

# TARFish

Tasmanian Association for Recreational Fishing Inc.

[www.tarfish.org](http://www.tarfish.org)

  
*Looking after the  
interests of recreational  
marine fishers*

3rd June 2019

DPIPWE

via email to [rocklobster.review@dPIPWE.tas.gov.au](mailto:rocklobster.review@dPIPWE.tas.gov.au)

Dear Sir/Madam,

I refer to the *Proposed Amendments to Rock Lobster Fishery Management Plan May 2019* and detail our submission into that review for consideration.

- *Increasing the minimum size of female rock lobster in the North West to 120mm*

Given the scientific advice is clear in the action that needs to be taken to rebuild stocks by 2023 TARFish supports the recommendation to increase the minimum size limit in the North West (Area 5) for both sectors.

Given the information paper outlines the justification for including Area 6 relates to economic considerations for the commercial sector, that do not relate to the recreational sector, TARFish does not believe the inclusion of Area 6 should relate to the recreational sector.

The stock issues relate to Area 5 and the recreational sector are amenable to the proposed changes relating to Area 5 only for the recreational sector. TARFish has long held the view that given the complexity and differential management measures that are available to be applied to the commercial sector (input controls) and the recreational sector (output controls) that there should not be an automatic extension of commercial management measures that do not relate to the recreational sector. There are a range of vastly different management measures that are used to manage the recreational sector and there should be no spill over or muddying of the regulations between the two sectors for management ease of application if they do not relate to the recreational fishing sector.

- *Removing the number of pots/vessel length schedule/associated alternative methods*

TARFish does not have a view/position on this proposal given there are not any expected impacts on the recreational fishing sector.

- *Increasing the maximum number of pots to be carried and used by a commercial rock lobster vessel*

TARFish have previously provided advise on this proposal on a number of occasions and have provided ongoing input into the 5-year 60 pot trial undertaken on the West Coast. We have been consistent over the years that if the trial determined that there were commercial sector economic gains/benefits then any consideration of implementing a 60-pot limit per vessel must be restricted to the West Coast, not the Western Region as is now being proposed.

Effectively including stock assessment area 5, North West coast, will, as the Minister notes in the Information Paper, “was likely to escalate tension between the recreational and commercial sectors...”. Stock Assessment Area 5 is a part of the fishery that has a virgin biomass, according to IMAS, of about 10% which is the lowest in the state and is deemed critical. Under dot point 1 it is being proposed to increase the female size limit by 14% to support efforts to rebuild stocks in that Area, which we support given the dire circumstances Area 5 is in. It seems counterintuitive to, on one hand, propose to increase the female size limit by a significant amount and then propose an increase in the number of pots per vessel that can be set in Area 5.

TARFish accepts that there will be no more pots allowed in the total fishery state wide however allowing more pots on vessels that fish in Area 5 will increase the fishing pressure on the Area given there are no corresponding catch caps being proposed as a balancing measure to offset any increase in commercial fishing pressure in Area 5, as is the case in Area 4, North East coast. TARFish believes implementation the 60 pot limit on commercial vessels for Area 5 will increase interactions/tensions between the commercial and recreational sectors and increase the commercial fishing effort without a corresponding catch cap for Area 5 and lead to unintended consequences on rebuilding stocks for Area 5.

TARFish, strongly, requests this proposal is immediately discarded for Area 5, or alternatively is only considered in the future when the noted development of “ more explicit social policy objectives and indicators for both sectors” have been completed and any future consideration for Area 5 is associated with a multi management measure approach rather than what appears to be a very narrow simplistic measure on a part of the fishery that is under significant stock stress.

TARFish believes that a decision support system for the Rock Lobster Fishery is of paramount importance moving forward. It has been discussed on numerous occasions over the years and given the regional differences and area stressors, including marine pests, right around the state that a coordinated effort needs to be undertaken that codifies the rules for the fishery when limit points are approached or exceeded. We currently have no defined rules around what actions will be taken should a part of the fishery “crash” as some would say has happened with Area 5 reaching a virgin biomass of around 10%. What constitutes a dire situation, and what drives agreed actions for the overall and regional fishery sustainability? At the moment we appear to be on a reactionary fishery management approach that considers industry sector proposals that, on the surface, appear to be compounding known issues with no clear and identified social policy objectives for any fishery sector.

- *Recreational boat limit in Northern Bass Strait*

TARFish supports the proposal and believes there will be minimal impact on Tasmanian recreational rock lobster fishers.

- *Notification of not being able to retrieve fishing gear – recreational fishery*

TARFish supports, in principle, this proposal given the noted intent without specific detail.

- *Publication of a Public Notice on a website*

TARFish supports the proposal given the constant changing nature of communicating with stakeholders.

Thank you for providing the opportunity to provide feedback on proposed amendments to the Rock Lobster fishery and please do not hesitate to contact me with any questions or clarification that may be required on the above detail.

Regards



**Mark Nikolai**

Chief Executive Officer