**SIV Draft Response / Alternative to VFA Draft Pipi Notice:**

Following the release of the VFA’s Draft Victorian Pipi Notice, which provides an avenue to open up the coast line with heavily restrictive measures, SIV has received considerable comment prior to developing this proposal.

Therefore, taking all comment into account, we have developed and present the following proposal. This has been distributed electronically and commented on by industry, who are largely in support of the proposal.

Concerns raised (in summary):

* Movement away from the 1 October 2013 investment warning (people both within and outside the fishery have made decisions based on this).
* Cannot allow another entitlement to be stripped off an OFAL when people have been restricted and unable to use this entitlement with the coastline closed.
* Draft does not provide for future interest in the fishery, nor does it really allow for prospectivity and potential pipi fishery growth.
* Should not include any licence class other than OFAL, otherwise one Bait licence will be given rights not provided to other holders of the same General Bait licence, who pay the same amount under Cost Recovery. (Maintain status quo for Bait General licences).
* People would like the opportunity to explore areas of the Coast – however the way the Draft notice is written it will give sole access to those people whose main interest and place of residence is in the West of the state. Not essentially opening the coast up at all.
* This cannot result in a pseudo-allocation as this restricts the opportunity for the Management Plan to consider all options for future management of the fishery.
* Industry are award of commercial quantities of pipi’s in other regions across the Coast, however the notice restricts any form of exploration.

Overarching ideas (fleshed out more below):

* Apply the original intention of the 1 October 2013 investment warning, which was first written in ‘Fisheries (Discovery Bay Pipi) Notice’ – to only Discovery Bay.
	+ This would limit the number of operators on this beach to a sustainable number, only allowing OFAL holders with catch history prior to 1 October 2013 on Discovery Bay to fish there.
	+ Note the warning for Discovery Bay is: ‘It is the intention that a record of pipi catch obtained after 1 October 2013 will not be considered in the development of future management arrangements for this fishery’.
* Open up the remainder of the Coastline to those OFAL’s who have pipi catch history but do not meet the 1 October 2013 deadline.
	+ Recognises interest in the fishery, and allows for prospectivity into other areas.
* Do not set the Catch Limit for all OFAL’s at 0kg – this is not acceptable noting the fishery has been locked up for 4 years now, and people have not had an opportunity to go looking for Pipi’s in other areas since the closure.
	+ Recommend implementing a permit application system, for a period of 12 months each (and renewable if used), to be available for all OFAL’s.
	+ If no catch history is recorded in a 12 month period the permit lapses.

**Proposal:**

As outlined above, a 3 tiered approach must be taken to consider the sustainability and spread of effort for the long-term success of the Victorian Pipi Fishery. Therefore it is proposed to manage the fishery, in the interim to a management plan, the following way:

*Spatial management:*

Noting the original 2013 investment warning issued by Fisheries Victoria, and recognised by the commercial fishing industry, it is proposed to manage Discovery Bay separately to the rest of the State.

Discovery Bay:

* limit the number of operators on this beach to a sustainable number, only allowing OFAL holders with catch history prior to 1 October 2013 on Discovery Bay to fish there.
* Based on evaluating the number of qualifying fishers – then we would need to discuss bag, trip, days, operators limits, etc… Ensuring sustainability of fishing operations and the fishery resource.
	+ In the interim could apply a slightly modified proposal for extraction of pipis to that in the current Draft Pipi Notice:
		- catch limit of 150kgs per day/trip (5 bags);
		- 96 fishing days per year, with a maximum of 16 days a month;
		- maintain minimum size limit of 35mm; and
		- requirement to prior-report, and post-report, fishing activity;
* Discovery Bay for sustainability measures should be managed in two zones (one to the East of Sutton Rocks and two to the West of Sutton Rocks).
* The current Draft pipi notice uses a 1 tonne total catch qualification from 1 January 2012 to 31 December 2016 – this seems extremely low and does not meeting the investment warning, so is not supported.
	+ For Discovery Bay, if a qualification must be set (beyond the catch history prior to 1 October 2013 as per the investment warning) then further discussion with industry is required here.

Venus Bay:

* Currently one single operator fishing Venus Bay.
* Given current and future social licence to operate issues with locals and proximity to Melbourne, suggest strongly restricting this area to one operator.
* Maintain current recreational only area.

Remainder of the State:

* Can be managed closely through the issuance and reporting requirements applied on permit applications.

*Access for those with ‘any’ pipi catch history:*

While Discovery Bay must be managed closely to ensure long-term resource sustainability, the rest of the Victorian Coastline remains relatively untouched and therefore for those OFAL holders who have Pipi Catch history, may have developed markets and supply chains, etc, it is proposed that those licence holders be entitled to explore other areas to fish.

* For those licence holders who did not have catch history on Discovery Bay prior to 1 October 2013, but have any legal pipi catch history on an OFAL, then the Victorian Coastline, except the two areas (Discover Bay and Venus Bay), will be open to exploration.
* Apply the measures outlined in the current Draft Pipi Notice, which will allow for ‘fishing trips’ to be undertaken to ensure prospectivity and spread of effort.
	+ catch limit of 150kgs per day/trip (5 bags), and 8 fishing days per calendar month;
	+ maintain minimum size limit of 35mm; and
	+ requirement to prior-report, and post-report, fishing activity.
* Opening this up will allow those to invest in developing regions, and will identify where operations can be focused and appropriately managed and considered in the development of the Victorian Pipi Fishery Management Plan.

*Access for those OFAL’s with no catch history:*

Noting that the vast majority of industry reject the setting of a 0kg catch limit for all OFAL without Pipi catch history in the VFA set qualification period (1 January 2012 to 31 December 2016), the following will allow those with any interest in pipi’s an opportunity for prospectivity.

* Implement a permit application system
	+ Permits to be applied for by and OFAL holder who is interested in fishing for pipi’s in a specific area.
	+ Permit valid for a period of 12 months (further applications can be applied for and renewed if used).
	+ Apply catch restrictions to ensure sustainability (eg: those consulted on in Draft Pipi Notice - catch limit of 150kgs per day/trip (5 bags), and 8 fishing days per calendar month).
	+ Must apply minimum size limit applicable across the State (35mm minimum).
	+ Implement stringent reporting requirements, eg: prior-report, and post-report, fishing activity – as a minimum.
* If no catch history is recorded in a 12 month period the permit lapses.