

# Fish stock reviews for 1 October 2024

## South Island – Flatfish (8 species) FLA 7



Proposal [online here](#).

1. **Table 1:** Proposed management options (in tonnes) for FLA 7, from 1 October 2024.

Stock	Option	TAC	TACC	Allowances		
				Customary Māori	Recreational	All other mortality caused by fishing
FLA 7	<i>Current Settings</i>	N/A	2,065	N/A	N/A	N/A
	Option 1	2,228	2,065	30	30	103
	Option 2	1,110	1,000 (↓1,065)	30	30	50
	Option 3	584	524 (↓1,541)	10	10	40

Estimated landings – 2022-23	
Commercial	121 t
Recreational	2 t

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

FLA 7 consists of five primary flatfish species. Of the species that have had a stock assessment, turbot, brill and sand flounder are 'About as Likely as Not (40-60%)' to be at the management target<sup>1</sup>. New Zealand sole is 'Unlikely (<40%)' to be at or above the management target. All flatfish species are primarily caught along the west coast of the South Island with little catch in Tasman Bay/Golden Bay (TB/GB), except sand flounder which is primarily taken in TB/GB and little catch is taken along the West Coast.



### 3. Is overfishing occurring?

Overfishing is 'Likely (>60%)' to be occurring for New Zealand sole and will continue to occur under current catch settings. Overfishing is 'About as Likely as Not (40-60%)' to be occurring for turbot, brill and sand flounder.

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

Bottom trawling is the primary fishing method used to catch brill, turbot, New Zealand sole, and lemon sole in FLA 7.

### 5. What are the associated species and habitats?

Red cod, barracouta, gurnard and tarakihi are primarily caught with flatfish in the FLA 7 South Island fishery. Other species caught as bycatch constitute, on average, 18% of the total catch.

### 6. What are the primary recommendations/concerns of the New Zealand Sport Fishing Council & LegaSea for this review?

- a. Subject to further discussion prior to finalising a submission, our preliminary recommendations for FLA 7 are:
  - i. The TAC is set at 467 tonnes.
  - ii. The allowance set aside for Māori customary interests is 30 tonnes.

<sup>1</sup> Management target is the level that a fish stock should be managed at or above to ensure sustainable use.

- iii. The allowance set aside for recreational interests is 30 tonnes.
  - iv. The allowance set aside for Other Mortality is 37 tonnes.
  - v. The TACC is set at 370 tonnes.
- b. The Total Allowable Commercial Catch (**TACC**) for FLA 7 was first set in 1986, at 1840 tonnes (t), and increased to 2066 t in 1989. In the past 38 years the TACC has never constrained commercial catch. In the last 5 years commercial catch has averaged 370 t per annum. Last year's catch was less than 6% of the TACC. Steep declines in FLA catch have also occurred in FLA 1, 2, and 3 in recent years.
  - c. Fisheries New Zealand (**FNZ**) state the high TACC allows fishers flexibility to adjust catch according to fluctuations in abundance<sup>2</sup>. There are 8 species of flatfish included within the FLA 7 TACC. FNZ note that catches of all species have declined significantly in recent years, to pre-QMS levels<sup>3</sup>.
  - d. The proposed options are rejected on the basis that the declining trend in catches is concerning and none of the proposed options will effectively reduce commercial effort nor will they provide for current needs and the foreseeable needs of future generations, as required by law.
  - e. Support the need to set the Total Allowable Catch (**TAC**) at a conservative level and for the Minister to set aside adequate allowances for non-commercial interests, both Māori customary and recreational, before setting the TACC.
  - f. Flounder are an important species targeted by non-commercial fishers for food, social and cultural reasons. Recreational access to flounder species has been severely reduced around the top of the South Island due to the set net restrictions now in place to protect dolphins. A higher abundance of fish is required if amateur fishers are to succeed in harvesting flounder for their family's needs using more selective techniques such as spearing.
  - g. The Minister must set the TACC at a more conservative level to meet his statutory obligations to manage fish stocks, including each species of flatfish, at a sustainable level. In a multi-species management system catch limits must be set to protect the most vulnerable species, in this case New Zealand sole. Business as usual cannot be a lawful option.
  - h. Research shows that 18% of the total catch in the flatfish target fishery is of species other than flatfish, including red cod, barracouta, red gurnard and tarakihi. For the Minister to make a lawful decision, the status of these associated species must be described. FNZ's report that red gurnard (GUR 7) is at 111% of B<sub>zero</sub> is implausible.
  - i. The impact of flatfish fishing on the current and future status of New Zealand sole and associated species must be addressed.
  - j. In this important fishery with such a high bycatch level, the allowance for Other Mortality ought to be at least 10% of the TACC. Trawl fisheries have known high mortality rates, especially in the deeper water fisheries operating on the west coast of the South Island. An allowance of 8% of the TACC is not sufficient nor lawful given the incomplete and inadequate information available on sub-legal mortality and discards.

## 7. Who can you contact?

- a. **Email submission to:** [FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)
- b. **Email NZSFC fisheries team:** [FM@legasea.co.nz](mailto:FM@legasea.co.nz)
- c. Submissions are due with Fisheries New Zealand by 29 July 2024.

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<sup>2</sup> Review of sustainability measures October 2024: SNA 7, FLA 7, and ELE 7. Fisheries New Zealand. July 2024. At [p10]

<sup>3</sup> Ibid.

## Appendix - Flatfish (FLA 7) associated species

### Commercial landings (tonnes)

Species and fish stock	2021-22	2022-23	TACC (2022-23)	% TACC caught (22-23)
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%
Gurnard – GUR 7 - West coast South Island	1005 t <sup>4</sup>	773 t	1450 t	53%
Jack mackerel – JMA 7 West Coast New Zealand	27 782 t	34 549 t	32 537 t	106%
John dory – JDO 2 East Cape to Wellington; Taranaki	98 t	90 t	270 t	33%
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	150 t	48%
Pilchard – PIL 8 West Coast North Island	92 t	61 t	65 t	94%
Rig – SPO 7 West Coast and top of South Island	326 t	306 t	298 t	103%
Snapper – SNA 2 East Cape; South Coast of Wellington	337 t	339 t	315 t	108%
Snapper – SNA 8 West Coast North Island	1720 t	1728 t	1600 t	108%
Snapper – SNA 7 West Coast South Island	361 t	518 t	450 t	115%

### Recreational harvest estimates<sup>5</sup> (tonnes)

Species and fish stock	2022-23	2017-18
Elephantfish – ELE 7 West Coast & top of South Island	380 fish	189 fish
Flatfish – FLA 7 West Coast & top of South Island	2 t	5.3 t
Gurnard – GUR 7 - West coast South Island	15 t	38 t
Jack mackerel – JMA 7 West Coast New Zealand	2.6 t	6.2 t
John dory – JDO 2 East Cape to Wellington; to Taranaki	1.4 t	3.1 t
Kingfish – KIN 7 West Coast South Island	8 t	13 t
Kingfish – KIN 8 West Coast North Island	46 t	43 t
Pilchard – PIL 7 West Coast South Island	N/A	10 346 fish
Pilchard – PIL 8 West Coast North Island	11 293 fish	27 864 fish
Rig SPO 7 - West coast & top of South Island	14.8 t	18.5 t
Snapper – SNA 2 - East Cape; Wellington south coast	121.9 t	93.1 t
Snapper – SNA 8 - West Coast North Island	702 t	853 t
Snapper – SNA 7 - West Coast & top of South Island	139 t	158.5 t

<sup>4</sup> Total allowable commercial catch in 2021-22 was 1298 t.

<sup>5</sup> 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.