



Level 3, 60 Leicester St
Carlton Victoria 3053
Phone 03 9347 5188
Fax 03 9347 5199
vnpa@vnpa.org.au
www.vnpa.org.au

The Hon. Lily D'Ambrosio
Minister for Environment
Level 16, 8 Nicholson Street,
East Melbourne, VIC 3002

Wednesday 9 September 2020

Dear Minister,

Re: environmental concern over the harvesting of Spider Crabs on the Mornington Peninsula, Port Phillip Bay.

We write regarding your responsibilities as Environment Minister, regarding the recent intensity of spider crab harvesting of Port Phillip Bay's world-renowned annual Spider Crab aggregation, and associated environmental damage, marine pollution and the public safety hazard on popular piers on the Mornington Peninsula. We seek your support for a seasonal no-take period during the annual spider crab moulting season between the months of April – July, and ask that you raise concerns with the Minister for Fishing and Boating.

This well-loved tourism drawcard, as featured by David Attenborough on Blue Planet II, occurs each year between the months of April-July, when the march of the spectacular spider crabs come in to the shallows to undertake their annual moulting, attracting thousands of visitors to witness this marine spectacle.

Unfortunately, the 2019/2020 spider crab migration events saw for the first time a sharp increase in intensity of crab catching from Rye and Blairgowrie piers, which until this time was unprecedented. The sheer volume of crab harvesting, combined with the nature of the fishing practices, and the high number of water users observing the crabs from above and below water, caused public health and safety, and environmental issues.

The 2020 event, saw a further escalation of crowds of people harvesting with nets, using chicken carcasses as bait, which littered the seafloor (80 within a small areas), damage to marine life, marine litter, crab pots being dropped on people in the water, and on marine life - all confined to a small area from a single section of pier.

This is causing significant public health, and safety, and environmental concern from audiences at the local, state, national and international level, and over the past months, has gained wide media coverage in [The Age](#), [Channel 9 News](#).

Given the potentially high tourism value of the spider crabs, and given the hardships faced due to Covid-19, by local tourism operators there is great value in protecting such an important tourism drawcard to Victoria's economy. Without protection of this natural asset, we are concerned it is at risk.

While we understand the responsibility for management of crab harvesting sits with the Minister for Fishing and Boating, Melissa Horne, and the Victorian Fisheries Management Authority (VFA), it is an issue requiring the collaboration of several government agencies, with an interest in the safety of

people in the area, and the protection of marine life. This includes Parks Victoria with responsibilities for management of the piers, DELWP for management of coastal areas and EPA for the management of litter, who have been involved in liaising with the VFA. As the Environment Minister responsible for the *Marine & Coastal Act 2018*, and the *Marine and Coastal Policy 2020*, and ultimately the marine and coastal environment, we think this is an issue relevant to your portfolio and requiring attention.

The marine and coastal policy recognises the need to protect migratory species at critical life stages, for example, (page 24) “native and migratory species at a critical stage of their life cycle.” In relation to access of marine and coastal crown land (page 55) “minimise risk to public safety; protect cultural values; protect natural values and habitats at critical life stages (such as for migratory and nesting shorebirds).”

Also importantly is the need for ecosystems to be valued in their own right, (page 24), “Ecosystems are valued in their own right – for their intrinsic value – regardless of their benefits to humans.”

With regard to recreation and tourism, the policy also states the need to “minimise impacts on environmental and cultural values; minimise impacts on other users; maintain public safety; respond to the carrying capacity of the site”, which is very relevant to the circumstances experienced during the 2020 event.

There is also a high degree of public interest. The VNPA is working with the community groups Spider Crab Alliance and Spider Crab Melbourne, also known as SOS #SaveOurSpiderCrabs, representing divers, fishers, educators, scientists, other water users, and concerned community members to garner local and broader support from the community, Councils, conservation groups, tourism and fishing bodies, and local businesses. We have also had positive feedback from local members and council on this issue.

Our groups have also been meeting and working with the Victorian Fisheries Authority, to assist in their work to monitor spider crab movements in an attempt to gain their support for a seasonal no-take period. So far, there does not appear to be appetite from them to implement any no-take period. Whilst tagging efforts are a welcome step in the right direction, the results may only tell us about crab movements, and does not specifically address the concerns that the last two seasons have shown. Without government action, we are concerned that the 2021 event will be an even greater hazard.

We therefore seek your support for a seasonal no-take period during the annual spider crab moulting season between the months of April – July, supported by your powers to implement the marine and coastal policy. We also ask you to raise this support with the Minister for Fishing and Boating. In our view, this is the only solution to solve the problems faced the past two spider crab moulting seasons.

Spider crab protection measures are supported by local and state-wide groups, The Spider Crab Alliance, and Spider Crab Melbourne, almost 34,000 petition signatories, statements of position from 50+ local businesses, industry representatives and educators, and 1000+ statements of support from individuals including marine biologists, scientists and educators, verbal and social media support from anglers and their representative bodies.

We believe a short period of no-take of the crabs during their peak moulting time would mitigate the majority of issues and risks, and given it is a new fishing pressure, it would gain wide community support, including people with fishing interests.

We believe this is a real opportunity if acted on quickly to curb before it gets even further out of control in coming spider crab seasons. If we can provide any more evidence or information, we are happy to do that.

I would welcome the opportunity to meet or discuss the issue further with appropriate staff. Please contact Shannon Hurley, Nature Conservation Campaigner at shannon@vnpa.org.au, or on 0433 481 346.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Ruchel', written in a cursive style.

Matt Ruchel
Executive Director
Victorian National Parks Association