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DPIPWE
GPO Box 44, Hobart 7001

RE: Rock Lobster Fishery Draft Management Plan

30 May 2011

Dear Madam/Sir,

Environment Tasmania appreciates the further opportunity to comment on the Draft Management Plan. Please accept this submission from Environment Tasmania and Ocean Planet Tasmania in response to the Rock Lobster Fishery Draft Management Plan.

Environment Tasmania is Tasmania's conservation council, representing 25 environment and conservation groups from across our island state. Ocean Planet Tasmania is a not for profit organisation working for the protection of Tasmania's unique marine environment and all that it sustains.

As mentioned in our previous submission, it is commendable that the industry has worked with the Minister for Primary Industries to reduce the Total Allowable Commercial Catch (TACC) for the fishery, however the reductions that have taken place so far, have had no practical impact as the actual catch taken was below the TACC due to poor catch conditions. The present TACC is still set far too high and needs to be set at a rate that shows some actual reductions in effort on the water. This should be done at the next annual review.

It is highly concerning that the valuable Tasmanian Rock Lobster Fishery is in such a serious state of decline, and particularly that it is in a similar state of ill-health as during the population collapse of the nineties. This decline warrants a range of serious and urgent protection measures in order to secure a sustainable industry and wildlife population for the future.

Response to Key Recommendations

Applies to Commercial and Recreational Fishers

*Introduce a maximum size limit of 160 mm carapace length for male and female rock lobster
Applies to all rock lobster fishing south of Eddystone Point to Whale Head (Maximum Size
Limit Region) Commercial fishers can transit this region with lobsters >160 mm but cannot fish within this region if they have lobsters >160 mm onboard (page 10)*

We believe that the limit should be set at 140 mm rather than 160mm as relatively few lobsters make it to 160mm before they are harvested.

We believe the proposed move to limit the maximum size to the eastern region is flawed. This will create a policing and enforcement problem and would increase the management costs across the system. It is also clear that the greater Tasmanian fishery and the marine environment would benefit if the larger rock lobsters applied to the western region as well. Larger lobsters would better be able to protect the southern and western coastline from the range extension of *Centrostephanus* and increased numbers may also contribute to limiting the expansion of urchin barrens on the east coast.

While it is good move that two management regions are being proposed, we believe that the scale of the regions is still far too course. Additional management regions should be created to allow for finer scale habitat management (similar to what applies with regard to management abalone).

Applies to Recreational Fishers

In general, the most obvious measure to limit catch should be the introduction of set number of tags for each individual recreational license holder. This would do far more to limit catch than bag limits. It would be a requirement of such a system that unused tags be returned at the end of a season so a true figure with regard to individual effort could be derived. Such a system would boost compliance, and greatly assist management of the fishery by providing real figures on the actual recreational catch effort. The cost of this system may be paid for using fishing licence income, and would be small when compared to the investment that most recreational fishers make with regard to their participation in the fishery. With the proposed introduction of two different management zones (eastern & western) different quantities of tags could be potentially be issued for each zone.

We strongly endorse the adoption of system using tags for the recreational fishery.

Continuation of Key Recommendations

Reduce daily bag limit from 5 to 3, applies east of Port Sorell to Whale Head (Eastern Region), page 14

We support a reduction from 5 to 2. We do not support 3.

On extended fishing trips, the on water possession limit in the Eastern Region is reduced from 10 to 6 (page 14)

We support this.

Use of Special Licence (possession limit of 15 lobsters for a 14 day period) limited to fishing west of Port Sorell to Whale Head (Western Region), page 14

We support this.

Introduction of boat limits equivalent to 5 x individual's gear allocation, 5 x individual's bag and possession limits (page 17)

We support such a provision.

Introduce a possession limit of 4 in northern Bass Strait north of the line of latitude 39 o 30' S (page 17)

We support a bag limit of two, in line with our policy, and also in line with the Victorian limit. Very few Tasmanian recreational fishers would be affected by such a move as the fishing effort by Tasmanians is minimal in this region.

Requirement for all fishers to mark all gear with a unique identification code (including rings), page 18

We support this measure.

Restriction on possession of a noose on a vessel or when diving; Restriction on possession of a crook when diving (page 19)

We support this measure.

Limit on using one fish cauf only and the ability to identify different fisher's lobsters within the cauf (page 20)

We support this measure.

Applies to People who do not hold a Rock Lobster Licence

Reduce the individual possession limit (with no receipt) from 5 to 2 rock lobster; Deem any lobster possessed by a child (<10 yrs) to be the possession of the supervising adult (page 19)

We support the measure

Applies to Commercial Fishers

Removal of carryover (under-catch) provisions (page 22)

We support this measure. This is an excellent move by the Tasmanian Government and in line with our previous submission.

Introduction of an annual cap of 30 lobsters per year to the existing personal possession (take home) provisions (page 22)

We support this provision.

Reduce the giant crab by-catch provisions from 100 kgs to 50 kgs per year (page 23)

We support this provision.

Changes to administrative approvals, including the ability of Secretary to exempt the commercial tagging of lobster under exceptional circumstances (page 24 & 25)

We do not agree that a change is necessary.

In conclusion, we have strong concerns about the overall state of Tasmanian fisheries, while the Rock Lobster Draft Management Plan contains some excellent recommendations in terms of broader ecosystem management. It's still a long way short of a coordinated approach that could be described as best practice marine ecosystem based management (EBM) within the state.

The management of fisheries in Tasmania is still one very much focused on single species management despite the objectives of the Living Marine Resources Management Act, 1995. For example the Living Marine Resources Act has a strong emphasis on habitat management but five years ago the dedicated staff position within Wild Fisheries Branch for habitat management was abolished when the employee left. Since then we have had increasing need to take climate change into account within fisheries management but this has not been reflected within Wild Fisheries Branch.

The research at Maria Island Marine Reserve has shown how valuable MPAs are in the control of pest species such as *Centrostephanus*. A network of highly protected Marine National Parks for Tasmania must be considered as an important element of rock lobster fishery management, especially in the current situation of such disturbing population and recruitment declines. New reserves need to be created for an insurance population of rock lobsters (in case our present fisheries management fails).

The effectiveness of Maria Island Marine Reserve in increasing the biomass and numbers of large rock lobsters, reducing the populations of *Centrostephanus* and maintaining healthy populations of macroalgae and kelp, have been demonstrated through years of monitoring and world-class research. Leigh Reserve in New Zealand has had similar success, as have many other reserves internationally (for heavily targeted species).


A comprehensive network of highly protected Marine National Parks in all of Tasmania's state waters would significantly increase protection of the heavily fished rock lobster, ensuring that large rock lobsters could grow and flourish, contributing many more eggs to the future population, predated upon the invading urchins, and restoring macroalgae and kelp coverage in many areas that have been denuded.

While we note the Tasmanian Governments enthusiasm for a *Centrostephanus* commercial dive fishery, the present catch of 60 tonnes, could be derived from as little as two hectares. As a habitat management tool and rock lobster population recovery program, it does not compare favourably with marine protected areas.

The Tasmanian Government has committed to establishing a network of marine national parks through its Tasmanian Marine Protected Areas Strategy. The Primary Goal of the Strategy is: "To establish and manage a comprehensive, adequate and representative system of marine protected areas, to contribute to the long-term ecological viability of marine and estuarine systems, to maintain ecological processes and systems, and to protect Tasmania's biological diversity."

It is fundamentally important that the Government implement a state-wide inquiry into the development of a network of highly protected Marine National Parks for the benefit of our marine biodiversity and future generations; such a measure is a key corner stone to the jigsaw of broader marine ecosystem management in Tasmania.

Kind regards,



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