

Sonia Talman
The Papi Fishery Manager
Victorian Fisheries Authority
By email: Sonia.talman@vfa.vic.gov.au

Dear Sonia,

Re: VRFish Submission – Draft Victorian Papi Fishery Management Plan 2018

Thank you for your inclusion of VRFish as a member on the Papi 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 Papi Fishery Management Plan.

Overall, VRFish is confident that the Draft Plan is a positive step towards the long-term 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 papi for consumption and papi 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

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better, for everyone.***

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 co-management 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 reseedling 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.

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 quota 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:

1. 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,

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

Rob Loats
Chair
Victorian Recreational Fishing Peak Body

13 July 2018