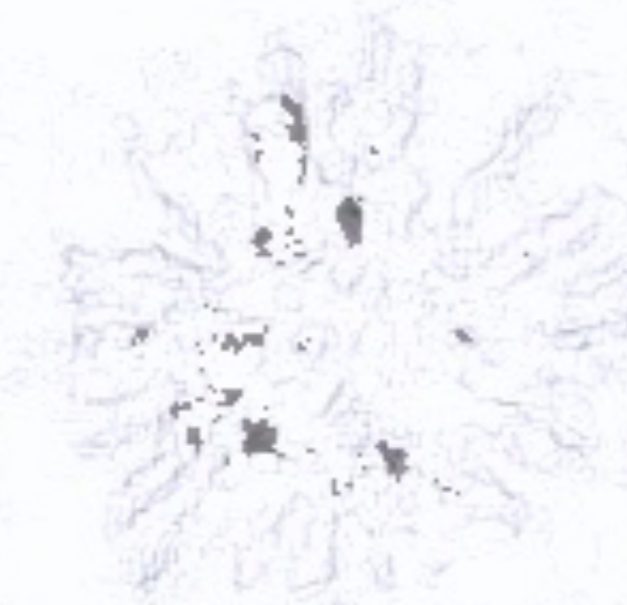


**VICTORIAN SEA URCHIN DIVERS  
ASSOCIATION INC.**

A0035833J

ABN 81841486417



17th November 2022

By email: [mar.sen@aph.gov.au](mailto:mar.sen@aph.gov.au)

Senate Rural and Regional Affairs and Transport

Enquiry into Fisheries References Committee Quota Systems.

Dear Sir/Madam,

I am writing to you on behalf of the Victorian Sea Urchin Divers Association, the body representing the Victorian Wild Harvest Sea Urchin Industry, regarding the recently re-opened Senate Inquiry on the Fisheries Quota System.

Following review of the Rural and Regional Affairs and Transport References Committee Hansard from 2nd November 2022 discussing the Fisheries Quota System, the Victorian Sea Urchin Divers Association (VSUDA) has significant concerns with comments made regarding the short-term leasing and public auctions of quota, allocations to not-for-profit organisations and matters of stewardship.

The Victorian Sea Urchin fishery operated on non-renewable developmental fishery permits for many decades. During this period most people who applied for a permit received one. These permits offered no security for fishermen and there was little incentive to invest in the development of the industry, most permits were not used.

In about 2011, a moratorium on the issue of further permits was put in place to allow a period of show cause provisions as to why individuals ought to retain those permits. Ultimately, those that were active participants and maintained a significant catch history, were rewarded with secure fishing rights.



The Fisheries Act 1995 (Vic) (the Act) provides the legislative framework for managing fisheries resources in Victoria.

In 2014, consistent with the objectives of the Act, Baseline management arrangements for the Victorian Sea Urchin Fishery<sup>1</sup> (management plan) were established. The management plan was developed in consultation with key stakeholders, to ensure the ongoing long-term sustainability, economic efficiency, and cost-effective and participatory management of the fishery.

The corner stones of the management plan are a Total Allowable Commercial Catch (TACC) and a fixed number of ITQ units to allow the equitable division of the TACC among fishery participants.

The tradeable ITQ units have provided for long-term security of fishing rights. This in turn has enabled participants to invest with confidence in vessels and equipment required to carry out fishing operations. Businesses have relied upon the security of the ITQ units to develop markets, invest capital and employ many people. The urchin processing sector particularly requires a significant infrastructure and human resources.

The Victoria Sea urchin fishery involves commercial diving operations in the rugged oceanic waters of Bass Strait. This activity is conducted by highly trained and experienced individuals who have dedicated their careers to the industry.

Comments made in other submissions to this enquiry that suggest short term leases and regular public auctions of quota as being an appropriate way to manage a fishery so as to extract resource rent, is totally misguided. If implemented, such a system would completely undermine any confidence, investment, or development of the Victorian Sea Urchin Fishery. It is no wonder such open access systems (such as permits) have failed in the past.

Further, to suggest that quota can be allocated to not-for-profit organisations for public good, demonstrates a clear lack of understanding of the requirements for a successful fishing industry and a disconnect with economic reality.

The VSUDA in partnership with other industry sectors, government departments and universities, has for many years participated in kelp forest restoration projects in Eastern Victoria. These projects enhance the productivity of fishery resources, protect marine biodiversity, and contribute to the fight against climate change. This is just one example of how the long-term tenure afforded by ITQ units promotes responsibility and stewardship.

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<sup>1</sup> Sea Urchin Fishery Baseline Management Arrangements June 2014 ISBN 978-1-74146-123-7



The Victorian Sea Urchin Divers Association strongly objects to any changes to the corner stones of TACCs and ITQ units and the manner in which they are allocated. This system underpins the investment, development and successful management of the Victorian Sea Urchin Fishery and similar fisheries around the country.

Jason York

President

Victorian Sea Urchin Divers Association Inc.