



TARFish

Tasmanian Association for Recreational Fishing Inc.

www.tarfish.org

*Looking after the
interests of recreational
marine fishers*

4th December 2018

Director of Marine Resources

Via email

I refer to your letter dated 20 November in relation to the Rock Lobster Fishery – Total Allowable Catch (TAC) 2019/20.

Given the significant, ongoing, sustainability issues the rock lobster fishery continues to face TARFish support a state-wide TAC for 2019/20 being set at 1,220 tonnes, i.e 1050 tonnes to the commercial sector and 170 tonnes to the recreational sector.

TARFish support for this TAC level is conditional on continuation of the three-year annual rock lobster translocation project and continuation of the East Coast Harvest Strategy and associated East Coast Catch Allocation to areas 1,2 & 3 of 195 tonnes.

TARFish continue to maintain that the 79/21% catch share between the commercial and recreational sectors for the revised East Coast Stock Rebuilding Zone (ECSRZ) was erroneous in its methodology. The inclusion of commercial deep-water catches from the East Coast inflated the original commercial catch share to the detriment of a fair and reasonable recreational sector allocation. Historically the East Coast recreational sector catch was approximately 70% of the total recreational state-wide catch and holds a very high social value to the majority of Tasmania's 20,000 recreational rock lobster fishers. RecFAC/IMAS have previously supported TARFish's call for a review of the catch share methodology given the significant reductions to the recreational bag/possession & season lengths over the last 5 years as a result of the flawed catch share %. TARFish wants to see a growth strategy model for the recreational sector, for the East Coast, to be implemented of 10t pa until 2023, starting in 2019. 2023 is the year that the current 10-year strategy expires. This would see no net increase in overall catch in the ECSRZ but would require a revised allocation between the commercial and recreational sectors in the ECSRZ. In 2017/18 TARFish tried to agree such a proposal with the commercial sector however our efforts were unsuccessful and will require Ministerial intervention.

Whilst we accept the current modelling shows 100kg/pot achieves all 3 target performance criteria we continue to have concerns with the application of a rolling 14-year average recruitment variable in the model. We believe a 5-year recruitment variable should be the basis for stock rebuilding efforts given the significant environmental changes that have been documented in our marine waters and which we now believe are more representative of the "new" norm in relation to forward estimation. The DPIPWE response on this outstanding issue from December 2016 notes "I understand that IMAS will be providing further information to RecFAC on this issue in 2017 which I hope will be of assistance to TARFish in understanding the IMAS rationale." IMAS have yet to provide further information to RecFAC or TARFish on this issue in 2017 or 2018. DPIPWE should seek clarification on the appropriateness of the length of the recruitment time series used in the stock assessment model as IMAS

have indicated to TARFish that they are prepared to consider addressing our concerns re the current recruitment time series data.

It continues to be disappointing that the fishery performance criteria used in previous years was reduced from 4 to 3 indicators three years ago. The DPIPWE response in December 2016 on this issue noted “The lack of clear economic objectives has made the task of developing an economic indicator more complex and this issue remains unresolved. CFAC will be giving further consideration to this issue in 2017.” To our knowledge, expansion of the performance indicators for the fishery have yet to be implemented. DPIPWE should establish a set of expanded fishery key performance indicators, including specific recreational KPI’s, which capture the breadth of the fishery in early 2019.

As we have advised in previous years, we believe that effective management of Rock Lobster stocks requires a broader scope of management measures and should include finer scale area management. We suggest that area management should at least be on a scale equivalent to the scientific research zones 1 – 12 with each zone having its own defined TAC which would total no more than the overall state-wide TAC. The very low Virgin Biomass levels for areas 2, 3 & 5 require urgent refined focus and management action in 2019 to achieve the Limit Reference Points by 2021.

TARFish continues to have concerns about the significant ecological impacts on the marine habitat by the Long Spined Sea Urchin, *Centrostephanus Rodgersii*. These marine pests have, and are expected to continue to have, a material impact on the habitat of rock lobster. IMAS have indicated the stock assessment model does not explicitly take account of the habitat degradation in the rock lobster fishery and the linkages between productivity and recruitment for the fishery are not very well known. These linkages should be investigated for impact on fishery performance and appropriate management response put in place to address the risks associated with “Centro”. TARFish will be attending the DPIPWE *Centrostephanus* Forum, scheduled for 14 December, and are hopeful that the outcomes of the forum will be agreed, funded and actioned as a matter of urgency.

Thank you for providing the opportunity to provide feedback on the TAC for the Rock Lobster Fishery for 2019/20 and should you have any questions or require clarification please do not hesitate to contact me.

Regards



Mark Nikolai
Chief Executive Officer