



16 October 2020

To The Victorian Fisheries Authority
The Hon. Melissa Horne – Minister for Fishing & Boating
Hon. Lily D'Ambrosio – Minister for Environment
The Hon. Martin Pakula – Minister for Tourism

Annual Spider Crab Moulting Aggregation - Port Phillip Bay, Victoria

Dear Sir/Madam

We write to you agreeing with and supporting the significant community concerns over the continued harvesting of this species from Port Phillip Bay piers, when these iconic marine animals are arguably at the most vulnerable stage in their life and breeding cycles.

In response to your consultation announcement asking for public comment on the reduction of the Australian Giant Spider Crab bag limit, we strongly urge you to instead introduce a 'no-take season' to safeguard these annual moulting aggregations from April-July each year. We further ask you to provide a written-consideration for future migration seasonal and evolutionary changes.

We ask for a no-take season as the only solution to the unprecedented and [recently evidenced](#) escalating spider crab harvesting and associated environmental damage, including marine pollution and public safety hazards.

We support opposition to the proposed bag limit reduction as a limit only fails to address the many substantial associated social and environmental concerns and impacts.

They include:

- To date there has been no recent, reliable, comprehensive scientific research conducted to determine the number of spider crabs in Port Phillip Bay. Without the science to indicate the sustainability of removing potentially large numbers of spider crabs during their moulting and potential breeding times, harvesting during this critical time of their life stage should not be permitted.
- While these moulting aggregations have only attracted recreational crabbing harvesting since 2019, this natural spectacle has extremely high and long-standing social, cultural and traditional value amongst locals, interstate and international tourists, children, families, businesses, fishers, scuba divers and film crews. Perhaps most notably Sir David Attenborough featured this incredible event on [Blue Planet II](#), bringing this famous event to the world stage, increasing tourism to our peninsular region.
- The intensive harvesting of crabs during the aggregations in 2019 and 2020 has been observed and documented to be intensive, leaving very few of the crabs aggregating at the piers to moult. This could have serious ecological ramifications.
- Not protecting species during critical times of their life (and ecological) cycle goes against indigenous lore and the Marine and Coastal Policy 2020. Allowing them to be targeted during these times without adequate science does not support ecosystem-based management, and evidence-based decision-making, as requirements under the Marine and Coastal Act 2018, and The Fisheries Act 1995. Without adequate science and knowledge of the life cycle of the crabs and the importance they provide to Port Phillip Bay's ecosystem, fishery should not be permitted.
- Damage to marine life, marine litter and marine pollution has been highly visible to the public eye, including the mass dumping of chicken carcasses, plastics and damage to marine life on pier pylons, associated with the specific methods and sheer volume of crab harvesting that has taken place.

- The potential economic benefit of celebrating and safeguarding this unique marine spectacle on the Mornington Peninsula during winter when the tourism value is critically important to local businesses, especially as they seek to recover from the crippling impacts of Covid-19.
- The VFA's measures of satellite tagging of 15 crabs and the proposed bag limit reduction does not address any of the concerns expressed above, and offers no insight into the sustainability of harvesting spider crabs. Introducing a no-take season effective immediately as of the 2021 moulting aggregation — or as an interim measure until such scientifically reliable data can be collected — is the only solution.
- Halving the bag limit from 30 to 15 does not address or mitigate the documented concerns and only further promotes the moulting season as a fishery.
- A recent survey undertaken by the VFA shows that of the approximately 300 people surveyed that target spider crabs, 77% had only fished for the first time in 2020; only 7.5% considered targeting the crabs as culturally important; only 4.5% of people said they went spider crab fishing to eat; and 83% indicated they would not target Australian Giant Spider Crabs for the purpose of eating them again. These results defeat claims by the VFA that the crabs are 'a really important cultural food source'.
- A seasonal no-take period during the annual spider crab moulting season is supported by local and state-wide groups, evidenced by the 50,000+ petition signatories to date and including but not limited to the Spider Crab Alliance, Spider Crabs Melbourne, The Victorian National Parks Association, and statements of position from 40+ local businesses, industry representatives and educators. Over 1000 statements of support from individuals including marine biologists, scientists and educators have also been received. The issue is gaining a significant international audience.

We ask that you consider the vast majority of opinions from the local to international community who wish to see our unique spider crab aggregation protected for the fascinating, ecologically valuable, environmental phenomenon that it is, in addition to its value as a local and national tourism drawcard and asset. Please introduce a no-take season to safeguard the moulting aggregations of spider crabs in Port Phillip Bay.

Yours Sincerely,

Founders, Advocating [Wild](#)

CONTACT

WWW.ADVOCATINGWILD.ORG | ADVOCATINGWILD@GMAIL.COM