

Stephen Chara
250 Portreath Road,
Bellbrae, Victoria, 3228

Ph: 03 5266 1556

Mailto: stephen@charas.com.au

My ref: [SC Nomination Jan 2010](#)

Date: 8th January 2010

Martin O'Brien
Secretary, Scientific Advisory Committee
Dept. Sustainability and Environment
2/8 Nicholson St., (PO Box 500) Victoria Pde.,
EAST MELBOURNE 3002

Nomination under the **Flora and Fauna Guarantee Act** of “Overfishing for bait of the common yabby (*Cherax sp*) and localised endemic crayfish species under Fisheries Victoria Regulations”.

Dear Martin,

I wish to nominate the following **potentially threatening process** for listing under the **Flora and Fauna Guarantee Act 1988**.

I believe that the nomination shows that the process is eligible for listing according to the criteria given in the nomination.

Yours sincerely,

Stephen Chara

encl.

File name:

Nomination by Stephen Chara – Final.doc

FLORA AND FAUNA GUARANTEE ACT 1988

NOMINATION OF A POTENTIALLY THREATENING PROCESS FOR LISTING

Nominator's name		Signature
Stephen Chara		
Nominator's address		
250 Portreath Road, Bellbrae, Victoria, 3228 Phone: 03 5266 1556 Email: stephen@charas.com.au		
Name of potentially threatening process		
Overfishing for bait of the common yabby (<i>Cherax sp</i>) and localised endemic crayfish species under Fisheries Victoria Regulations.		
Please state whether this is a nomination for listing or delisting		
This is a nomination for a listing. PLEASE NOTE: <i>Cherax destructor</i> is listed as vulnerable (VU-A1de) IUCN Red List 2003(1)		
Description	<i>Provide a brief, general description of the potentially threatening process. A reference to a detailed description could be included.</i>	
<p>Victoria's Fisheries Regulations were reviewed and approved March 2009. The allowable daily take of whole yabbies was increased from 20 litres to 30 litres. There was no size restriction or the requirement to return berried females. Please note that NSW and SA have a daily take set at 200 yabbies per person per day regardless of size with berried females being required to be returned. In Victoria Commercial bait fishermen are required to submit monthly catch and effort returns so that Fisheries Victoria can monitor the health of the fishery. In Victoria the new regulation has allowed 721,000 Recreational Fishermen to take an increase in commercial quantities of bait sized yabbies without any form of monitoring. If bait yabbies between the size range of 3-4 grams were targeted then the daily take allowed would be in the vicinity of 6000 bait yabbies per person per day. Recreational fishermen are not required to be able to distinguish different species so crayfish that are not <i>Cherax</i> species would also be targeted. For example <i>Geocharax spp</i>, <i>Gramastacus spp</i>, <i>Euastacus spp</i> and <i>Engaeus spp</i> would be severely impacted. Another un-named rare species of <i>Cherax</i> found in North Victoria would also be potentially targeted.</p> <p>Recreational Fishermen are not subject to translocation protocols. With the ability to take and translocate large numbers of live <i>Cherax</i> and non <i>Cherax</i> species unintentionally taken, these non <i>Cherax</i> species may be translocated outside of their natural range, used as live bait with the possibility of release. Yabbies are also a food source for other fauna. Reducing this food source from an area will impact on the survival of these species, for example Murray Cod, Native water rats, birds and Platypus. This has the potential to cause a range or distribution shift by fauna searching for an alternate food source.</p> <p>During drought periods larger yabbies aestivate. When water returns they re emerge and seem to be plentiful. These are then aggressively targeted by recreational fishermen. It must be noted that these are remnant populations and heavy fishing pressure will threaten their ability to recover. (Please refer to fisheries report p6). This is happening now.</p>		
Habitats or areas affected	<i>Describe the habitats, geographic areas or environments where the potentially threatening process operates.</i>	
<p>The potentially threatening process would cover the whole state of Victoria with different species being endemic to isolated areas. For example <i>Cherax destructor</i>, north, north east and east of Victoria. <i>Cherax albidus</i>, south west Victoria, <i>Geocharax gracillus</i>, around Colac, <i>Gramastacus</i> species around the Grampians. The yabby is a semi-aquatic freshwater crayfish commonly found in a wide range of habitats throughout most of Victoria, including low-lying swamp ground, streams, rivers, man made channels and dams. See distribution p16 .</p>		

Taxa or communities affected	List individual taxa, functional groups of taxa or communities affected by this potentially threatening process.
	<p><i>Cherax destructor</i>, <i>Cherax albidus</i>, Un-named <i>Cherax</i> species (Barmah Swamp Yabby) <i>Geocharax spp</i>, <i>Gramastacus spp</i>, <i>Engaeus spp</i>, <i>Euastacus spp</i> that have an OCL less than 5cm.</p>
Significance of the threat	Indicate the significance of the threat, in terms of its scale and/or severity. Indicate how the potentially threatening process is operating now and/or is expected to operate in the future.
	<p>The significance of the threat is a dramatic reduction in yabby populations especially during this extended dry period and climate change. Yabbies are a food source for other species which will also be affected. Recreational Fishermen target sizes from 3 grams to 300. In unfished ponds the size distribution can be compared to a pyramid with the larger yabbies representing the smallest numbers. These are targeted for human consumption but are too large for most other predators. Large yabbies are required to keep a pond sustainable since they are less vulnerable to non human predation such as water rats, birds, eels, turtles etc. which target small to medium sized yabbies. The larger yabbies will continue breeding securing survival of the species. Due to recreational fishing, the average size of yabby populations has reduced significantly which results in the whole of the individual populations being vulnerable to non human predation (Observations by myself as a Commercial Bait Collector and Aquaculturist). The long term sustainability is thus affected. Humans also target small to medium sized yabbies for fishing bait and by taking commercial quantities will impact on the sustainability of populations throughout Victoria. When I first argued my case for sustainability issues the number of Recreational Fishermen was in the order of 550,000. It is now recorded at 721,000 and growing. Without accountability on poor decision making the impact on the wild stock fishery is increasing yearly. Commercial fishermen were recorded as harvesting less then 1 tonne in the last fisheries report see p22. This information was possible due to the requirement for Commercial Bait collectors to submit monthly catch and effort returns. Since Recreational Fishers are permitted to take commercial quantities of bait without the requirement to submit monthly catch and effort returns no data is made available. To give you an idea of the possible yearly take I will put forward a simple scenario.</p> <p>For example, If 1% of participating Recreational Fisherman caught the new allowable limit of Yabbies (bait) 12 times per year (one day per month) the total wild catch of yabbies would be in the vicinity of 1467 tonnes for the year.</p> <p>Fisheries Regulations 2010</p> <ul style="list-style-type: none"> ➤ No Size limit. ➤ Not required to return berried females. ➤ Allowed 30 litres of live Yabbies per person per day. <p>One practical test showed that 113 live bait sized Yabbies between 4 to 6 grams in weight filled a one litre container. 30 litres of bait Yabbies would be equivalent to 3390 yabbies. About 6000 yabbies between 3 to 4 grams.</p> <p>The latest figures show that there are 721,000 Victorians per year participating in recreational fishing.</p> <p>1% = 7210 persons. If 1% of Recreational fishers catch the new allowable limit 12 times per year (one day per month) the total catch per year would be,</p> <p>7210 persons x 3390 yabbies x 5 grams (average weight per yabby) x 12 days of a year, divided by 1000,000 to convert to tonnes = 1467 tonnes per year.</p> <p>If 1% caught a limit of 200 bait Yabbies 12 times per year it would equate to 87 tonnes per year. Even this is excessive. It is obvious that more research is required into recreational fishing habits.</p> <p>PLEASE NOTE: Table 24 p22 Reported catch for 30 Commercial bait collectors is under 1 tonne per year. WHAT IS THE ANNUAL TAKE OF 721,000 RECREATIONAL FISHERS TAKING COMMERCIAL QUANTITIES OF BAIT SIZED YABBIES AND YABBIES FOR HUMAN CONSUPTION?</p>

Eligibility criteria	Indicate which of the primary criteria and sub-criteria stated in the Regulations the potentially threatening process satisfies, on what evidence the case is based and cite the sources of this evidence. The evidence may have been presented in full in the preceding sections, but, in this section, a summary of the logic of the case should be provided. Unsupported statements which need to be verified delay the SAC's consideration of the nomination.
	<p>5.1 <i>the potentially threatening process poses or has the potential to pose a significant threat to the survival of a range of flora and fauna.</i> Allowing recreational fishermen to take commercial quantities of bait sizes yabbies <i>Cherax spp.</i> “will deplete their numbers and have broader ecosystem impacts” Note Fisheries Media release and comments p19 . I have consistently reported low wild stock numbers and other observations as a commercial bait collector and I am submitting a higher number of Catch and Effort Returns that are marked as Nil Fishing. I am entitled to collect bait within a 75 Km radius of my home. Due to lowering wild stock numbers over the last few years it is no longer viable to trap for bait Yabbies in my designated area.</p> <p>5.1.1 <i>the potentially threatening process poses or has the potential to pose a significant threat to the survival of two or more taxa;</i> Since there is no requirement by recreational fishermen to be able to distinguish various species then being allowed to take crayfish at commercial quantities would severely impact on <i>Geocharax spp</i>, <i>Gramastacus spp</i>, <i>Engaeus spp</i>, and <i>Euastacus spp</i>. The impact on <i>C. albidus</i> is of great concern having a smaller range than <i>C. destructor</i>, see p16 . Duck hunters are tested for their ability to distinguish between duck species but there is no such requirement for obtaining a Recreational Fishing licence.</p> <p>5.1.2 <i>the potentially threatening process poses or has the potential to pose a significant threat to the survival of a community of flora and fauna.</i> Yabbies are a food source for many other species. Reducing yabby numbers will impact on the survival of these species. Refer to VRFish (Peak Body for recreational fishers) comments p18.</p> <p>5.2 <i>the potentially threatening process poses or has the potential to pose a significant threat to the evolutionary development of a range of flora and fauna.</i> As the number of Wild Stock Yabbies reduces the range of fauna that has yabby on its menu will be forced to seek an alternative food source. This in turn will impact on this food source which will impact on other species and so on. This effect will have an evolutionary impact on many species. Observations made as an experienced Commercial Aquaculturist and Commercial Fisherman.</p> <p>5.2.1 <i>the potentially threatening process poses or has the potential to pose a significant threat to the evolutionary development of two or more taxa;</i> There is a significant threat to the evolutionary development of <i>Cherax albidus</i>, <i>Cherax destructor</i> and an un-named <i>Cherax</i> species (spanner claw or Barmah swamp yabby). By observation and experience if you constantly remove the best performers (growth rate) and larger Yabbies the gene pool for these Yabbies will be severely reduced resulting in smaller average sizes and Yabbies berrying at a smaller size. Reducing a food source ultimately results in the reduction in size of a species.</p> <p>5.2.2 <i>the potentially threatening process poses or has the potential to pose a significant threat to the evolutionary development of a community of flora and fauna.</i> There is a significant threat to the evolutionary development to a community of fauna and flora. Reducing a specific food source will result in fauna searching for an alternative which can result in a change to a species range. This can then impact on other species. Less Yabbies results in less fish that eat Yabbies which results in less birds that eat fish etc. Yabbies eat plants so less Yabbies more plants, more plants then less access to water for birds and so on.</p>
References	Provide full details of references which have been cited as sources of evidence in the nomination.
	DPI Web sites, Victoria, South Australia and NSW. DPI Media releases. VRFish Web site. Attached Documents

Please Note:

1/ That I believe that the Cherax species Cherax destructor, Cherax albidus and the Barmah Swamp Yabby which is soon to be named would meet all criteria shown below. This would primarily be due to the increase in the numbers of Recreational Fishermen. See VRFish documents.

1.2 the taxon is significantly prone to future threats which are likely to result in extinction.

1.2.1 the taxon is very rare in terms of abundance and distribution;

1.2.2 the threat is currently operating and is expected to operate at a level in the future which is likely to result in the extinction of the taxon.

1.1/2.1 the reproduction or recruitment of the taxon has seriously declined or is not occurring.

2/ Due to recreational fishermen being entitled to take commercial quantities of bait sized Yabbies the use of legal and illegal traps has increased dramatically. Illegal traps like the opera house are being sold in the 1000's for prices as low as \$2.50 each which make them a throw away item see p12. Many other species of fauna are being trapped and die as a consequence, eg platypus, turtles and diving birds. **The ability to overfish bait sized yabbies (Cherax species) due to management approved Fisheries Victoria Regulation impacts on the survival of many species. As the number of Recreational Fishers increase so does the threat into the future.**

Key Points

The issue is **not** the increased volume from 20 litres to 30 litres in the daily take of yabbies by Recreational Fishermen but the fact that there is **no size restriction** placed on a volume take and no requirement to return berried females. Since there is no size restriction the allowable daily take for bait sized yabbies is far more than what is required **“for the legitimate personal needs of recreational fishers”**.

“Taking yabbies at a commercial rate will deplete their numbers and have broader ecosystem impacts”.

This principle is acknowledged by Fisheries Victoria in relation to bass yabbies.

The increase to 30 litres of whole yabbies is so that the daily take is consistent with that of a marine prawn species that is not subject to drought. See p22.

Fisheries Victoria states that 100 bass yabbies per person per day is sufficient for legitimate personal needs of recreational fishers. Taking numbers greater than this then becomes consistent with the taking of yabbies for commercial purposes. **This same reasoning should apply to Inland Cherax spp.**

There is a contradictory attitude by Fisheries in relation to Bass Yabbies when compared to Cherax spp.

Fisheries Victoria has failed to answer 2 key questions.

30 Victorian Commercial bait collectors are required by law to submit monthly catch and effort returns so that Fisheries Victoria can monitor the health of this fishery.

1/ How can Fisheries Victoria manage the health of a fishery when 550,000+ recreational fisherman are entitled to take commercial quantities of bait yabbies without the requirement to submit catch and effort returns?

"Catch and effort data provides Fisheries Victoria with crucial information on the health of each fishery and allows us to assess the relative abundance of key target species. This information is fundamental to the sustainable management of Victoria's fisheries, in line with the objectives of the Fisheries Act 1995."

100 bass yabbies per person per day is considered to be sufficient for legitimate personal needs of recreational fishers.

2/ What is the daily bag and possession limit of bait sized yabbies, cherax species, per person which Fisheries Victoria believes to be sufficient for the legitimate personal needs of recreational fishers?

Allowing 5 litres of yabby tails as an option to 30 litres of whole yabbies is a waste of a resource.

40% of the available meat in a table yabby is in the claws and the remainder in the tail. This wastage results in more yabbies being taken.

There are no documents or scientific evidence that shown NO sustainability issues. FOI document. Fisheries acknowledges an illegal trade in bait yabbies.

In relation to the harvesting of Cherax spp for bait I believe that Fisheries Victoria has not responded to the impacts of drought and its consequences on inland recreational fisheries by increasing the volume.

Fisheries have stated that it is “very unlikely that they would revisit the regulation again”.

Fishery status report 2008 Report No. 63

Why manage our fisheries and aquatic resources?

History has shown that without effective management and regulatory controls, fisheries often become over-fished and aquatic habitats can become degraded. This is known as the 'tragedy of the commons' whereby individuals will race to harvest an available stock before their competitors. Over-fishing can lead to long-term stock depletion and have significant ecological impacts. The declining catches usually result in lower profit margins for the fishing industry, reduced employment, and increased fish prices for the community. Such factors can contribute to economic hardship.

In 2006/07, DPI issued a total of 816 commercial fishery access licences in coastal marine waters (690), bay and inlets (96) and freshwater/bait (30).

PRACTICAL TEST TO SHOW THE NUMBER OF A SAMPLE OF BAIT SIZED THAT WOULD OCCUPY A 30 LITRE VOLUME



The above photo shows one hundred bait sized Yabbies (length 5 to 6 cm tail tip to eyes) with an average weight of 4.4 grams occupying a volume of 0.8 litres. This is equivalent to 125 yabbies per litre. The box above shows the 30 litre mark and inside the box is the 100 bait Yabbies. Recreational Fishermen are entitled to fill this box up to the 30 litre line with live Yabbies per person per day. Since there is no size restriction and if bait Yabbies were targeted they would be entitled to harvest 125 per litre x 30 litres=3750 of the above size per person per day. That is the box full of bait Yabbies per person per day.

COMMENTS

- 1/ Issue is **not** the change in volume from 20 litres whole yabby to 30 litres but,
a/ No size limit resulting in excessively high catch limits of bait sized yabbies.
b/ No requirement to return berried females as per SA and NSW.
- 2/ Would not have persevered for as long as I have if I did not feel justified in my conclusions of an unsustainable harvest of yabbies by recreational fishermen. First raised this issue with Fisheries Victoria 3/09/08.
- 3/ There is a lack of current data available on recreational fishing habits. Requested check boxes on fisheries licences a/ marine fish, b/ freshwater fish, c/ marine crustaceans, d/ freshwater crustaceans, with a fee associated with each box checked. This would then give fisheries an idea of what species are being targeted.
- 4/ Information supplied based on observations as a commercial Fisherman and Aquaculturist.
- 5/ Comment: "I would be cautious citing IUCN's listing of *Cherax destructor* as 'vulnerable'. True, farming practices and river degradation have negatively affected the species, but this has been more than compensated by the fact that the amount of habitat the species occupies has been increased many-fold through construction of farm dams, so it is doubtful that *C. destructor* is threatened."

Reply: **My concern is with yabbies in public waters that contain other native fauna.** Some farmers don't like yabbies in dams and will remove them. As a Commercial Fisherman I spoke to an old timer in my designated area and asked him if he new of any good yabby dams. His reply was, "If you had spoken to me 20 years ago we could have filled your ute in a day, but ever since the canola growers moved in, the yabbies have disappeared". No doubt due to the use of pesticides. Increasing the number of farm dams does not automatically mean that the yabby population increases also.

5/ Have been told that only large yabbies aestivate. The smaller ones are not able to burrow deep enough. After a drought period yabbies re emerge. This is a remnant population and if heavily fished the remaining population will take years to recover if at all.

6/ Statement by Fisheries. This is why I am concerned.

"Travis said that it was very unlikely that they would revisit the regulation again."

INDEX OF FOLLOWING PAGES

p8	Listing of <i>Cherax destructor</i> on Redlist
p9-11	Australian Aquatic Biological Pty Ltd.
p12	Opera House nets
p13-14	Comparisons of Recreational Fish limits b/n Vic. SA and NSW
p14-15	Spiny Project
p16	Distribution of <i>Cherax destructor</i> and <i>C. albidus</i> .
p17	Ecosystem-Based fishery management in SA and Vic.
p18	VRFish
p19	Media release.
p20	Various communications.
p25	Recreational Statistics for Victoria.

The IUCN Red List of Threatened Species™

<http://www.iucnredlist.org/apps/redlist/details/4622/0>

Cherax destructor



Taxonomy

Kingdom	Phylum	Class	Order	Family
ANIMALIA	ARTHROPODA	CRUSTACEA	DECAPODA	PARASTACIDAE

Scientific Name:	<i>Cherax destructor</i>
Species Authority:	Clark, 1936
Common Name/s:	English – YABBY

Assessment Information

Red List Category & Criteria:	Vulnerable A1de ver 2.3
Year Assessed:	1996
Annotations:	Needs updating
Assessor/s	Crandall, K.A.

Geographic Range

Countries:	Native: Australia
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Habitat and Ecology

Systems:	Freshwater
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Citation: Crandall, K.A. 1996. *Cherax destructor*. In: IUCN 2009. IUCN Red List of Threatened Species. Version 2009.2. <www.iucnredlist.org>. Downloaded on **14 January 2010**.

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Australian Aquatic Biological Pty Ltd

<http://www.aabio.com.au/>

Extract with permission from,

THE FRESHWATER CRAYFISH OF NSW, AUSTRALIA

By Robert B McCormack

ISBN: 0 978-0-9805144-1-4 - 138 full colour pages

Overfishing – Awareness - Make no mistake; overfishing can have dramatic consequences to the overall viability and survival of many species in NSW. It is quite possible that one person in the period of a month with just recreational fishing could impact on a species to such an extent that the species would become extinct in that area. This is a frightening outcome and something that can happen so easily.

In NSW the Department of Primary Industries that is responsible for recreational fishing is well aware of this problem. They have introduced bag limits and size limits and are always attempting to stop illegal fishing and commercialization of native stocks. They have a ban on the collection of any crayfish species with eggs and most people are pretty good in NSW they do return the females with eggs back to the wild. In NSW if you are after *Euastacus armatus* or *Euastacus spinifer* our largest most common species, it is just about impossible to catch a large male these days. These are very slow growing animals and just about all the large males in NSW that are over 50 years old have been fished out of accessible fishing spots. The largest animals you catch these days are all females as most people do the right thing and return these animals after capture.

The long term consequences of recreational fishing centred on removing the largest animals from the population are obvious and inevitable. As a commercial crayfish farmer I was well aware of the consequences and was always attempting to improve or remedy this situation. For example take the yabby *Cherax destructor*. This is a very fast growing highly fecund crayfish. It is also a species that is perfect to predict the future of a whole species in NSW. *Cherax destructor* is a species that wanders far and wide when the conditions are right. A male and female can make it to an isolated dam or humans can help and drop these two crayfish in the dam. These crays breed and from now to eternity you will have crayfish in that dam. If left alone it will be natural selection. The larger crayfish dominating the food, living space and breeding. The largest males will get the girls and these will be the ones that do the majority of breeding with the females. Without intervention the largest males are the

131

major breeders and it is the offspring of these animals who are born with the predisposition for fast growth and large size, that's just natural selection and evolution in action as the parents pass their genes on to their offspring.

Now add man to the equation and everything changes. Man now selects for the big males and females and removes them from the breeding pool. Now it is the small males and females that are breeding and adding their genes for slow growth and small size into the population. As a result the overall size of the adult animals in the population reduces. I have seen this time and time again with *Cherax destructor* in farm dams that are fished by the general public and even on aquaculture farms. For the aquaculturalist, once he gets to that stage he needs to terminate his stock and restock with fresh stock.

In NSW our NSW DPI Fisheries Department recognizes this problem and has imposed recreational fishing restriction on *Euastacus armatus* the states largest crayfish and most widely distributed *Euastacus* species. These regulations are designed to alleviate this problem. We have a closed season for fishing and large sections of river closed altogether. We have bag limits and the restrictions on number and types of traps. We have regulations that restrict the removal of females with eggs but not large males. We now have regulations on the eastern drainage for *Euastacus* species with a bag limit of 5 and a size limit of over 90 mm OCL. These regulations will do much to limit the damage and secure these species for the future but regulations are only as good as the enforcement. Please do your bit to help, follow the regulations and if you see others not following, then make the effort to alert the authorities. One person in one day with a dozen or two traps can fish out a section of river of large crayfish that will take 25 years or more to replace.

With *E. armatus* they do not migrate as such so are restricted to a reasonably small area. With the large males and females gone only small crays are left so we are now naturally selecting for smaller size. This may result in the reduction of the size of the species and long term genetic damage to the species. Perhaps in 50 years *E. armatus* may no longer be the states largest species in large sections of NSW.

Awareness is something that has been overlooked in NSW. As part of this project a large amount of my time is spent in National Parks and State Forests catching crayfish. The best source for information on good crayfish spots is often obtained from the NP&WS and State Forest personnel that look after these parks. Wherever I go I contact them and have always found them to be extremely helpful and very knowledgeable on where the crayfish are, etc. However, without fail they generally know little more, only a few know the size or bag limits and most do not know the names of the species they have in their parks and streams. This lack of awareness is something we are lagging behind in NSW. The same personnel in Victoria for example portray a far greater knowledge on the species in their local streams.

As I move from State Forest and National Park to Park in NSW it is not unusual to see people fishing for *Euastacus* species in the streams of these Parks. I have for example seen people with 30 to 40 *Euastacus valentulus* all around the 50 to 60 mm OCL size. When you explain the bag limit is 5 and that the size limit is greater than 90 mm OCL, they call them yabbies and tell me to "Piss Off" the bag limit is 200 per person per day. General public education on the difference between *Euastacus* and *Cherax* species is also desperately needed in NSW.

Hopefully this publication will contribute to the public knowledge of the crayfish species in NSW, including those in whose hands their future may rest in. Increasing the general communities awareness of the desperate need to protect these species plus their habitat and the large diversity of species in NSW needs to be the highest priority of us all.

Pollution - Generally after surveying much of NSW I feel that we are in a reasonably good state on the pollution side. Thanks to our governmental departments we really have picked up our game and with greater awareness of aquatic environments by all departments we are generally seeing an improvement.

If we ignore the unforeseen we can divide pollution into two main sources. Urban and rural. Urban pollution is from multiple sources, sewage, storm water runoff and the inputs that go with it like fertilizers, cigarette butts and dog droppings, etc. Most of our crayfish species seem to handle this well and in all the major cities we can still catch crayfish in the creeks of suburban backyards.

Rural pollution is a bit more insidious. Widespread chemical use years ago before any controls and the continued use of a wide range of chemicals now are all entering our waterways. Many of these chemicals persist for generations in the bottom sediments of the waterways and it is here that our crayfish live. Now I know little on chemicals and residue levels in crayfish or their habitat areas. However, I do know a bit about *Cherax destructor* (yabbies) and natural populations of this species from around NSW. After 20 plus years of recreational and commercial fishing of yabbies in NSW I have made some interesting observations. I have captured native populations of crayfish from all over NSW. When I head west and hit the irrigation areas you have two types of crayfish those that are from the grazing areas and those from the cropping areas. Both areas have the same numbers of crayfish so quantity is not the problem, it's quality. The crays from the cropping areas are weak. The chemicals they are exposed to do not kill them, they live fine until they are stressed and then they just do not have the immune system to protect them. They will die from secondary infections, generally bacterial infections. Yabbies from large areas of NSW seem to be weakened by exposure to agricultural chemicals and have weakened immune systems. Perhaps the extended droughts are not helping and a few flood years to help purge the rivers and streams would improve the situation.

THE ABOVE ALSO APPLIES TO VICTORIA

"Stephen" <stephen@charas.com.au> 10/11/2008 10:55 PM

To Ray's Customer Service

I would like to express my concerns with the pricing of your opera house nets.

At these low prices they become a throw away item.

Being a commercial fisherman collecting bait I have seen these traps left in the water or thrown into the bushes.

The use or possession of these traps are prohibited in, on or next to all Victorian inland public waters.

They are used and left behind to avoid being in possession if inspected by fisheries.

Ownership can be denied if fishers are not in possession.

Please protect native fauna by doing the following.

- In the area these traps are sold have a sign stating the Victorian Fishing Regulations.
- Increase the price.

Last year I estimate that over 5000 of these traps were sold in Victoria by Ray's.

I just wonder how many platypus and other native fauna that have died as a result of their prohibited use.

I have sent this email to other persons I hope are concerned enough to email Rays' Customer Service at kmr@raysoutdoors.com.au to lodge their concerns.

Thanking You
Stephen Chara
Otway Bait



From: Peter.Appleford@dpi.vic.gov.au [mailto:Peter.Appleford@dpi.vic.gov.au]

Sent: Thursday, 13 November 2008 11:20 AM **To:** Stephen **Subject:** Re: Opera House Nets

Stephen

if you or your colleagues are seeing areas/patterns of use of these nets in public waters then please contact the 13FISH hotline so we can identify if targeted patrolling or operations are required.

Thanks Peter A.

Hi Peter

Thanking you for your reply.

Notified Fisheries last year about this same issue (passed on some locations from the Aire River to Badgers Creek).

The Pattern is, *during a holiday period*. The areas are, *isolated camping sites near a stream or river*. Traps are set at night and checked early morning. Traps are left in water or taken home on the last day of camping.

Could you please send an email to Ray's suggesting they place a sign with the sale of the nets stating the Vic. Fish Regs. Feedback that I have received suggests that if they were to do this, they would not sell any nets. What does this tell you?

Best Regards,
Stephen

Comparison of Recreational Fishing limits between Victoria, SA and NSW

VICTORIA

[http://www.dpi.vic.gov.au/dpi/nrenfaq.nsf/LinkView/D4978F0C7779B888CA257568001BB9F0863080215E41289ECA25753D0013A569/\\$file/10_Limits%20and%20Closed%20Seasons%202.pdf](http://www.dpi.vic.gov.au/dpi/nrenfaq.nsf/LinkView/D4978F0C7779B888CA257568001BB9F0863080215E41289ECA25753D0013A569/$file/10_Limits%20and%20Closed%20Seasons%202.pdf)

CRUSTACEANS

Yabby (freshwater)

Scientific name: *Cherax spp.*

Minimum legal size: no minimum.

Bag/possession limit: 30 litres whole yabby or 5 litres yabby tails. You may have in your possession whole yabbies or tailed yabbies, but not both at the same time.

PERSONAL NOTE:

No requirement to return berried females as per NSW and SA.

No minimum size. A 30 litre container will hold approximately 6000 bait sized Yabbies between 3-4 grams, or approximately 3750 bait sized Yabbies between 4-5 grams.

Collecting 5 litres of yabby tails is poor utilisation of a resource since 40% of the total meat in a yabby is in the claws.

NEW SOUTH WALES

<http://www.dpi.nsw.gov.au/fisheries/recreational/regulations/fw/fw-bag-and-size>

[Yabbies - freshwater](#) + N/A - 200 in total



Unlisted native species N/A N/A 10 in total

* a bag limit comprised of any single species or a combination of listed grouped species.

+ All crayfish, including yabbies carrying eggs must be returned to the water.

SOUTH AUSTRALIA

http://www.pir.sa.gov.au/fisheries/recreational_fishing/catch_limits_and_legal_lengths

Remember that **recreational fishers are not allowed to sell or trade their catch.**

The following gives the size, bag and boat limits that apply to marine and freshwater fish, molluscs and crustaceans caught in South Australian waters. Information about closures and other restrictions is also included.

Yabbie, Cooper Creek and Diamantina River

Genus *Cherax*

Freshwater

Minimum legal length:

There are no size limits for yabbies

Personal daily bag limit:

200

Restrictions:

Female yabbies carrying eggs are totally protected and must be returned to the water immediately.



[More information about Cooper Creek and Diamantina River yabbie](#)

Yabbie, River Murray

Cherax destructor

Freshwater

Minimum legal length:

There are no size limits for yabbies

Personal daily bag limit:

200

Restrictions:

Female yabbies carrying eggs are totally protected and must be returned to the water immediately.



[More information about River Murray yabbie](#)

Extracts from.

SPINY PROJECT 2005/2006

RESEARCHING THE POTENTIAL

**OF THE EUASTACUS SPECIES (SPINY FRESHWATER CRAYFISH)
FOR THE AQUARIUM TRADE**

MOORA MOORA PTY.LTD.
PERMIT No. GA30
10/04/06

DISCUSSION



This picture says it all. There are eight *E. Yarraensis* on the barbeque. Government departments have done insufficient to educate the public on the preservation of our native wildlife. Similar scenes were observed at other parks during school holiday periods. The above crayfish made up a colony of about 20 *E. yarraensis* situated at the Aire River Plantation 15 minutes from Beech Forest. Two of the larger mature specimens would have been collected for brood stock.

Morphological Variation in Relation to the Taxonomy of the *destructor* Group of the Genus *Cherax*

Anthony Sokol
Department of Zoology, Monash University, Clayton, Vic. 3168.

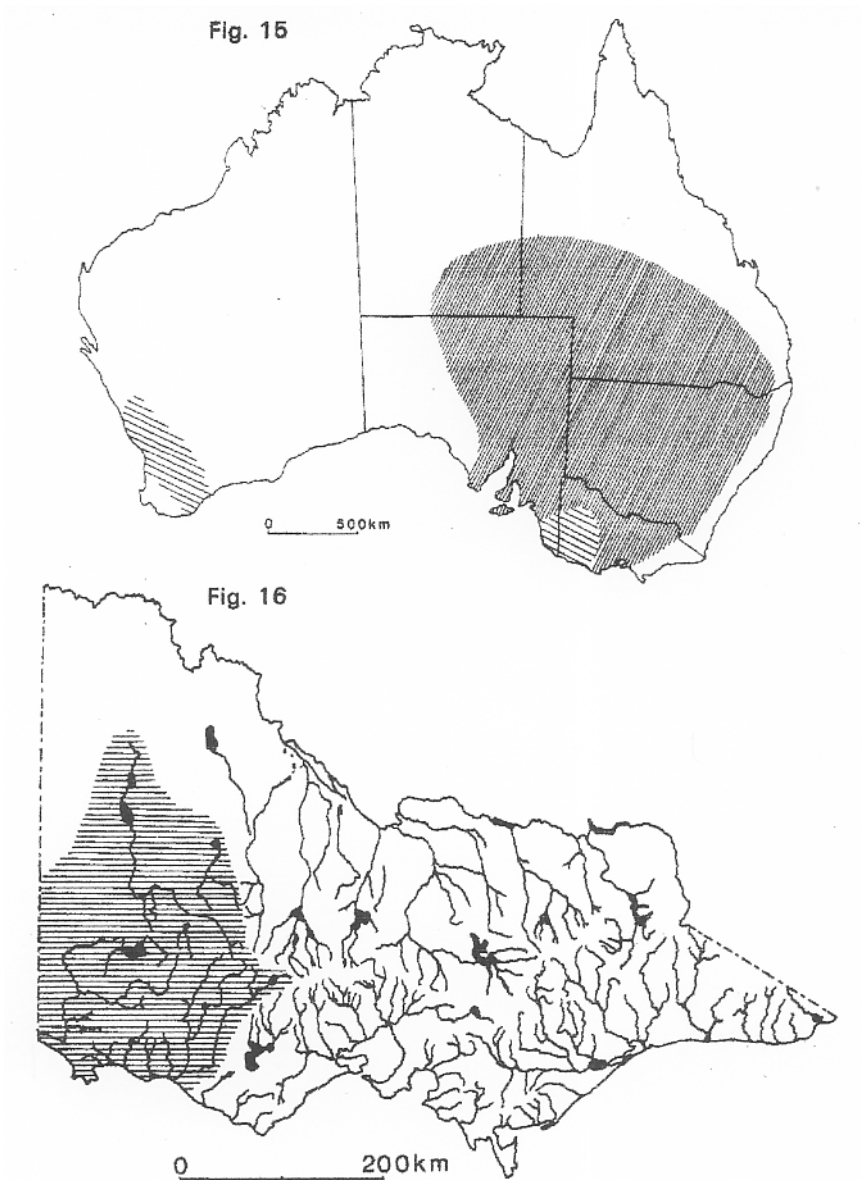


Fig. 15. Distributions of *Cherax destructor* (heavy hatching) and *C. albidus* (light hatching). The Western Australian distribution of *C. albidus* was obtained from Austin (1985).

Fig. 16. Victorian distributions of *C. destructor* and *C. albidus* (shaded) in relation to the major river systems.

Title:

Ecosystem-Based Fishery Management in South Australia and Victoria

Authors:

[Rebecca DeVries](#), *SIT Study Abroad*

Sending School - Ithaca College

Publication Date - Spring 2007

Program Name - Australia: Sustainability and the Environment

Abstract

The detrimental impact from fishing on various species as well as on the overall ecosystem has increased so much over the years that the Australian fishing industry is currently in jeopardy. Scientists, fishery managers, government agencies, industry, and environmental organizations have therefore been actively developing and researching management strategies focused on finding a balance between fisheries and the ecosystem. A new holistic and promising approach, ecosystem-based fishery management, invested in ecological sustainability and the recognition of the critical interdependence between human well-being and ecological health, is currently proposed as the best solution for fishery management.

This paper will consequently investigate the way in which two states, South Australia and Victoria, are beginning to implement ecosystem-based fishery management (EBFM). To understand why the states stand where they do in terms of implementation, this paper will also investigate the perceptions held by various stakeholders on EBFM, particularly addressing why it is needed, the pace at which it is being implemented, limitations, and ways in which it could be approached better. The overall questions for this project focus on: How the states of South Australia and Victoria are beginning to move towards and implement ecosystem-based management into their fisheries and how different stakeholders perceive this movement.

For this study, formal interviews were conducted with fishery managers, conservationists, industry members, and fishery scientists in both states throughout the month of April 2007 and the beginning of May 2007. After the data was collected, it was analyzed to determine which actions in each state are in fact following the principles of EBFM, as well as for trends and inconsistencies of perception.

Results show general agreement between all stakeholders that EBFM is the direction that states ought to be heading, but there is great divergence on how and why states ought to be doing so. **This is supported by the data obtained through this study demonstrating that South Australia and Victoria are working towards and interpreting EBFM in considerably different ways. Results also show that both states are not necessarily taking actions specifically following ecosystem-based principles, but rather following basic standards of sustainability.**

Overall, it is agreed upon by most stakeholders that state governments ought to be taking a more proactive and structured approach to implement EBFM. Additionally government ought to be investing more money into ecosystem-based fishery research so as to fill in the gaps of ecological knowledge and eliminate dispute on how to go about implementation.

Disciplines

Natural Resource Economics | Natural Resources and Conservation

Recommended Citation

DeVries, Rebecca, "Ecosystem-Based Fishery Management in South Australia and Victoria" (2007). *ISP Collection*. Paper 223.
http://digitalcollections.sit.edu/isp_collection/223

VRFish Website

http://www.vrfish.com.au/index.php?option=com_content&view=article&id=155:ernst-a-young-study&catid=10:media-releases&Itemid=15

Victoria has 721,000 recreational fishers spending \$2.3 billion annually.

DATE: 2 December 2009

EXTRACTS

VRFish, the peak recreational fishing body representing all recreational fishers in Victoria, is pleased to release the results of economic research by Ernst & Young that quantifies the net benefit and economic contribution of recreational fishing to Victoria.

*

"The results of this study should provide Victoria's economic planners with a clear indication of just how significant are the contributions of Victoria's recreational fishers to the state's economy. Geoff concluded. **"The report also found that participation rates are set to grow along with Victoria's population so the importance of maintaining a healthy fishery into the future can't be underestimated.**

Media Contact: Christopher Collins 03 9686 7077 or 0409 104 710

Fisheries Regulations 2008, Regulatory Impact Statement and Comparison Table of current and proposed regulations.

1 August 2008

http://www.vrfish.com.au/index.php?option=com_content&view=article&id=49:1-august-2008-fisheries-regulations-2008-regulatory-impact-statement-and-comparison-table-of-current-and-proposed-regulations&catid=13:submissions&Itemid=17

Bag/possession limit 30L whole or 5L meats not supported. Retain existing regulations 20L whole or 5L meats.

Many of the regional lakes and wetlands that were valuable locations for fishers to source yabbies are either dry or have extremely low water levels. Where has the reasoning come from to increase the catch limit from a 20 litres container to a 30 litres container? A clearly defined 50% extra catch rate.

While some have suggested 20 litres and 5 litres of meat do not correspond, this is not a reason to increase the overall take. **Yabbies are a highly important resource that need to be managed with a sustainable approach to protect the species from over fishing, as yabbies are also a vital ingredient of the food chain associated with the survival of many native fish species (e.g. Murray Cod, golden perch)** Yabbies are also an eagerly sought after bait supply by anglers. Further, with the continued Government approach to increase the piping of many regional water supplies some reservoirs will be decommissioned, open channel systems (a haven for bait yabbies) will also be filled in, this will place enormous pressure on the remaining water supplies from bait collectors and fishers in general.

MEDIA CONTACT: Alan Everett 9658 4092

[http://www.dpi.vic.gov.au/DPI/dpincor.nsf/v/AC333E00FF1A3E2BCA2573A8001F3E79/\\$file/20070824-%20Limit%20for%20Bass%20Yabbies%20introduced-MR_final.pdf](http://www.dpi.vic.gov.au/DPI/dpincor.nsf/v/AC333E00FF1A3E2BCA2573A8001F3E79/$file/20070824-%20Limit%20for%20Bass%20Yabbies%20introduced-MR_final.pdf)

Media release

From the Department of Primary Industries

24 August 2007

DAILY CATCH LIMIT INTRODUCED FOR BASS YABBIES

A daily bag and possession limit of 100 Bass yabbies has been introduced for recreational anglers following concerns that large quantities are being gathered and illegally sold, announced Executive Director of Fisheries Victoria, Dr Peter Appleford, today. Unlicensed fishers have been pumping commercial quantities of Bass yabbies from Port Phillip Bay and Western Port bay, and selling them for bait.

This is illegal because recreational fishers are not entitled to sell their catch, including the bait they collect. **Taking yabbies at a commercial rate will deplete their numbers and have broader ecosystem impacts.**

“Reports from members of the public and observations by Fisheries Officers indicate individuals and groups have been taking Bass yabbies in quantities far greater than what would be needed for personal use,” Dr Appleford said.

“Fisheries Victoria believes these quantities are consistent with the taking of Bass yabbies for illegal sale,” he said.

“Although Bass yabbies are widely known as excellent bait for marine and estuarine fish such as whiting and bream, they have also become popular with freshwater anglers targeting inland native species such as golden perch.

“The increased use of Bass yabbies as bait in inland waters appears to be supported, at least in part, by yabbies collected from Port Phillip and Western Port bay and sold by unlicensed fishers.

“Fisheries Victoria believes the best way to manage the problem before it leads to a significant depletion of Bass yabby stocks is to introduce recreational catch limits,” Dr Appleford said.

According to Dr Appleford, the daily bag and possession limit of 100 Bass yabbies per person will be sufficient for the legitimate personal needs of recreational fishers.

“Those found exceeding the new limits risk on-the-spot fines or could face charges in court with maximum penalties over \$2000,” Dr Appleford said.

Members of the public who observe suspected illegal fishing activity are reminded to call the 13FISH Offence Reporting Service on 13 3474 at any time, seven days a week.

Various communications by S. Chara.

This has been included to show that I have attempted to have the Fisheries Regulation amended by putting forward various arguments but have failed.

ECOLOGICAL VANDALISM

FISHERIES REGULATIONS 2008

Part 7, Division 1, 124 Catch Limits, page 112

(Increasing catch limits of yabbies (freshwater from 20 to 30 litres per person per day)

SUMMARY

The Fisheries Regulations 2008 Exposure draft was released in which Fisheries Vic. proposed to increase the daily take of Yabbies (*Cherax sp*) from 20 litres to 30 litres (over 3,500 bait yabbies). I responded stating that these are commercial quantities and without adequate monitoring as per the requirements of Access License holders required to submit catch and effort returns, Fisheries Vic. would be unable to assess the health of this fishery. These volumes especially during a drought would dramatically reduce an available food source for fish and native fauna. It would also encourage an increase in the illegal trade. I was also concerned that these quantities would impact on rare species eg. *Geocharax* that are mistakenly taken for bait yabbies. *To my knowledge the DSE had no input into these regulations.* NSW have a limit of 200 yabbies per person per day compared to Vic. at over 3500. Please note that in some cases both NSW and Vic. fishermen, fish in the same waters but in their respective states. It was also pointed out that the reasoning behind setting the take limit of 100 Bass Yabbies (bait) per person per day should also be applicable to *Cherax sp.* (yabbies) caught for bait.

Daily take of yabbies *Cherax sp.* compared to other species taken for bait by Recreational Fishermen

QUESTION TO FISHERIES VICTORIA, Sent by email Sun 20/12/2009 11:08 PM

In relation to the Media release.

"The daily bag and possession limit of 100 bass yabbies per person is believed to be sufficient for the legitimate personal needs of recreational fishers"

Refer to document Daily Catch Limit Introduced for Bass Yabbies.

The question in blue below was asked with no reply to date.

What is the daily bag and possession limit of bait sized yabbies, cherax species, per person which Fisheries Victoria believes to be sufficient for the legitimate personal needs of recreational fishers?

Also please note statement second line paragraph 3 in the document "Daily Catch Limit Introduced for Bass Yabbies".

"Taking yabbies at a commercial rate will deplete their numbers and have broader ecosystem impacts."

QUESTIONS TO FISHERIES VICTORIA, Sent by mail 3/09/2008

To
Subject

Since Recreational Fishermen can catch commercial quantities of bait yabbies are they required to submit catch data?

Fisheries requires this data from the commercial sector to provide crucial information on the health of each fishery.

There are 721,000 Recreational Fishermen compared to 30 Bait Access License holders so how can submitting Catch and Effort Returns by Access License holders provide accurate information on the health of the Fishery?

These and similar questions were not answered. Please refer to first paragraph of the following document.

From: Stephen [mailto:stephen@charas.com.au]
Sent: Wednesday, 2 September 2009 11:32 PM
To: 'anthony.hurst@dpi.vic.gov.au'; 'redlist@iucn.org'
Cc: 'redlist@iucn.org'
Subject: Sustainability of yabby fishery.

Anthony Hurst
A/Executive Director Fisheries Victoria

Dear Anthony

I have been in dispute with Fisheries for over 12 months in relation to the increase in the take of yabbies (cherax sp) by Recreational Fisherman from 20 litres to 30 litres.

I am arguing that this increase is poor management of a fishery and that these volumes will cause an increase in sustainability issues during this drought period.

Fisheries have stated that there are no sustainability issues but have not provided any documentation or data to support this. Please refer to FOI document attached.

Information on sustainability was derived from verbal comments from telephone conversations etc.

Since I am extremely concerned about the sustainability of this fishery I am asking you to organise written and signed comments from your experienced field staff and scientists who have made statements that there are no sustainability issues.

Some background.

19 Victorian Commercial bait collectors are required by law to submit monthly catch and effort returns so that Fisheries Victoria can monitor the health of this fishery.

How can Fisheries Victoria manage the health of a fishery when 550,000 recreational fisherman are entitled to take commercial quantities of bait yabbies without the requirement to submit catch and effort returns?

"Catch and effort data provides Fisheries Victoria with crucial information on the health of each fishery and allows us to assess the relative abundance of key target species. This information is fundamental to the sustainable management of Victoria's fisheries, in line with the objectives of the Fisheries Act 1995."

For example, the annual take for Vic bait collectors is one tonne (this is known because data is supplied). Recreational Fisherman can potentially take thousands of tonnes annually. There is no data supplied so who knows. Worst case scenario is over 2 million tonnes. We need good data or this fishery will be destroyed.

Yours Sincerely
Stephen Chara

Table 24. Reported catch of Victorian commercial mollusc, echinoderm, crustacean, shark and rays (2002/03–2006/07)

Species Production (live weight, tonnes)	2002/03	2003/04	2004/05	2005/06	2006/07
<i>Crustaceans</i>					
Yabby (freshwater)	1	1	1	1	1

EXTRACTS from - Summary of community feedback and decisions on fisheries regulations.

A	B	C	D
Bass yabbies Convert existing temporary catch limits of 100 per person (introduced by Fisheries Notice) to permanent catch limits by regulation.	Need for ongoing daily bag/possession limits to identify a reasonable daily recreational take and to deter illegal (take for sale) activity.	Submissions were generally supportive of the introduction of permanent daily bag/possession limits for this species. However, comments received identified the difficulties of distinguishing Bass yabbies from other species of burrowing shrimp.	AMENDED to make the daily bag/possession limits of 100 per person apply to all species of swimming and burrowing shrimp (including Bass yabbies).
E	F	G	H
Yabby (freshwater) Increase the daily bag/possession limits for whole yabby from 20 litres to 30 litres per person.	5 litres of tails (considered to be a reasonable day's take) is more consistent in terms of numbers with 30 litres of whole yabby than 20 litres. Consistency and simplification of regulations – same daily catch limit for prawns.	Submissions generally supported the change to the whole yabby catch limits of 30 litres per person. A small number of submissions cited sustainability concerns and impacts on illegal take-for-sale.	ADOPTED proposed change, as per original proposal. Current information suggests there are not sustainability issues in yabby harvesting at current or proposed levels; intelligence reports do not indicate increased illegal take-for-sale of this species.
I	J	K	L
Prawn species Introduce a daily catch limit of 30 L for whole prawns or 5 L of meats	Consistency with limits on freshwater yabbies, and identifying a reasonable day's take.	Submissions generally supported the introduction of the recommended specific catch limits for this species group.	ADOPTED proposed change, as per original proposal

Prawns and Yabbies.

Why link a Freshwater species threatened by drought with a Marine species (Penaeidae, See page 53 VR Fishing Guide 2009 2010) when determining daily take levels?

Linking a marine prawn species with an inland freshwater crayfish species especially during a drought and then argue “consistency with limits” see F & J is suspect thinking.
What about consistency with neighboring states?

“there are not sustainability issues” Item H is another suspect statement since we are in a prolonged drought with low water levels. Read VRfish comments p.

There are no documents or scientific evidence that supports “there are NOT sustainability issues” See FOI document.

“intelligence reports do not indicate increased illegal take..” see media release re prevention.

“ECOLOGICAL VANDALISM” CONTINUED

FISHERIES REGULATIONS 2008

Exposure Draft May 2008, Part 7, Division 1, 124 Catch Limits, page 112

(Increasing catch limits of Yabbies, Item 62, p121 (freshwater yabbies from 20 to 30 litres per person per day))

Dear Mr. Helper

Please consider the following additional information for not supporting an increase in the catch limit of yabbies (Cherax species freshwater) from 20 to 30 litres per person per day proposed in the Fisheries Regulations 2008.

For example, If **1%** of participating Recreational Fisherman caught the new proposed allowable limit of Yabbies (bait) **12** times per year (one day per month) the total catch would be in the vicinity of 1119 tonnes for the year.

Fisheries Regulations 2008 – Exposure draft.

- No Size limit.
- Not required to return berried females.
- Allowed 30 litres of live Yabbies per person per day.

Practical test showed that 113 live bait sized Yabbies between 4 to 6 grams in weight filled a one litre container. 30 litres of bait Yabbies would be equivalent to 3390 yabbies.

The Allen Consulting Group, Fisheries Regulations 2008, Regulatory Impact Statement, p104, A4, quotes (VRFish 2006, p4) that 550,000 Victorians per year participate in recreational fishing.

1% = 5500 persons. If 1% of Recreational fishers catch the new allowable limit 12 times per year (one day per month) the total catch per year would be,

5500 persons x 3390 yabbies x 5 grams (average weight per yabby) x 12 days of a year,
divided by 1000,000 to convert to tonnes = 1119 tonnes per year.

If 1% caught a limit of 200 bait Yabbies 12 times per year it would equate to 66 tonnes per year. Even this is excessive. It is obvious that more research is required into recreational fishing habits.

With the current climatic conditions, wild stocks will be dramatically depleted, reducing the natural source of food for platypus, birds etc. To approve an increase from 20 to 30 litres is Ecological Vandalism. There should be a dramatic reduction instead.

One way of Managing our resource is if all Recreational Fishing licenses had check boxes listing various species fished. There would be a fee for each corresponding check box marked. This would then enable monitoring of species targeted by Recreational fishermen.

The examples above shows that the volumes that can be potentially taken by recreational fishers could result in a time where a ban will be placed on the taking of all Freshwater crayfish in public waters. This will need to be done to assist in the survival of native fauna.

- Over 3000 bait sized yabbies per person per day for recreational fishing are commercial quantities.
- This unmonitored quantity will have a dramatic effect on the ecosystem reducing an available food source for Platypus and birds.
- This increased quantity will further encourage an illegal trade difficult to control.
- This quantity will impact on financial returns to the commercial fishing sector.

Please do not support this change. Consider a separate regulation for bait yabbies.

Yours Sincerely
Stephen Chara
10/11/2008

ECOLOGICAL VANDALISM

FISHERIES REGULATIONS 2008

Part 7, Division 1, 124 Catch Limits, page 112

(Increasing catch limits of yabbies (freshwater from 20 to 30 litres per person per day)

Various arguments put forward by myself in various communications.

HOW CAN FISHERIES VICTORIA MANAGE A FISHERY WHEN THE MINISTER HAS ALLOWED 550,000 PLUS RECREATIONAL FISHERMEN TO TAKE COMMERCIAL QUANTITIES OF YABBIES WITHOUT THE REQUIREMENT TO SUBMIT CATCH AN EFFORT RETURNS AS PER THE SMALL COMMERCIAL SECTOR?

This information is fundamental to the sustainable management of Victoria's fisheries, in line with the objectives of the Fisheries Act 1995. See first paragraph page 8.

In my opinion the Minister has approved a regulation that is NOT in line with the objectives of the Fisheries Act 1995.

Comment " Firstly, there was no evidence to suggest that the increased whole yabby limit would create any sustainability issues " FALSE

Commercial catch and effort returns have informed Fisheries Victoria that water levels are low and that the yabby fishery is overfished. Alternately there is no scientific evidence or document to support NO sustainability issues. See FOI doc.

Comment " I am advised that there has been no indication of increased illegal harvest or trade in Yabbies since the start of the new regulations" MISLEADING

Fisheries have been informed of the illegal trade and they have commented that it is difficult to police, since illegal fish are mixed with legal purchases.

Comment " Secondly, new regulation was supported by the vast majority of people who made submissions during the review of the regulations" A DECEPTIVE COMMENT

VRFish which is the peak body for 550 000 plus recreational Fisherman did not support the increase.

The Minister did not consider the possibility that some of those that supported the increase are active in the illegal trade and would benefit by the increase?

Comment " Fisheries Victoria will continue to monitor the health of fish stocks." FOR YABBIES, HOW?

This brings us back to my question that has not been answered.

HOW CAN FISHERIES VICTORIA MANAGE A FISHERY WHEN THE MINISTER HAS ALLOWED 550,000 PLUS RECREATIONAL FISHERMEN TO TAKE COMMERCIAL QUANTITIES OF YABBIES WITHOUT THE REQUIREMENT TO SUBMIT CATCH AN EFFORT RETURNS AS PER THE SMALL COMMERCIAL SECTOR?

The Department of SUSTAINABILTY and Environment was not consulted on yabby sustainability issues.

The DPI Fisheries Victoria released a policy titled.

RESPONDING TO THE IMPACTS OF DROUGHT AND ITS CONSEQUENCES ON INLAND RECREATIONAL FISHERIES.

In this document the DPI acknowledges that fisheries are facing significant pressures due to ongoing drought conditions.

With dams nearly dry due to drought, increasing the take limit of Yabbies because some people want it, is *not* good management of a fishery?

The recreational limits in New South Wales is 200 yabbies per person per day.
The recreational limits in South Australia is 200 yabbies per person per day.
In Victoria with no size limit on Yabbies this figure can be over **6000** per person per day depending on the size targeted.

Catch and Effort returns – Commercial Fishing.

First reported low water levels March 2007.

First reported low yabby numbers August 2008 (see document page 6). Continued reporting low numbers Oct 08, Nov 08, Jan 09, Feb 09, May 09, June 09.

How can the Minister make the comment that there is no evidence of sustainability issues?

Fisheries Victoria acknowledges that a black market in Yabbies does exist. A representative has also stated that the black market is difficult to police since a person can buy 500 yabbies legally and thus show proof of purchase, but at the same time continually sell illegal Yabbies mixed in.

437 supported the change, 119 opposed it one of which was VRFish which is the peak body representing **550,000+** Victorian Recreational Fishermen. Fisheries had an opportunity to run a sting operation, for those that supported the increase would be made up of those that are involved in the illegal trade and would benefit by the increase. 3000 bait Yabbies @ 30 cents each = \$900.

6000 smaller bait Yabbies @ 20 cents each = \$1200. What an incentive for the black market.

I sell Yabbies at 38 cents each and cannot put my prices up because I am continually reminded that I am in competition with the black market. I need to get 50 cents each to be viable.

EMAIL COMMUNICATIONS

Hi Stephen

I spoke with Travis Dowling from FV about the issue that you spoke to me about on Tuesday 5/5/09.

Travis gave me the following figures: FV received 707 submissions regarding the regulation to increase the take of yabbies from 20l to 30l. He stated that 437 submissions supported the change and 119 submissions opposed them, including yours and VRFish's.

I discussed the idea of using a Fisheries Notice to ensure sustainability was not compromised. **Travis said that it was very unlikely that they would revisit the regulation again.** He also said that you had raised the issue of endangered species of flora and fauna. He stated that he would be more than happy to send one of his officers over to work with directly with DSE where there is evidence to say that there are sustainability issues for those highly protected species that may get confused with common species.

Travis stated that FV currently has no evidence that there are yabby sustainability issues. He talked about the fact that you had raised with him the need to protect some threatened Barmah species. Travis reported to me that he had just recently spent three months in the Barmah region doing work on the government's response to the VEAC River Redgum report and the only water around the Barmah was in the Murray, which is under NSW management.

I would be happy to discuss the issue with you further.

Best regards

"Stephen"
<stephen@charas.com.au>
01/05/2009 12:14 PM

Hi Travis

Just read VRFish's response. See attached.
How many and who supported the increase?
How can this increase be justified when you read "Responding to the impacts of drought....."?
Have the DSE been consulted on the impacts on non Cherax species?

Will be requesting a survey on Victorian Yabby populations.

Regards,
Stephen

From: Travis.Dowling@dpi.vic.gov.au [mailto:Travis.Dowling@dpi.vic.gov.au]
Sent: Tuesday, 21 April 2009 12:59 PM
To: Stephen
Cc: Liesa.Martin@dpi.vic.gov.au
Subject: Re: FW: Ecological Vandalism

Stephen,

Thanks for your comments. As discussed on the phone there was an extensive consultation period prior to the new regulations being set. Your views and those of other stakeholders were considered as part of this process.

Whilst you support a **ban on recreational and commercial yabby collection** this is not the general consensus of other stakeholders.

Thanks again for your comments.
kind regards

Travis Dowling
Acting Director Fisheries Management
Fisheries Victoria

Ph 03 9658 4345 M 0418 176 231

"Stephen"
<stephen@charas.com.au>

20/04/2009 10:24 AM

To: 'Travis.Dowling@dpi.vic.gov.au'
Subject: FW: FW: Ecological Vandalism

Hi Travis

By the way you still haven't answered my question.

How can fisheries monitor the health of a fishery when over 500,000 recreational fisherman are entitled to take commercial quantities and not submit catch returns?

Regards, Stephen Chara

From: Stephen [mailto:stephen@charas.com.au]
Sent: Tuesday, 21 April 2009 2:35 PM
To: 'Travis.Dowling@dpi.vic.gov.au'
Subject: RE: FW: Ecological Vandalism

Hi Travis

I will continue to push my argument that allowing over 500,000 Recreational Fisherman to take commercial quantities of Yabbies is poor management of a Fishery and more so during a drought.
NSW fisheries, 200 bait yabbies per person per day.
VIC Fisheries, 100 bass yabbies per person per day.
These limits are set for a reason. To protect the Fishery.

Over 3000 bait yabbies per person per day is ridiculous.

**Do I interpret you correctly?
You don't give a hoot about the viability of a fishery just so long as you keep the majority of stakeholders happy?**

Regards,
Stephen Chara

"Stephen" <stephen@charas.com.au>

To <travis.dowling@dpi.vic.gov.au>

20/04/2009 10:24 AM

cc

Subject FW: Ecological Vandalism

Hi Travis

I believe strongly that Fisheries made a mistake when they increased the catch limit of yabbies to 30 litres allowing Recreational Fishermen to take an increase in commercial quantities of yabbies. I was disappointed when I was informed that Fisheries have no intention of amending this regulation.
I believe that there should be a ban on the taking of yabbies by both Recreational and Commercial Fisherman in most of Victoria until the drought is over.

Regards,
Stephen Chara

My Comments were that it is possible that some of the persons that supported the increase in volume were involved in the illegal trade. Also just because a few more people supported the increase does not mean that it is good management of a fishery to increase the daily take. And once again the issue is not the volume increase but that there is no size restriction associated to the volume and no requirement to return berried females.

The following shows that yabbies are targeted by Recreational Fishermen.

Recreational Statistics for Victoria

<http://www.daff.gov.au/brs/fisheries-marine/data/rec-indig/survey-stats/rec-vic>

For Victoria, the survey has shown that in the twelve months prior to May 2000

Approximately 0.55 million people or 12.7% of the population over the age of 5 years fished at least once.

85.6% of fishers were male

17.7% of households had at least one recreational fisher living there

In the twelve months prior to May 2001

There were a total of 2.64 million fisher days, with each fisher fishing on an average of 6.37 days - comprised of 2.81 million events or 11.32 million fishing hours

Fishers harvested

9.6 million finfish

0.8 million small baitfish

75 thousand crabs and lobsters

3.5 million prawns and yabbies

1.3 million other molluscs (shells)

0.4 million other taxa