**Public submissions on the 2019/20 Eastern Zone Abalone Total Allowable Commercial Catch (TACC)**

| ***Submitter*** | ***Submission*** |
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| John O’Neill | Thank you for the opportunity to comment on the 2019/20 proposed TACC for the Eastern Abalone Zone. I was an attendee at the EZ TACC workshop at Mallacoota earlier this month. I found the meeting to be pretty harmonious with little or no descent in relation to the how and why the eventual conclusions were arrived at. There was good general discussion on the health and sustainability of each reef which I saw as a positive.  All reports on Cape Conran are that it is travelling very well and would handle an increase. The one tonne increase at Conran I believe is a conservative (token gesture) number that reflects the meetings cautious conservative approach to any perceived recovery. As you know the overall cut was as a result of one particular (small) reef in the far East being seen to be in trouble and requiring remedial attention in an attempt to turn that around which resulted in it being recommended for a two tonne cut.  With nearly all reports this year being positive the EZ resource may have been able to sustain a small increase but I believe the correct conclusion was arrived at. I have always advocated a cautious approach to reef health and sustainability.  Better to be leaving a few more abalone in the water when the resource is starting to look like it will withstand more than to take a few too many and risk putting pressure back on the resource that may be detrimental to its recovery.  If the EZ reef shows further improvement over the next 2019/20 season we may be able to consider a small increase at next seasons TACC workshop whilst always adopting a conservative approach.  I fully support the adoption of the one tonne cut recommended by the meeting. |
| Chris Daniel | Hope all good and thanks for the opportunity to comment on the proposed Fisheries Notice (which I note runs for 12 months and is revokable at any time).  As far as the TACC is concerned , it’s probably a fair outcome although my personal point of view is that we didn’t need to drop qulotra by a solitary ab. However, I understand it's the process and happy to stick with that. I am aware that some think its not appropriate , but as has always been the case, if you’re not towards the front of the effort or you don’t dive deeper than 30 feet you’re always going to struggle.  My main difficulty with the draft Fisheries Notice (and I suspect I'm not alone) is the rolling over of the Big Ramme SMU. There are two reasons for this:  cid:C9FDA063A9754B69990B9220E9ED3028@Toshiba1) Being a separate zone we inadvertently lock in non catchrate fishing. As we all know, the ability of a diver to move on once catch rate falls to a certain level has been a cornerstone of this Fishery’s sustainability since its inception (if you're scratching you move). That leaves remnant adult population , both cryptic and non cryptic, to underpin re-recruitment. The problem we have created now is this dynamic has broken down. Non catch rate fishing is a result of the current management regime. Interestingly, this is the converse of what the aim of the draft Harvest Strategy is. This is a horrible outcome and should be struck out. As we all know, we should have a regulatory environment in place that treats the resource as a farm, not a mine, and this management tool is simply not achieving this. Dive effort should be able to move up and down to surrounding reefs, and vice versa, according to each particular days fishing.  2) The L50 plus 2 size is 127mm and we’re fishing at 138mm ( although we know that L50 plus two varies both year on year as well as where on a reef the sampling for gonad development is/was conducted).  I have no idea why we’re continuing to fish this reef at 138mm. Look at this photo- theres plenty (video as well) more but they won’t fit on an email. These abalone stocks are now out of the fishery-they don’t “grow through” - a term I hate as its a gross generalisation and oversimplification- with dive effort simply now displaced into areas where the abalone do grow large, resulting in effort overlap. This has obvious negative effects.  Jason York took this footage on his GoPro the other day (thanks Jason). These abalone, and those on the surrounding reef, do not grow at the same rate, nor to the same size as the stocks in closer. We are not achieving anything by not fishing these stocks anymore. This is not an isolated gutter of stunted abs, its just how they grow out deeper. We need to get more effort into these cohorts and ease up pressure on larger cohorts (where size limit is academic anyway).  Please consider this. We have it wrong and it can be easily fixed. There is no science to support 138mm.  There’s plenty in this to unpack but ill keep it brief. What should be done is put the size back to 125MM (bearing in mind that most voted to put it to 120mm in our 2017 size review) and do away with the Big Ramme/Skerries sub zone. This would tick a lot of boxes |
| Geoff Ellis | As CEO of EZAIA we endorse the workshop process and recommendations delivered.  We make no further comment save endorsing the recommendations. |
| VRFISH | Thank you for consulting with VRFish and providing the opportunity to comment on the 2019/20 Draft Further Abalone Quota Order (FAQO) and proposed Fisheries (Eastern Abalone Zone) Notice.  In preparing this response, VRFish has consulted regional representatives and relevant stakeholder groups, such as the Scuba Divers Federation Victoria and Victorian Spearfishing Commission. We are  satisfied that the stock assessment process is sufficiently robust and the proposed TACCs and minimum size limits will support the ongoing sustainable management of the Eastern Zone abalone stocks. VRFish is also pleased to report that is has received reports anecdotal evidence from recreational divers that they are easily able to obtain their bag limit for abalone in the Eastern Zone, which reflects positively on the TACC and current management arrangements.  VRFish invites contact if you like to discuss our submission or our proposal further. |
| Seafood Industry Victoria (SIV) | Seafood Industry Victoria (SIV) appreciates the opportunity to provide comment on the draft 2019/20 Further Quota Order for the Eastern Zone Abalone fishery.  SIV, in consultation with members of the Eastern Zone Abalone fishery, support the proposed Draft total allowable commercial catch (TACC) and management arrangements for the 2019/20 quota year;  - a blacklip abalone TACC of 345.5 tonnes (a reduction of 1.0 tonne from last year);  - to implement mandatory closures when the upper limit for a spatial management unit (SMU) or reef code is reached; and  - to set a legal minimum size for blacklip abalone.  If you wish to discuss this submission further, please contact the SIV office. |