



The Hon. Matthew Groom,
Minister for the Environment, Parks and Heritage,
Parliament House,
Hobart 7000.

By email: matthew.groom@parliament.tas.gov.au

21 December 2016

Re: Giant Freshwater Lobster Recovery Plan and Reserve Proposal

Dear Minister,

We are writing to request a meeting early in the new year in relation to the Recovery Plan for the Giant Freshwater Lobster (*Astacopsis gouldii*), and to discuss with you a Wilderness Society-published reserve proposal designed to help safeguard the future of the lobster (attached).

As you are aware, the Australian and Tasmanian Governments are currently progressing an updated Recovery Plan for the species, following a review of the current (2006-2010) Recovery Plan and a period of community consultation. The Wilderness Society is strongly committed to safeguarding the survival of this species and made a substantive submission to the draft recovery plan. We understand the Tasmanian Government is currently considering the content of the draft Recovery Plan.

As acknowledged in our submission to the draft plan, while there have been some positive progress in some areas of management of the lobster and new research into threats to the species, there are substantial risks to and declines in some key populations. Additionally, identified threats are yet to be adequately addressed and long-standing recommendations remain unimplemented.

In particular, there are recommendations relating to two key aspects of habitat protection that are of importance.

The first of these is the recommendation, from both current and draft recovery plans, for additional public land to be formally reserved in key areas of identified priority lobster habitat. We particularly note that the 2016 review has identified that a 30,000ha increase in the total area of reserves, *'may greatly reduce the need for any active management of this species'*.

The attached 'Lobster Forests Nature Reserve Proposal' proposes the dedication of 37,500 hectares of 'unallocated crown land' in priority sub-catchments with important lobster populations into two, formally gazetted protected areas, under Tasmania's *Nature Conservation Act 2002*:

1. A 'Lobster Forests Nature Reserve', covering 10,000 ha of the Black, Dip and Flowerdale-Hebe River catchments;

2. The inclusion of 27,000 ha of the Frankland, Leigh and Lindsay; Horton; and Rapid River catchments into a long-proposed Tarkine National Park.

The dedication of these areas as formal protected areas would make a substantial contribution to the long term viability of the species, and provide opportunities for appropriate management planning. The lobster currently lacks any form of dedicated formal protected area.

The second key area in relation to habitat is the need for additional measures to manage 'upstream' habitat. Recent research has identified the impacts of sedimentation in upstream watercourses. The draft Plan now recognises that riparian areas upstream of key lobster populations should be identified as 'critical habitat'.

The Wilderness Society strongly supports this determination, and the corresponding and collaborative action 2c in the draft Plan:

Habitat managers and regulators work cooperatively to identify and implement methods for strengthening habitat protections, or reducing forestry impacts, in upstream reaches of priority sub-catchments

We believe there to be substantial opportunities for improved conservation outcomes for the species that are widely supported by stakeholders, including in relation to important habitat protections and urge you to lead efforts to realise these opportunities.

We welcome and support steps to progress the Recovery Plan for the lobster, and respectfully request it to be finalised, with Tasmanian Government endorsement, in line with the draft that has been published.

We write to recommend the reserve proposal to you, seek your support for its creation and request a meeting to discuss both the lobster Recovery Plan and Lobster Forests Nature Reserve proposal.

Yours sincerely,



Vica Bayley,
Tasmanian Campaign Manager,
The Wilderness Society (Tasmania) Inc.



Lyndon Schneiders
National Director,
The Wilderness Society



Hon Matthew Groom MP
Minister for Environment, Parks and Heritage
Parliament House
Hobart 7000

By email: matthew.groom@parliament.tas.gov.au

6 September 2017

Dear Minister,

The Wilderness Society welcomes the finalisation of the Recovery Plan for the Giant Freshwater Lobster (the Recovery Plan) and the Tasmanian Government's endorsement of its objectives, strategies and actions.

We note Strategy 3, to *"increase the reservation status and improve the quality of key habitat for the giant freshwater crayfish"* and highlight the specific on-ground action to *"increase the total area of giant freshwater crayfish habitat that is reserved."*

As you are aware from our correspondence of 21 December 2016, including the request to meet and the provision of the Lobster Forests Nature Reserve Proposal, we have a keen interest in this strategy and specific action.

I write to highlight the inconsistency between current Tasmanian Government policy to reverse the reserve status of Future Potential Production Forest (FPPF) land, to allow logging, and this agreed Recovery Plan strategy and action.

Current Government policy is to reduce (not increase) the reservation status of Crown land (FPPF land), including some in catchments identified in the Plan as requiring assessment for formal reservation and *'which have previously been nominated for protection.'* This includes forests included the Lobster Forests Nature Reserve Proposal.

These forests are listed by your Department as part of the [Tasmanian Reserve Estate](#) and, while not formally reserved under the *Nature Conservation Act 2002*, they are currently legally protected from logging.

The stated objective of your policy is to allow industrial scale logging, which includes clearfelling and burning of native forest, into these reserves. Logging and associated activities like roadbuilding is identified in the Plan as affecting 'riparian and aquatic habitats' of the lobster.

Additionally, The Tasmanian Government has recently released a draft Special Species Management Plan. This plan foreshadows logging rainforest species in a range of reserved land tenures in the catchments identified as being part of the 'current distribution' of the species. This includes logging in Informal Reserves on Permanent Timber Production Zone Land, including riverine buffer zones and wildlife habitat strips.

It is important to note that the context in which the Plan discusses 'reservation' demonstrably relates to its formal reservation in dedicated reserves and associated protection from threatening activities like logging.

Given the publication of the Recovery Plan, its welcome recommendations regarding formal reservation of key habitat areas, and the demonstrable conflict between the Recovery Plan and current Government policy, we ask that you publicly clarify the Tasmanian Government's intention relating to implementation of Strategy 3 in the Recovery Plan and if the policy of reversing FPPF land will be amended.

I again request a meeting to discuss the plight of the lobster and government policy to delist reserves in the Tasmanian Reserve Estate so they can be logged.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Vica Bayley', written in a cursive style.

Vica Bayley,
Tasmanian Campaign Manager,
The Wilderness Society

cc

josh.frydenberg.mp@aph.gov.au

jason.jacobi@parks.tas.gov.au



Hon. Elise Archer MP
Member for Denison
Cnr Main/Albert Rd, Moonah
PO Box 426
MOONAH TAS 7009

5 July 2018

By email: elise.archer@parliament.tas.gov.au

Dear Ms Archer,

Congratulations on your re-election and your appointment as Minister for the Environment, among other portfolios.

I write to request a meeting with you to discuss a number of issues relevant to your portfolio and representation of constituents in Denison.

We are especially keen to understand your role as Environment Minister, your priorities for the portfolio and what your plans are for the implementation of Species' Recovery Plans, including that for the giant freshwater lobster.

In the past, we have written to your predecessor to identify the policy conflict of reversing informal reserves (FPPF land) declared as part of the Tasmanian Forest Agreement, and the 2017 joint Tasmanian/Australian Government's EPBC Lobster recovery plan. We are yet to receive clarity with regards this inconsistency and would appreciate an open conversation with regards the protection of this, and other iconic threatened species.

I look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Vica Bayley'.

Vica Bayley
Tasmanian Campaign Manager
The Wilderness Society

Cc tom.allen@wilderness.org.au

**Attorney-General
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Minister for Corrections
Minister for Environment
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Mr Vica Bayley
Tasmanian Campaign Manager
The Wilderness Society
130 Davey St
HOBART TAS 7000

16 AUG 2018

Dear Mr Bayley

Thank you for your recent letter regarding threatened species recovery plans, including for the Giant Freshwater Lobster.

The Government is committed to the protection of all threatened species, including the Giant Freshwater Lobster, and has jointly prepared the revised Recovery Plan for the species with the Australian Government. The Department will progressively implement key actions in the Plan over the next 10 years.

The Recovery Plan notes that poaching is a major threat to the lobster, and the Government has recently introduced legislation to Parliament to significantly increase the penalties for taking threatened species, which is an important deterrent to such actions.

The Department is providing administrative and technical support to both formal research into the Giant Freshwater Lobster, as well as a citizen science initiative to map the species' habitat. It is also supporting captive breeding research, with the hope that this may allow release to the wild in the future to reinforce populations.

This Government continues to work closely with the Forest Practices Authority to ensure that Giant Freshwater Lobster habitat is appropriately and specifically protected during forestry operations and that management prescriptions are kept up to date to take into account new research findings.

I trust this updates you on the Government's plans in regard to this iconic Tasmanian species.

Yours sincerely

A handwritten signature in blue ink, appearing to be "S. Archen".



Hon. Elise Archer MP
Member for Denison
Cnr Main/Albert Rd, Moonah
PO Box 426
MOONAH TAS 7009

16 August 2018

By email: elise.archer@parliament.tas.gov.au

Dear Ms Archer,

Thank you for your response of 16 August.

However, you have neither addressed my question with regard the Tasmanian Government's policy to reverse informal reserves and the resultant conflict with the EPBC giant freshwater lobster recovery plan, nor responded to my request for a meeting.

While I appreciate Government action to increase penalties for poaching, the recovery plan itself identifies habitat loss and degradation as a significant threatening process and my question with regards your government's policy goes to the heart of your intent and ability to implement the recovery plan whilst maintaining this policy.

Please note that the Forest Practices Authority has no involvement in the Future Potential Production Forest land, nor relevance to the recovery plan's goal to increase the formal reservation of land in key identified catchments. Logging the informal reserves, even with Forest Practices Authority oversight, remains counter to the recovery plan and its strategy to 'increase the reservation status and improve the quality of key habitat...'

As indicated, if I cannot receive a clear written response to this policy/legislative instrument conflict, I would appreciate an open conversation about it at the very least.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Vica Bayley'.

Vica Bayley
Tasmanian Campaign Manager
The Wilderness Society