

Ngātiwai Trust Board



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Inshore Fisheries Management
Ministry for Primary Industries
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Emailed to: FMsubmissions@mpi.govt.nz

YOUR REVIEW OF THE SUSTAINABILITY AND OTHER MANAGEMENT CONTROLS FOR SNAPPER ONE (SNA 1).

Tēna Koe Minister Guy,

The SNA 1 fishery stretches from the East Coast of Northland, through the Hauraki Gulf down to the Bay of Plenty. Within our rohe we are both quota owners of SNA 1 stock and kaiakiiti of customary catch. This submission addresses our responsibilities as owners of quota.

Our submission .

We support Option Two and a TAC increase of 500 tonnes, shared as:

TAC should be set at 8050 tonnes

Commercial should be set at 4819 tonnes Recreation catch should be set at 2731 tonnes Customary should be set at 50 tonnes.

In addition we support the following management controls for:

Commercial: the initiatives of the commercial fishers and quota owners to better report their catch effort, fishing location and to work collaboratively with fishery managers and scientists.

Recreation: control on the total extraction of this sector including being required to report their catch including returns (to the sea) of under Minimum Legal Size fish and the location of their catch.

Charter: should be treated as commercial operations and have their catch managed and reported.

Reasons

This submission raises two fundamental issues.

Firstly, from a shared commercial perspective as an iwi fishing company we join with industry concerns that a reduction or reapportionment of the TAC in favour of recreational interests is inappropriate, unwise and illegal.

Secondly, a reapportionment of the TACC in favour of recreational interests is a derogation of our Treaty rights that were carried through into the Settlement Act and are now reflected in our Individual Transferable Quota, which has either been passed to us in settlement or which continues to be held in trust for us by Te Ohu Kaimoana.

On both these issues our submission puts you on alert that any reduction or reapportionment of the SNA 1 TAC in favour of recreational and charter interests will be considered by us to be a breach of trust and good faith.

The snapper 1 fishery is in good health.

The 20 year rebuild target for the fishery set in 1997 has been reached. Snapper numbers are continuing to increase under the current catch rates and catch data shows the numbers of mature fish are abundant.

This means the IPP TAC review of SNA 1 is not about the sustainability of the fish stock. It is an established fact that the snapper stock is growing and an increase in the TAC can be sustained. The snapper stock is not at risk.

What this review does is to question the current catch levels being taken by the recreational sector and asks how this should be managed. Of great concern to us is that in asking this question, the IPP Option two proposal to increase the TAC by 500 tonnes seeks to allocate this on a 50:50 apportionment between commercial and recreational. This is wrong.

The current proportionment of the TAC is 36% recreational and 64% commercial.

Recreational fishers are not the only persons entitled to utilise the benefits from an expanding snapper fishery. Snapper are an important inshore finfish settlement stock, and as iwi operating a commercial fishing company we are entitled to benefit from the improvement in this fishery.

Our iwi fisheries portfolio is a very tangible, good financial investment. Put frankly, snapper earns us money.

The IPP has failed to consider what has happened across the years when the uncapped recreational take exploded: Commercial fishers suffered a 25% decrease in their total allowable catch while simultaneously the recreational sector benefited from a 140% increase.

Commercial fishers must record and report their catch. Every kilo over TACC caught is penalised by deemed value. In complete contrast there is no reliable information on the charter catch, the recreational sector has been essentially left unmonitored and

unconstrained. The total extraction from the recreational sector is enormous and far exceeds its allocation.

Despite the fact that the recreational catch has long been known to be a significant proportion of the total SNA 1 catch, Government has consistently failed to manage this sector.

This lack of adequate management has run alongside a situation whereby the commercial sector is very closely monitored, managed and constrained. This situation must change. Your immediate action is required.

Conclusion

Our snapper fishery is important to iwi both in its own right as a valuable quota resource and as part of our wider quota portfolio that allows us to lease an integrated catch package to commercial fishers.

This IPP review is not about sustainability. It has been clearly stated that the SNA 1 stock can sustain a TAC increase. This debate is about the apportionment of the total catch and whether it is appropriate to provide greater utilisation opportunities for recreational fishers.

This amounts to a reallocation of our resource in a shared fishery from the commercial sector to the recreational sector. The precedent that is being set is far more significant than the tonnage involved.

The Quota Management System (QMS) is an economic tool that achieves fisheries management objectives relating to both the utilisation and sustainability of the resource. The QMS employs property rights and creates incentives that encourage stewardship of the resource.

The QMS has been used to settle Treaty breaches by the Crown. To give us quota to settle our claim and then to downgrade that quota and give it to the recreational sector is inappropriate.

The integrity of the QMS means that all sectors must enjoy or suffer the fluctuations of the stock. For snapper this means that the Option two 500 tonne increase must be reframed to reflect the current entitlement of a 36:64 split.

Regards



Haydn Edmonds
Ngatiwai Trust Board