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April 29, 2023

Travis Dowling  
Chief Executive Officer  
Victorian Fisheries Authority  
GPO Box 2392  
Melbourne Victoria 3001

Via email c/o Toby Jeavons ([toby.jeavons@vfa.vic.gov.au](mailto:toby.jeavons@vfa.vic.gov.au))

Dear Travis,

### **Southern Rock Lobster 2023/24 total allowable commercial catch (TACC)**

The Victorian Rock Lobster Committee (VRLC) welcomes the opportunity to provide comment on the Victorian Fisheries Authority's (VFA) recommended total allowable commercial catch (TACC) for the 2023/24 fishing year.

The VRLC is a sub-committee of Seafood Industry Victoria (SIV) made up of seven rock lobster industry members. The committee seeks to represent the interests of Victorian rock lobster licence and quota holders.

VRLC Chairperson, Wayne Dredge and Executive Officer, Matthew Wassnig attended the VFA port visits during the week of April 17 – 21, 2023. Other committee members also attended the meetings in their local ports. Feedback was captured from industry members in both the Western Zone and Eastern Zone regarding:

- Latest stock assessments based on data collected in the 2021/22 fishing year
- Proposed harvest strategies for inclusion in the 2024/25 5-year Management Plan
- TACC recommendations for the 2023/24 fishing year
- Proposed VFA fee relief in support of stock rebuild targets in the Eastern Zone

The results of the latest stock assessments were encouraging. Standardised catch rate in the Western Zone has continued an upward trend and egg production has remained stable. Catch rates also improved in the Eastern Zone for the second consecutive year, along with a modest increase in the number of pre-recruit sized lobster. Under the harvest control rules within the current management plan both the Western and Eastern Zones are eligible for TACC increases in the coming fishing year to 270 Tonnes and 40 Tonnes, respectively. It is

understood however that the consensus view reached by the steering committee for the 2024/25 5-year Management Plan was that industry should adopt lower TACC's this year that reflect the starting point for the next proposed 5-year harvest strategy. This view was also reflected by the Rock Lobster Resource Assessment Group which recognises the decline in reproductive productivity of Victorian rock lobster stocks since the early 2,000's. Conservative TACC's in 2023/24 could facilitate a more immediate start toward achieving stock rebuild targets aligned to the core principles of Marine Stewardship Council (MSC) certification.

**Table 1:** Recommended TACC for 2023/24 by comparison to current and eligible TACC

<b>Zone</b>	<b>Western</b>	<b>Eastern</b>
Current TACC 2022/23	246 Tonnes	32 Tonnes
Eligible TACC 2023/24	270 Tonnes	40 Tonnes
Recommended TACC 2023/24	242 Tonnes	21 Tonnes

It is accepted that lower TACC's are likely to contribute to improved catch rates over time and maximise the likelihood for third party sustainability accreditation of the fishery; however, a detailed cost/benefit analysis of the draft 2024/25 5-year Management Plan will be required upon its release. The VRLC will undertake further industry consultation in response to the draft Management Plan during the formal consultation period scheduled by VFA for later in 2023.

It is important that business viability for licence holders be maintained while a longer-term harvest strategy is being finalised. Depressed wholesale prices for Southern Rock Lobster driven by export bans into China along with elevated running costs (labour, fuel, bait, materials, maintenance) continue to place significant strain on individual businesses. In accordance with VFA's current cost recovery model, licence and quota holders contribute levy fees to fund management of the zone they operate within. The comparatively low TACC in the Eastern Zone results in a much higher cost of licence/quota levies per kilogram of available catch by comparison to the Western Zone. This fee structure combined with the economic pressures on fishing businesses has made it unviable for some licence holders in the Eastern Zone to fish their available quota in recent years.

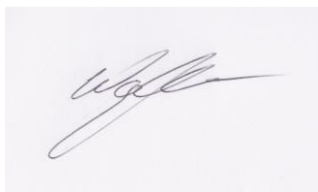
**Table 2:** Cost of licence/quota levies per kilogram of recommended TACC

<b>Zone</b>	<b>Western</b>	<b>Eastern</b>
Licence levies last full fishing year	\$2574/licence (total \$182,752)	\$3615/licence (total \$119,290)
Quota levies last full fishing year	\$118/unit (total \$428,440)	\$276/unit (total \$275,890)
Recommended TACC 2023/24	242 Tonnes	21 Tonnes
Estimated licence/quota levy cost per kg TACC 2023/24	\$2.53	\$18.82

The VRLC is able support conservative TACC's in 2023/24 designed to achieve faster stock rebuilds if business viability for licence holders can be secured through sufficient fee relief. The VRLC thanks the VFA for agreeing to fee relief for the Eastern Zone in 2023/24, however, the \$50,000/annum offered to date across all Eastern Zone licence holders is insufficient to protect business viability. To assist industry in adopting the conservative TACC recommended by the VFA in 2023/24, despite an eligible increase under the current management plan - the VRLC requests that the VFA consider fee relief in the Eastern Zone that will bring the cost of licence and quota levies per kg of TACC in line with the Western Zone, without negatively impacting fee structure for the Western Zone. If fee relief allows for implementation of a lower TACC in the Eastern Zone it will not only assist in rebuilding the fishery to more productive levels in a faster timeframe but also contribute to greater recreational satisfaction amongst Victoria's diving community who share access to the resource.

The VRLC looks forward to receiving a response regarding how the contents of this letter will be considered for the 2023/24 rock lobster fishing year.

Yours sincerely,



Wayne Dredge  
Chairperson  
Victorian Rock Lobster Committee  
Seafood Industry Victoria



Matthew Wassnig  
Executive Officer  
Victorian Rock Lobster Committee  
Seafood Industry Victoria