



Monique Leane
Fishery Manager
Victorian Fisheries Authority
By email: Monique.Leane@vfa.vic.gov.au

Dear Monique,

RE: GENERAL (EEL) PERMIT APPLICATION

I write to you in response to your request for comment on applications received for General (Eel) Permits and an Aquaculture (Crown Land – Eel) Licence. Thank you for the opportunity provided to convey the views and expectations of the recreational fishing community and to assist in your assessment of these applications.

VRFish is committed to working collaboratively with the commercial fishing sector and supporting sustainable, equitable growth and improved economic performance of the commercial sector.

In consulting with our constituents on this matter, it has become evident that a great deal of concern is held within the recreational fishing community around the applications and the ramifications of managing the commercial eel fishing in the manner proposed.

The key concerns of note in relation to the applications include:

- **Best practice, sustainable management of the fishery:** the *Victorian Eel Fishery Management Plan 2017* (“the Plan”), and the review and allocation of waters to Eel Fishery Access Licence (EFAL) Holders as the key input control in the fishery was intended to ensure sustainability through providing for escapement of migrating eels to spawning grounds at sea. VRFish is concerned that the opening of the additional waters proposed will undermine these controls and the sustainability of the fishery significantly. Further, one of the key drivers behind the *Victorian Eel Fishery Management Plan 2017* (“the Plan”) and review of the management framework was to simplify the existing arrangements and increase transparency. VRFish is of the view that expanding the currently allocated waters as a permit condition is not a transparent, best practice management model for the fishery;
- **Bycatch:** VRFish has previously raised its concerns on the impact that commercial eel fishing and use of fyke nets have on bycatch. VRFish continues to receive reports and images of fish and fauna caught in fyke nets. During the development of the Plan it

was proposed that nets be checked at a minimum of every 24 hours (ideally every 12 hours) in order to mitigate against injury or mortality to fish and other fauna. However, 48 hours has been adopted as the standard timeframe within the Plan. Without review of this requirement and increase in compliance effort and oversight, VRFish is of the view that the applications and proposal to extend the eel fishery into new waters and significant recreational fishing spots will only exacerbate issues of bycatch, and interactions and conflict between commercial eel and recreational fishers. It is critical that proven, best practice management to prevent bycatch be established before any growth or expansion of the commercial fishery into additional waters;

- **Aquaculture:** Lake Elingamite supports a recreationally significant trout and redfin fishery of high socio-economic value to the surrounding region and community. The performance of these fisheries is highly correlated to the food biomass in the Lake. Stocking the Lake with juvenile eels for on-growing will be in direct competition for the limited food biomass and have a detrimental impact on the growth rate of the targeted recreational species in this Lake.

Consequently and as a result of the concerns outlined above, at this point in time VRFish is unable to support the eel permits and aquaculture licence applications received by the VFA.

As expressed, VRFish is committed to working with industry and the VFA to ensure management of the eel fishery into the future which supports the aspirations and expectations of both commercial and recreational fishers.

VRFish welcomes further contact if you would like to discuss our submission on this matter.

Kind regards,

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

19 October 2017