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Jo Klemke
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Thursday 9 January, 2020

Dear Jo,

Re: VNPA submission on the proposed Fisheries (Gummy and School Shark) Notice 2020.

The Victorian National Parks Association (VNPA) thanks the Victorian Fisheries Authority for the opportunity to comment on the proposed Fisheries (Gummy and School Shark) Notice 2020.

The VNPA is a leading community conservation organisation and has been advocating for the protection of Victoria's biodiversity for over 60 years.

We wish to make comments on the following measures outlined in the Draft Fisheries Notice:

New augmented shark possession limit

Whilst we welcome the potential halving of the possession limit from two to one school shark from the proposed changes, catering for less take of school shark, our concerns remain that school shark can still be taken in the first place. There are currently serious concerns regarding their lack of recovery under current management measures with most recent data suggesting declines in school shark may be greater than previously estimated¹.

We strongly encourage the possession limit to go a step further and for there to be **no school shark retained** as a precautionary measure, when there is far too much uncertainty regarding its current stock status, noting the formal scientific assessment of its status is yet to be confirmed. The recovery of school sharks requires as much assistance as possible, and despite there being a Commonwealth Stock Rebuilding Strategy, this is forecast over the next 66 years which we argue is too long a time frame, with many potential changes and uncertainties within that time – noting concerns that recovery is not occurring and the time frame may in fact be longer

¹ Raynes, N (2019) Review of Recovery Planning for Threatened Sharks: Status, Analysis & Future Directions. Self published.

We also argue the lack of economic advantage in taking only one school shark, as further reason why **school shark should not be retained**, particularly if it was a pregnant female. Throwing one back is better than nothing and there is still a chance of post-release survival of this species.

We are aware the gummy shark limits are sustainable and the increase in their numbers retained as bycatch is acceptable.

A 36 tonne trigger limit system

We welcome the trigger limit to ensure the statewide commercial take of gummy and school shark is managed within the 40 tonne limit, however more information is needed as to how this will be administered/achieved. For example, what is the scope of the administrative changes, and would any controls be used such as restrictions on fishing areas, fishing days, number of boats, or other restrictions to license holders etc.

It would be beneficial if this information could be made publically available.

Thank you again for the opportunity to express our views. I would like the opportunity to discuss this with in more detail at a future meeting.



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