Fish stock reviews for 1 October 2024

South Island – Elephantfish (ELE 7)

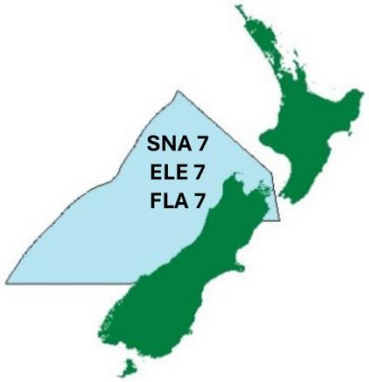
West Coast & top of South Island

Proposal online here.

1. Current total allowable catch (TAC) settings and proposed options (tonnes).

Stock	Option	TAC	TACC	Allowances		
				Customary Māori	Recreational	All other mortality caused by fishing
ELE 7	Option 1 (*Status quo*)	127	102	5	10	10
	Option 2	149 (↑22)	122 (↑20)	5	10	12 (↑2)
	Option 3	160 (↑33)	132 (↑30)	5	10	13 (↑3)

Estimated landings – 2022-23	
Commercial	127 t
Recreational	380 fish



2. What is the current status of this fish stock?

In relation to the management target[1], the status of elephantfish in this area is 'About as Likely as Not (40-60%)' to be at or above the target. Future projections of the elephantfish fishery are unavailable[2].

3. Is overfishing occurring?

Overfishing is 'About as Likely as Not (40-60%)' to be occurring. The current total allowable commercial catch settings and current catch levels are 'About as Likely as Not (40-60%)' to cause overfishing[3].

4. What is the primary fishing method used to catch elephantfish in this area?

Elephantfish are primarily caught as bycatch in the bottom trawl fishery targeting other species. A small portion of catches are caught in a set net elephantfish target fishery.

5. What are the associated species and habitats?

Brill, turbot, flatfish, red cod, barracouta, sole, gurnard, rig, spiny dogfish, school sharks are commonly caught with elephantfish. The majority of Elephantfish 7 catch is caught on the west coast when targeting brill, turbot, New Zealand sole and gurnard. A small amount is also taken in Cloudy/Clifford Bay. Bottom trawling is non-selective, catching target and non-target species or organisms in its path, whilst leaving extensive, long-term damage to the seafloor. This impacts benthic productivity and function.

[1] Management target is the level that a fish stock should be managed at or above to ensure sustainable use.
[2] Fisheries Assessment Plenary – Volume 1: Introductory sections and Alfonsino to Hoki. May 2024. Fisheries New Zealand. At [p.330]
[3] At [p.331]

6. **What are the primary concerns of the New Zealand Sport Fishing Council & LegaSea for this review?**
    a. Subject to further discussion prior to finalising a submission, a preliminary recommendation for ELE 7 is for the Minister to **retain the status quo.**
    b. The Minister has a statutory duty to make a precautionary decision when setting the Total Allowable Catch (**TAC**), non-commercial allowances, and Total Allowable Commercial Catch (**TACC**) for ELE 7 as there is a known risk that "an increased TACC may drive additional effort and bycatch of New Zealand sole, which is unlikely to be at or above target"[4].
    c. Fisheries New Zealand (**FNZ**) has also identified that there "might be a corresponding increase in environmental impacts associated with bottom trawling, such as seabird interactions and benthic disturbance"[5].
    d. We note the 1 April 2024 MPI report that highlights the change in fisher reporting for vessels operating cameras, compared with the period from 2018 until cameras were operating. That report notes 1) A 3.5 times increase in albatross interactions, 2) 6.8 times increase in dolphin captures, 3) 34% increase in the number of fish species reported in catch, and 4) a 46% increase in the volume of fish discards. While these are not all vessels operating in FMA 7, there has been a problem with fish dumping from South Island trawlers historically.
    e. The ELE 7 TAC increase has been proposed to align with a proposed TAC increase for SNA 7. The problem is being misdiagnosed as too many snapper, when the real issue is poor selectivity due to trawl method and over allocation of SNA when compared to the abundance of associated species such as elephantfish and flatfish.
    f. FNZ notes that in recent years the ELE 7 TACC has been regularly exceeded, so the TACC has not proven to be an effective constraint on commercial landings. There is no indication to suggest that increasing the TACC to current catch levels will protect elephantfish from greater exploitation if the SNA 7 and FLA 7 TACCs are increased. This is especially concerning given that any SNA 7 increase will likely lead to increased trawling on the South Island west coast.
    g. Elephantfish are vulnerable to overfishing. Low fecundity means recruitment success may be highly dependent on environmental conditions. Given the uncertainties associated with maintaining elephantfish at an acceptable abundance level, a precautionary decision must be made for this vulnerable species.
    h. Associated species. Red cod 7 status is unknown, and the TACC of 3126 t has not been caught since 2006. The status of barracouta BAR 7 is also unknown. The biomass estimate of 111% B_{zero} for Red gurnard 7 (GUR 7) is implausible. The 8 species included in FLA 7 are at various stock levels. The variability and unreliability of the stock sizes reinforces the need for a precautionary decision from the Minister.
    i. Our previous advocacy for FMA 7 and South Island fish stocks are summarised online here.

7. **Who can you contact?**
    a. Email submission to: FMSubmissions@mpi.govt.nz
    b. Email NZSFC fisheries team: FM@legasea.co.nz
    c. Submissions are due with Fisheries New Zealand by 29 July 2024.

[4] Review of sustainability measures October 2024: SNA 7, FLA 7, and ELE 7. At [p.7]
[5] At [p.8]

Appendix – Elephantfish 7 associated species

Commercial landings (tonnes)

Species and fish stock	2021-22	2022-23	TACC (2022-23)	% TACC caught (22-23)
Barracouta – BAR 7 West coast New Zealand	2442 t[6]	1596 t	11 173 t	14%
Elephantfish – ELE 7 West Coast & top of South Island	131 t	127 t	102 t	125%
Flatfish – FLA 7 West Coast and top of South Island	370 t	121 t	2066 t	6%
Jack mackerel – JMA 7 West Coast New Zealand	27 782 t	34 549 t	32 538 t	106%
Kingfish – KIN 7 West Coast South Island	25 t	54 t	44 t	122%
Pilchard – PIL 7 West Coast South Island	31 t	72 t	80 t	87%
Rig – SPO 7 West Coast and top of South Island	326 t	306 t	298 t	103%
Red cod – RCO 7 West Coast & top of South Island	253 t	72 t	3126 t	2%
Red gurnard – GUR 7 - West coast South Island	1005 t[7]	773 t	1298 t	53%
School shark – SCH 7 West Coast & top of South Island	583 t	301 t	641 t	94%
Snapper – SNA 7 West Coast South Island	361 t	518 t	450 t	115%
Spiny dogfish – SPD 7 West Coast and top of South Island	722 t	578 t	1902 t	30%

Recreational harvest estimates (tonnes) [8]

Species and fish stock	2022-23	2017-18
Flatfish – FLA 7 West Coast and top of South Island	2 t	5.3 t
Elephantfish – ELE 7 West Coast and top of South Island	380 fish	189 fish
Jack mackerel – JMA 7 West Coast New Zealand	2.6 t	6.2 t
Kingfish – KIN 7 West Coast South Island	8 t	13 t
Pilchard – PIL 7 West Coast South Island	N/A	10 346 fish
Red gurnard – GUR 7 - West coast South Island	15 t	38 t
Rig - SPO 7 - West coast & top of South Island	14.8 t	18.5 t
Snapper – SNA 7 West Coast & top of South Island	139 t	158.5 t

[6] Combined annual total allowable commercial catch for BAR 7, 8 & 9 is 11 173 t.

[7] Total allowable commercial catch in 2021-22 was 1298 t.

[8] Recreational harvest totals include recreational fishers estimates from National Panel Surveys, amateur charter vessel reported catch and recreational take from commercial vessels under s111 landings, where available.