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cc NZSFC delegates
LegaSea supporters

7 June 2016

Decisive management action required in troubled CRA 2 fish stock

Dear Nathan,

The New Zealand Sport Fishing Council represents 56 fishing clubs with over 32,000 members nationwide. For some time our members in the greater Auckland area and Bay of Plenty have been concerned about the collapse of rock lobster in the CRA 2 Quota Management Area. We have consistently raised these concerns in submissions to you, the National Rock Lobster Management Group (NRLMG) and your Ministry (MPI), but have had little positive response.

The NRLMG state in their 2017 Final Advice Paper to you, "*That whilst current CRA 2 abundance is less than preferred by legitimate and responsible extractive users there is no evidence of a 'sustainability issue' with the fishery*"

Certainly our members and other experienced divers believe there is a sustainability issue. Of the 841 (mostly) recreational fishers who responded to our February 2017 survey, 78% rated the size and availability of rock lobster in CRA 2 as very poor or worse. Only 8.2% described the fishery as average or better. A detailed report on the survey questions and responses is included with this letter. (Appendix One). Commercial fishers obviously harbour similar concerns as they have again decided to shelve 50 tonnes of ACE, worth millions of dollars, for another year.

The NRLMG justify their claim of sustainable management by advising you, "*A management procedure has been in use in the CRA 2 fishery since 2014 to ensure the stock is maintained above your statutory reference level, BMSY. Based on the operation of this procedure no change was proposed for the CRA 2 TAC for April 2017 because commercial CPUE had not declined to a level to invoke a reduction (CPUE has declined by only 0.072 kg/potlift since 2014).*"

This statement highlights a number of problems for us:

1. The management procedure has obviously failed to rebuild the stock and meet the expectations of recreational, customary, and commercial fishers.
2. The TACC was reduced by 15% in 2014 and has remained the same under the

management procedure which uses (standardised) commercial catch per potlift to trigger a management response.

3. The reality is that CPUE (Catch Per Unit Effort) used in the management procedure was just 0.367 kg/potlift in 2013 which was used for setting the TAC in 2014–15. CPUE is now 0.29 kg per potlift, which is a further 20% decline in CPUE over the last four years with no management response.

The NRLMG would say that this equates to a 20% decline the abundance of rock lobster in CRA 2. We are concerned that in some areas the decline has been larger than this, as it is only economics that is driving fishing effort into the last refuges holding crayfish. The act of shelving, while promoted as a 'conservation' measure, may in fact artificially inflate catch rates.

The stock assessment indicated that the CRA 2 was above the statutory reference level (Bmsy) by 36% in 2012. If this is true then we are concerned that this fishery is open to being fished down even harder for the near future, depleting it even more, before any real management action is taken.

1. What level does CRA 2 need to hit before we realise that:
 - a. The fishery is actually collapsed;
 - b. That recreational fishing is largely unsuccessful; and
 - c. Commercial fishers have shelved another 25% of available ACE?

We are concerned that the Quota Management System fails to manage fishing effort, particularly for high value species such as rock lobster in CRA 2. To illustrate this, we have plotted commercial pot lifts against catch from a report published by MPI in 2015 (Starr, P.J. *Rock lobster catch and effort data: summaries and CPUE standardisations, 1979–80 to 2013–14*).

This plot shows that while the TACC remained the same from 1997–98 to 2013–14 fishing effort rose from 274,00 pot lifts per year to over 616,000. No other rock lobster quota management area had more than 370,000 pot lifts on 2013–14, yet CRA 2 commercial fishers have consistently exceeded that level since 2001–02 (Figure 1).

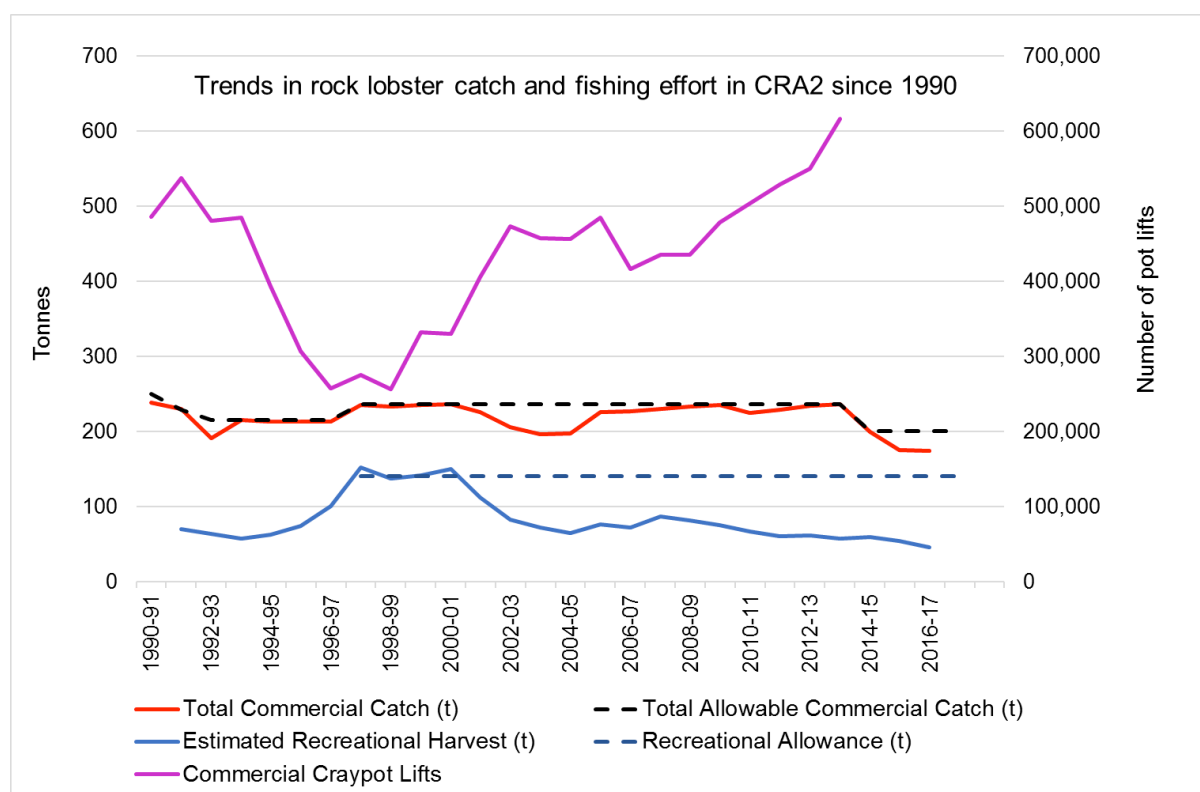


Figure 1: Trends in rock lobster catch from CRA 2, in tonnes, and fishing effort, in pot lifts, since 1990.

Recreational harvest estimates

There have been several projects to collect detailed information on recreational harvest in CRA 2. The allowance for recreational fishers was set at 140 tonnes in 1997 based on the 1996 national recreational harvest survey. However, the 2011–12 National Panel Survey estimated just 43 tonnes (plus or minus 20%). A second concurrent method using intensive ramp surveys estimated rock lobster harvest in CRA 2 at 41 t in 2010–11 and 22 t in 2011–12. The latter estimate was affected by the Rena disaster in late 2011, which impacted the main survey areas of Tauranga and eastern Coromandel.

This year, the majority of the anecdotal reports collected in our survey of (mostly) amateur fishers in CRA 2 indicated that individual catch has declined over the last six years, to the point that many experienced fishers don't bother diving for rock lobster any more. In effect, recreational fishers have been under-catching their allowance by 60 to 70% over this time.

Summary

The CRA 2 fish stock is in trouble and the New Zealand Sport Fishing Council urge you to take decisive action to restore abundance on behalf of the people of New Zealand.

The CRA 2 management procedure based on the 2013 stock assessment has failed to halt the decline in this stock. It seems absurd to us that poachers can be having much impact given that the stock is so low, and professional fishers setting up to 600,000 pots a year struggle to catch their quota.

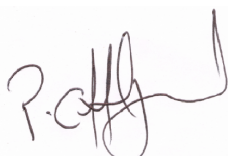
As you will see from the attached survey report, we tried to gauge support from recreational fishers for additional management measures to help rebuild abundance in CRA 2. Most fishers were prepared to contribute in some way and there was strong support for a seasonal closure to all harvest for part of the year, and some support for total closure for a limited time.

Minister:

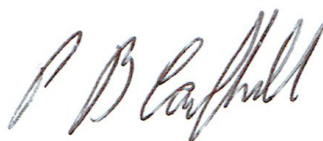
1. Do you believe that excessive fishing effort is a problem in CRA 2?
2. Would you consider specific measures to limit fishing effort to help rebuild the CRA 2 stock and the fishery?
3. As part of any new measures would information be collected on the recreational catch rate in CRA 2 to help determine the impact of management changes on this important fishery?

The NZSFC is available to discuss how we can support you to manage the CRA 2 fish stock to enable all New Zealanders to provide for their social, economic and cultural wellbeing from fishing. We would appreciate your earliest response. Our Council contact is Dave Lockwood, secretary@nzsportfishing.org.nz.

Yours sincerely,



Phil Appleyard
President
New Zealand Sport Fishing
Council



Peter Campbell
Chairman
Fisheries Management – Marine Protection
Sub-committee

APPENDIX ONE

REPORT - Survey of recreational rock lobster fishers in CRA2

New Zealand Sport Fishing Council

May 2017



Between January and March 2017 a survey was conducted to measure people's perceptions of the state of the rock lobster (crayfish) fishery on the northeast coast of the North Island, known in management terms as CRA 2. Over 800 responses were received, with many respondents having dived or fished for crayfish for more than 20 years in the area stretching from Te Arai Point, Northland, to East Cape.

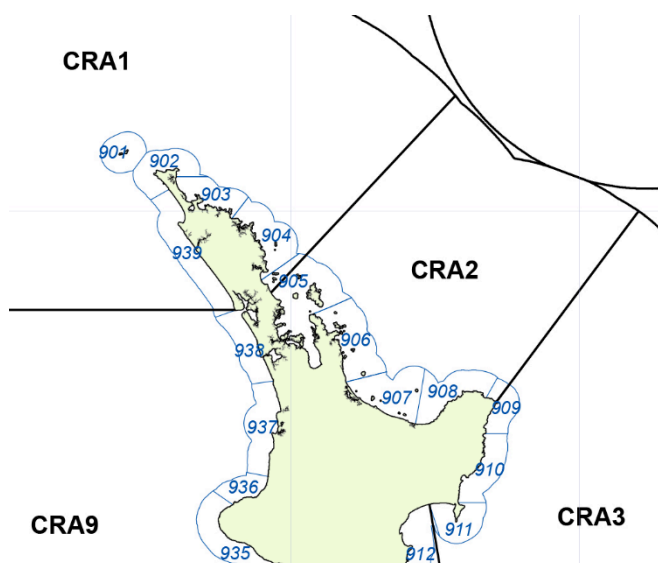
Of 841 respondents 78% rated the state of the crayfish stock in CRA 2 fishery at 1 or 2 out of 7, with 1 being decimated and 7 being best ever.

Background

The Ministry for Primary Industries (MPI) is undertaking the annual review of rock lobster sustainability measures for the 2017-18 commercial fishing year.

The recent submission by the New Zealand Sport Fishing Council (NZSFC) highlighted the failure of fisheries managers to address sustainability concerns in CRA 2, a highly popular and valuable fishery.

The CRA 2 area has the lowest commercial catch rate in New Zealand and last year commercial fishers left a quarter of the quota uncaught in this area to help reduce fishing effort.



The New Zealand Sport Fishing Council has a database of 50,000 members and LegaSea supporters. The survey was targeted at people who fished for rock lobster in CRA 2 and designed to gather the views of recreational fishers on the state of the fishery and possible management actions.

On 25 January 2017 the survey was circulated to NZSFC clubs in the northeast area and posted online in late February. An email with links to the survey was sent to the NZSFC and LegaSea databases with the following message (over page):



Do you pot or dive for crayfish in the Bay of Plenty, Coromandel, or Hauraki Gulf including the outer islands ?

If so we need your views on the size and availability of crayfish in this area and any changes you have seen.

Your opinion matters. Please take two minutes to [fill in this questionnaire](https://www.surveymonkey.com/r/HDQ2CW3) so we can better understand the current state of this fishery.

We will send a summary of the survey results to you, the Ministry, and the Minister. For your views to be counted you must submit the survey before 8 March 2017.

<https://www.surveymonkey.com/r/HDQ2CW3>

Thanks in advance
The LegaSea team

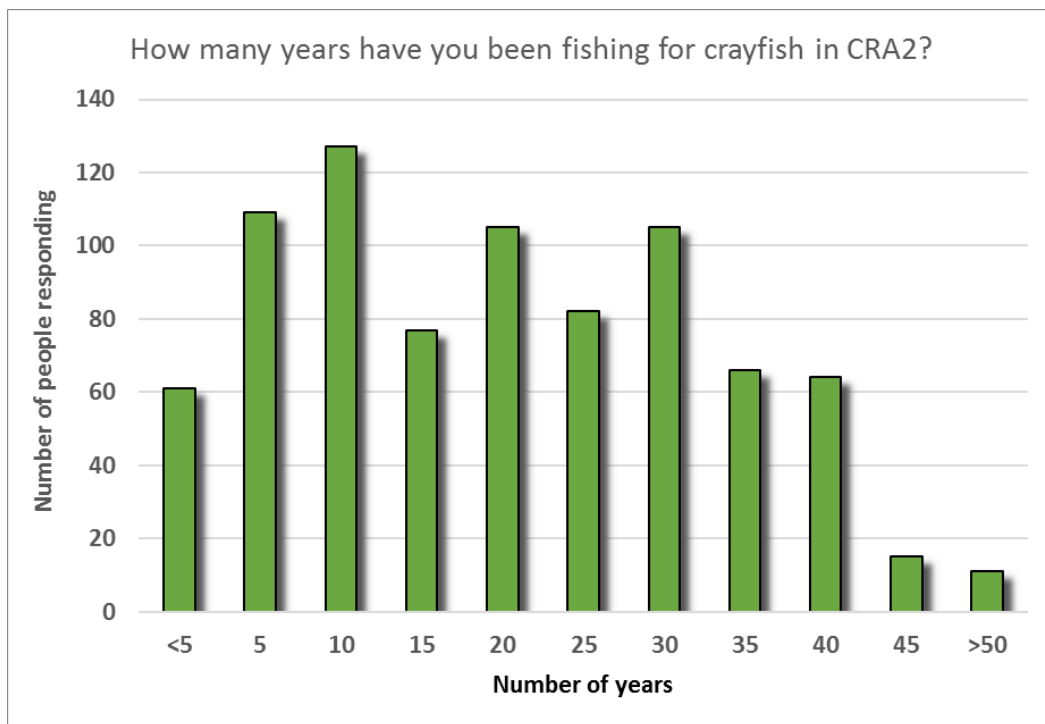
The survey was extended until 12 March 2017 to allow for responses from New Zealand Underwater Association members.

Respondents were asked to name of their club if they belong to one, the general area between Te Arai Point and East Cape where they most commonly fish for crayfish, and how many years they have been fishing for crayfish in CRA 2.

851 responses were received but some fishers did not answer all the questions.

Survey participant experience

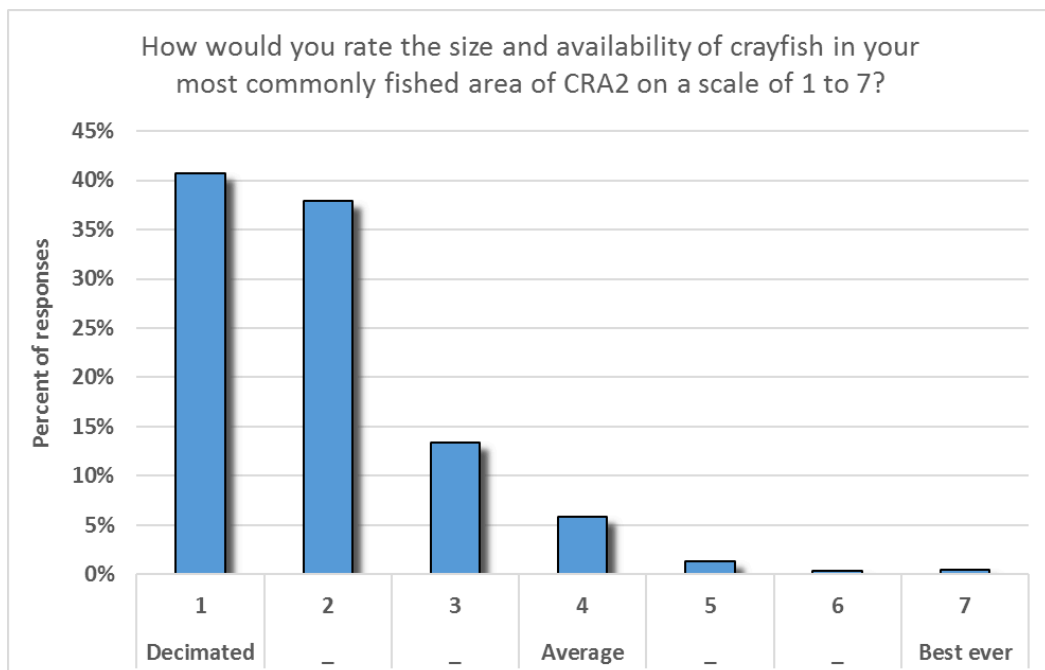
835 people gave valid answers to the number of years fished (dived or potted) in CRA2. There was a good spread of experience with 55% of respondents having fished for 20 years or more.



State of CRA 2 fishery

78% of 841 respondents rated the size and availability of crayfish in CRA 2 fishery at 1 or 2 out of 7, with 1 being decimated and 7 being best ever. Just 6% rated it as average and only 2% rated it better than average.

This answer was consistent across all levels of experience in the fishery, although fishers with 1 to 9 years' experience rated the fishery slightly better than others.



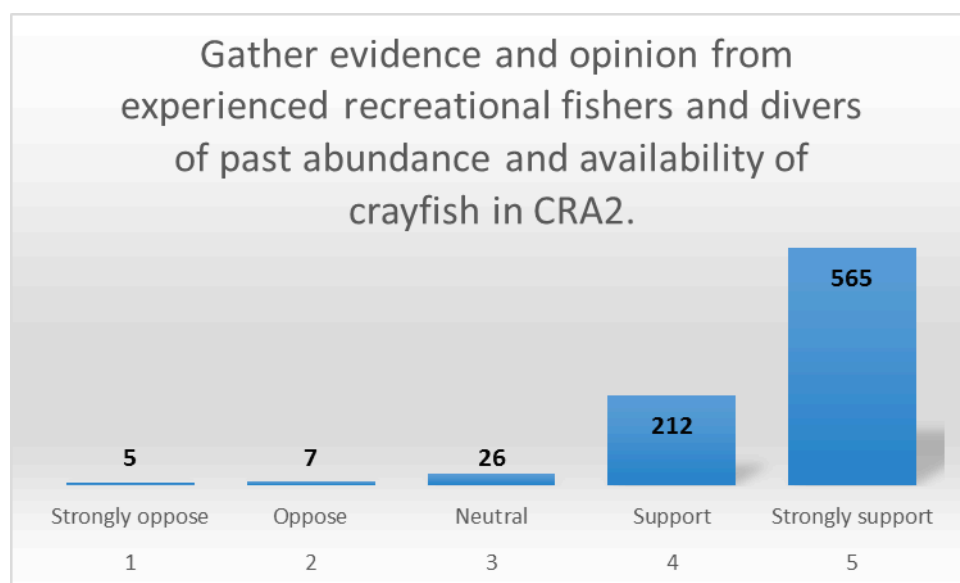
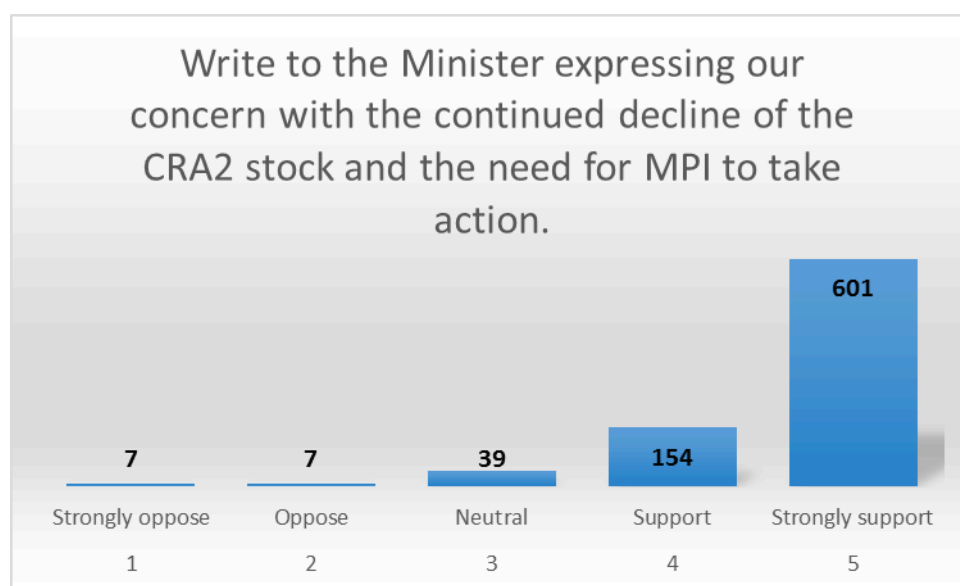
The survey asked fishers their most common crayfish harvest area within CRA 2. There were 372 respondents that named specific locations in CRA 2 as their main area. These were split into a northern area (Hauraki Gulf and Barrier Islands), a central area (eastern Coromandel to Motiti Island) and an eastern area (Town Point to east Cape).

Just over 50% of respondents were from the central area and these fishers rated the fishery in a worse state than other areas.

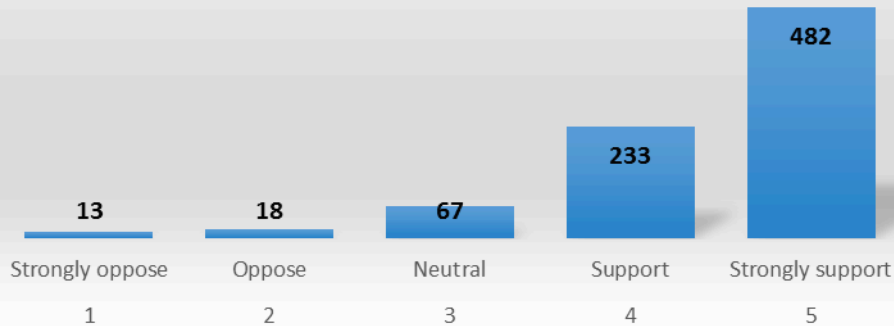
Fishers in the eastern area rated the cray fishery slightly better, with just 62% rating it as decimated.

Future management action

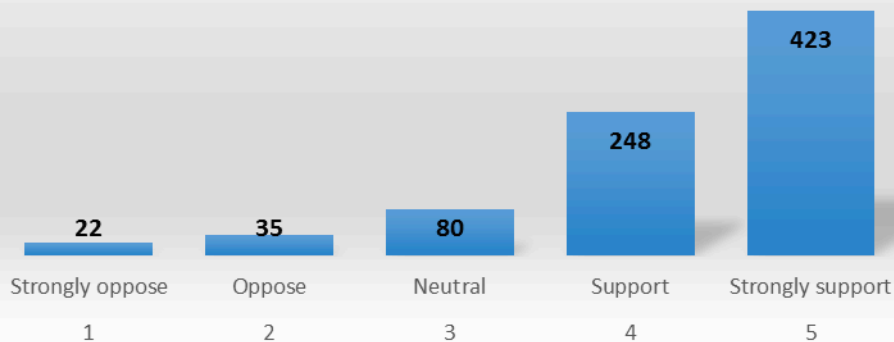
The survey provided participants with a list of five possible actions available to NZSFC and LegaSea. Respondents were asked to rate, on a scale of 1 to 5, what actions they would support. 1 being strongly oppose to 5, being strongly support.



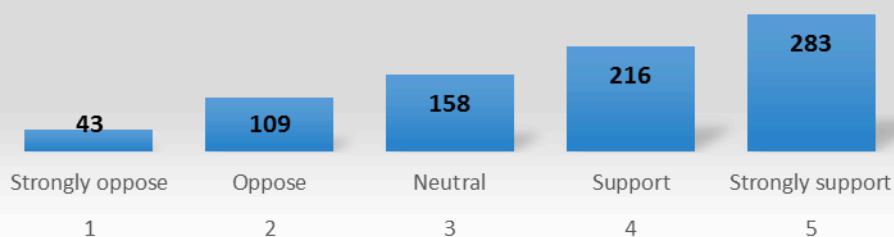
Build a case to start a disputes resolution process . This process may take several years to complete.



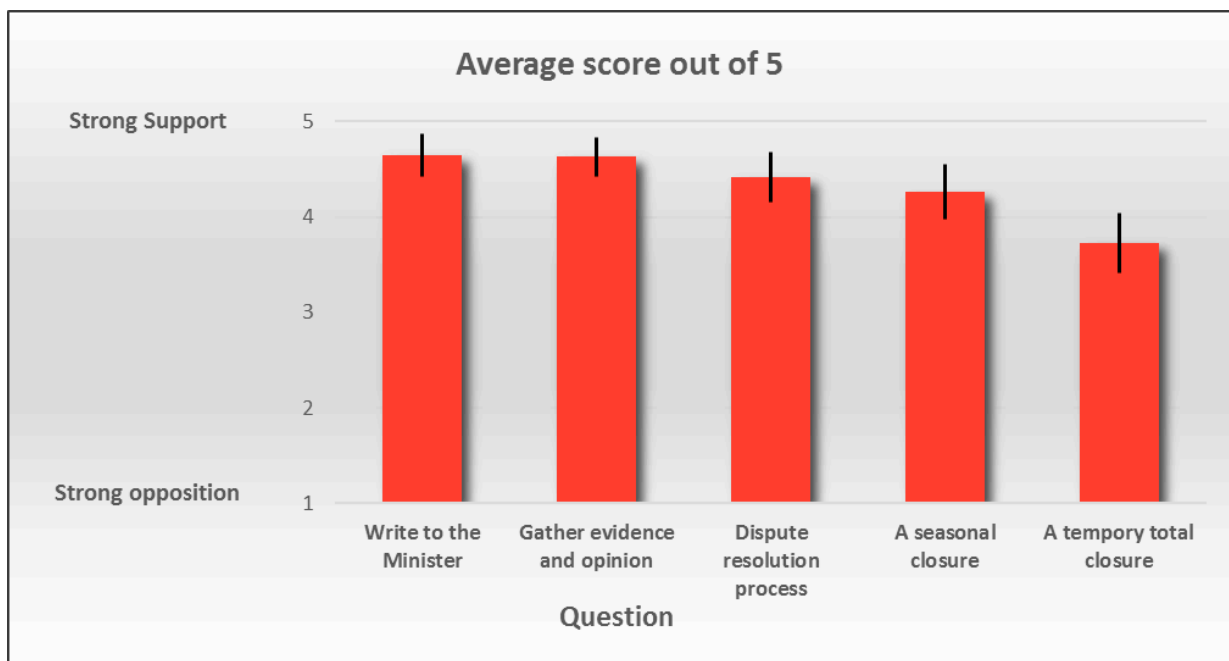
Build a case for a seasonal closure to all harvest (commercial and non-commercial) for part of the year.



Build a case and gain support for total closure of the CRA2 fishery to all harvest for a fixed time, with a staged introduction of non-commercial and commercial fishing when the CRA2 fishery reopens.



There were over 800 responses to each of these questions and the average scores are plotted below.



There was strong support for asking the Minister to take action, gather more information, and to start a disputes resolution process.

A surprising number of fishers also supported some form of fisheries closure to start rebuilding the CRA 2 stock.

A large number of fishers chose to complete this survey, many with long term experience in the fishery. Their detailed comments on how the fishery has changed and how it could be better managed in the future is a valuable resource that will be used when discussing the results of this survey in the future.