



The Rock Lobster Fishery Manager
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By email: ewan.flanagan@vfa.vic.gov.au

Re: consultation on the Draft Management Plan for the Victorian Rock Lobster Fishery

Thank you for the opportunity to provide comment on the Draft Rock Lobster Fishery Management Plan.

The Australian Marine Conservation Society is Australia's peak marine conservation organisation, representing around 300,000 people from all around the country. For over 50 years, we have used scientific research, policy advocacy, community engagement, and education to protect and restore Australia's oceans.

Our submission is broadly supportive of the draft management plan for the Victorian Rock Lobster Fishery. If implemented in full, we expect the management plan to deliver a better chance than in recent history for sustained rebuilding of the fishery, particularly in the Eastern Zone. This should result in better medium- and long-term ecological outcomes, and better social and economic outcomes for the communities that benefit from the southern rock lobster resource.

We welcome the draft management plan's intent to acknowledge and respect the rights of traditional owners, on a pathway to Treaty.

Most of the high risks identified in the fishery's Ecological Risk Assessment relate to the interaction of inadequate target species abundance in key areas of the fishery and rapid climate change. These include many of the social, economic and wellbeing risks identified.

Efforts to preserve, restore and prevent further degradation of kelp forest reef habitat that may be external to the scope of this management plan but intrinsically linked to the achievement of its objectives could be more explicitly incorporated into the management plan if these high risks are to be addressed. This will require improved collaboration between Victorian government agencies but also others that share the biological stock. Despite the lack of understanding of the stock-recruit relationship in southern rock lobster fisheries, it is highly likely that recruitment (and therefore the future success of the fishery) is at least in part driven by events in southern rock lobster fisheries managed by other States. For too long, Australian southern rock lobster fisheries have been managed without adequate regard to the shared nature

of the biological stock. Given the species' role in maintaining the health of kelp forest reefs that support both elevated biodiversity and fishery productivity, collaboration between industry and agencies tasked with fishery and wider environmental management should also be advanced under more formal arrangements. We urge industry and the Victorian Fisheries Authority to actively pursue this collaboration in the implementation of this fishery management plan.

We welcome the proposed arrangements to manage the recreational fishery, noting that there remains some uncertainty around the innovative but only recently implemented recreational catch reporting app. We are open to an interim review of these arrangements should further serious challenges arise with implementation or effectiveness of recreational catch reporting.

While the implementation of formal catch allocation between commercial and recreational sectors may provide some certainty and confidence within respective sectors, we note that wherever Australian fisheries with formal sectoral allocations have found themselves in need of rebuilding, all sectors tend to be called upon to reduce fishing effort regardless of their respective contribution to a target stock's depletion. In our experience, an abundant and productive fishery that delivers economic and social wellbeing tends to render the perceived need and benefit of formal resource allocations moot.

If implemented in full, particularly the areas of the draft Harvest Strategy relating to stepwise TAC setting against CPUE bands, we are confident that the Victorian Rock Lobster Fishery can maintain its amber ranking in our GoodFish Sustainable Seafood Guide. This would mean the fishery will retain access to the >125 Australian chefs and businesses that partner with our program, and the social license benefits associated with that endorsement to our supporters and the environmentally aware Victorian seafood consumer. We believe this will be of considerable value to the Victorian Rock Lobster Fishery as it seeks to maintain social license to operate and diversify its markets.

Industry, recreational fishers and the Victorian Fisheries Authority are commended for their roles in developing a management plan with clear potential to set this fishery on a more secure trajectory.



Adrian Meder

Sustainable Seafood Program Manager

Australian Marine Conservation Society.