



Submission Form

Review of sustainability measures for 1 April 2018

Once you have completed this form

Email to: FMSubmissions@mpi.govt.nz

While we prefer email, you can also post your submission to: 2018 Sustainability Review, Fisheries Management, Ministry for Primary Industries, PO Box 2526, Wellington 6140, New Zealand.

Submissions must be received no later than 5pm on Friday 9 February 2018.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:

Name of submitter or contact person:

Margaret Wind, Executive Officer, NZ Recreational Fishing Council

Organisation (if applicable):

NZ Recreational Fishing Council

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Fishstock this submission refers to:

Rock lobster – CRA 2, CRA 4, CRA 7, CRA 8
Sea cucumber – SCC 3, SCC 7B
Southern blue whiting – SBW 6B.

Rock lobster – CRA 2, CRA 4, CRA 7, CRA 8

Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):

CRA 2: OTHER

Official Information Act 1982

Note, that your submission is public information. Submissions may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.



Submission:¹

Details supporting your views:

NEW ZEALAND RECREATIONAL FISHING COUNCIL

Since 1978, the New Zealand Recreational Fishing Council has been participating in fisheries management and advocating for recreational fishing. They have been doing this work to advocate for the 600,000+ New Zealanders who fish for recreational and sustenance purposes and to provide a voice in partnership with commercial and customary representatives, to ensure sustainability of all marine species around the NZ coast.

The Council has a role to ensure the Minister and Ministry of Fisheries have comprehensive and informed knowledge from the recreational sector, to balance the views of all parties and ensure abundant and healthy fisheries remain the objective when decisions are being made.

There have been notable achievements with the Council's work in influencing decisions on fisheries management. A few examples would include the establishment of recreational only areas for scallops in the Coromandel, heavy involvement in the Hauraki Gulf Maritime Park establishment, restraining commercial drag netting in Tauranga Harbour and getting cray loops legitimised as a valid method of crayfishing.

In short, the NZRFC have been an informed voice speaking for recreational fishers in New Zealand for over 40 years. The Council is recognised by the Government and the Courts as a representative body and are the only national body directly offering membership to individual fishers. The Council works on all fish species, in all regions and for all fishers across New Zealand

OUR SUBMISSION

There are increasing signs that our fisheries management system is not working. This is clearly becoming evident in a number of rock-lobster fisheries with CRA 2 – CRA3 and CRA4 all showing signs of decline, CRA5, 7 & 8 remain a concern to Amateur fishers and this Council.

The sad fate of the Hauraki Gulf and Bay of Plenty crayfish stock (CRA2) is a case in point. CRA2 has been in rapid decline since the late 1990s and is at an all-time low. Commercial harvesters now have to haul four pots to harvest one legally-sized crayfish. Few bother to venture west of the Coromandel Peninsula because there are so few crayfish to be found there.

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¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.



Data from the Leigh research, Goat Island Reserve, suggests that the population may have crashed to less than 5 per cent of its original size. The industry has only survived in the region to this point because of the extraordinarily high prices being obtained for live crayfish in the Chinese market. Whilst the advent of commercial fishers voluntarily shelving ACE or catch was an admirable approach on paper, all it really does is skew the CPUE data, effectively giving a false reading of the very tool we must trust in managing these rock lobster fisheries.

No systematic surveys of the stock have been undertaken and no information about the settlement rates for juveniles, which is regularly collected in other cray fisheries, is gathered by MPI in the Hauraki Gulf and Bay of Plenty.

Since 2014, MPI has adopted a "management procedure" for the CRA2 stock. This is an automatic control system that adjusts the harvest level according to a fixed decision rule. The rule indicated that all was well and no harvest reduction was required. Unfortunately the crayfish stock was actually being fished down to precipitous levels.

This situation is now so dire and with the high level of uncertainty even amongst both scientists and commercial fishers of whom we should be able to trust, serious action must be taken now. The ministry proposal of further cuts of between 40 percent and 54 per cent is too little - too late.

The fishery needs respite from all fishing before more damage is done. This is necessary until accurate data can be gathered to make more informed decisions on a proper management approach involving all sectors.

While much of the decline in this fishery rests primarily with the commercial effort for continuing to fish down this fishery when the CPUE alarm bells were ringing loud, this continued fishing down along with repeated catch and release harm and associated mortality in the self-interest of commercial community survival has been the key part to this dramatic decline.

We also agree that because of this rapid commercial decline in the CPUE, the reduced effort from the recreational sector has assisted in forcing the fishery lower than expected by the science predictions. We say reduced recreational effort because our effort and success can be and is correspondently measured by the commercial CPUE. When the CPUE is high amateur effort and reward is equally high. When the fishery and CPUE declines so do amateur fisher landings.

Couple this to the already high illegal catch, (by fish thieves) the amount of which is so uncertain that managers can only give a best guess. We now find that this illegal fishing is being increased by the opportunist recreational diver who in their desire to take a feed of crayfish for friends or family, are now resorting to taking undersize sub legal lobsters. They do so with the confidence that MPI Fisheries Officers are so thin on the water, the chance of being caught is very slim. We would suggest that most of this catch is being cooked and consumed on overnighting live-aboard type vessels at sea.



Given the history of poor management interventions in this fishery which borders the largest boating population in New Zealand, the public has clearly lost confidence in the MPI management procedures and or the Ministers ability to constrain the harvest levels to the allowed TAC.

Therefore it is our submission that the CRA2 fishery be closed to all fishing, all pots and divers out of the water for three years.

That MPI conduct a **full and proper stock assessment** after two years to determine the status of the recovery of this fishery, prior to any decisions being made to re-open the fishery and the setting of any TAC to be established after three years. Based in this information the Minister will be better informed in his desire to maintain a precautionary approach when making future decisions re allocations.

At this time we would also recommend that 'telson' clipping be introduced as a recreational management tool for identifying rock lobsters taken under the Amateur Fishing Regulations.

To not close this high profile public fishery now, when it is in a state of collapse, irrespective of how you dress the science, would be, in our view, tantamount to mis-management and incompetence on behalf of our fisheries managers.

In conclusion: It is our submission that the CRA2 fishery be closed to all fishing, all pots and divers out of the water for three years.

Margaret Wind
Executive Officer
NZ Recreational Fishing Council
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Please continue on a separate sheet if required.