

Fred Butcher Feedback:

Dear Ewan

I am a Rec fisherman and I perused with interest draft management plan but I could not find any data that broke down the percentage of Rec take between divers and hoop nets!

I bring this up as given the Rec take is such a small percentage of the overall take and I believe that hoop nets would account for a small percentage of the Rec take, surely it is time to allow Rec fishers to use lobster pots!

This would bring us into line with other states and given you have virtually real time monitoring of the catch rate, it could be managed should the need arise.

Regards
Fred Butcher

Peter Galvin Feedback:

Ewan

Here is my feedback on the rock lobster draft plan, it is mostly minor. However, I support the concern that will be expressed by VRFish and SDFV that the recreational allocation for WZ of 6 tonnes is unreasonably low. I provide the following for your consideration, my other comments on the plan are below this.

Impact on Rebuild Strategy

We believe an additional 2 tonne allocation that is equivalent to 0.25% of the WZ biomass and 0.8% of the TAC should be able to be easily accommodated within the rebuild strategy. We expect the rebuild statistics have such a high level of uncertainty that an extra 2 tonnes or 0.8% of the TAC will barely be detectable.

Community Recreational Benefit

According to the Victorian Recreational Rock Lobster Tagging Program Summary Report 2021: November 2020 – September 2021" the number of divers registering each year was between 5,000 to 6,000 across age ranges from <20 to >80 years. This demonstrates a considerable recreational community benefit.

The majority of these registered divers have taken none, one or two SRLs each season which demonstrates significant activity by a large number of Victorians for a small number of SRLs for each participant and in total.

Equity

The 0.25 % and 0.8% mentioned above are extremely low for an important sector and are not supported by the diving community we have spoken to. A number of divers we have explained this too are surprised at how low even 8 tonnes is in comparison with the TAC or biomass.

Economic Activity

In the absence of an economic study of the benefits of recreational diving we believe that it clearly delivers a significant economic benefit to Victoria and particularly regional Victoria.

A day trip typically involves significant car travel, boat fuel, tank fills, food in a regional location and possibly charter boat costs. Overnight trips will also involve accommodation costs. The majority of this will be spent in regional locations.

Recreational divers also have a significant investment in gear and boats and incur significant annual maintenance costs.

When we consider that 12,000 divers registered for the tagging program in its first four years and between five to six thousand each year, if this community only does a small number of dives each year it still represents considerable economic activity.

In summary, we believe an additional two tonnes in WZ is a modest request that can safely be accommodated within the rebuild strategy, gives appropriate significance to community benefit, balances equity between the commercial and recreational sectors and will assist in maintaining the economic benefit from recreational SRL fishing.

The below feedback is clarifications and minor questions

Table 5 Page 18 still has the high average weights, e.g. 2.1 in EZ. This should be updated to the revised average weights and total catch weights?

3.2 Ecologically sustainable development risk assessment

Typo in second paragraph

"are maintained, and the total quality of life, not and in the future, can be increased".

Not should be deleted

Page 40, 7 Rock Lobster Fishery Harvest Strategy

References here to TACC should be to TAC?

Table 9 Pg 47 explanation refers to WZ but it is actually EZ, it also refers to red, orange and greens figures but the figures are not coloured.

Page 47 section 7.6 dot point 3

"For the Eastern Zone, a cap on the recreational catch at 6 tonnes until the TACC for the Eastern Zone rises to 32 tonnes under the proposed commercial harvest strategy, at which time, the recreational catch cap will be reviewed. The recreational catch cap will be reviewed at this catch level to determine if an increase to the recreational allocation can be made without impacting the rebuilding trajectory towards the TRP."

There is no mention of a review for WZ cap?

Table 9 also shows TACC capped at 32t but Table 12 page 50 shows caps exceeding 32t.. I can understand the <32t as this is the voluntary catch reduction but can't understand why the TACC exceeds 32t after Step 7.

There is no Table 10

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Peter Galvin

Ewan

There is an apparent inconsistency in how the TARC is defined in 7.5 Resource allocation and then in the glossary

7.5 Resource allocation

The recreational sector is allocated a TARC (total allowable recreational catch) equal to 15.8 percent of the TAC in the Eastern Zone and 2.4 percent in the Western Zone. This is capped at a maximum of 6t in the Eastern Zone and 6t in the Western Zone. The commercial sector is allocated a TACC (total allowable commercial catch) consisting of the remainder of the TAC.

Glossary

Total Allowable Recreational Catch: The mass of rock lobster that may be taken by recreational fishers. The Total Allowable Recreational Catch is limited to five and ten per cent of the Total Allowable Commercial Catch in the Western Zone and the Eastern Zone, respectively.

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Peter Galvin

Ewan

This may or may not be required.

When explaining some of the plan features to our guys I realised there was some confusion with terminology, e.g. some people referred to allocation as either TARC or capped TARC.

It may be worth considering defining capped TAC, TARC and TACC?

Just a thought, not 100% certain we need it

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Peter Galvin

Ewan

In discussing some of the finer points of the plan with the recreational sector I realised there was confusion around TACC. I realised we effectively have two definitions of TACC as shown in Table 9 and Table 12, i.e. 32 and 21 tonnes. As they are calculated differently and are different I think we should have a new defined term for the "21 tonne". I think the 21, 22's etc. could be something like Total Voluntary Commercial Catch?

Craig Starritt Feedback

Hi Ewan

Here's my feed back on the Draft Management Plan, these are my personal views & opinions

- Decrease the possession limit in the home to 10, The RL possession limit in the home should be listed in the Fishing Guide on page 26.
In the same way Abalone Possession limits on page 30. of the 2023-24 Victorian Recreational Fishing Guide 2023-24 currently ""The possession limit for rock lobster in, on or next to any Victorian waters is 4""

- Port MacDonnell just across the South Australian boarder has a daily bag limit: 4 Rock Lobster per day

The Victorian Western Zone bag limit: 2 Rock Lobster per day

South Australia view the Recreational take as inconsequential,

- The Victorian WZ is a vast deep water fishery, the Recreational access is little more than tinkering around the coastal edge

to have a cap in the WZ of approximately 1% of the Biomass, is harsh in my opinion

While the VFA promotes ""Target One Million"" & golden tags. incentives to encourage increasing participation in the Recreational Dive sector

seem to be lacking, there has been a dramatic reduction in partition, which is concerning,

- The VFA should be promoting the fishery to First Nations People the Recreational sector & it's value to all Victorians

- Reverse the Legal Minimum Length for Male & Female, the reasoning is to increase the egg production. ? by 2 extra cycles

Male: 10.5cm carapace & Female: 11cm

This will provide a clear direction and commitment to rebuilding biomass to optimise benefits to all resource users.

- 7.3 Current stock state and rebuilding timeframe

I'm glad to see the aggressive rebuild strategy. reaching MEY will be beneficial for both the economical & environmental aspects of the

fishery. the only concern is the Soak Time is missing, maybe MSC sustainability certification if will result in a soak time, given that Pots do

occupy a Public Space, some times in high activity areas close to the coast.

Pots are a hazard to both boating & wildlife, short of having a spatial separation between the commercial potting & the busy coastline

the introduction of a soak time of 48 hours for pots within 500mtrs of the coast line, should be considered, there shouldn't be an

unlimited access to a valuable public space, like the Bay of Islands at Peterborough.

Kind Regards
Craig Starritt

Paul Maquire Feedback:

Hi Ewan

Could you please consider increasing the catch limit of SRL for the western zone. An additional 2t to the current capped 6t TARC (and/or boat catch limit to 6)

I put in a lot of work and enjoy the few decent dive days that the Victoria weather permits in complying with VFA guidelines.

I feel 2 SRL per diver is to restrictive given the opportunity I have as a diver (my favourite and only passion)

I feel the online app process will be more efficient with an increased catch limit as:

1. Divers appreciate the gift VFA may provide in increasing catch limits and will respond more professionally

2. Provide a wider catch area as divers will travel as 3 SRL justifies the added time and cost. Thus reducing the impact of divers in a close and convenient area such as Torquay

3.if online reporting doesn't improve then VFA have more respect and reason to reduce catch limits to less than 2 in future years

I respect t the ocean a marine environment. I respect the work on policy and policing that VFA provide

Please kindly reply
Regards
Paul maguire

Matt Rawson Feedback:

I am writing in regards to the proposed changes to the recreational catch limits on SRL currently it is 2 per licensed diver daily I've been diving out of Barwon Heads for 30 years and in my opinion it is not the recreational diver needing any further restrictions some of our reefs out the front are constantly hammered by commercial fishing and I stress again not the recreational diving

Kind regards
Matt

Stephen Crowe Feedback:

Dear Sir

My comments on the rock lobster management plan are as follows:

I have been a keen recreational diver and commercial abalone diver over the last 50 years.

During that time I have seen a once plentiful cray fishery in the EZ decline to what it is today.

When I started diving the recreational cray catch was obviously very small, while the commercial catch was documented to being in the some hundreds of tonnes.

You could argue all day about why it is in the state it is in, but it is what it is so I support the recreational allocation and cap in the EZ.

The situation in the WZ is quite different and I can't for the life of me understand how the allocation in the WZ can be the same as in the EZ given the size and state of the WZ fishery.

How can you allocate only 6 tonnes to the rec sector with a commercial allocation of over 240 tonnes .

Why are we being penalised for the obvious over fishing by the commercial sector since the 1950's?

Surely the rec sector is entitled to more than 6 tonnes out of an over 240 tonnes TAC.

Regards

Stephen Crowe

Lawrence Moore Feedback:

Hi Ewan,

My response to the rock lobster management plan (RLMP).

Firstly, like most people I am pretty happy with the draft plan. However one aspect of the plan that I have a big problem with is the resource sharing arrangements in the western zone.

Whilst I fully understand the reasoning behind the 6 tonne allocation to the Rec Sector in the EZ, to allocate the same tonnage (and cap) in the WZ is not in any way equitable, considering the estimated available biomass in the WZ is about four times that of the EZ. Furthermore the recreation allocation in the WZ does not measure up to the parts of the management plan visions and objectives that refer to community benefit and equity.

During the management plan process all aspects of the fishery were examined in great detail but when it came to discuss the WZ recreational allocation we had run out of time and would have to be discussed out of session. As far I know there was only one meeting between VFA and VRFish/SDFV (No management plan recreational representatives present). No outcome was recorded, as far as I know, no minutes were taken, that I know of, and no notification to the rest of the management plan steering committee members. To me the issue has yet to be discussed.

Regarding the recreational sectors desires for high allocation and cap in the WZ we have been told that any increase in any rec allocation would have to come from the commercial TACC. Although I can't see why the commercial sector shouldn't be able to give up a few tonnes to make the problems go away, I have to say that after being involved in the last three management plans I get the impression that when dealing with a couple of tonnes either way in a 247 tonne fishery the rec allocation could easily rise slightly without coming off the commercial TACC. In the scheme of things a rise of a few tonnes could not possibly be measured with any degree of accuracy considering the rebuild is over 20 years, on top of that any increase in the recreational allocation would likely not be caught in the lifetime of this management plan.

Also keep in mind, under the old 5% notional system the rec sector was theoretically given 10-12 tonnes PA for about 16 years now, with the suggested 6 tonne rec allocation, I assume the extra has gone to the commercial sector. I am just echoing the thoughts of many recreational divers in the WZ that the resource sharing arrangements are in no way equitable.

Regards, Lawrence Moore

Peter Price Feedback:

I am responding to the Management Plan, which seems to have a lot put into recreational fishing and T.O. to eventually share more of the resource. That can only mean less for Commercial Fishermen who pay the fees to run the fishery. (4.2 part 6).

Seismic testing is not scrutinized nowhere near enough. I think they are the very reason our recruitment has been "poor" since 2008 killing the peroulous.

I am totally against M.S.C. It is getting written into our management plan without us being told the details (it's very expensive for little or no return to fishers).

Tom Cosentino says it is a pre-assesment research project and because of this the whole pre-recruitment has changed to suit M.S.C Compliance going against the previous 5 year management plan and it may not even happen.

Our last AGM Toby was pushing very hard for M.S.C saying how good it will be but not explaining how much it will cost, he just wanted to get M.S.C plan completed before he went elsewhere. No other state is pushing as hard for it as this (some have already said no) and now that the farmers Federation have pulled out of negotiations with the EU this will be too difficult for us to attempt.

This may not be what is meant to be said but we are very passionate about our lobster industry. We have brought it back to a very good level with a lot of unrecognized pain and stress (last 4/5 years). We know it is a public resource for all Victorians to enjoy but we as Commercial operators pay the price for all the decisions that seem to work against us. It has been a very long time since Commercial Operators have been rewarded with an increase in quota or any reduction in fees. It seems to always be take and more take.

I hope that the commercials over the next 5 years dont become the sacraficial lambs for labor trying to chase votes for next election.

Peter Price

Allan Conley Feedback:

Good evening Ewan

My name is Allan Conley I am 70 yrs off age I have been scuba diving since 1980 and snorkelling since 1968, I have noticed the abundance of Crayfish and Abalone has been desecrated along the back beaches on the Mornington Peninsula from Barwon Heads to West Head at Flinders.

This resource is owned by the public and should be managed responsibly, for the Public it seems to me that the Commercial sector have had a field day “ over the last 40 years that I have been diving “ with no science limiting the catch or Quoters of the Commercial fisherman this does not seem fair in the interests of the general public or fished in a substantial scientific way.

I been diving around Cape Schanck have been harassed by Commercial cray boats on numerous occasions and been abused by their skippers and told to leave their crays alone and keep away from there pots having 2 or 3 boats with divers on board out on the water, we were able to push back.

One of the issue's that I have is they pot in shallow water up to 5 meters in depth close to shore were the amateur's dive , which causes conflict, also their excessive long pot shot lines are a safety hazard that get caught in our propeller's, which is very dangerous especially in a trailing sea with ocean swells breaking over the stern off our boats

I hope that when VFA brings out there new Crayfish Quoters that they take into account the real reason that the fishery is in such bad shape, and take appropriate action based on science not Commercial Greed.

Also what does the science say about the mortality rate throwing back cray that are either in berry or undersized and not necessarily putting them back on the reef that they were taken from.

Sincerely
Allan Conley

Gary Pahoff Feedback

Hello Ewan,

Response to the VFA Draft Crayfish Fisheries Management Plan.

My name is Gary Pahoff,

I have been scuba diving since 1987, I have noticed the amount of Crayfish has been decreasing year by year, from a healthy environment to being very scarce.

The crayfish should be shared by both recreational and commercial sectors.

I have been harassed by Commercial Cray boats on numerous occasions and been abused and told to leave the area, because I was told by the commercials that the crayfish were theirs.

Their respect for recreational fishermen is nil, the floats on the pots in shallow water is a navigation hazard, because of the long ropes used.

This contravenes international maritime law, by creating hazards and safety issues to maritime vessels.

We need separation zones between commercial and recreational fishers.

May I suggest that commercial zone limited to fishing beyond 20 metres and not be able to fish in shallow waters, anything less than 20 metres. This will create a sort of marine sanctuary which will allow the crayfish to breed and grow, creating a larger biomass. The recreational fishing pressure will be minute compared with the commercial fishing.

May I also suggest a full closed season on males and females between June and November.

This will decrease the mortality rate of female crayfish being returned to the water, in the case of divers, we can't check the sex of the crayfish until we have captured them. By the time we have identified the sex, they may have dropped their berries, due to stress. With the commercial fisherman returning undersize to the water, are they returning them to the reef where they caught the crayfish.

Increasing minimum size by 5mm on both male and female crayfish.

I believe that recreational divers are entitled to a larger portion of the TACC, and increasing the daily catch from 2 to 4 crayfish a day. It is now very rare that we actually take our daily bag limit, so it might be a bonus for the recreational fisher's to get lucky sometimes.

I hope that when VFA Crayfish Fisheries Management Plan is released, changes are made to protect the crayfish stock with the best practices for both commercial and recreational stake holders

Sincerely

Gary Pahoff

Stephen Snow Feedback:

Dear sir,

I am an recreational diver and would like to make the following observations that I would appreciate being taken into account in your final policy.

Because I have been diving since late 1980's, my personal observation is that stocks are well depleted and continue to deplete. The recreational catch is not what it was.

The Commercial catch has remained relatively stagnant at approximately 240 tonnes for the last 15 years. This is UNUSTAINABLE and needs to be drastically reduced.

The recreational catch is peanuts in comparison. The fishery appears to be slowly inexorably declining, based on my underwater observations.

The Act requires that the fishery be ecologically sustainable and I do not believe we are on this path.

My recommendations.

- Reduce commercial quota drastically, immediately.
- Leave recreational quota as is.
- Bring female and male take seasons into line at the minimum time period. To have separate seasons makes no sense at all to me. To take a female male and then return it to the water stresses the animal.
- Bring back the plastic tag for recreationals. That system seemed to work just fine.
- I would suggest that economic activity generated by recreational divers to the Victorian economy is substantial. Fuel, licences, boats, cars, repairs, for example. I am not sure where this economic activity is accounted for- leave that to the experts.

Thank you for the opportunity to comment.

I am more than happy to elaborate at any time.

Stephen Snow

Allan Buck Feedback:

Hi Ewan

Here are my point relating to the Crayfish Manage Plan

1 I had a lot of trouble understanding the Rock Lobster Management Plan, specifically how the recreational allocation of the TAC for the Eastern Zone and Western Zone is arrived at.

2 What will happen when the Recreational TAC of 6 ton is reached for the Easter Zone, will there be a meeting of the RLMAC and will it be closed immediately, and how will the divers know what the RLMAC recommendation are so recreational can comment.

3 There should be a greater allocation for the recreational divers in the Western Zone (eg eastern zone 15.8%of the TACC where the western zone is only 2.4%of the TACC) it doesn't meet the pub test! as the Western Zone is a lot better resource and could easily stand an increase in recreational allocation.

4 the Digital reporting on crayfish that are caught should be simpler a lot of older fishers are having trouble reporting.

5 The season for crayfishing by recreational and commercial should go from 15 November to 31 May it would leave a lot more males for breeding. It would help with the recruitment.

Cheers

Allan Buck

Rob Timmers Feedback:

Hi Ewan, as a ' member to the VFA, and being involved first hand in the 'draft RL management plan, I fully subscribe and agree to the SDFV submission (within 60 days public consultation) . Yours sincerely Rob Timmers. Scuba instructor, Charter boat owner, life member of the LVSC, member of VRfish DFRG, recreational RL fisher with 2 lobster reported for this 2023/24 season. Thankyou.

Len Joyce feedback:



A Recommended Addition to the 2023
Southern Rock Lobster (SRL)
Management Plan

Contents

- Introduction
- Brief History
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- Known and Potential Risks to SRL.
- Potential SRL Rebuild Intervention Methods
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Introduction

The current SRL Management Plan manages SRL stock using a mixture of lagging (CPUE) and leading key indicators (PRI) and Egg Production. The plan adjusts total allowable catch based on these indicators. However puerulus settlement in Victoria from Victorian SRL's is probably minor and therefore reducing harvest rates may not achieve the rebuild strategy. In addition the rebuild could be at risk, from risks that have no relationship to the actual total catch.

This submission is aimed at adding to the management plan an investigation into viable intervention methods to increase biomass in the future.

Brief History

“A primary strategy of the 2009 Fisheries Management Plan is to rebuild the available biomass in both zones to the target reference point of 40% of 1951 by 2021”.

Although this rebuild strategy has not been achieved, fisheries SCIENTISTS have studied evolving methods/interventions that show potential.

If one or more interventions were successful, the SRL biomass could flourish and exceed the 20 year rebuild expectations.

Brief History

Declining Resource

Eastern Zone (1978 – 2022)

Western Zone (1978-2022)

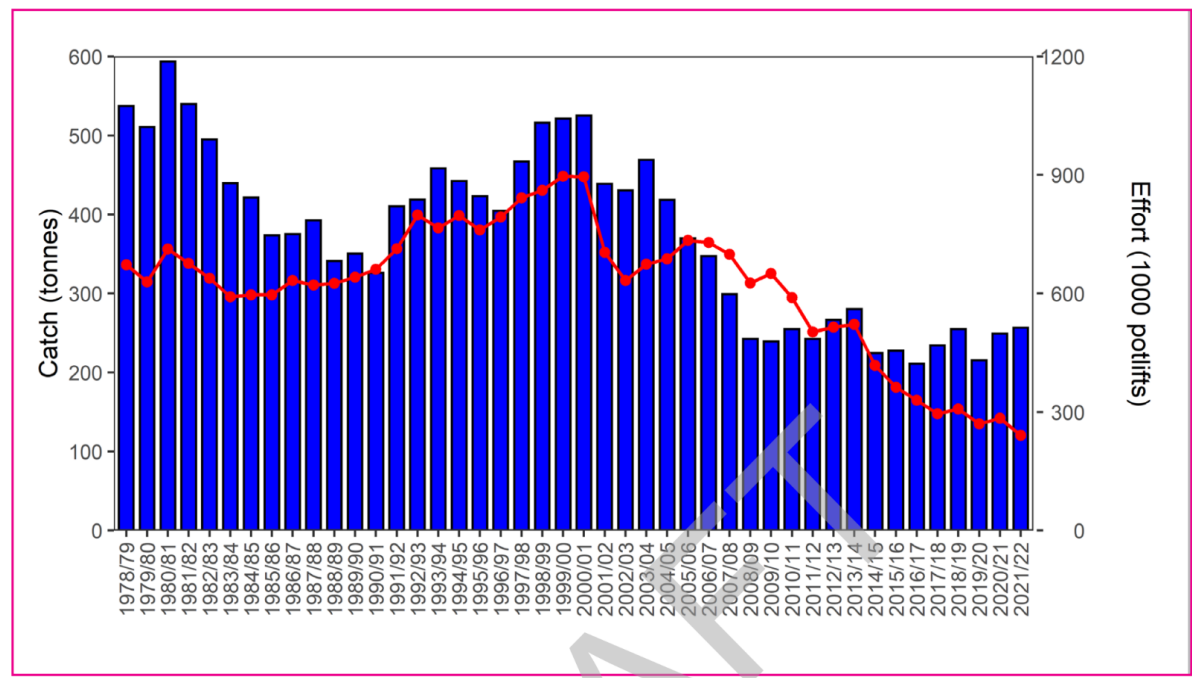
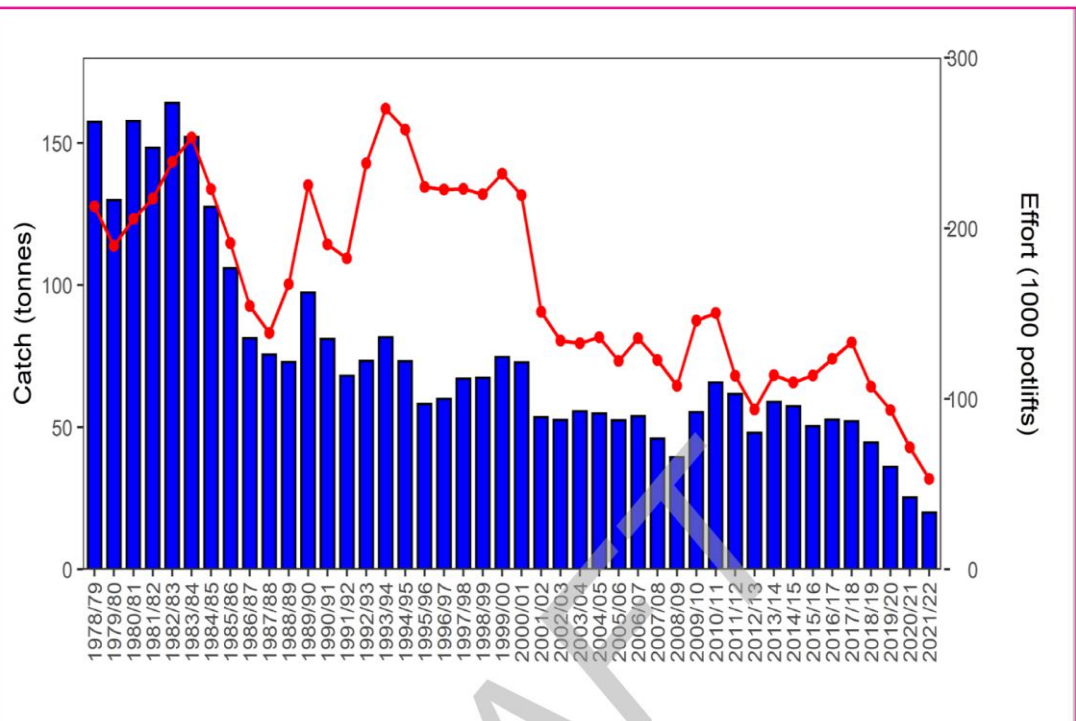


Figure 3. Total catch (tonnes) and unstandardised effort (x1000 pot lifts) in the Western Zone from 1978/79 to 2021/22.

Figure 6. Total catch (tonnes) and unstandardised effort (x1000 pot lifts) in the Eastern Zone from 1978/79 to 2021/22.

Known and Potential Risks

Climate Change

- Longer periods of warmer water.
- Decrease or loss of upwellings
- Change in ocean currents

Loss of kelp forests

Predators and Seismic Exploration

- SRL survival rate at say 2 to maturity per 500,000 eggs
- SRL and octopi kill rates of smaller SRL.
- Continued/increase in petroleum seismic exploration. (The Guardian 24 Aug 2022)

Minimal reef structures in Eastern Zone

Known and Potential Risks

Increased pressure on the resource as Victoria's population will increase by 1.8 million within 13 years and increasing to 10.3 mil by 2050. (www.planning.vic.gov.au) – VIF 2023

Chemical dump sites and other impacting puerulus chemical sensing. (LCEPC Inquiry into Ecosystem Decline in Victoria submission 661)

See appendix for other possible potential risks

Potential SRL Rebuild Intervention Methods

Below, are some examples of intervention methods that may increase biomass that has been mentioned in literature, or proposed by others.

- Increase legal size limits for the TAC allowing more breeding cycles
- Hatching, growing and release of mature puerulus in vulnerable areas
- Commence farming trials as the technology is known
- Capture wild mature puerulus near their morphing phase and release in vulnerable areas
- Relocation trial of female SRL in berry during closed season to allow a higher puerulus release in vulnerable areas

A watching brief by VFA scientists on possible Intervention methods and any trial/s and regular reporting to the SRL RAG. I further suggest intervention trials should be included as part of the 2023 SRL Management Plan and run in parallel with current controls. If such a programme is successful this would be excellent insurance should the rebuild strategy fall behind the 5 year target reviews.

Appendix

Other Potential Risks

Significant increase in marine traffic – personal observation when viewing the Marine Traffic App. over several years.

Technology improvements:

- GPS Technology improvements
- underwater drones,
- 3-D mapping,
- live scan sonar and
- possible drone hunting/location technology.

Con't

Appendix

Other Potential Risks

- Decrease in krill /zooplankton levels. I.E. Factory ships harvesting krill. (Association of Responsible Krill Harvesting Companies).
- World population increasing to over 10.7 Billion by 2050 increasing demand for a green quality product

2023 – 8.3 Billion

2050 - 9.7 Billion

2100 – 10.7 Billion

WWW.UN.ORG.global-Issues-population