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29 July 2024

Recommendations for Snapper 8 (SNA 8)

1. **The Minister makes a precautionary decision** for SNA 8 because increasing the Total Allowable Catch (TAC) and Total Allowable Commercial Catch (TACC) will result in increased trawl effort that will impact on habitats of significance for a range of species, and will increase the bycatch of associated species with no evidence their sustainability will or can be ensured, as required by law.

2. **The Minister seeks clarification from Fisheries New Zealand** on the impacts on associated and dependent species if the Total Allowable Catch and Total Allowable Commercial Catch are increased for SNA 8.

3. **The Minister** takes account of the views of the west coast Iwi Fisheries Forums in recommending no TAC or TACC increase, or a modest TACC increase dependent on smaller spatial area management and application of ecosystem based fisheries management.

4. **The Minister establishes a pathway** to enable the trawl fleet to transition from trawling to longlining, to reduce the environmental effects of fishing.

5. **The Minister treats with caution** the new computer models that suggest the SNA 8 stock biomass has increased by 30% since 2021.

6. **The Minister makes a precautionary decision to maintain the status quo for another 4 years,** however, if the Minister decides to increase the TAC we recommend a variation on Option 2. Option 2a as follows –
    a. The TAC is increased from 3065 tonnes to 3340 tonnes (t).
    b. The allowance set aside for Māori customary interests is retained at 100 t.
    c. The allowance set aside for recreational interests is retained at 1205 t.
    d. The allowance set aside for Other Mortality is increased from 160 t to 185 t.
    e. The TACC is increased from 1600 t to 1850 t.
    f. A further stock assessment of SNA 8 is completed to inform a stock review in 3 years' time.

7. **The Minister makes precautionary decisions** as described above because there are no details on how the Minister can or will avoid, remedy or mitigate the adverse effects of fishing on associated and dependent species, and their habitats, as required by law.

Submitters

8. The New Zealand Sport Fishing Council (**NZSFC**) is a recognised national sports organisation with over 37,000 affiliated members from 48 clubs nationwide. The Council has initiated LegaSea to generate widespread awareness and support for the need to restore abundance in our inshore marine environment. Also, to broaden NZSFC involvement in marine management advocacy, research, education, and alignment on behalf of our members and LegaSea supporters. www.legasea.co.nz.

9. The New Zealand Angling and Casting Association (**NZACA**) is the representative body for its 24 member clubs throughout the country. The Association promotes recreational fishing and the camaraderie of enjoying the activity with fellow fishers. The NZACA is committed to protecting fish stocks and representing its members' right to fish.

10. The New Zealand Underwater Association (**NZUA**) comprises three distinct user groups including Spearfishing NZ, affiliated scuba clubs throughout the country and Underwater Hockey NZ. Through our membership we are acutely aware that the depletion of inshore fish stocks has impacted on the marine environment and the wellbeing of many of our members.

11. Collectively we are *'the submitters'*. The joint submitters are committed to ensuring that sustainability measures and environmental management controls are designed and implemented to achieve the Purpose and Principles of the Fisheries Act 1996, including "maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations…" [s8(2)(a) Fisheries Act 1996].

12. Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this process. We would like to be kept informed of future developments. Our contact is Helen Pastor secretary@nzsportfishing.org.nz.

Proposals

13. **Table 1:** Proposed management options for SNA 8 for 1 October 2024, in tonnes.

Option	TAC	TACC	Allowances		
			Customary Māori	Recreational	All other mortality caused by fishing
Option 1 (*Status quo*)	3,065	1,600	100	1,205	160
Option 2	3,505 (↑ 440)	2,000 (↑ 400)	100	1,205	200 (↑ 40)
Option 3	3,637 (↑ 572)	2,120 (↑520)	100	1,205	212 (↑ 52)
Option 4	3,769 (↑ 704)	2,240 (↑ 640)	100	1,205	224 (↑ 64)
Option 5	4,165 (↑1,100)	2,600 (↑ 1,000)	100	1,205	260 (↑ 100)

Discussion

Consultation

14. On 27 June 2024 Fisheries New Zealand **(FNZ)** released the Discussion Paper No: 2024/19, seeking to review the Total Allowable Catch (**TAC**), Total Allowable Commercial Catch (**TACC**) and Other Mortality allowance for Snapper 8 (**SNA 8**). Submissions are due by 29 July 2024. The NZSFC released a Preliminary View for Snapper 8 on 15 July requesting feedback prior to developing a submission.

15. **The submitters** appreciate the opportunity to submit on the proposal, however we object to the unreasonable timeframe available to respond to this proposals and those for 19 other fish stocks.

16. The 21 working days submission period is inadequate and likely unlawful given the Court of Appeal Wellington Airport judgment determining that, "**Consultation must allow sufficient time,** and a genuine effort must be made. It is a reality not a charade…Implicit in the concept is a requirement that the party consulted will be (or will be made) adequately informed so as to be able to make intelligent and useful responses"[1]. [emphasis added]

Introduction

17. The SNA 8 stock is estimated to be at target yet there is an absence of large snapper in the catches of commercial and recreational fishers, and the stock. The claims of a large increase in stock size, 30% since 2021, arises from a model that uses a new measure of recruitment, so much higher than the historical one it's being referred to as a 'regime shift'[2].

18. There are a lot of small fish in SNA 8. Precautionary management will require these fish to grow through and provide a good yield per recruit, as there is minimal return from just going to catch them because they are there – consideration needs to be made for the economic impacts of increasing the landings of small fish compared to higher yields from older fish.

19. A precautionary SNA 8 decision would require the Minister to maintain the status quo for another four years to see the modelled abundance appear in the catch. Their appearance would confirm the regime shift is the result of the 2016 exceptional year class growing through to capture, and not simply computing power.

20. Our reality is that any increase in the Total Allowable Commercial Catch (**TACC**) will be used to satisfy 28N rights holders and most of these will go to Sanford Ltd, who no longer fish their quota after securing a long-term Annual Catch Entitlement (**ACE**) sale agreement with Moana New Zealand. Time will tell whether Moana can catch and sell Sanford's ACE profitably. We know that significant increases in snapper landings will put additional downward pressure on fishers' earnings.

21. With all of the potential TACC increase going to 28N rights holders, this still leaves many small-scale operators with insufficient ACE to cover their existing catches. These small-scale operators are the very people who need to have access to any increased ACE because unlike corporate fishers, they do not have sufficient capacity or flexibility to alter their fishing patterns to deliver fish to order.

22. We would have preferred Fisheries New Zealand (**FNZ**) to have presented to the Minister more precautionary Options 2 to 5, increasing in 250 t increments. That would have enabled consideration of Option 2 as a 250 t TACC increase, and Option 3 as a 500 t increase. Instead, FNZ's Option 2 is a 400 t increase, not a precautionary approach given the known risks to significant habitats and increased trawling.

[1] Wellington International Airport Limited and others v Air New Zealand [1993] 1 NZLR 671. At p.675.

[2] Review of sustainability measures October 2024: SNA 8. At [p.11]

Current management

Figure 1: Snapper 8 Management Area

23. The stock status as claimed in the last assessment has not been confirmed by the latest assessment. In the 2021 stock assessment of SNA 8, the biomass was estimated to be above the previous management target of B40[3]. Since that assessment the management target has changed and the status of the SNA 8 in relation to the new, interim management target is considered to be 'About as Likely as Not (40-60%) to be at or below the target'[4]. This means SNA 8 is estimated to be at a sustainable level. Abundance is 'Very Likely (>90%)' to increase over the next 5 years.

24. Overfishing is 'About as Likely as Not' to be occurring in SNA 8. The probability of current catch or TACC settings causing overfishing to continue or commence is assessed as 'Unlikely'[5].

25. Bottom trawling is the primary method used to catch snapper in SNA 8. Since 2011, most (>80%) of the commercial catch of snapper has been taken by trawlers targeting trevally and red gurnard[6].

26. The primary species caught in association with snapper in the SNA 8 bottom trawl fisheries are trevally, red gurnard, John dory and tarakihi. Others within the SNA 8 area include flatfish, kahawai, leatherjacket, rig, skates, spiny dogfish and school sharks. Seabirds are also captured in this mixed trawl fishery.

27. Increased trawling for snapper will increase potential catches of associated and dependent species. The Minister has a statutory obligation to consider the status of these species when managing snapper, so a relevant question is how can the Minister increase the TACC for SNA 8 when the overlapping John dory 2 stock is in decline and requiring a significant TACC reduction?

Stock status

28. Something seems out of whack. People fishing in SNA 8 are experiencing a diminishing number of large fish while stock biomass is estimated to have increased by 30% over 3 years. How can this be real?

29. Is the perceived increase in stock size arising from the strong 2016 year class? If the large modelled increase in abundance is real but the fish are still too young to show up in catches then a high level of precaution is required. It is highly unusual for a species to rapidly increase in stock size while subject to intense fishing.

30. Is this proposal relying on a new index of recruitment that has driven modelled productivity way above historical levels?

[3] Management target is the level that a fish stock should be managed around to ensure sustainable use. The current management target setting for SNA 8 is an exploitation rate (USB40%). Being below this target is estimated to be sustainable.

[4] Fisheries Assessment Plenary – Volume 3: Red gurnard to Yellow-eyed mullet. May 2024. Fisheries New Zealand. At [p.1672]

[5] At [p.1673]

[6] At [p.1674]

31. Fisheries management has a history of optimistic stock models enabling higher catch limits to be set. There is a risk of over estimating stock size when high recruitment year classes, such as 2016, are treated as a windfall and accepted as part of the historic pattern that sustains the stock over time.

32. We know that by 1988 the SNA 8 stock had plummeted to an all-time low of around 7% of unfished biomass. By 2005, 17 years later, the stock had only increased to around 10% of estimated unfished biomass despite a rebuild plan. All catch settings were then reduced by 13%. It took until 2021 before the stock was deemed sufficiently abundant to increase the TAC and other catch settings.

33. FNZ note the uncertainties estimating future recruitment success and if the current high recruitment will continue, revert to average rates, or decline[7]. This uncertainty must be spelt out to the Minister prior to a decision being made.

34. As the Supreme Court ruled in 2009, while there is discretion in how fisheries can be used and by whom, the Minister has a statutory obligation to **ensure sustainability**[8]. We must not jeopardise sustainability in the race to satisfy commercial demands for higher TACCs that will ultimately only satisfy 28N rights holders.

Effects of fishing

35. The common denominator amongst snapper fishing and the capture of associated and dependent species is trawling. Bottom trawling is destructive and non-selective. Bottom trawling does not discriminate between target and non-target species or organisms in its path. It catches them all while leaving extensive, long-term damage to the seafloor. This impacts benthic productivity and function.

36. In November 2022 the High Court provided clarification on the Minister's responsibilities in terms of setting the TAC. Churchman J. described those responsibilities (in part) as follows –

    a. "When setting or varying [the] TAC **the Minister must take into account any effects of fishing on any stock and the aquatic environment.** 'Effect' means the direct or indirect effect of fishing, including any positive, adverse, temporary, permanent, past, present, future, and/or cumulative effect. 'Fishing' means the catching, taking, or harvesting of fish, aquatic life, or seaweed."[9] [emphasis added]

37. This judgment applies to all species in and outside the Quota Management System (**QMS**) and their habitats, not just the fish stocks of value to commercial interests. It also includes the endangered Māui dolphin that reside in inshore waters of SNA 8.

38. FNZ describe in their proposal some potential habitats of particular significance for fisheries management. They note that in the Patea Shoals, South Taranaki Bight, biogenic habitats that are susceptible to breakage and dislodgement are likely to be heavily impacted by ongoing fishing activities, with extensive areas already showing signs of damage and loss (e.g. bryozoan thickets off Patea Shoals)[10].

39. FNZ also discuss the intertidal and subtidal mussel reefs at and adjacent to Ahipara and Te

[7] Review of sustainability measures October 2024: SNA 8. At [p.14]

[8] New Zealand Recreational Fishing Council Inc and Anor v Sanford Limited and Ors. SC 40/2008 [28 May 2009]. At [p.39]

[9] Environmental Law Initiative v Minister for Oceans and Fisheries [2022] NZHC 2969 [11 November 2022]. At 22.

[10] Review of sustainability measures October 2024: SNA 8. At [p.21]

Oneroa-a-Tōhe (Ninety Mile Beach). FNZ highlight that the mussel spat and seaweed harvested from the beach supports New Zealand's $380 million per year mussel aquaculture industry. They go on to say that " there are no measures currently in place to protect this habitat of particular significance for fisheries from the impacts of trawling and dredging[11]. Currently, around 24% of the SNA 8 TACC is being taken from this area. It is no wonder that the Iwi Fisheries Forum and local community resent the amount of trawling occurring off their coastline.

40. In order for the Minister to meet his statutory obligations more must be done to protect these significant habitats from further damage and to protect their productivity.

41. FNZ must set out for the Minister how each of the proposed TACC increases will impact on the aquatic environment, including the Patea Shoals, Ahipara and Te Oneroa-a-Tōhe (Ninety Mile Beach). And how the Minister will address the direct or indirect effects of fishing on each of the associated and dependent species. This is essential information if the Minister is to make a lawful decision for SNA 8.

42. John dory 2 (JDO 2) overlaps with SNA 8, encompassing FMA 8 on the lower west coast of the North Island. The JDO 2 stock is currently under review for a substantial TAC and TACC reduction. The Minister has a statutory obligation to consider the combined effects of changes to the TACC and potential changes to fishing patterns, on other species and their habitats.

43. Onboard cameras is one tool used to monitor the effects of fishing on fish stocks and their habitats. It is concerning that the Minister has earlier indicated a review of the camera programme so these installations may not proceed as planned.

44. We note with concern 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. This change in reporting due to onboard camera monitoring needs to be factored into any new management settings in SNA 8.

Selectivity is the issue, not low TACCs

45. The underlying issue in SNA 8 (and other areas) is that there is a selectivity issue due to trawling in a mixed species assemblage. In some overlapping stocks there is an overallocation of catching rights compared to the available fish.

46. Around 80% of the SNA 8 catch is reported as bycatch while targeting other species such as gurnard and trevally. These associated species overlapping SNA 8 remain well under-caught despite intense targeting. For example, catches of red gurnard in GUR 1 and GUR 8 are 77% and 16% of their respective TACCs. This indicates the TACCs for some associated species are purely speculative and stocks are not available to sustain current TACCs.

47. Many of the TACCs were set when the stocks were introduced into the QMS and have never been reviewed or adjusted since 1986. This also means that in many fish stocks there are no TACs and allowances set aside to account for fishing related mortality, or for non-commercial fishing interests, both Māori customary and recreational.

[11] Review of sustainability measures October 2024: SNA 8. At [p.21-2]

48. Increasing the SNA 8 TACC will result in increased trawl effort that will increase bycatch of associated species. There is no evidence to ensure the sustainability of the associated species because many of these stocks have unknown or uncertain status.

49. **Table 2:** Associated and dependent species overlapping SNA 8, their TACCs and percentage caught in 2023. Landings in tonnes.

Species & stock	2021-22	2022-23	TACC 2022-23	%TACC caught 2022-23
Flatfish 1	336	233	890	26%
John dory 1	271	235	354	66%
John dory 2	98	90	270	33%
Kahawai 8	355	274	520	53%
Leatherjacket 1	55	40	188	21%
Red gurnard 1	700	615	800	77%
Red gurnard 8	221	86	543	16%
Rig 1	262	242	692	35%
Skates 8	47	36	53	68%
Tarakihi 1	833	676	978	69%
Trevally 7	1461	1132	2153	53%
School shark 1	491	587	689	85%
School shark 8	260	272	529	51%
Spiny dogfish 8	114	96	307	31%

50. We need to see the catch of these species per stat area. It is clear that the TACC is not operating as an effective limit of catch; the constraint is more economics and not environmental limits, as required.

51. FNZ advise that many of the above stocks are target species compared to snapper catch. The low percentage of catches compared to their TACCs would suggest that catches for some of the above stocks could be trebled, but the abundance is not there. Those fish don't exist in reality, only on paper.

52. This raises the question of the regulator's role; is it to prevent over-exploitation or to enable it by setting or condoning uncatchable TACCs?

53. To be lawful, fishing in New Zealand must comply with national and international obligations. Officials and operators are always going to struggle in multi-species complexes if they continue to sanction and use bulk harvesting, indiscriminate fishing methods such as trawling, Danish seining and dredging.

54. After more than a century of bottom bashing it's about time we innovated our way out of mobile, bottom contact fishing and transitioned to more selective techniques such as longlining.

55. If snapper are as abundant as FNZ suggest then now would be the ideal time to transition more of the trawl fleet to a longline fishing, to both enable more selective fishing and avoid the capture of other species. Making this transition would be beneficial for the marine environment and our coastal communities while supporting regional development, whanau businesses and innovation.

Environmental bottom line

56. The purpose and principles in sections 8, 9 and 10 of the Fisheries Act 1996 form an environmental bottom line that will **ensure sustainability.** This bottom line applies to all species – none are exempt from the obligation to ensure sustainability. Bycatch species are not exempt and cannot be ignored or given secondary status. **Ensured** applies to all species.

57. The primary tool used to defend the bottom line is the setting of catch limits pursuant to s13 of the Act, determining the TAC for each stock.

58. The biomass that will provide the maximum sustainability yield (B_{MSY}) of any species is only a starting point at determining the environmental bottom line. From this theoretical point the Act's principles must be applied to describe and take into account the uncertainty, information fullness and reliability, international obligations, and to adopt the precautionary principle, as described by Churchman J. of the High Court:

    a. "Accordingly, I accept Mr Salmon's submission that the importance of the requirement relating to the use of the 'best available information' in a fisheries context, is somewhat elevated. Indeed, the purposes of the Act appear to create what could be described as an **'environmental bottom-line',** and are accordingly complemented by a scheme that favours precaution" [12]. [emphasis added]

59. The single species focus has been ruled by the Court as insufficient. In considering the challenge to the Minister's 2021 and 2022 decisions for CRA 1, the Court described how the Minister applies the Fisheries Act 1996, saying "there are two approaches to fisheries management that are identifiable at international law, being an 'ecosystem approach' and a 'precautionary approach':

    g. The ecosystem approach requires decision-makers to incorporate wider ecosystem effects into fisheries management, instead of considering sustainability with a single-species focus; and

    h. The precautionary approach stipulates that decision-makers are more cautious where information is uncertain, unreliable or inadequate[13].

60. Full application of the relevant factors is required to ensure the bottom line is at least achieved; the bottom line is not an aspiration, it is a bottom line not to be breached.

61. Each TAC option must include assessments of each of the relevant factors identified in Part 2 of the Fisheries Act, and describe how a Minister may take these into account; how to explicitly reflect each of the factors when making a determination. Without full advice from officials, the Minister will be unable to take the mandatory factors into account.

62. In order for the Minister to make a lawful decision, officials must provide the Minister with more complete information that takes into account all of the uncertainties, and the interactions with associated and dependent species. In the absence of this information the Minister is obliged to apply all of the Act' s principles in setting a TAC to achieve a stock size well above the bottom line, to **ensure sustainability**.

63. In simple terms, catches of snapper and associated species must be considered together if an ecosystem approach to setting catch limits is to occur. If information is poor or

[12] Environmental Law Initiative v Minister for Oceans and Fisheries [2022] NZHC 2969 [11 Nov 2022]. At [108]
[13] At [16-17]

unavailable, as FNZ suggest, then the Minister is required to make a precautionary decision.

64. The modest TACC granted by the previous Minister in 2021 has proven to be the correct decision – a small increase and a future review.

65. Another modest increase of 250 t might be possible if the effects on associated and dependent species is assessed and taken into account. However, it might be that the current status or information deficit of associated species prevents any increase.

66. It might be necessary to finally acknowledge that the solution to trawlers' inability to avoid snapper is internalised; the problem is not with overallocated associated species, but poor selectivity by single trawl. That is the correct problem statement, not that there are too many snapper in SNA 8.

28N rights

67. When the QMS was introduced in 1986 commercial catches in SNA 8 needed to be reduced. Some commercial fishers took government compensation to reduce their catch levels, others chose to retain their interests by being first in line to receive future catch increases. It took 33 years for SNA 8 to rebuild sufficiently to consider a TAC increase in 2021. Over that time the public has been denied access to a healthy fishery, and trawling effort has increased, creating adverse impacts on the benthic environment and bycatch species.

68. In a legal environment the Crown has the authority to seize property or assets that have been obtained due to criminal activity. While commercial fishing is a lawful activity, the Minister needs to give due consideration to the unreasonable rebuild timeframe and the impacts on the public and marine environment caused by more than three decades of depletion. In these terms, we do not consider that 28N rights are legitimate nor that the government has any moral obligation to meet what we now understand as overfishing and environmental damage.

69. The submitters share the concerns of Māori interests in regards to the impact of fulfilling the outstanding 28N rights, currently at 632.4 t. Sixteen quota holders have 28N rights, with two holders having 96% of those rights with Sanford Ltd as one of those two holders.

70. Any TACC increase will first be given to the holders of 28N rights. This means all fishers will only benefit if the Minister increases the TACC by more than 632.4 t. That makes FNZ's Option 4, for a 640 t TACC increase, a highly attractive starting point for Sanford and other corporate interests.

71. FNZ advise that "the existence of 28N rights is not a reason for or against setting or varying the TAC, TACC and allowances. If a TACC is to increase for a stock with associated 28N rights, section 23 [of the Fisheries Act] must be applied and shares deducted from persons owning quota for that stock and reallocated to 28N rights holders"[14].

72. This statement cannot easily wipe away the inevitable pressure on the Minister to ignore Options 1, 2 and 3, and look to Options 4 or 5 as they are the only two options that increase the TACC by more than 632.4 t.

73. 28N rights represents a windfall of $30 million dollars benefiting mainly Sanford and one other, yet they have already benefited from the initial exploitation of the fish stock. SNA 8

[14] At [p.10]

was fished hard for decades and has taken more than 30 years to rebuild. The irony is that Sanford has sold its inshore ACE to Moana yet it will reap the benefits of 28N without getting anywhere near the water. The proposal to increase the TACC would not exist without a large increase in estimated recruitment, an environmental dividend untethered to events of 30 years ago. The benefits rightly accrue to New Zealand, not to a corporate that prefers rent seeking to fishing and value creation.

74. The existence of a $30 million dollar winner's prize pool arising from any increase in the TACC is not moot. It cannot be swept aside as somehow divorced from the review process, or not have any influence on the stock assessment process or positions advocates have taken to settle on the stock assessment. Self interest often trumps common sense and with such powerful incentives in play, the stock assessment needs to be treated with caution.

75. 28N rights in SNA 8 were generated by the reckless pair trawling during the 1980s, the catch history years. These catches were never sustainable and would never have occurred if there had been effective government oversight. (See Appendix One)

76. With hindsight, 28N rights are visible for what they are, a future right extracted from government in the heat of introducing Individual Transferable Quotas (ITQs) in a fishery on the verge of collapse.

77. The 640 t increase in TACC would raise the total allowable commercial catch to 2240 t, a level not seen since 1982 when the stock was pushed below B10 – the hard limit (Figure 3), while the extreme option of a 1000 t TACC increase fails to reach the management target in the projection period.

78. The fish that were taken beyond the sustainable threshold should never generate future catch entitlements – it's simply a transfer of wealth from incumbents to past entities, on the basis of environmental destruction. It is illogical, morally unjust and inequitable.

79. Today's government, with the benefit of hindsight, must simply cancel these so called 'rights' and start with a clean slate. For SNA 8 to have a bright future it is essential that 28N rights are cancelled and a precautionary, principle based harvest strategy implemented.

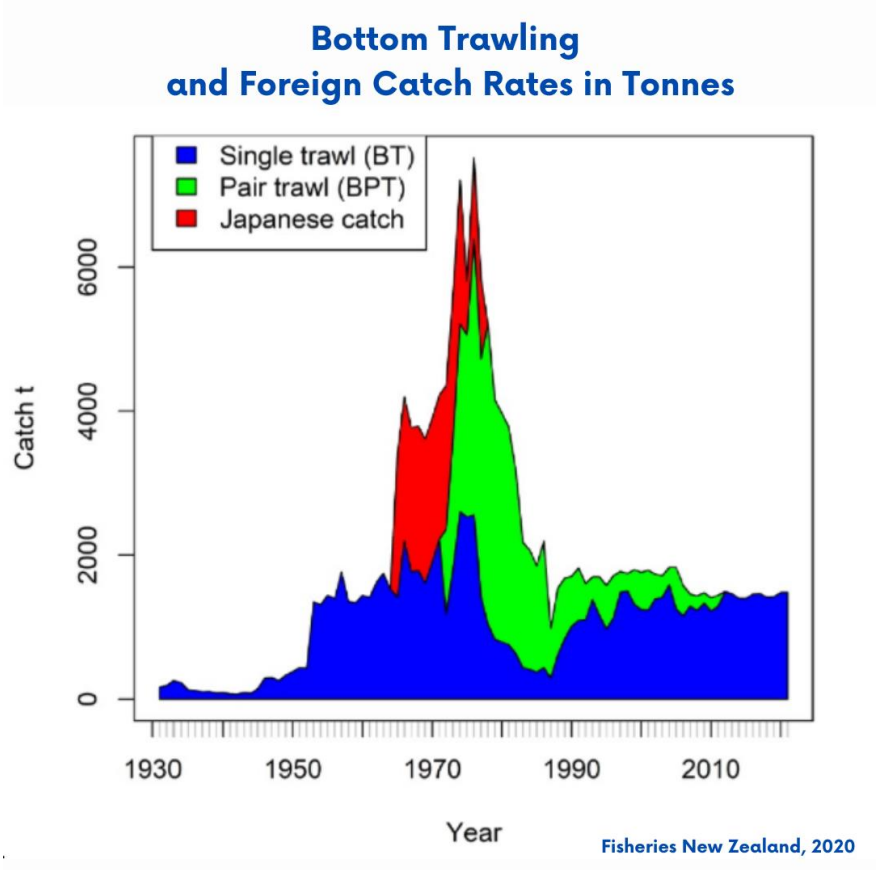
80. Even if all the outstanding 28N rights are met with a TACC increase, we agree with the Iwi Fisheries Forums that smaller scale fishers are unlikely to have sufficient access to the ACE they need to continue fishing. We submit these small-scale fishers are the very people who need to have access to any increased ACE because unlike corporate fishers, they do not have sufficient capacity or flexibility to alter their fishing patterns to deliver fish to order.

81. Moreover, it is untenable that existing quota holders, including Māori commercial interests who have purchased quota holdings, will lose market share as Sanford and other 28N rights holders increase their proportional share in SNA 8, if the TACC is increased.

82. To eliminate the unseen, undue pressure on the Minister to increase the TACC, the most elegant solution is for the Minister to relegate 28N rights to history, and start with a clean slate so all catches and inputs into his decisions are in plain view of the public.

Appendix One

83. **Figure 2:** Estimated historic commercial catches of snapper in SNA 8, in tonnes.



84. **Figure 3:** Spawning biomass estimates in tonnes by year from the SNA 8 stock assessment showing the Soft and Hard limit reference points.