

SCUBA DIVERS FEDERATION of VICTORIA
GPO Box 1705P Melbourne, 3001



28 February, 2003

Majella McIntosh,
Fisheries Victoria,
Dept of Primary Industries,
PO Box 500,
East Melbourne,
VICTORIA, 3002.

**re: Comments in relation to the Victorian Giant Crab
Fishery Draft Management Plan**

Dear Ms McIntosh,

SCUBA Divers Federation of Victoria (SDFV) has considered the *Victorian Rock Lobster Fishery Draft Management Plan*.

The SDFV represents the interest and community values of recreational SCUBA divers throughout Victoria. The SDFV was the nominated body to represent the Victorian Recreational Fishing Peak Body (VRFish) on Rock Lobster & Giant Crab Management Plan Steering Committee. Our comments are made in the context of this participation.

Please find our comments about the Draft Management Plan attached, and we thank you for the opportunity to comment.

Yours sincerely,

(signed Daniel Grimm)

Daniel Grimm,
Vice President - Communications,
SCUBA Divers Federation of Victoria, Inc.



Comment on the *process*

The SDFV participated in the development of the Giant Crab Fishery Draft Management Plan (DMP), and thus witnessed the process in which the plan was developed. The DMP was developed under the same regime as the Rock Lobster Plan. While we can not claim equity as stakeholders in the Giant Crab Fishery, we did witness the same level of commitment to openness, transparency and stakeholder involvement. From a wider community-interest perspective, we conclude a fair and balanced process.

Comments on the *contents*

We have considered the DMP, and in summary:-

- concur there is no known recreational fishery in giant crabs,
- support the proposal to continue to manage the giant crab fishery as an adjunct to the Rock Lobster fishery,
- endorse the similarity in approach and structure of the DMP to the Rock Lobster Fishery DMP,
- accept and endorse the introduction of a bio-mass “bottom-line” to prevent over-fishing,
- recognise the sensibility in co-joining the developing TAC recommendations for giant crab at the same time as those for rock lobster, setting process.

In relation to the TAC setting process, we support the intention for open and transparent processes. The formal expert advice to the Minister relation to the TAC for giant crab is to be prepared by the Rock Lobster and Giant Crab Fishery Committee of FCC. We assume the composition of the FCC committee is rock lobster fishers who participate in the giant crab fishery. We again reiterate our general view that it may not meet community expectations that vested interest recommend their own TAC. In this context, we advocate that the expert representation on the Rock Lobster and Giant Crab Fishery Committee of FCC be sufficiently wide so as to be seen to dilute the possibility of undue influence by vested interests.

End of Comments

SDFV Executive,
28 Feb, 2003.