

Kylie Wohlt
Principal Policy Officer
Victorian Fisheries Authority
By email: Kylie.Wohlt@vfa.vic.gov.au

REVISED MANAGEMENT ARRANGEMENTS FOR THE WESTERN PORT/PORT PHILLIP BAY COMMERCIAL FISHERY

Dear Kylie,

Thank you for consulting VRFish in relation to the proposed revision of the management arrangements and reforms for the Western Port/Port Phillip Bay Commercial Fishery.

As the peak body representing Victoria's recreational fishing community, VRFish is committed to ensuring enhanced recreational fishing experiences and the most optimal allocation of Victoria's fisheries resources.

As such, VRFish continues to offer strong support to the Government's plan to phase out commercial netting in Port Phillip Bay, including steps for early exit and transition to the long line fishery. To date, our feedback from recreational fishers has been overwhelmingly positive with reports of better catches and greater satisfaction rates.

A VRFish survey of recreational fishers conducted between September and November 2017 confirms the most targeted fish species in order of preference for Port Phillip Bay and Westernport fisher are flathead, snapper, King George whiting, calamari and gummy shark.

We thank the Victorian Fisheries Authority for preparing this proposal to ensure that recreational fishers continue to receive the desired benefits from the phase out of commercial netting.

VRFish recognises that the management of catch limits in a multispecies commercial fishery is incredibly complex. As a general principle, we would

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better, for everyone.***

envisage the remaining commercial licenses in the fishery to maintain their operations in line with their historical catch records.

Due to privacy limitations, VRFish does not have access to each individual license catch and effort data. Therefore, the Seafood Industry Victoria is best placed to work with the Victorian Fisheries Authority detailed management approaches.

Restricting the number of operators on each license

During the Christmas and New Year period of 2017/18, VRFish received a number of complaints from recreational fishers across the Bellarine Peninsula pertaining to commercial net fishing. The concern was a shift of effort from bait species to recreationally important species (non-bait) at the height of recreational fishing effort and tourist season in the area. As a result of this isolated incident there is a need for tighter controls on who and how many operators are working under a license.

We believe there should be only one nominated operator to prevent splitting or doubling of operations. There should be the ability to transfer the nominated operator to account for a range of circumstances as part of running a commercial fishing operation. However, when this does occur the subsequent operations should be consistent with the licensee's historical catch, area fished and ethical practices.

We would also like to ask whether the VFA makes an assessment whether an operator is a fit and proper person to participate in the fishery.

Weekend and Public Holidays

We do not have an intimate knowledge of commercial licensees working schedule. Therefore, it would be useful to know how much effort is undertaken on weekends and public holidays to provide an informed response.

We agree that temporal restrictions have been an effective tool to mitigate conflict between recreational and commercial fishers. However, recreational fishing behaviours have changed in accordance with weather forecast technology, flexible working arrangements and a shift to weekday activity to avoid congestion and overcrowding at our boat ramps.

Considering the recreational fishing population on the doorstep of Port Phillip Bay a restriction over weekends may not be as effective as in regional areas which experiences influxes of fishing 'tourists' over weekends. Restricting commercial fishers from weekends may unintentionally increase effort prior to weekends and may result in new angst from recreational fishers.

As there is a likelihood of interaction and possible conflict 365 days per year, an alternative approach could be for VRFish to work closer with Seafood Industry Victoria (SIV) to mediate, negotiate and mitigate instances conflict. We have an expectation that commercial operators would be alert and attentive during times of high recreational fishing effort such as during summer and Easter school holidays to avoid conflict and respect the level of effort by recreational fishers during these times.

Public holidays are an extremely busy time on the water, including for recreational fishing and does carry a higher level of risk of user conflict. Therefore, it would be logical to restrict commercial operations on public holidays, if commercial operators are not already voluntarily avoiding fishing.

Applying total cap for non-bait species

Our advice is to manage the total cap of non-bait species in accordance with historical catch records. Shifting effort from bait species to non-bait species is not acceptable and should not be permitted.

We note the increase of reported catches of 'Other' species in 2016/17. We would like to know what species are included in this category as the assumption is they relate to species of low recreational fishing importance.

Reducing fishing bycatch across both sectors is important. If these species were once discarded from nets in the past and are now being utilised in the commercial market then this is worthy of consideration within a total cap of non-bait species. VRFish would be open to further discussion on this matter.

Applying annual species catch limits

Examining the commercial catch data that is publically available through the Victorian Commercial Fish Production, data up to 2016/17 indicates the overall catches of all recreationally important species have declined

substantially and 'Other' species (assumed to be low value recreational fish species) have increased. This indicates the netting phase out has been successful and delivering the desired benefits to the recreational fishing sector as intended by the *Target One Million* policy.

However, in relation to King George whiting where catches have "the potential to exceed historical catch levels", this is of high concern to recreational fishers. We would support management measures to curb the increase in effort towards KGW, again in line with historical catch levels. A species catch limit for KGW could be one method to restrict and contain catches for the species.

Having single-species limits will require commercial fishers to accurately predict or control their catch compositions, and resources will be required at the VFA to process commercial data in a timely manner and report back to commercial operators.

The application of a single-species catch limits to a multispecies fishery could lead to adverse outcomes which the Victorian Fisheries Authority should take into consideration. The recreational fishing sector would not like to see commercial fishers being forced to discard one species of fish out of their nets (possibly dead or low post-release survival) because they have already caught the annual allocation for that species, but they are still able to fish for other species.

Unless we are provided advice to the contrary we do not see strong case for introducing species catch limits except for King George whiting and snapper. The commercial sector may be able to suggest alternate arrangement which in effect manages the catch towards historical catch levels.

Restrictions on the KGW commercial catch in Port Phillip Bay may lead to a shift of effort to the Corner Inlet fishery and this should be considered in the context of this review.

In conclusion, we thank the VFA for reviewing the management arrangements for the Western Port/Port Phillip Bay Commercial Fishery. So far, the phase out of commercial netting in Port Phillip Bay is successfully delivering tremendous outcomes for recreational fishers. As stated, VRFish is not privy to all the commercial fishery data. Therefore, to manage the commercial catch of the current operators it appears fair and reasonable to support management arrangements that are consistent with historical catch records.

Thank you in advance for your consideration of our response and request for further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rob Loats', with a stylized flourish at the end.

Rob Loats
Chairman
Victorian Recreational Fishing Peak Body

9 April 2018