Dear Melissa,

Melissa Schubert

Fisheries Victoria

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**Comment on Fisheries (Rock Lobster tagging) Notice 2017**

I am writing on behalf of VRFish, the peak body representing Victoria’s 838,000 recreational fishers.

As you are aware VRFish is not supportive of using harvest tags to estimate recreational catch. However, we are committed to the sustainability of our fish stocks and will work with Fisheries Victoria on a trial scheme with an objective to obtain a robust and defendable catch estimate for rock lobster.

We thank you for selecting to legislate the rock lobster trial tagging scheme through a Fishery Notice. This signifies this scheme is a legitimate trial and enables more flexibility and input by the rock lobster tagging advisory group throughout the operation of the trial. The word ‘trial’ should inserted in Objective 2a.

Rock lobster fishers are well-versed at adhering to their current obligations in the fishery. However, with any new initiative, and in this case a trial to obtain research data, we would call on Fisheries Victoria to implement and sustain an educative approach to a compliance policy. We consider recreational fishers to leaders in citizen scientists who by and large are willing to supply data, biological samples and observations on a voluntary basis to support sustainable fisheries. If this approach and methodology is not able to occur such as in this trial, then we would stipulate that fishers are must be sufficiently engaged, administration burden is minimised and a supportive compliance policy and educative approach is undertaken.

The main concern of the Fishery Notice is a prohibition on the transfer of tags to other individuals. Despite best intentions, this restriction will prevent the opportunistic and unplanned take of rock lobsters. It will be disappointing if fishers are not able to retain a rock lobster on the basis they do not possess a tag. The recreational rock lobster fishery is highly determined by weather and ocean conditions and therefore has a strong opportunistic fishing component. We are very supportive of allowing persons under 18 access to access tags from a supervised individual. We would strongly encourage Fisheries Victoria to allow the transferability of tags across all individuals.

To compensate for a lack of transferability, fishers should be able to be obtain tags through other means rather than waiting for an exceedingly slower postal service to deliver tags. We are encouraged that Fisheries Victoria are looking at range of options to make it easier to obtain tags on site, including Government offices and through Fisheries Officers.

These efforts however, will not assist fishers out at sea who have misplaced their tags. In lieu of this situation, VRFish’s advice to rock lobster fishers and those that may participate, will be to access and obtain tags as soon as practicable and to store tags with on board their vessel or in their dive kit. We are concerned this behaviour may impact negatively on trial by having more tags in circulation that need to be accounted for and disposed of at the end of each fishing season.

Reporting requirements described in 8 1c) should be discussed and passed through the rock lobster tagging advisory group. What is required to be collected and reported by recreational fisher should be kept to a minimum to avoid administration burden and directly achieve the objective of obtaining catch estimates. The reporting requirements assume that everyone is connected to the internet to undertake their obligations under the trial. We know that this is not always the case and some flexibility will need to be applied through the trial to allow for fishers to easily fulfil their reporting requirements.

Thank you for the opportunity to provide comment on this draft Fishery Notice and look forward to continuing discussions via the rock lobster tagging advisory group.

Yours sincerely,

Mr Rob Loats

Chair

**Victorian Recreational Fishing Peak Body**

21 April 2017