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Travis Dowling  
Chief Executive Officer  
Victorian Fisheries Authority  
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Via email c/o Ewan Flanagan ([ewan.flanagan@vfa.vic.gov.au](mailto:ewan.flanagan@vfa.vic.gov.au))

Dear Travis,

### **Draft Victorian Rock Lobster Fishery Management Plan 2023 – 2028**

The Victorian Rock Lobster Committee (VRLC) welcomes the opportunity to provide comment on the draft Victorian Rock Lobster Fishery Management Plan 2023 – 2028. 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, noting that not all stakeholders within the fishery may hold the same views.

The VRLC recognise that building biomass in the Victorian Southern Rock Lobster (SRL) fishery provides the greatest opportunity to improve catch rate per unit effort (CPUE) and therefore reduce operation costs by minimising the number of fishing days required to catch available quota. Additional benefits include greater resilience to external pressures such as climate change, which will benefit all stakeholders, and opportunities for third party sustainability accreditation to improve social licence and broaden market access.

It is acknowledged that a target biomass of 40% of available biomass pre-fishing (above legal minimum length) aligns with several existing standards, including the Commonwealth Fishery Harvest Strategy Policy and the Marine Stewardship Council (MSC). The VRLC understands that due to observed declining productivity of the fishery, linked to recruitment rather than fishing pressure, it was determined that this target was not achievable even in the absence of all fishing. Based on this, the target was adjusted to 28% of pre-fishing available biomass in the Western Zone (WZ) and 28.8% in the Eastern Zone (EZ).

The rebuild time frame to reach biomass targets of 20-years (or two generations) is also consistent with the MSC standard. It is understood that to have a 50% or greater likelihood of achieving biomass targets within 20 years, a precautionary principle is required whereby total allowable commercial catch (TACC) is maintained only when:

- a) CPUE remains stable or increases over time
- b) Minimum thresholds for egg production and PRI are met

In recognition of lower recruitment events after 2013 driving down biomass in the Eastern Zone (EZ), the Management Plan Steering Committee (MPSC) recommended that the EZ commercial sector aim to rebuild biomass to the target in a time frame of 10 rather than 20 years. This recommendation requires EZ licence holders to voluntarily commence the harvest strategy at a TACC of 21 tonnes for the fishery rather than 32 t and accept it will take at least 7 years to reach 32 t again, assuming significant increases in CPUE over that time. There is also a recommendation for the Western Zone (WZ) to take a 4 t decrease in TACC from the 2022/23 fishing year and maintain that level for the life of the management plan, assuming CPUE does not drop which could trigger a sharp reduction in TACC.

### **Eastern Zone Management**

Lower TACC's place significant strain on the viability of long-standing fishing operations, putting socio-economic contributions of the industry and local supply of fresh seafood at risk. There is concern that a conservative approach to stock rebuilds in the EZ may result in annual yields that barely cover the cost of running some commercial fishing operations. The impact of reduced revenue on businesses is compounded by higher fees per kilogram under the VFA's current cost recovery model. The cost per kg of quota/licence fees at a TACC of 21 tonnes in the EZ is approximately \$19/kg. It has already become unviable in recent years for some licence holders to fish or lease their available quota, which has forced them to focus on alternative employment and resulted in not all available EZ TACC being caught.

In recognition of this issue, for the 2023/24 fishing season the VFA agreed to provide \$149,000 of fee relief for the EZ, comprising \$50,000 pure fee relief and \$99,000 of savings through a reduction in data collection for the fishery. The \$7.14/kg reduction in fees provided some temporary financial assistance for EZ licence holders, however the cost per kilogram of production remains a significant issue.

There is further concern from EZ industry members that with only approximately 10 boats now active, volume and geographical spread of fishing data will be insufficient to accurately monitor the stock. A small change in a single operator's activity from year to year may skew data informing the thresholds (such as PRI index) required to appropriately adjust TACC over time in response to stock performance. Adopting a conservative harvest plan therefore creates risk for EZ licence holders if stock recovery is not properly recognised and TACC adjusted accordingly.

## **Recreational catch**

It was agreed by the Management Plan Steering Committee that total allowable recreational catch (TARC) be set at 15.8% of TAC in the EZ and 2.4% in the WZ, with both allocations capped at a maximum of 6 tonnes per annum. The VRLC note that a new provision has now been introduced into the Management Plan under sections 7.5 and 7.6. This change means that when the agreed 6 tonne cap is reached in the either zone an automatic closure of the recreational fishery does not occur. Instead, a review is triggered when a zone reaches 5 tonnes and a Management Advisory Committee (yet to be formed) will consider the need for possible management intervention. Any recommendation would then be put to the VFA for a final decision.

It is crucially important that once final harvest strategies are agreed for the life of this Management Plan that the rebuild process is not jeopardised. It is also important that the commercial sector not incur any further restrictions to TACC than those already proposed in the draft Management Plan presented to industry.

## **Conditions of support**

Support from the VRLC for the draft Management Plan 2023-2028 in its current form, including a conservative harvest strategy for the Eastern Zone (10-year stock rebuild), is contingent on the following:

- a) a commitment from the VFA for ongoing fee relief in the EZ per kilogram of TACC equivalent to that provided in the 2023/24 fishing year (\$7.14/kg) for the life of the 5-year Management Plan.
- b) a viable strategy involving all stakeholder groups to support a sampling regime in the EZ (while commercial TACC is below 30 tonnes) that ensures appropriate decision making is informed by robust scientific modelling for the benefit of both the commercial and recreational sectors.
- c) all fishery stakeholders be consulted in the event fee structure changes, from that in place for the 2023/24 fishing year, at any stage during the life of the management plan. These consultations, and any changes to levy structures, must consider the costs of managing the fishery for all sectors.
- d) by agreeing to significant TACC reductions, and pauses in TACC increases, the commercial sector is recognised as being proactive in the stock rebuilding strategy for the rock lobster fishery which will ultimately be to the benefit of all stakeholders.
- e) once final harvest strategies for both zones are agreed, TARC allocations factored into the harvest strategy modelling for both zones be maintained for the life of the plan.

- f) a commitment from the VFA and Management Plan Advisory Committee to comprehensively review the harvest strategy at the conclusion of the 2028/29 fishing season prior to a harvest strategy being confirmed for 2029 – 2034. This must include a thorough reassessment of whether the long-term harvest strategy is appropriate based on changes to biomass over time and consider external factors impacting the commercial and recreation industries such as market dynamics, international trade, costs of operation, environmental conditions, and growth in recreational fishing participation.

The VRLC looks forward to receiving a response regarding how the contents of this letter will be considered during the revision process for the draft Victorian Rock Lobster Fishery Management Plan 2023 – 2028.

Yours sincerely,



Wayne Dredge  
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Victorian Rock Lobster Committee  
Seafood Industry Victoria



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Executive Officer  
Victorian Rock Lobster Committee  
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