



Fisheries FRL Regulations RIS  
c/- Domestic Animals, Fisheries, Forestry and Game Policy  
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### **Submission for Regulatory Impact Statement Fisheries (Fees, Royalties and Levies) Regulations 2017**

I am writing on behalf of VRFish, the peak body representing Victoria's 838,000 recreational fishers. Thank you for the opportunity to comment on the remaking of the Fisheries (Fees, Royalties and Levies) Regulations.

Recreational fishers have benefited greatly in Victoria through the operation of the Recreational Fishing Licence (RFL) Trust Account where all funds are designated to projects supporting the improvement of recreational fishing. VRFish has a funding agreement with the Victorian Government, funded through the RFL Trust Account to provide advice on recreational fishing policy matters.

#### **Responses to stakeholder questions:**

##### ***Are the proposed fees, levies and royalties fair and reasonable?***

Maintaining current recreational fishing license fees as recommended in the Regulatory Impact Statement (RIS) would be a reasonable approach considering a significant increase and adjustment in RFL fees occurred as at 1 July 2016. Also, there does not appear to be a need to deviate from the current pricing structure.

That said, there is a strong willingness by some fishers to make a greater contribution to the RFL Trust Account and help fund further initiatives that improve recreational fishing. In 2014/15, it was reported that 23 projects totalling \$2,257,237 was unable to be funded despite being assessed as having a net benefit for recreational fishing in Victoria. VRFish is currently conducting a survey of recreational fishing licence holders to ascertain our industry's priorities for future investment. There are benefits in increasing revenue to the

RFL Trust Account through a combination of increasing and maintaining participation and raising fees where appropriate.

The low level of awareness of how RFL revenue is re-invested on projects to improve recreational fishing is a concern. We propose this can be explained because recreational fishers are confused with the range of funding sources: RFL Trust Account; Target One Million, including Better Fishing Facilities Funds and Stronger Fishing Clubs Grants; and concurrent Government funding. It is difficult for some fishers to distinguish between these funding sources when Government administers them all and several funding sources are in operating concurrently. In addition, the community assumes the Government provides, at minimum, core services for the sustainable management of recreational fishing and it is not explicit or tangible where some services are wholly or partly funded by their RFL Trust Account funds.

It would be beneficial for the recreational fishing industry and our constituents to have more involvement to proactively set specific priorities for investment, establish EOs for certain projects and support administration and promotion. If the department and the VFA are considering this awareness level we suggest that greater autonomy and involvement by recreational fishers is the key.

The 28-day licence is becoming less popular and undoubtedly fishers are choosing to select longer licences or are content with one or multiple 3 day licences during the year. A one year licence is very good value at \$33.60 when compared to the cost of a 28-day licence and enables parents to take their kids throughout the year for a fish or enable an individual fisher to opportunistically fish all year round. Considering the decreasing trend in the application of 28-day licences this licence category is becoming no longer relevant. The 28-licence will at some stage need to be abolished.

We do not believe licencing is major barrier for fishing participation. Instead barriers such as time, skills, experience, competition with other hobbies and urbanised culture are having a more significant impact. A new fisher licence is probably not required as other initiatives are already supporting new people to fishing. National Gone Fishing Day is already a licence free day in Victoria and further opportunities such as Father's Day coinciding with the trout opening could be explored to attract new people to fishing and provide them with the skills and advice they need to become 'hooked on fishing'. Also, Fishcare Victoria and fishing clubs' conduct 'come and try fishing' days and operate under a group fishing licence. Again, this enables new participants to try fishing before deciding to purchase a licence.

***Are the activities undertaken by the Victorian Fisheries Authority done efficiently?  
(including activities previously undertaken by Fisheries Victoria?)***

A well-funded, efficient and effective Fisheries agency is essential to the successful management of recreational fishing in Victoria.

Under the Act, money in the Trust Account can only be used for the purpose of improving recreational fishing. In terms of the expenditure of the RFL Trust Account there is a competitive assessment process and commissioned grants overseen by the Recreational

Fishing Grants Working Group and an annual report to Parliament provides accountability and transparency.

The current VFA activities are well-organised and competent. Recreational fishers do expect 'value for money' for expenditure using their funds. Therefore, efficiency and optimising benefits for recreational fishing should be a continual process, and from time to time be subject to a more substantial review.

The RIS examined an increase to RFL prices to allow the Trust Account to pay a higher amount towards the government's costs of enforcement. This is 'cost recovery' which is against the intention of the RFL Trust Account whereby licence revenue is used for programs that benefit recreational fishing, and not as a means to recover government costs of regulating the sector. Cost recovery is already occurring so we recommend that more clarity is required to determine what is the level core services will be delivered by Government to effectively manage our fishery and what deliverables and outcomes are best funded by the RFL trust account.

Cost recovery aside, the VFA delivers work funded by the RFL Trust. To further demonstrate efficiency, performance targets and indicators could be applied and would be well suited to enforcement and administration activities. For example, a total of \$2,236,258 of RFL Trust funding was used to deliver enforcement and education services equivalent to 13 Fisheries Officers (out of a total of 74) in 2015/16. The delivery of the RFL Trust funds resulted in approximately 7080 contacts with recreational fishers at a cost of \$316 per contact. Performance measures relating to cost per hour, annual compliance hours and number of inspections could be established. Given the substantial cost for enforcement and education, a performance approach could help inform further efficiencies such as cost-effective ways the industry can deliver education, engagement, promotion and development activities with its fishers while allowing the VFA to more efficiently target resources towards enforcement.

Research is an essential component of sustainable fisheries management and development of our industry. In the 'cost recovery' table on page 4 of the RIS, research has not been included. Clarification is required to establish whether research activities are also being cost recovered. Examining projects funded by the RFL Trust, research projects are consistently funded for a range of organisations, including those delivered by the VFA. In the 2015/16 RFL Trust Account approximately \$1.6 million was distributed to the VFA for research-related projects. Applying this value to the 'cost recovery' table, cost recovery is in the order of 55-60%.

The administration of the RFL Trust is estimated to be around \$700,000 and was considered 'small' within the RIS documentation. However, considering the comparable amount allocated to large RFL Grants program in 2016/17 of \$702,000 to over 13 projects there is significant interest to by recreational fishers to reduce administration costs where possible. Any efficiencies made with administration activities such as a plan to transition to online licensing and away from in-store purchasing will enable more on-ground work to improve recreational fishing.

A discussion around 'cost recovery' is required as it remains unresolved. VRFish has established that recreational fishing makes a significant and far-reaching economic and social benefits to Victoria yet the broader Victorian Government policy is for a user-pays system. Even if a 'contribution' is required based on current investment could result in efficiencies for the RFL Trust Account. For example, a guaranteed % allocation of the annual RFL Trust funds could be provided for service delivery. In Western Australia, 25% the RFL Trust Account is allocated to large and small projects, 15% for the operation of the recreational peak body Recfishwest and the remainder 60% to Government for services that improve recreational fishing in that State. This approach would reduce administration costs, provide clarity on deliverables and give our fishers assurances funds are directed to initiatives that improve recreational fishing.

***Are there other alternative approaches not included in this RIS that should be considered?***

The RIS provides context that "unmanaged fisheries waste economic resources and no-one has the correct incentive to undertake activities that will help build up stocks for the future." The Charter Boat industry in Victoria is not currently licenced and not mentioned across the RIS documentation. A recommendation the Productivity Commission Inquiry into Marine Fisheries and Aquaculture was the introduction of licensing for marine fishing charter boat operators in Victoria.

We acknowledge this RIS does not deal with matters such as setting the classes of licences, exemptions, and other conditions, which are covered by the *Fisheries Regulations 2009*. Our expectation is further discussion and evaluation of approaches with the recreational fishing industry will occur during the remaking of these regulations. For example, the Productivity Commission Inquiry also recommends that Victoria should "improve the comprehensiveness of existing schemes by limiting exemptions" of RFLs.

Globally, there is a trend towards the recreational fishing industry taking greater stewardship of fisheries resources and partner with Government in a co-management approach to improve recreational fishing. The RFL Trust Account enables our industry to work in partnership with Government and other organisations to improve recreational fishing. We look forward to ongoing discussions about how our recreational fisher's funds can be invested strategically, continue to offer ongoing value to Victorian fishers and continue to build our industry for the safe and sustainable enjoyment of current and future generations.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Burgess', with a long horizontal line extending to the right.

Michael Burgess  
Executive Officer  
Victorian Recreational Fishing Peak Body

**3 October 2017**