

Secretary
Productivity Commission
Australian Marine Fisheries and Aquaculture
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Dear Secretary

Productivity Commission – Marine Fisheries and Aquaculture

I am writing on behalf of VRFish, the peak body representing 838,000 recreational fishers in Victoria.

We appreciate the opportunity to respond to the Draft Report relating to the review of marine fisheries and aquaculture. After reading the report, it is clear that Victoria is leading the nation in a number of areas of recreational fisheries management and policy.

We wish to provide the following comments:

- **Recreational Fishing Licence in Victoria:**

Victoria has had an all waters Recreational Fishing Licence (RFL) in place for close to 20 years. A system of no exemptions may sound appropriate on face value, however there are a number of social and administrative issues that must be considered if all fishers are to be licensed. For example, reducing red tape and regulatory burden, especially on children and the elderly is a sound policy.

The Victorian RFL has raised more than \$70 million and continues to fund a range of services and projects (eg-fish stocking, fisheries officers, habitat improvement, fishing infrastructure, research and monitoring) that protect and enhance our valuable recreational fisheries. This system is the envy of many other jurisdictions across Australia.

The Andrews Government also has a clear policy to grow the number of recreational fishers to 1 million by 2020. The policy is a watershed development and has the strong support of VRFish and the recreational fishing community.

- **Recreational fisheries data needs**

From a Victorian perspective, it is clear recreational fishers have invested strongly in a suite of research and monitoring programs over time. The report should acknowledge the significant investment by recreational fishers paid for through revenue generated by our licence fees. For example, we have funded projects to ensure sustainable use of our valuable wild fisheries for mako sharks, thresher sharks, tuna, snapper, King George

whiting, mulloway, flathead and calamari over the last 5 years. This includes monitoring tools such as the internationally awarded scientific angler diary program, which complements other tools such as pre-recruitment monitoring and creel surveys in Victorian bays and inlets.

- **Recreational Fishing for Southern Bluefin tuna in Victoria:**

Of the issues covered in the Draft Report, it is resource allocation between recreational and commercial fishing for SBT that is one of the most important to us.

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“the Australian Government should set allowable catch limits of southern bluefin tuna for all fishing sectors (including the recreational sector). For practical reasons, the government could continue to draw on states for day-to-day management of recreational fishers, but this should be in accordance with the catch limits determined by the Australian Government. Catch limits should be in place for the southern bluefin tuna fishing season commencing on 1 December 2018”

This sounds like a takeover by the Commonwealth for a fishery which has been managed by the States in the past. It is implied that recreational fishing for SBT would be capped and this could be interpreted to mean an ITQ style managed recreational fishery. Commonwealth intervention using tradable quotas, limited tags, reporting, additional fees and the like is not supported by VRFish. We note the ABARES 2015 report into estimating the recreational catch of SBT references this approach.ⁱ

Southern blue fin tuna are a public resource, owned by the Australian community and have a high recreational and commercial value. Australian recreational fishers have caught southern bluefin tuna for more than 150 years. Our catch varies significantly from year to year and the fishery is regulated by measures such as catch, boat and size limits. Since the early 2000s the recreational fishery has seen a major resurgence in Victoria, Tasmania, South Australia, New South Wales, and to a lesser extent Western Australia. This growth has provided much needed stimulus to regional and State economies. An independent economic valuation showed the fishery is worth \$9 million per annum to Victoria alone and this was in a low catch and effort season and prior to significant improvements in boating infrastructure at Portland.ⁱⁱ

While the stock of SBT is relatively low due to a history of commercial overfishing, more recently it has continued to increase against the backdrop of growing recreational fishing, following tighter controls on commercial fishing by overseas countries that are party to the Commission for the Conservation of Southern Bluefin Tuna.

Estimating the catch of southern bluefin tuna nationally will be a costly and complex exercise given the year to year variations. As the stock continues to grow into the future, it is vital that recreational fishers be given secure access rights to the fishery by

the Commonwealth Government. The lack of action by the Federal Fisheries Department has gone on for too long and this is limiting optimal use of the resource and associated industries.

Past Federal Governments have chosen to allocate formal access rights to the commercial wild catch industry and it is now time for the new Government to properly recognise the rights of recreational fishers. In 2014, the Australian allocation was increased by the Commission and this was passed on directly to the commercial fishing quota holders, with no acknowledgement of the need to make progress on incorporating the recreational catch into the over-arching management framework. This management decision must not be repeated by the Australian Government.

VRFish is calling on the Commonwealth to properly recognise the rights and value of recreational fishing for SBT and commit to the fishery managed by open access and bag limits, in addition to regular surveys to monitor the fishery.

- **Resource allocation between the sectors in State waters**

Victoria is well down the path of implementing resource allocation decisions in State waters between commercial and recreational users. Inland commercial net fishing has already been phased out, with the exception of a boutique eel and carp fishery. Our bays and inlets have seen a consistent trend of removing commercial net fishing in areas such as Mallacoota, Lake Tyers, Shallow Inlet, Anderson's Inlet, Tamboon Inlet, Sydenham Inlet, Western Port and now Port Phillip Bay. Ocean access net licences are also to be phased out as they are non-transferable. These allocations are area or geographically based, rather than catch based.

There is a defined share of recreational and commercial rock lobster and the regulations for recreational abalone fishing mean that our access is so heavily restricted in central Victorian waters that a defined share between competing users adds little value.

Thank you for the opportunity to provide comment into the review process. We look forward to further input and consultation as the process unfolds.

Yours sincerely,

Rob Loats
Chairman
Victorian Recreational Fishing Peak Body
3 October 2016

ⁱ http://frdc.com.au/stories/Pages/30_SBT-by-the-numbers.aspx

ⁱⁱ <http://agriculture.vic.gov.au/fisheries/policy-and-planning/publications-and-resources/assessing-the-economic-value-of-the-2012-victorian-recreational-southern-bluefin-tuna-fishery-in-portland/introduction>