



Mr Toby Jeavons
Fishery Manager, Fisheries Management and Science
Victorian Fisheries Authority
2A Bellarine Hwy
Queenscliff. VIC 3225

28/3/19

Dear Toby

Re: 2019 – 20 eastern rock lobster quota and management

Eastrock is an Association representing the interests of operators, processors and quota holders in the eastern zone of the Victorian rock lobster fishery. We thank the Victorian Fisheries Authority (VFA) for the draft TACC recommendations for the eastern zone and provide the following comments.

We note that:

- the application of the Rock Lobster Harvest Strategy (HS) to the stock assessment determines a 31t TACC for 2019/20
- the exploitation rate (ER) has been increased from 15% to 20% in the TACC table in the HS
- the pre recruitment index (PRI) has been declining over the last four years.

Eastrock would like to provide the following comments in relation to the eastern zone proposed TACC, future management of the fishery and allocation of management costs:

1. The Victorian Rock Lobster Fishery Management Plan 2017 (the Plan) sets out a number of fishery objectives and strategies. Included in these is Objective 3 that states “Ensure optimal economic utilisation of the rock lobster resource” by “continuing to rebuild the stock biomass” and “promote a profitable and viable commercial fishery, within the constraints of ecological sustainability”.
The proposed TACC of 31t is a combined 47.4% decrease over 2 years from the 59t TACC last season. Eastrock members are extremely concerned that a reduction of the eastern zone TACC to 31t will cause severe economic hardship for all sectors of the fishery and would not meet Objective 3 of the Plan.
2. As TACCs decline it becomes even more important for operators to maximise the value of their catch. Operators weigh up catchability versus beach price and target areas that are going to give them the best return, not necessarily areas with the best CPUE. For example, during last season offshore grounds were fishing best but because the lobsters were not red the reduced beach price meant it was more profitable to fish lower CPUE inshore areas for higher returns. Considering that this operator behaviour is happening and the CPUE for the first part of this season has still increased, this further supports the view that the CPUE index used to set the TACC may not be a reliable indicator of eastern zone stock abundance.



3. Although the eastern zone CPUE has declined last season, operators have noticed an increase in catch rates from the previous year over the first part of this season. The *Monthly Victorian Rock Lobster catch update February 2019* supports these observations documenting a CPUE increase to 0.47 kg/pot lift from 0.36 last season with 78.4% of TACC taken. This may indicate that the previous year's CPUE index was not representative of the entire eastern zone stock status and that the proposed TACC reduction cannot be fully justified.

Eastrock proposes a TACC decrease to 38t.

Recognising the variability of the CPUE throughout the zone, together with the observed increase in this season's (so far) CPUE and the substantial effect a reduced TACC would have on the economics of the fishery, Eastrock recommends adopting a more cautious approach to the TACC decrease by implementing a reduced TACC of 38t. The proposed 38t TACC would still constrain catches and leave enough lobsters in the water to continue the rebuild.

This would allow time for the RLRAG to investigate how representative the CPUE is as an index of eastern zone abundance, avoid a short-term reaction to what could be a "glitch" in the CPUE and reduce the severe economic impact of a large TACC decrease.

4. At the time of the development of the HS an ER of 15% was chosen as being at an appropriate rate to allow rebuilding of the eastern rock lobster stock. Since this time analysis of different ER has shown that the current ER of 15% is very conservative and that the ER can be increased to provide slightly higher catches with little increased risk to egg production (stock rebuilding). Eastrock supports increasing the ER to 20% and notes that egg production is maintained at above the limit reference point if the ER is increased to 20%. Considering the economic and stock rebuilding objectives of the Plan and the large area of the eastern zone, Eastrock supports continued investigation of a CPUE index that is more representative of the whole of the eastern zone and an appropriate eastern zone ER.
5. The HS sets out the decision tree using fishery CPUE and pre recruitment index (PRI) to determine the recommended TACC. Operators are concerned that the TACC falls with downward shifts in CPUE but any increase in TACC requires an increase in both CPUE and PRI. RLRAG has recognised that with the eastern zone being so large and some sites not being adequately sampled, the current sampling regime cannot provide indices of recruitment representative of recruitment across of the entire zone. Eastrock recommends:
 - decoupling the PRI from TACC decisions until such time as RLRAG consider the index to be representative of eastern zone recruitment
 - amending the HS to allow for consecutive CPUE increases to override the PRI limiting a TACC increase
 - developing a meaningful PRI sampling program for the eastern zone.
6. Eastrock supports the cost recovery policy as per the HS and notes that "cost recovery is in place only for the commercial fishing sector, and there is no transfer of levies collected from



the commercial sector to the management of the recreational sector or to address illegal fishing activity". Notwithstanding this, Eastrock recognises that a reduction in eastern zone TACC will result in considerable economic hardship for industry and requests a reduction in VFA rock lobster levies.

7. The costs associated with a reduced TACC require all fishery operators to maximise their landed catch value while reducing the risk associated with leaving quota to be caught at the tail end of the season. Eastrock proposes several changes to the rock lobster season:
 - extending the September fishing month from the 15th to the 30th (maximizing landed catch value)
 - commencing the 2019/20 season from the 1st July to the 30th September and then re-open from the 15th November to 30th April
 - commencing the 2020/21 season from the 1st May to the 30th September and then re-opening from the 15th November to 30th April.

If commercial effort can be shifted to target lobsters during the autumn/winter months this would result in the maximum value of the landed catch but also relieve the congestion currently being experienced on the water over the summer months at the same time giving the recreational divers an increased chance of success.

8. The stock assessment process currently includes a notional recreational catch share equivalent to 10% of the Eastern Zone TACC. According to the latest estimates from the recreational tagging program the estimate of recreational take from the eastern zone (between 16 November 2017 and 14 September 2018) is 6.4t. This equates to 11% of the 2017/18 EZ TACC. If the same catches were applied to the current TACC and next season's proposed TACC the recreational catch increases to 14% and 21% of the TACC respectively. It is inequitable that the commercial sector bears the full brunt of reduced catches. Eastrock recognises that certain undertakings were given to the recreational sector by VFA when the tagging program was first mooted, however the current decline in stock status was not known at that time. Rebuilding the stock is a responsibility that should be equally shared by both sectors. A reduction in the recreational bag limit is an equitable and responsible reaction to declining stock status.

Eastrock will be sending a representative/s to some of the port meetings and thanks the VFA again for the opportunity to comment of the proposed eastern zone rock lobster TACC. Representatives of Eastrock would be happy to have further discussions with VFA if required.

If you have any queries please contact the Executive Officer, Ross Bromley, rossbromley@yahoo.com.au or 0419 572 245.

Yours sincerely

Anthony Ciconte
Eastrock Chair