

Trudie Macfarlane
Ministry of Fisheries
P O Box 1020
Wellington
Trudie.Macfarlane@fish.govt.nz



29 July 2011

NZ Sport Fishing Council Submission on the reduction in TACC and other management measures for all bluenose stocks

NZ Sport Fishing Council

1. The NZ Sport Fishing Council (NZSFC) is a national sports organisation. Membership from affiliated clubs has grown steadily and we now represent over 30,000 members in 57 clubs spread throughout NZ. We run the NZ Nationals fishing tournament, which has evolved over time and remains successful.
2. NZSFC compile and publish the New Zealand records for fish caught in saltwater by recreational anglers. NZSFC is affiliated to the International Game Fish Association (IGFA) which records and publishes catches that qualify as recreational world records.
3. In 1996 the NZSFC helped establish the NZ Marine Research Foundation, which aims to sponsor research on marine species and fisheries for the benefit of all New Zealanders, including participants in ocean recreation.
4. Many of our most established fishing clubs have a focus on fishing for large pelagic species such as marlin, tuna, and sharks. In recent years our membership has expanded beyond the traditional deep sea angling clubs to include many local clubs targeting other species.
5. NZSFC representatives have engaged in the Inshore Working Group Meetings that have reviewed the characterisation of bluenose fisheries, age sampling, CPUE analysis and stock assessment modelling. We acknowledge that there is considerable doubt about the validity of some of the stock assessment assumptions such as a single national stock, the relationship between CPUE and abundance, and natural mortality.

Recommendations

- ⇒ NZSFC supports option 1 or option 4 as these provide the greatest certainty that we can avoid stock collapses that have affected similar species elsewhere in the world.

New Zealand Sport Fishing Council Inc.

(Previously New Zealand Big Game Fishing Council Est. 1957)

Patron: J R Chibnall

President: R J Baker

Secretary: R T Nelson

www.nzsportfishing.org.nz

PO Box 93

Whangarei 0140

P: 09 4339648

F: 09 4339640

secretary@nzsportfishing.org.nz

- ⇒ That a precautionary approach is taken in managing this important fishery and significant cuts are applied to the TACC now.
- ⇒ There should be sufficient commercial catch (TACC) in each QMA to allow the on-going monitoring of bycatch CPUE, in case a rebuild occurs sooner than expected.
- ⇒ NZSFC reject the predetermined reduction in amateur bag limit to 5 fish per day and ask for time to discuss options with members and delegates involved in the fishery.

MFish proposals

6. The Ministry proposes significant cuts to the commercial catch (TACC) in all options it is consulting on (Table 1).

Table 1: Proposed and Current Management Options for BNS 1, 2, 3, 7 and 8

Option	Combined Year 1 Total TAC (t)	Combined Total TACC (t)			Combined Total Māori customary allowance (t)	Combined Total Other Sources of Mortality (t)			Recreational	
									Combined Total Allowance (t)	Bag limit applying to each QMA
Current Settings	2477	2325			42	47			63	20 (part of mixed bag)
1	787	700			9	15			63	5
2	991	900			9	19			63	5
3	1705	2011/12	2012/13	2013/14	9	2011/12	2012/13	2013/14	63	5
		1600	1150	700		33	23	15		
4	1603	2011/12	2013/14	2015/16	9	2011/12	2013/14	2015/16	63	5
		1500	1130	440		31	23	9		

7. The first two options reduce the current combined TACCs of 2325 t by 70% (to 700 t) or by 61% (to 900 t). These options were selected using the stock assessment model projections and the standards in the MFish Harvest Strategy. Bluenose is a low productivity stock so the target biomass selected is 40% of virgin biomass and the rebuild time should be 20 to 26 years (which is twice as long as it would take with no fishing allowed according to model projections) as set out in the Harvest Strategy Standard.
8. Options 3 and 4 have a 3-year phase in period for the cuts to try and avoid the immediate economic effects on commercial fishers reliant on bluenose. The Appeal Court in the snapper case ruled that the Minister needed to consider economic impacts. However, deeper cuts may be needed eventually if management action is delayed.
9. All options propose that the amateur daily bag limit be dropped from the 20, as part of a mixed species limit, to 5 bluenose per person per day within that limit. (Note; bluenose is

New Zealand Sport Fishing Council Inc.

(Previously New Zealand Big Game Fishing Council Est. 1957)

Patron: J R Chishall

President: R J Baker

Secretary: R T Nelson

www.nzsportfishing.org.nz

PO Box 93

Whangarei 0140

P: 09 4339648

F: 09 4339640

secretary@nzsportfishing.org.nz

generally not available to non-commercial fishers in the South East, Southland and Fiordland management areas where the mixed species daily bag limit is 30 fish).

The fishery and current allowances

10. The target line fishery for bluenose only developed in the late 1970s, with the trawl fishery on the lower east coast of the North Island developing after 1983, initially as a bycatch of the alfonsino fishery. Between 1992 and 2009, all bluenose fishstocks were included, for at least some of the time, in Adaptive Management Programmes, which allowed increases in commercial catch to test if they were sustainable. Under AMPs, the bluenose combined TACCs increased by over 1000 t. In response to information suggesting declines in abundance in BNS 1, 2, 3, 7 and 8, TACCs in these QMAs were reduced in 2008 to the current combined TACC of 2480 t and additional research was initiated. The Fisheries Plenary concluded that commercial harvest levels were a key driver of the decline in stock abundance, while other drivers such as recruitment and environmental factors may also have contributed.
11. The total combined recreational allowances for all bluenose QMAs is 63 t, which was based on 2000-01 diary survey estimates of recreational catch. The total combined customary allowance is 43 t. MFish is not aware of any customary permits being issued for bluenose.

The fish

12. The depth distribution of bluenose extends from near-surface waters to about 1200 m. Research trawl surveys record their main depth range as 250–750 m, with a peak at 300–400 m. They are often found around seamounts and other bottom structure, though they are also caught by mid-water trawl in some areas, like the Chatham Rise. Bluenose can live up to 70 years old and are relatively slow growing, reaching sexual maturity at about 16 years old.

NZSFC submission

13. Amateur fishers do participate in the bluenose fishery. There are more boats these days equipped with high power depth sounders and heavy tackle with non-stretch braid line. Targeting bluenose in deep water can be quite productive and it is unknown whether they would survive catch and release when hauled from that depth.
14. Many NZSFC members are based in the Bay of Plenty, and they have reasonable access to deep water seamounts that hold bluenose. On the right day catch rates can be good but there are many days when sea conditions or current strength make deep water drift fishing unproductive. The general perception from recreational fishers is that abundance has declined.
15. “All stock assessments models are wrong”. They are statistical generalisations of complex, variable biological processes, but some models are useful. There is considerable doubt about the validity of some of the stock assessment assumptions such as a single national stock, the relationship between CPUE and abundance, and natural mortality, to name a

New Zealand Sport Fishing Council Inc.

(Previously New Zealand Big Game Fishing Council Est. 1957)

Patron: J R Chishall

President: R J Baker

Secretary: R T Nelson

www.nzsportfishing.org.nz

PO Box 93

Whangarei 0149

P: 09 4339648

F: 09 4339640

secretary@nzsportfishing.org.nz

few. In the Bluenose IPP there is at least a section on model uncertainty. However, as with the last kahawai IPP/FAP fisheries managers struggle to know how to formulate recommendations independent of the model point estimates and predictions.

16. Given that the fishing industry has already reaped the benefit of fishing down this stock under the flawed Adaptive Management Programme, and considering that similar species in other countries have been rapidly over fished, NZSFC submit that the Minister should take a precautionary approach. There is a strong enough signal in the stock assessment to indicate that current commercial catch is not sustainable and should be significantly reduced. It is better to have a rapid turnaround and resumption of sustainable fishing than a long slow decline and failure of management principles.
17. There should however be sufficient commercial catch (TACC) in each QMA to allow the on-going monitoring of bycatch CPUE, in case a rebuild occurs sooner than expected.

Amateur Bag limit

18. The daily bag limit for public fishing serves two purposes. The first is to limit catches by an individual to non-commercial quantities, in the interests of ease of compliance. The second is to ensure that public catch opportunities are available to all.
19. There is no data to suggest that amateur fishers are using their maximum daily limit as a means of commercial fishing, or that a few greedy amateurs are taking the stock and depriving their neighbours of fishing opportunity.
20. NZSFC strongly objects to the lack of process, information and discussion around the setting of the amateur bag limit. According to the IPP there is only one option, a daily bag of 5 bluenose. It seems the decision has already been made. There is no valid case made in the IPP for a 75% reduction in daily bag limits.
21. NZSFC has not had time, in the 23 days MFish has allowed for consultation on bluenose and other species under review, to widely discuss and debate what is the right bag limit for bluenose. We believe MFish must talk to fishers in areas that actual catch bluenose rather than be (mis)guided by the Fiordland Marine Guardians who are miles from the main recreational fishery.

The NZ Sport Fishing Council appreciates the opportunity to submit on the review of sustainability measures and other management controls for Bluenose 1, 2, 3, 7 and 8. We look forward to MFish addressing our concerns. We would like to be kept informed of future developments.

Yours faithfully,

Richard Baker
President

New Zealand Sport Fishing Council Inc.

(Previously New Zealand Big Game Fishing Council Est. 1957)

Patron: J R Chishall

President: R J Baker

Secretary: R T Nelson

www.nzsportfishing.org.nz

PO Box 93

Whangarei 0140

P: 09 4339648

F: 09 4339640

secretary@nzsportfishing.org.nz