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NZ Sport Fishing Council Submission on the increase in TACC and other management measures for Rig on the southeast coast of the North Island (SPO2)

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 CPUE for Rig.
6. The NZSFC is concerned that there is no stock assessment, conflicting Catch Per Unit of Effort (CPUE) information, no reference to Fisheries 2030 or the Harvest Strategy Standard in the Initial Position Paper (IPP).

Recommendations

⇒ The options presented are inadequate to address the problem of overcatch of the SPO2.

New Zealand Sport Fishing Council Inc.

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

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- ⇒ The SPO2 stock is under threat from excessive catch and dumping of small unmarketable rig, the same fate causing extreme stress to other species within the mixed trawl fishery.
- ⇒ The solution to the problem is to first remove the unwanted fish from the catch, by using better selectivity. An increase to 125mm mesh should be considered a mandatory requirement.
- ⇒ Adding SPO2 to the 6th Schedule will be counterproductive in that it will provide for legalised dumping.
- ⇒ A monitoring programme that includes at-sea catch sampling is immediately required in the FMA2 trawl fishery to inform estimates of fishing mortality.
- ⇒ Commercial fishers need incentives to avoid overcatch; this IPP rewards overcatch.
- ⇒ Until the above measures are implemented the NZSFC supports the status quo, MFish option 1.

The Proposals

7. Option 1 retains the current TAC, TACC, and allowances. This may continue to give rise to deemed value payments which have been between \$36,000 and \$100,000 per year.
8. Option 2 increases the TAC by 8 tonnes, and transfers 15 tonne of Customary allowance to the TACC, making a total TACC of 108 tonnes, an increase of 22 tonnes.

Option	TAC	TACC	Customary Non-commercial Catch	Recreational Catch	Other sources of Mortality
Option 1 (status quo)	122	86	20	10	6
Option 2	130	108	5	10	7

Background to the IPP

9. The Total allowable commercial catch (TACC) is routinely exceeded.
10. The TACC is constraining catch of other species.
11. There are no reported increased sustainability risks to SPO2.
12. The condition of the stock is unknown and catch decisions must be based on examining CPUE data.
13. No credible information is offered to explain the extreme decoupling of trawl and set net CPUE for SPO2. If the set net targeted effort had moved from Rig to other species this would be in the CELR record, but the IPP only makes a general reference to other species. (MFish Figure 1)

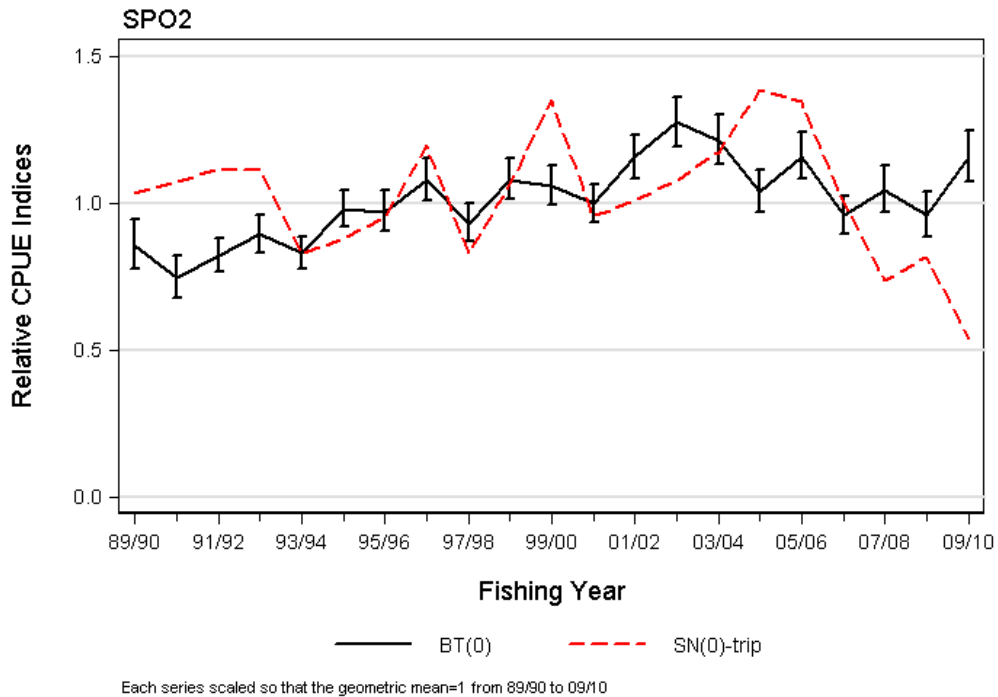
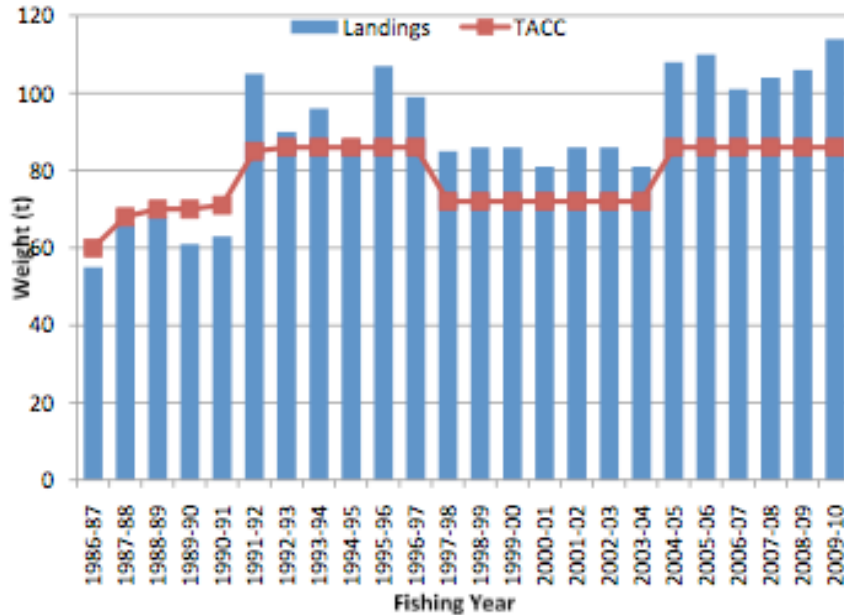


Figure 1: Trends in catch per unit effort for Rig from all bottom trawl catch in FMA2 (black line) and all set net fisheries landing rig in FMA2 (red dash line).

Figure 2: Historical landings and TACC for SPO 2.



14. There appears to be marginal catch landed in excess of TACC, regardless of quantum, and regardless of the deemed value. This would suggest residual incentive to land Rig when taken as part of a mixed species catch, as in the trawl fishery.

Overcatch

15. There is a 10-15% historical overcatch of Rig regardless of changes to the TACC, which indicates causes other than unavoidable catch are present. It appears that deemed value payments are economic at the margin of mixed trawl fisheries, and will continue regardless of the level of TACC.
16. In the six years prior to the 2009 review there was a general downward trend in CPUE for trawl.
17. The 2009 review resulted in agreement to monitor CPUE for a couple of years to confirm a relationship with abundance. In the following year the CPUE jumped an unprecedented amount. The risk with using CPUE as a proxy for abundance is if the data is manipulated to meet a decision rule.
18. 100mm diamond mesh is used in the trawl fishery, and large numbers of small Rig are caught. These are largely unmarketable and dumped. Increasing the TACC will not alter the level of dumping.
19. The proposed increase to TACC responds to overcatch, not a stock assessment. This is always a poor principle on which to base increased TACC. Catch data does not tell you what is happening to stock abundance.
20. There is a lack of at-sea catch sampling in FMA2. Until data is gathered on what is caught, rather than what is landed, no objective management response can be made.

Adding Rig to 6th Schedule

21. There is a certain naivety to the Ministry's proposal. It is evident this year that MFish is looking to the 6th Schedule to resolve overcatch in mixed trawl fisheries. There is a fine line between dumping and released in the terms of the 6th Schedule.
22. While commercial fishers are not insensitive to the needs of returning fish alive, they are in the business of selling fish. The first priority when the trawl is emptied (most often directly into the hold) is to get the valuable fish into the slurry.
23. Dealing with discards, whether they are small fish, unwanted species, or a species in the 6th Schedule, will always have to wait until the valuable fish have been dealt with. Undertaking some contrived trial on deck to establish the vigour of a species is pointless; this isn't commercial practice.
24. There is no evidence that including Rig in the 6th Schedule will reduce mortality on the stock. Adding another category of discard only obfuscates any assessment of total mortality.

Customary Allowance

25. Again the Ministry is applying a catch-it or lose-it principle in respect of non-commercial catch, which is allocated in perpetuity to commercial stakeholders.
26. If MFish have again changed the criteria for setting customary allowances in inshore fisheries then they should state what they are. Obviously they have changed in the last six years since the TACC was last increased.

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

Yours faithfully,

Richard Baker
President
NZ Sport Fishing