted.**

**3.  Recognition of the Discovery Bay Coastal Park as a s Ramsar wetlands of international importance.**

               The recent press announcement detailed below is fully supported by the Friends of the Great South West Walk.

"Tourism and the environment in the Portland district are to get a significant boost with the listing of the Glenelg River estuary and the adjoining Discovery Bay wetlands as Ramsar wetlands of international importance.

Victorian Water Minister Lisa Neville said the recent international accolade was a great accomplishment by local agencies and communities that had invested in the conservation of the area.

The area listed by the Ramsar Convention on Wetlands stretches more than 22,000 hectares and includes part of the Lower Glenelg National Park, Discovery Bay Coastal Park and the Nelson Streamside Reserve.

It is known for its rare dunes that are home a variety of threatened species including plants, waterbirds and fish.

The Andrews state government has provided about $215,000 to help manage the site over the next three years.

The area meets five of the required Ramsar criteria by supporting unique wetlands and providing habitat for 95 birds – with 24 species migrating from Russia and China. It has three main systems, including the freshwater wetlands of Long Swamp, Bridgewater Lakes and Swan Lake, the Glenelg Estuary, Oxbow Lake and the dune fields, as well as beach along 50 kilometres of the Discovery Bay Coastal Park.

Glenelg Hopkins Catchment Management Authority conducted extensive consultation on the Ramsar nomination that included local landholders, government agencies, Nelson Coastcare and traditional owners.

Parks Victoria is the land manager. The Gunditjmara people are one of the primary guardians of the Aboriginal cultural heritage of the area.

Portland Tourist Association president Denis Carr said the Ramsar listing  was “fantastic” news.

Mr Carr said locals already knew the area was “amazing” but the listing would help other people learn about the area.

Member for Wannon Dan Tehan said the listing was “a great success story for Glenelg.” The federal government backed the area’s nomination".

**Recommended is all laws and regulations relating to the management of the Discovery Bay Coastal Park as part of our National Parks be adhered to and enforced by all land managers including the Victorian Fisheries Authority.**Thank for the opportunity to make the above submission and we welcome any opportunity to assist in community consultation and resolution

of issues taking into account all interests to best manage the pipi resource on the beaches of the Discovery Bay Coastal Park.

Proposed is to continue our monitoring of the progress of this Victorian Pipi Fishery Management Plan.

Yours Sincerely

Friends of the Great South West Walk