



N Z RECREATIONAL FISHING COUNCIL

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NEW ZEALAND RECREATIONAL FISHING COUNCIL

Submission on Review of Sustainability and other Management Controls for

Snapper 1

Inshore Fisheries Management
Ministry for Primary Industries
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The Council and its Representation

1: The national organisations represented by this body are N.Z. Angling & Casting Association, N.Z. Trailer Boat Federation, N.Z. Marine Transport Association, N.Z. Sports Industry Association and N.Z. Underwater Association. We also support the Ministry led and funded recreational forums of which many of these regional members are now members as individuals.

2: The Council maintains close contact with a number of Iwi representatives. While every effort has been made to consult we do not suggest that this submission is representative of their views.

3: This Council represents over 76,000 recreational and sustenance amateur fishers. In addition by default we represent the public interest in the fishery and those amateur fishers who are non-members. We say by default because we are the only constituted representative body that has been recognised by Government and the Courts of doing so.

4: Over one million people or by recent Ministry of Fisheries figures 20% of New Zealanders fish for sport or sustenance. This does not include those elderly or infirmed amateur fishers who can no longer actively participate in catching seafood for the table. The 1996 research to provide estimates of Recreational and Sustenance Harvest Estimates found that there are approx 1.35 million and increasing recreational and sustenance amateur fishers in New Zealand and therefore we effectively, through our associated member groups, and lack of any other democratically elected or statutory recognised group represent this number also.

5: The Council has been recognised in three court cases as representing the recreational and amateur fishers of New Zealand. The Council was attached to two of these cases without its prior knowledge and the court papers show it was ordered, “to represent the recreational fishing public of New Zealand”. The first of these was the order of attachment to the High Court Action on the Manukau, Taiapure application. The second relates to the SNA1 challenge of the Minister’s decision that was heard by the High Court. The Council also holds “Approved Party Status” for consultations with the Ministry of Fisheries and is recognised by them and the Minister of Fisheries as a stakeholder group. In the third case this Council along with the NZ Big Game Fishing Council were the applicants in the recent Kahawai case.

6: The Council has a Board of democratically elected officers and members. The Council consults with its members and the public using various means. These include newsletters, both written and electronic, its web site and various press releases. In addition it consults through the various fishing media and meetings it holds and receives input through those forums.

7: This submission has been prepared and presented after consultation via email and our web site to our members and board members.

8: As previously stated, we are aware that many of our National Affiliates and Regional Members are submitting their own submissions and in most cases we have seen and support these submissions where they are not in direct conflict with this submissions intent or requested outcome.

9: In the submission we talk of both recreational and amateur fishers as these two descriptions are so intertwined. For sake of some clarity recreational fishers referred to are generally those who have an interest in supporting recreational fishing interests while amateur refers to all fishers who exercise their rights to fish under the amateur fishing regulations.

10: The NZRFC participates as fully as possible for a voluntary organisation in the annual management rounds and in addition we have made submissions on many of the recent Bills before Parliament relating to our marine systems.

11: Introduction

The NZRFC are disgusted with the pre-consultation on the Snapper 1 IPP, there was none. The recreational forums had Snapper 1 hit on them at the last minute and we thought one of the main functions of the forums was information sharing and gathering in developing IPP’s. We expected such important issues to come via the AOP so that all parties were informed

and could prepare. In this case MPI claim there is “new information” and action was required. MPI is very selective with “new information” and we have plenty of examples where commercial catches have changed but no action was taken on this “new information”. The latest information on this very fishery shows a 114 ton over catch in TACC what are MPI going to do about this? In another important public fishery we note the large increase in commercial Blue Cod take in the Marlborough Sounds while public fisher are shut out of the area. The policy direction presently being applied by MPI is inequitable in the extreme with commercial over catch of TACC’s being rewarded with TACC increases while draft information indicated public fishers are exceeding your old estimates of our allowances are met with draconian cuts. This has happened to such a degree that it has damaged any developing social capital of collaborative management between the sectors.

12: Snapper 1 (SNA 1)

Over view

Snapper 1 is the most important fishery to all public fishers in New Zealand just by sheer volume of population, over 2.6 million people estimated to be living near its boundaries. Snapper is a near shore species. It is timely that this fishery be reviewed as many years have passed since 1997 and of all the fisheries available to New Zealand’s public fishers the sustainability of this one is crucial. However how MPI have gone about this one is beyond belief.

13: This IPP needed a collaborative approach, where all parties have a willingness to change. Instead recreational fishers have been polarised into a corner and forced to defend their right to fish.

14: In a recent survey commissioned by Recreational Fishing New Zealand and conducted by the University of Auckland Business School revealed that 26% of all New Zealanders go fishing at least three times a year with an average of five times a year. Of this number 74% of fishers said that they went fishing for food and it was important to them and their families. 90% of fishers took fish for food. The value of fishing to the public is indisputable.

15: There is no legal requirement for the Minister to make any changes to the TAC or allowances. The Minister is required to move the stock toward Bmsy and by all accounts it is doing just that, albeit slowly. There is no set timeframe in which this is required to occur. Public fishers have played a significant role in this rebuild.

16: Since 1985 recreational fishers have played their part in the conservation of this iconic shared fishery.

- Prior to 1985 unlimited take of Snapper by recreational fishers
- 1 January 1985 Bag Limit established of 30 Snapper
- 1993 Bag Limits further reduced to 20 Snapper
- 1994 recreational long-line hooks went from 50 to 25
- Recreational size limit for Snapper increased from 25 to 27cm, Thus reducing recreational catch by an estimated 10%
- 1997 Reduction in bag limit from 15 to 9.

This was all agreed to in the interests of restoring this fishery to its former glory by recreational fishers. So we have already demonstrated that we can conserve fish. There is no doubt these changes restraining public access and catch have contributed to the rebuild. Given the TACC hasn't been altered since 1997 we question the part commercial have played in any rebuild. All the pain appears to have been ours.

17: There is no legal requirement, in fact no precedent so far as we are aware for the Minister to take any action to limit the non-commercial catch with the present estimate of our catch. So long as the overall biomass is increasing how any cuts to allowances be justified? Or is this all about Government policy to double primary industry export value by 2025 The NZRFC understands that many Snapper are being killed and wasted in this iconic fishery by commercial fishers. Fish dumping is rampant with poorly balanced catch portfolios leading to fishers with no ACE tossing unwanted catch away.

18: The Auckland University Business School study shows the value in recreational fishers just going fishing on the day to work out to be around 1 billion dollars per year. This figure does not include Boats & Tackle, only fuel, bait and food for the day. Its time MPI did some real studies on job losses in the recreational fishing sector and take into account the real value of recreational fishers. The potential job losses to small and large businesses in the marine industry should our bag limit be slashed could far exceed those that could ever be considered within any other sector.

19: Stock Status

It is our understanding that this stock has been moving towards Bmsy for several years and still is, which is the key to this conundrum. The SNA 1 stock has rebuilt and now exceeds the 1997 management target of 20% or original stock size. This fishery is not in trouble. No one is moaning about not catching fish. This is a situation that the government should be proud of. It's a success story which is being turned into a disaster. This appears to be a straight forward example of a policy by the government to extract more export value from primary industries over-riding all prior agreed management protocols.

20: Allocation

The allocation for recreational catch was set at a time when the fishery was in a state of collapse. Hence the introduction of the Quota Management System (QMS). This introduction had huge input from the commercial sector but little from the public fishers of New Zealand. Recreational representatives at the time argued that the Ministry were underestimating the amateur take by some 1,900 to 2,200 tonnes. This argument was lost because the ministry would not accept anecdotal evidence. Surveys since that time have shown the public take was higher and we submit it has never been fully accounted for or allowed for. Given the Biomass is still increasing we submit this indicates the truth that public take has always been above the estimates and that MPI have been underestimated the productivity of the fishery. Now there is ample evidence that those estimates were correct

21: There is no requirement in the legislation requiring the minister to lock public fishers into a fixed proportional share. While the NZRFC accepts we need a responsible commercial fishing industry and many fisheries are shared, the time is overdue for MPI/government to have meaningful discussions on public fishing access and allocation framework. At present there is a one way safety valve and it's us. Recreational fishers have over the years taken several cuts in bag limit. While commercial TACC has remained unchanged in recent time

remained unchanged. It is plain we have played out part and the bag limit of nine in this fishery is as low as we would want to go knowing that the fishery is not in trouble and rebuilding

22: On what basis was the 1997 recreational allowance set, who was consulted with? To our knowledge the recreational allowance was a figure plucked from thin air that has simply not been a sufficient to cover the actual catch. Then when MPI get some preliminary figures on recreational catch, they are prepared cut the existing bag limit immediately without any prior consultation.

23: The recreational catch figures were always greater than what was allocated in the depleted fishery of 1997. This fishery, despite the odds has continued to improve. With an improving fishery more public fishers will go fishing and should be allowed for within the allocation. Allowances must be able to vary with population changes and allow for. This is the right of the public of New Zealand under Article Three of the Treaty of Waitangi. Survey results show that 80% of the fish taken by Maori for food is taken under the amateur regulations so any bag limit reduction will have a significant negative impact on people's ability to feed their families.

24: Fishing for food is a significant part of the social and cultural heritage of all New Zealanders'. We are all Islanders irrespective of our skin colour and sustenance fishing is a very important part of our lives. We demonstrate independence in caring for and feeding our families every time we fish for food and this iconic part of Kiwi life must be maintained. We will not accept having our right extinguished by Government.

25: Bay of Plenty

This stock is a prime candidate for a catch splitting regime. This could be explored and a contract agreed upon by commercial fishers if they were willing. This stock is considered to be in a state of collapse at just six percent of its original biomass. Recreational fishers cannot be blamed for the decline in this fishery. There are simply not enough people in the population who fish to achieve this. There does however appear to be a heavy presence of commercial vessels stationed in the Tauranga area. Could the commercial catch be excessive? Or is there another explanation? There is anecdotal information to suggest that the trucking and misreporting of fish was rife in this fishery. This has screwed the historical dataset which makes the present information not accurate. This information is worth investigating. MPI needs to rework the data sets for the Bay of Plenty which could be done if MPI offered amnesty for historical practises in order to get an accurate data set of information for this area.

26: The law has never acknowledged the practical realities of commercial fishing practises. MPI has always kept the policy simple therefore it's impossible for commercial fishers to be 100% within the law.

27: The Bay of Plenty area is in serious need of some areas closed to commercial bulk harvesting. This would be to protect areas of known juvenile habitat.

28: Hauraki Gulf

Auckland's Hauraki Gulf is recognised by public fishers as a Snapper fishery with all other species making up a by-catch.

29: Auckland is home to over 1.5 million New Zealanders many of whom are new to our country, these people range from the lowest socio-economic to the richest. It is a large portion in the low-income area that turn to the sea to feed their families. If collapse of a fishery was due to recreational overfishing this would be the one. It is not.

30: This area has many closures to commercial fishing, this protects juvenile fish from being exploited and allows them to enter the fishery.

31: East Northland

This fishery also needs some areas closed to commercial fishing or gear restrictions. Also we note that the population base in this fishery is low compared to that of the Auckland Hauraki Gulf area.

32: Main Issues

MPI's proposals are biased towards protecting commercial catch while cutting the recreational allowance.

33: Make a lawful allowance for the public by increasing TAC and rec allowance, engage with recreational fishers consult and recognise the value of recreational fishers economic and social and cultural wellbeing.

34: MPI need to look at the catches and TACC's of other species in area one. Examples of under caught TACC's are Trevally about 60 % caught and Gurnard 50% consistently over the last 20 years. This results in trawlers going round and round trying to catch non-existent fish and not surprisingly, catching Snapper. Snapper mingle with these species so the need to have a balanced portfolio of Quota covering all species when you leave the wharf is important. This is rarely obtainable as the large company's control who gets what. This ends up with fisherman dumping fish in the dead of night or paying high deemed values.

35: Options

The NZRFC asks the Minister to retain the operational status quo, by increasing the allowance for recreational fishers to what is currently being caught as required by law. We need to be allowed for.

36: Our own survey figures align closely with the MPI estimate of recreational catch levels and can be interpreted as showing slightly higher recreational harvest. There needs to be a robust process where all stakeholders, recreational, traditional, conservation and tourism can meet and reach consensus about future management. Failure to create such a robust process will create a politically untenable situation.

37: If any changes are made to the bag limits in area 1 recreational pressure will transfer to the neighbouring snapper fisheries of 2 & 8

38: We suggest that the 3 management options in the Snapper 1 IPP should be withdrawn from this year's decisions.

40: Additional Management Controls

To set a commercial fish size limit on bulk harvesting methods is ridiculous any undersized fish are dumped at sea. These fish are not accounted for only estimated. All waste must be

fully reported, so the real number can be accounted for. This waste should be deducted from quota.

41: All methods of bulk harvesting should have no size limit at all. This would encourage commercial fisherman to stay away from known juvenile areas and to adopt the smart net technology that is available today. This technology has the ability to allow small fish to swim through the net, if this was combined with shorter tows we would see a lot less waste.

42: Commercial gill netting must have a reduced soakage time to revolve around the tides and reduced wastage.

43: There must also be an increase in the number of areas closed to commercial fishing to fully protect juvenile stocks and the habitat they require to reach adulthood. Studies completed show that areas with low bottom structure hold a lot more juvenile fish. These areas need to be protected and enhanced. This could mean gear restrictions in some areas.

44: There needs to be an increase in observer coverage to ensure that the checks and balances that are to place upon this fishery are working. MPI should also install compulsory deck cameras and GPS transponders on-board all vessels fishing within New Zealand's territorial waters.

45: The effects of runoff from the land must be addressed by MPI, water quality is a huge factor to a healthy fishery. Some areas of New Zealand have gone quite some distance in addressing this issue. The same needs to be done for the Snapper 1 area.

46: The massive increase in Aquaculture in the snapper 1 area has got to start to have an effect on the effectiveness of spawning snapper. Shellfish are filter feeders and in doing so consume fish spawn. We cannot afford to let nature get out of balance.

47: Recreational fishers must also play their part with the handling of fish they intend to release. The handling of these fish needs to be given encouragement amongst the recreational fishing media and MPI. Also the choice of hook used can play a big part in the survival of the fish caught. Using Circle hooks increases the chances of survival as the fish are lip hooked.

48: There must be a mechanism to acknowledge and reward conservation. So far this has only worked from the recreational interests in receiving continued bag limit reductions since 1985. So far this extra fish is being used to prop up the commercial fishing industry

49: The Future

Recreational fishing has one of the highest participation levels of all activities second to walking, we do not want this participation to collapse as recreational fishing becomes uneconomic and people are squeezed out the fishery in favour of commercial interests. This is a healthy activity which will grow in future and needs to be catered for.

50: MPI should start a collaborative approach in agreeing targets and management setting's for this important fishery. This means actively engaging with all stakeholders. MPI must invest in increasing the capacity of the recreational fishing sector to properly participate in all MPI fisheries management processes.

51: The public fishers of New Zealand care about the way the fisheries are managed. They want to see equity of allocation guiding management decisions and are prepared to change their fishing behaviour to support re-building fish stocks. MPI need to look at the way they engage the fishing public of this country. This needs to change from the present. The allocation discussion needs to take place. Then and only then can we look forward to a world leading sustainable fisheries management system.

52: We look forward to MPI addressing our concerns especially those around consultation and allocation. No fish stock should be up for review without the recreational forums being able to have input into the preparation of the IPP. This is especially important with fisheries of significance to recreational fishers. We would like to be kept informed of any future developments. The NZRFC is always available to discuss this submission and fisheries management in general in more detail if needed.

Yours faithfully,
NEW ZEALAND RECREATIONAL FISHING COUNCIL

Sheryl Hart
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