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Marlborough Sounds Blue Cod Review
Fisheries New Zealand
FMSubmission@mpi.govt.nz

29 November 2024

Submission: Marlborough Sounds blue cod review

Submitters:

1. The New Zealand Sport Fishing Council (**NZSFC**) is a recognised national sports organisation with over 37,000 affiliated members from 55 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 Together we are *'the submitters'*.
2. The 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].
3. The Council and our Clubs' affiliated members living in the South Island, lower North Island and around the Marlborough Sounds have a strong interest in maintaining the abundance and availability of blue cod for future generations. This interest is demonstrated by our participation in numerous forums, working groups including the Marlborough Sounds Blue Cod Technical Group, and submissions made over the past 20 years.
4. 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.

Discussion

5. The submitters acknowledge and encourage the Marlborough Recreational Fishers Association (**MRFA**) to make a separate submission expressing different views on several topics compared to this submission. As a Council of 55 clubs, we are pleased to maintain a common interest in seeing blue cod flourish in the Marlborough Sounds.
6. Commercial and recreational harvest from the Blue cod 7 (**BCO 7**) fish stock has been declining for years. BCO 7 is a large management area, with most of the catch coming from inside or the outer Marlborough Sounds. Since the Total Allowable Catch (**TACC**) was set in 1986 it has never constrained commercial harvest or effort, even taking into account the TACC reduction from 70 to 58 tonnes in 2022-23. In the past five years commercial landings

have averaged 77% of the TACC. Most recreational landings are taken in December and January when the fishery reopens.

Stage One (now to end 2024)

Consult on an initial measure and develop a full package proposal.

7. First things first. Before Fisheries New Zealand (**FNZ**) talk about extending the seasonal fishing closure from the end of 2025 onwards, we must address blue cod habitat. Because it's one thing to manage peoples' behaviour to try and reduce mortality, but fish need somewhere decent to live, spawn and thrive.
8. Water quality and habitat degradation due to poorly controlled land run-off into many areas of the Sounds means we may not, in our lifetime, see blue cod numbers rebuild to natural levels. So while this current process is focused on recreational fishing, fisheries managers need to do more to ensure the Marlborough District Council is fulfilling its duties to reduce land run-off and contaminants entering the waterways feeding into the Sounds.

Extended seasonal closure

9. FNZ advise the closure of the Marlborough Sounds to recreational blue cod fishing has been in place since 2011, and 2015 for commercial fishers. The closure runs from 1 September to 19 December every year. FNZ propose to extend the closure to 31 December, 5 January or 15 January, to reduce recreational harvest by an estimated 10-25%, 25-40%, or 40-45% respectively.
10. FNZ advise the closure was introduced to protect blue cod during their peak spawning period, yet they have done no research since 2011 to support the assertions that a. blue cod spawn inside the Marlborough Sounds and b. that the peak spawning period extends from September to December.
11. Experienced local fishers, both commercial and recreational, are adamant that much of the blue cod spawning occurs down the east coast of the South Island during August, September and potentially into October. Blue cod are serial spawners so likely they are active over these months. On this basis, the MRFA are opposed to any extension to the seasonal closure after 19 December.
12. A clearer problem definition would be useful in future FNZ documents. In terms of the spawning recovery areas, we will address that in the next section.
13. In terms of the proposed closure extension from the end of 2025, if the purpose is to reduce recreational and commercial fishing effort then our local representatives advise that extending the closure to either 31 December or 5 January would be preferable. Extending to 15 January is not acceptable. However, **any extension is conditional on more resources for boat ramp surveys and improved monitoring of commercial landings**. That's because any extension to the closure period will have the most effect on local fishers who fish to feed their family. Fishers from Wellington, Christchurch and elsewhere have already indicated their intention to change their holiday plans to match the end of the closure period. So, to make any extension worthwhile, robust monitoring at boat ramps and of commercial landings is essential.
14. Since 2023 the NZSFC has had a policy opposing self-reporting of catches by both recreational and commercial fishers. We have [discounted the use of phone apps](#) to report fish catches as [the research](#) into the accuracy of current self-reporting systems finds them to

be readily manipulated and riddled with errors. We do not want to knowingly apply this regime to an iconic fishery such as blue cod.

Stage Two (mid to late 2025)

Return to consult on wider package and implement non-regulatory actions (if supported by input and research).

Spawning recovery areas

15. FNZ seek to help boost recruitment through spawning recovery areas and better fishing practices, advising that balanced and healthy local population could then replenish local areas.
16. We suspect the BCO 7 fishery has not fully recovered from the poorly implemented slot rule a decade ago leading to thousands of fish being caught, released and predated on by other creatures including shags. The 'free lunch' behaviours developed by predators during that time persist to today and now predation is a major cause of post release mortality of blue cod. Our unfortunate reality is that it's not only humans that need re-educating when it comes to blue cod fishing.
17. Locals contest the Marlborough Sounds Blue Cod Technical Group's assessment of blue cod spawning areas, as not being based on any meaningful science. The lack of research since the blue cod fishery closure 17 years ago means other sources of information need to be given respect. Real life, on the water observations must be taken into account. As mentioned above, experienced local fishers, both commercial and recreational, are adamant that much of the blue cod spawning occurs down the east coast of the South Island during August, September and potentially into October. Blue cod are serial spawners so likely they are active over these months. If FNZ is serious about protecting and enhancing the spawning success of blue cod and other species bottom trawling ought to be banned from inshore waters on the east coast and top of the South Island for a minimum of three months from August.
18. We look forward to seeing the results of the research that FNZ has commissioned to identify potential spawning recovery areas however, we cannot wait for that research to be completed and published. It has been 17 years since the first closure, the time to protect spawning blue cod is now, so a ban on inshore trawling is a good start.

Combined daily bag limit

19. The submitters oppose any further reductions to the combined daily bag limit applying to recreational fishing while the TACC remains uncaught and commercial fishing effort is unconstrained.
20. The submitters agree with the MRFA in opposing any reduction to the combined recreational daily bag limit. Marlborough Sounds fishers have been given a raw deal for many years. The blue cod limit is two per person, per day, while people can catch 10 or 15 in other areas. The snapper limit in the Sounds is 3 per person, per day, while other fishers across the top of the South Island can take up to 10 snapper per day.
21. The National Panel Survey shows the majority of fishers only harvest one or two of each species which supports the arguments that people fishing in the Sounds are fishing to feed their family. There will be occasions when people take more to satisfy a family need or social event. Providing fresh fish for a special occasion is part of our DNA. It's what makes us Kiwis.

We need to protect this privilege while teaching our kids how to harvest good food and share it with the whanau.

22. Given the historic biases against recreational fishing in the Marlborough Sounds and the need for FNZ to maintain public confidence in their management, FNZ will need to provide adequate information to support any future reduction in the daily bag limit.

Education campaign

23. Education ought to be an ongoing investment from FNZ. However, to be successful FNZ need to be seen to be fair in its dealings with recreational fishers. It is unfortunate that FNZ has created a level of distrust due to past management failures, so any new rules or guidelines need to be equitable and developed with the input from local fishers, local experts and scientists.

Reducing release mortality

24. The submitters support measures to reduce release mortality. Ideally, unwanted fish or undersized fish are not hooked at all. Mandatory change to hook types and sizes to prevent smaller fish being caught and/or gut hooked is supported if those changes are based on science. Research into hook types, configuration and sizes is essential. The FNZ funded research laying 50,000 hooks in the early 2000s found that appendaged hooks reduced the gut hooking of snapper by over 90%. Given the iconic status of blue cod, a similar investment ought to be applied to this valuable fishery if we are to maintain it for the benefit of future generations.

Improved recreational information

25. As mentioned above, the NZSFC has a policy that opposes self-reporting of catches by both recreational and commercial fishers. We have [discounted the use of phone apps](#) to report fish catches as [the research](#) into the accuracy of current self-reporting systems finds them to be readily manipulated and riddled with errors. We do not want to knowingly apply this regime to an iconic fishery such as blue cod.
26. A voluntary registry for sampling or surveying fishers is not supported because it would lead to similar biases as self-reported catch. There is no point in spending resources on collecting information if it is not scalable or useful for management purposes.
27. The submitters support increased monitoring at boat ramps and on the water, if the intention is to improve the management of blue cod in the Marlborough Sounds. Ideally, any such programme would be well advertised in advance and supported by the local fishing clubs and interests.

Stage Three – Final Package (2025/26)

Implement remaining regulatory measures.

Using the potting survey results

28. FNZ aim to use the results of the next potting survey in October 2025 as a baseline to assess the effective of the “package”. We assume that means the changes proposed above.
29. The submitters suggest that any biomass changes to due implementation of management controls will not be fully realised by October 2025. More realistically, the changes will need to be monitored over time, and rules adjusted to suit management objectives on an ongoing basis.