

Fish stock reviews for 1 October 2024

South Island – Snapper (SNA 7)



Proposal [online here](#).

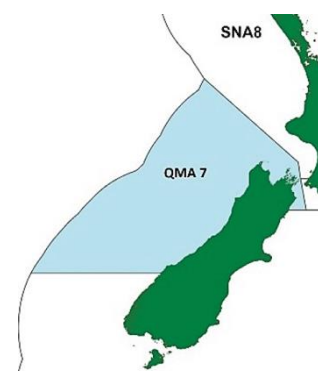
1. Current total allowable catch (TAC) settings and proposed options (tonnes).

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

Stock	Option	TAC	TACC	Allowances		
				Customary Māori	Recreational	All other mortality caused by fishing
SNA 7	Option 1 (<i>Status quo</i>)	768	450	30	250	38
	Option 2	1,311 (↑543)	900 (↑450)	60 (↑30)	275 (↑25)	76 (↑38)
	Option 3	1,445 (↑677)	1,000 (↑550)	60 (↑30)	300 (↑50)	85 (↑47)

2. What is the current status of Snapper 7?

In the 2024 stock assessment the biomass of Snapper 7 (SNA 7) was estimated to be well above the previous management target¹ of B40. Since that assessment the management target has changed and the status of the SNA 7 stock in relation to the new, interim management target is 'Very Likely (>90%) to be at or below the target'². This means SNA 7 is estimated to be at a sustainable level. The SNA 7 biomass is projected to continue increasing at current commercial catch settings and projected recreational catch.



3. Is overfishing occurring?

Overfishing of snapper in SNA 7 is 'Very Unlikely (<10%)' to be occurring. Fisheries New Zealand (FNZ) estimates the current catch or the total allowable catch (TAC) is 'Exceptionally Unlikely (<1%)' to cause overfishing to commence³.

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

Snapper in this area are taken in the mixed species inshore bottom trawl fishery. Around 20% of snapper caught in this area is targeted by bottom trawling.

5. What are the associated species and habitats?

The snapper target fishery has bycatch of flatfish, red cod, gurnard, tarakihi, barracouta and blue warehou. 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.

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

- a. There has been a large increase in recruitment and abundance in SNA 7 over the last 8 years. In deciding on whether to increase the SNA 7 Total Allowable Catch (TAC), Total Allowable Commercial Catch (TACC) and allowances, the Minister must firstly

¹ Management target is the level that a fish stock should be managed around to ensure sustainable use. The current management target setting for SNA 7 is an exploitation rate (USB40%). Being below this target is estimated to be sustainable.

² Fisheries Assessment Plenary – Volume 3: Red Gurnard to Yellow-eyed mullet. May 2024. Fisheries New Zealand. At [p.1643]

³ At [p.1644]

consider the status of the associated and dependent species in the same area, and the past, present and future effects of fishing.

- b. FNZ describe snapper as a 'choke' species, we reject this assessment on the basis that single trawl has poor selectivity and the species most abundant and susceptible to trawling will be caught in greater numbers, regardless of the TACC. So, it's a selectivity issue, not a quota issue.
- c. Increasing the SNA 7 TACC will impact on other species whose status is unknown or assessment unreliable. New Zealand sole and East Coast tarakihi is estimated to be Unlikely at or above target, or worse. The status of red cod (RCO 7) and barracouta (BAR 7) is unknown. In the absence of any analysis to determine the impact of increased catch of SNA 7 on these associated species, the Minister will be required to make a precautionary decision.
- d. The proposed [TACC increase to ELE 7](#), from 102 tonnes (t) to 122 t or 132 t merely reflects recent catches and takes no account of any increase if the SNA 7 TACC increases. Similarly, the proposed [TACC reduction for FLA 7](#), from 2065 t to either 1000 t or 524 t fails to reflect recent catches. In the past 5 years commercial catches in FLA 7 have ranged from 474 t to 121 t.
- e. The proposed changes to the FLA 7 and ELE 7 TACCs are being used to justify the large, proposed increase TACC in SNA 7, from 450 t to either 900 or 1000 t.
- f. While it is widely accepted that snapper abundance has increased, if there is a large TACC increase there is a risk that trawl effort will shift in season and location to where snapper are found. This will have an impact on other species therefore a precautionary decision must be made.
- g. There is tenuous evidence to support a separate snapper stock in the Marlborough Sounds, but it is a convenient argument to justify the 3-daily bag limit (**DBL**) for recreational fishers in the Sounds compared to the 10-daily bag limit elsewhere in SNA 7.
- h. The DBL in the Marlborough Sounds ought to be increased to 10, however, local fishers would likely agree to a 6-daily bag limit until the next assessment.
- i. Given that the estimated recreational harvest is around 139 t, the current recreational allowance of 250 t ought to be sufficient until the next assessment, or until FNZ offer some advice on what overall harvest might be with a change to a 6 or 10-daily bag limit.
- j. In this important mixed trawl fishery, the allowance for Other Mortality ought to be 10% of the TACC. An allowance of 8.4% is not reasonable or plausible in a mixed assemblage trawl fishery.
- k. Given the apparent abundance of snapper and the widespread opposition to bottom trawling, now would be the ideal time to transition more of the trawl fleet to a longline fishery, to enable more selective fishing and avoiding the capture of other species. This would support regional development, whanau businesses and innovation.
- l. The issue with small-scale operators not having sufficient access to ACE to cover current catch is not too many snapper, it is a failure of the quota management system (QMS) that enables the aggregation of quota by corporates and investors who collect rent from the hardworking fishers, while not even getting their hands wet.
- m. 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.

Appendix - Snapper 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	124%
Flatfish FLA 7 – West coast & top of South Island	370 t	121 t	2066 t	5.8%
Gurnard – GUR 7 - West coast South Island	1005 t ⁴	773 t	1450 t	53 %
Jack mackerel JMA 7 - West coast New Zealand	27 782 t	34 549 t	32538 t	106%
John dory JDO 2 - East Cape south to Wellington; Taranaki	98 t	90 t	270 t	33%
Kingfish KIN 7 - West coast South Island	25 t	54 t	44 t	123%
Pilchard PIL 7 - West coast South Island	31 t	72 t	150 t	48%
Pilchard PIL 8 - West coast South Island	92 t	62 t	65 t	94%
Rig SPO 7 - West coast & top of South Island	326 t	306 t	298 t	103%
Snapper SNA 2 - East Cape & Wellington south coast	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 estimates⁵ (tonnes)

Species and fish stock	2022-23	2017-18
Blue cod BCO5 - Southland and Sub-Antarctic	94.6 t	95.7 t
Flatfish FLA 7 - West coast & top of South Island	2 t	5.3 t
Elephantfish ELE 7 - West coast & top of South Island	380 fish (CV=0.62)	189 fish (CV=0.4)
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, 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

⁴ Total allowable commercial catch in 2021-22 was 1298 t.

⁵ 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.