



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

29/5/19

Dear Toby

Re: Fisheries (Rock Lobster Tagging) Notice 2019.

Thank you for the opportunity to comment on the Victorian Fisheries (Rock Lobster Tagging) Notice 2019. Eastrock congratulates VFA for the introduction of this method of estimating recreational catch and generally supports the Notice. We provide the following comments/suggestions/additions:

1. S 7 (1) (b). 20 unused tags in the person's possession is excessive, 20 tags is 10 times the daily bag limit. Reducing this number to 10 may also increase the rate of reporting as persons would have to apply for tags more frequently.
2. S 9 (1). Include sex data. Data on the sex of captured lobster could prove to be informative as the recreational take is further evaluated.
3. S 9 (2) Does VFA intend to prosecute under this section, with a maximum \$3200 penalty? This seems excessive for a failure to report the use/loss of recreational tags. There are a substantial number (perhaps thousands) of people that had not reported on their tag use by last season's the cut-off date, large fines would be counterproductive in working with the recreational sector. If VFA does not intend to prosecute under this Regulation, it should be removed. A smaller fine and exclusion from the following year's tag issue would be more realistic.
4. S 10 (3)is landed, or put into any basket, bag or receptacle;. This would prevent divers keeping lobster on board and high grading before they land the lobster.
5. S 10 (9) c) or the tag has been transferred in accordance with S 11. This should be added to legalise the use of transferred tags.
6. S 11 (a)(ii) excessive number of tags, see point 1.
7. Add a clause mandating that all recreationally caught lobsters are to be tagged and landed before being eaten. Under the proposed legislation it may be construed that there is a legal loophole that allows cooking and eating lobsters on board a boat without them being tagged or landed.

Eastrock would like to make the following general comments on the Notice:

- We note the expiry date of the trial period (16 November 2020) and look forward to discussions with VFA regarding establishing a responsible and equitable estimate of the appropriate recreational take from the eastern zone of the fishery.
- Maintaining the recreational bag limit while the commercial harvest is being reduced is not an equitable use of the resource. Both sectors should equally bear the responsibility of reducing catches and the fruits of a hopefully rebuilt stock.

Eastrock again thanks VFA again for the opportunity to comment of the proposed Notice and representatives of Eastrock would be happy to have further discussions with VFA if required.



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

Yours sincerely

Anthony Ciconte
Eastrock Chair

A handwritten signature in cursive script, appearing to read 'Anthony Ciconte', written over a horizontal line.