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Inshore Fisheries Management
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**Submission on MPI's IPP of Fish Stocks 2013
Review of sustainability and other management controls
for snapper 1 (SNA 1)**

Executive Summary

1. The process by which the SNA 1 IPP was developed and consulted on has damaged the developing social capital of the collaborative FISHinFuture Search project.
2. The 3 management options proposed in the SNA 1 IPP should be withdrawn from this fishing year's decisions.
3. Instead, the MPI should embark upon a wholly collaborative approach in agreeing targets and management settings for the important SNA 1 fishery. This means actively engaging with recreational and customary fishers as well as commercial stakeholders.
4. Further, the MPI should consider investing in increasing the capacity of the recreational fishing sector to properly participate in all MPI fisheries management processes. Stage 2 of the FISHinFuture Search project provides a ready made platform for investment by MPI.

About the submitter

5. This submission, compiled by the Project Manager, FISHinFuture Search, is fully endorsed by the FiFS Steering Group as an official submission to MPI. Members of this steering group are Brett Bensemann, Don Boddie (Chair), Kim Drummond, Peter Ellery, Ted Howard, Heath Kamins, Lindie Nelson, Stef Railey, Geoff Rowling, Nikki Searancke, Mike Shepherd, Aaron Shields and Steve Terry.

FISHinFuture Search (FiFS)

6. The FiFS project was initiated to address the less than effective participation recreational fishers have in the fisheries management system of New Zealand. Issues such as a lack of capacity and a highly fragmented sector combined with a system that suits high capacity stakeholders means recreational fishers are restricted in their ability to add value or influence fisheries management decisions.
7. This is not a satisfactory situation for the government tasked with providing for the utilisation of fisheries resources while ensuring sustainability. Utilisation meaning *conserving, using, enhancing and developing fisheries resources to enable people to provide for their social, economic and cultural well being*. Without good information on recreational fishing and participation by recreational fishers, the Government is unable to fully meet this legislative

responsibility.

8. Nor is this a satisfactory situation for recreational fishers to get their social, economic and cultural needs met within a healthy marine environment.
9. The FiFS project was planned and implemented according to best collaborative practice. This meant multi-stakeholder involvement from the outset with care to include the 'whole system' in the project and emphasis on consensus decision making.
10. It is noted that officials from MPI were participants in the FiFS event in February 2013.
11. The FiFS event from 14-16th February 2013 resulted in eight areas of common ground being unanimously agreed by the 66 multi-stakeholder participants. This 'vision' painted a future where recreational fishers could positively contribute to sustainable fisheries management.
12. Over the 3 days of the event the diverse stakeholder voices shared information and built trust and understanding with each other. This developing social capital, if nurtured, will assist management of shared fisheries in New Zealand.
13. Social capital is the trust between people in a society, the respect people hold for their environment and the greater causes that affect us all. Social capital is the currency that underpins a healthy community. Social capital can be the currency that underpins a world leading sustainable fisheries management system in New Zealand.
14. The FiFS project has now moved to Stage 2 which is about securing enough funding to establish an accountable and representative national body for recreational fishing in New Zealand. A steering group nominated at the February 2013 event is responsible for maintaining momentum to achieve the agreed vision.
15. The highly charged environment (over 60,000 submissions and numerous protests, meetings and media reports) created in response to the SNA 1 IPP damages the developing social cohesion and instead reinforces a polarisation of views. This environment is not conducive to making sound decisions for abundant fisheries in a healthy marine environment.

SNA 1 IPP

16. The IPP does a good job at highlighting many issues to do with the SNA 1 fishery. It is New Zealand's most valuable inshore finfish fishery. It is highly valued by all fisheries users and it is easily accessible to a large and fast growing fishing population. Further, it is timely and necessary for the SNA 1 fishery to be reviewed with many years having passed since the 1997 assessment.
17. However the process by which the SNA 1 IPP was developed and consulted on is an unfortunate example of an ineffective process that will NOT produce wise, informed nor enduring solutions to the vexed issue of managing a highly popular shared fishery.
18. The process does not embrace collaborative principles as is intimated in paragraph 21 of the IPP rather is autocratic in implementation. Continuing with this kind of process will stop the burgeoning build of social capital from the FiFS and reduces us all to the adversarial

positioning behaviour of old.

19. Paragraph 21 of the IPP is confusing in its logic. It states that MPI “supports the desire of tangata whenua, commercial and recreational stakeholders to work alongside government...: Further it states that “MPI’s support for collaboration is independent of whether the stock is more or less actively managed and what options the Minister may decide...” This paragraph indicates a misunderstanding of collaboration.
20. Collaboration is a process entered into where all parties have a willingness to change and there is an acceptance that participants can have a real influence on outcomes. Some of the suggestions in the IPP, such as forming a long term management strategy for SNA 1, are collaborative yet the proposed SNA 1 management options are not.
21. The SNA 1 IPP is a consultation not a collaboration. It is interesting to note the relative merits of these two processes to aid decision making. In cases where two parties are equally matched, collaboration is preferred as both stand to gain while in cases where one party has more resources than the other, consultation is preferred to benefit the weaker party.
22. ‘Equally matched’ implies equal capacity to participate in management processes. It is generally understood that the recreational fishing sector does not have the capacity to participate equally with other stakeholders like the commercial fishing industry. Thus for MPI to support collaboration in the future (thumbs up from the submitter for this intent) attention must be given to developing the capacity of the recreational fishing sector.
23. In terms of this SNA 1 IPP, Justice McGechan’s definition of consultation should guide the FAP later in September. That is "Consultation does not mean negotiation or agreement. It means: setting out a proposal not fully decided upon; adequately informing a party about relevant information upon which the proposal is based; listening to what the others have to say with an open mind (in that there is room to be persuaded against the proposal); undertaking that task in a genuine and not cosmetic manner. Reaching a decision that may or may not alter the original proposal."
24. The Government’s public responses to the backlash as reflected in the media over the previous weeks indicate that indeed there is ‘room to be persuaded against the proposal.’ This submission supports the rejection of all 3 proposed management options, with Government attention instead being given to building the capacity of the recreational fishing sector.
25. A number of comments in the SNA 1 IPP support taking a longer term more collaborative approach to managing fisheries such as SNA 1.
26. Paragraphs 89-92 of the IPP refers to determining an appropriate biomass target for SNA 1. The IPP says “Determining an appropriate target....is best done by working with stakeholders. MPI intends to collaborate with tangata whenua and stakeholders to develop a harvest strategy for SNA 1...” This is admirable intent. Why then pursue the proposed SNA 1 management options with an interim target biomass that was reached not via such a collaborative process but via an ‘analytical proxy’? Although the suggested 40% Bo is attractive to many recreational fishers, it needs to be agreed via a robust and truly

collaborative process.

27. In MPI's own words in paragraph 157 of the IPP "...implementing a formal rebuilding plan would be presumptuous prior to discussions (with stakeholders) taking place." This submission suggests that progressing with any of the proposed management options in the SNA 1 IPP is similarly presumptuous and should not be done in this fishing year.
28. Some of the principles guiding decisions on sustainability measures include that of 'best available information' and taking a 'precautionary approach.' Paragraph 178 of the IPP notes that "no analysis about the downstream impacts of any decision on charter boat operators, fishing tackle and bait suppliers, and tourism, has been undertaken at this time." In the absence of this crucial information, this submission repeats the suggestion that none of the 3 management options should be progressed in this fishing year.
29. The IPP expresses a number of policy positions being adopted by MPI regarding allocation that also need thorough discussion by stakeholders. The most contentious policy position is MPI's stated preference (refer paragraph 167 of IPP) for a proportional policy or a system of "shared pain, shared gain." The IPP quite rightly notes there is no legal obligation to take a proportional policy yet MPI has "historically favoured a proportional policy as a default approach."
30. Successful policies are those that have a large support base from diverse stakeholders. Meaningful discussion on proportional policy is required to ensure that recreational, customary and commercial stakeholders are in agreement with a proportional policy being applied to fisheries management decisions.
31. Less contentious and much needed is MPI's proposal in paragraph 180 of the IPP to develop "a non-commercial information strategy during 2013, in consultation with tangata whenua and stakeholders." This submission supports such a strategy as long as it is developed in a collaborative not consultative process. A strategy does not need legislation and therefore is not reliant on Ministerial decision making. Rather it is crucial that a strategy is fully owned by the stakeholders who provide the relevant catch information.

Conclusion

32. A number of lessons can be learned from the SNA 1 IPP process. Many of these are described in this submission yet one not mentioned is the flourishing awareness by the fishing public for fisheries management. Although this growth of awareness has come about via a protest mode, the magnitude of the demonstrated public interest in SNA 1 is heartening for the future of NZ fisheries management.
33. Recreational fishers care about the way the fisheries are managed. Recreational fishers want to see equity of allocation guiding fisheries management decisions and are then prepared to change their fishing behaviour to support re-building of stocks. These are excellent building blocks for forging a world leading sustainable fisheries management system in New Zealand.