VICTORIAN RECREATIONAL
FISHING PEAK BODY

PO Box 4574 GEELONG VIC 3220
t: (03) 5221 1104 e: info@vrfish.com.au w: www.vrfish.com.au
ABN 47 068 111 624

Hon Steve Dimopoulos
Minister for Environment
Minister for Tourism, Sport and Major Events
Minister for Outdoor Recreation
Level 16, 8 Nicholson Street East Melbourne VIC 3002

By email: reception.dimopoulos@deeca.vic.gov.au

24th February 2025

Dear Minister Dimopoulos,

RE: Victorian Fisheries Authority (VFA) - Reform Proposal

The Victorian Recreational Fishing Peak Body (VRFish) represents over 1 million Victorians who undertake recreational fishing each year. Central to our activities are supporting the sustainability of recreational fishing and the resource.

VRFish acknowledges the current requirement for budgetary savings but does not support the VFA proposed reforms being achieved through the mass retrenchment of authorised fisheries officers.

On behalf of the VRFish Board, our members and recreational fishers we bring to your attention the following:

1. **Budgetary Savings can be found by working together**

Best practice, workplace based budgetary savings will also be found in a collaborative approach between VFA leadership and VFA staff, with assistance from the relevant union representatives. VFA staff know where ongoing cost savings can be realised.

Further, VRFish can assist with consultation and advice on VFA initiatives and programs that recreational fishers are prepared to defer, accept lower service levels on or even go without, if retaining the maximum number of authorised officers is the goal.

Recreational fishers contribute substantially to the delivery of recreational fisheries compliance services in Victorian coastal and inland locations and should therefore have a voice.

VRFish Recommendation: ***Minister Dimopoulos direct VFA leadership to halt the current reform process and to undertake a meaningful and diligent consultation with all VFA staff and the Community & Public Sector Union, with a view to identifying ongoing cost savings in lieu of proposed redundancies.***

2. **More Fisheries Officers are required to sustainably manage Victorian fisheries**

Current levels of noncompliance and deterrence for the 'serious end' of the illegal fishing spectrum (*Shamateurs, Syndicate Fishers and Organised crime groups*) will change detrimentally if the VFA proposed reform is carried out. For example, there were 39 briefs of evidence generated for fisheries prosecutions

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across the State in 2023/24, with 18 from enforcement action attributable[1] to the Port Phillip and Central Abalone Management Regions.

VRFish takes the view that for every serious offence resulting in a prosecutable brief of evidence, there are two or more offences that go undetected, and that it is the serious end of the illegal fishing spectrum that currently poses the highest risk to resource damage and flow on negative impacts to industry and the environment.

While the lower commercial fishery workload rationale is understood, the VFA proposed reduction from twenty-seven to nine authorised officers for the Port Phillip region will likely result in insufficient staffing at the three proposed new stations – when usual workplace pressures reduce the actual on ground enforcement staffing levels further (*annual and sick leave, training and reaccreditation, court dates, etc*).

VRFish rejects the view that staff substitutions into Port Phillip region from other regions, to cover usual workplace pressures, will be sustainable when noting the current (*and proposed unfilled*) regional Fisheries Officer vacancies existing across the State.

3. **Reducing the current number of authorised officers within the Port Phillip Region carries risk of incentivising the serious end of the illegal fishing spectrum and importantly, reducing deterrence.**

Noting that it is the serious end of illegal and unreported fishing in Victoria that currently provides the highest risk for damage to fish stocks, the aquatic environment, recreational fishing and our economic contribution (*and even the Victorian Fisheries Authority's reputation*); the proposed reduction in enforcement presence across the Port Phillip region risks incentivising and increasing syndicate and organised crime based illegal fishing as they exploit new gaps in Statewide enforcement coverage. The deterrence of illegal fishing is not currently being serviced by court-imposed penalties[2]. Therefore, only patrolling in situ can deliver the level of deterrence required to offset low court-imposed penalties.

While supportive, VRFish has concerns that a small, specialist investigative team within VFA enforcement and compliance will be unable to undertake the significant increase in investigations necessary to combat incentivised illegal fishing should the above materialise.

Further, VRFish rejects the notion that activities such as media promotion of VFA and VFA event activities, Boating and Fishing Club forums is wholly responsible for the high compliance rates observed in the general recreational fishing community. Organic recreational fisher stewardship, which has grown significantly over the past two decades, is often overlooked. The VFA proposed reliance on 13Fish calls from the public as a substitute to replace *in situ* enforcement patrolling at a level required to disincentivise the serious end of illegal fishing is absolutely rejected.

[1] Recreational Fishing Licence Trust Account 2023-24. Victorian Fisheries Authority (October 2024)
[2] DPP v Finai [2024] VCC 301 (19 March 2024). Trafficking in a commercial quantity of a priority species. Offender part of syndicate. "*They…discussed a previous time when they got 130 kilos out of the ocean that was sold for $14,000*". Sentence: $6,000 fine without conviction.

VRFish Recommendation: ***Increase the minimum number of authorised Fisheries Officers allocated to the Port Phillip Region to between 12 and 15 authorised officers (4 to 5 staff per new Port Phillip region station) and reallocate the remaining planned redundant Fisheries Officers to current, regional vacant positions.***

VRFish Recommendation: ***Consider mandatory and increased minimum penalties for commercial take of priority species offences (s.111A Fisheries Act 1995 - SECT 111A), especially for recidivist syndicate fishers.***

4. The currently proposed reforms risk costing more than the budgetary savings gained

The cumulative cost impacts of incentivised serious illegal fishing will likely result in the necessity of hiring more authorised officers shortly, with the loss of corporate culture, economic damage to the commercial industry and from fish stock depletions and lower recreational fishing economic contribution, meaning a cost benefit analysis of VFA proposed reform may be required. The quantum of funding required to keep a maximum level of enforcement and compliance staff in the field and to offset the looming economic and environmental damage can surely be found in other portfolio cost savings.

VRFish Recommendation: ***That Minister Dimopoulos explores alternate State Government funding mechanisms to secure employment of the maximum number of authorised Fisheries Officers across the State***

Lastly, VRFish are of the opinion that engagement and education are important contributors to maintaining and increasing compliance rates in the general recreational fishing population. Recreational fisher led programs funded from the Recreational Fishing Licence Trust account already exist (i.e. Fishcare Victoria, VRFish) and can ably value add VFA engagement and education activities.

Thank you for your time and consideration of the matters raised and I seek a meeting with you at your earliest convenience to discuss these and other pressing issues.

Yours sincerely,

Rob Loats
VRFish Chair

Cc: Premier Jacinta Allen