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12 February 2018

## **NZ Sport Fishing Council submission on the proposal for an in-season increase to the total allowable catch for southern bluefin tuna**

### **Recommendations**

1. A 40 tonne allowance is set aside to allow for recreational interests in Southern Bluefin tuna, as part of the current in-season adjustment to the Total Allowable Catch for 2017-18.
2. A 40 tonne recreational allowance option is included in the Discussion Paper on setting the 1 October Total Allowable Catch for 2018-20.
3. The allowances and regulations set in 2018 must provide the opportunity for this fishery to develop responsibly, without turning fishers away.

### **New Zealand Sport Fishing Council**

1. The NZ Sport Fishing Council is a national sports organisation with over 32,000 affiliated members from 56 clubs nationwide.
2. The Council has initiated LegaSea, a public outreach organisation, to generate support for the ongoing effort to protect and enhance the public's access to abundant fisheries in a healthy marine environment. [www.legasea.co.nz](http://www.legasea.co.nz). The intention is to broaden NZSFC involvement in marine management advocacy, research, education and working together on behalf of our members and LegaSea supporters.
3. We are committed to ensuring that sustainability measures and 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]
4. The New Zealand Sport Fishing Council appreciates the opportunity to submit to the Ministry for Primary Industries (MPI) on the proposal for an in-season increase to the total allowable catch for the Southern Bluefin tuna. MPI released their proposals on 12 January 2018 with

submissions due by 9 February 2018. On February 8<sup>th</sup> the Council requested an extension to the submission deadline, this was approved by MPI on the 9<sup>th</sup> and this document was submitted to MPI on 12 February 2018.

5. NZSFC representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this review and would like to be kept informed of future developments. Our contact is Helen Pastor, [secretary@nzsportfishing.org.nz](mailto:secretary@nzsportfishing.org.nz).

## **Background**

6. Management of Southern Bluefin tuna (SBT) throughout its range is the responsibility of the Commission for Conservation of Southern Bluefin Tuna (CCSBT), of which New Zealand is a founding member. Japanese longliners were catching 1000s of tonnes of SBT a year in New Zealand waters (1960s to 1980), mostly prior to the establishment of the Exclusive Economic Zone (EEZ).
7. Southern Bluefin had a domestic catch limit of 420 tonnes (t) since early 1990s. On introduction to the QMS in 2004 the Total Allowable Commercial Catch (TACC) was set at 413 t, with a recreational allowance of 4 t, a customary allowance at 1 t and other sources of fishing related mortality at 2 t. There have been a series of in-season increases following allocation decisions by the CCSBT. In 2012 the Total Allowable Catch (TAC) was set at 830 t, with a TACC of 817 t, a recreational allowance of 8 t, a customary allowance at 1 t and other sources of fishing related mortality at 4 t.
8. For a long time the reported catch was around 14,000 t worldwide. CCSBT agreed to reduce global catches by 20% in 2010-2011, to 9,449 t. The Commission has decided over recent years to increase the “Global” TAC to 10,449 t in 2012, 10,949 t in 2013, 12,449 t in 2014, and 14,647 t in 2015.
9. Southern Bluefin can live to 30 years old and reach maximum size of about 190 cm and 140 kg by 20 years old. (The recreational all tackle world record is 158 kg from BOP). Most SBT are mature by 12 years of age.
10. Southern Bluefin tuna consist of a single stock primarily distributed between 30° S and 45° S, and spawn in the Indian Ocean south of Java around March. 1999 to 2002 seemed to be particularly bad spawning years. Since then there appears to have been good recruitment and a number of these year classes have become part of the spawning stock.
11. Current spawning stock size is 13% of unfished biomass according to the most recent stock assessment (2017). While this is an improvement, it is still well below the biomass that could produce Maximum Sustainable Yield (MSY).
12. There has been a small recreational fishery based out of Fiordland and SBT are taken as a by-catch of the Pacific Bluefin tuna fishery out of Greymouth and Hokitika. In 2017 a more accessible recreational fishery off Cape Runaway was developed. Good catch rates and favourable weather attracted hundreds of anglers to the eastern Bay of Plenty at short notice. Waihou Bay Sport Fishing Club representatives did a great job weighing fish for these keen anglers. In addition, some fish were taken back to other clubs and weighed there.

## **Proposals for southern bluefin tuna**

13. For the three years 2018 to 2020, the CCSBT has raised the Global Total Allowable Catch by 3,000 tonnes to 17,647 t. As a result, New Zealand’s national allocation has increased by 88 t

to 1,088 t per annum for the next three fishing years. An in-season adjustment would allow New Zealand fishers to utilise the additional allocation this fishing year.

14. No change is made to the Total Allowable Commercial Catch (TACC) when implementing an in-season TAC increase, instead, additional Annual Catch Entitlement(ACE) is generated for the current fishing year.
15. The recreational allowance in 2016–17 was 8 t. MPI estimate the recreational catch landed at gamefish clubs at 17 t last year and propose an allowance for recreational harvest of 20 t in 2018.
16. The options in the MPI discussion document include: Option 1. No change; Option 2. All 88 t to the commercial TACC; Option 3. A 20 t allowance for recreational interests and 76 t added to commercial TACC (Table 1).

**Table 1: The three options included in the MPI discussion document for southern bluefin tuna.**

<b>TAC and allowances (tonnes)</b>	<b>Option 1 (Status quo)</b>	<b>Option 2</b>	<b>Option 3</b>
TAC (2017-18 fishing year)	1000	1088	1088
Customary allowance	1	1	1
Recreational allowance	8	8	20
Other fishing-related mortality allowance	20	20	20
TACC	971	971	971
Additional Annual Catch Entitlement	0	88	76

17. The New Zealand TAC has been regularly under-caught in recent years. The recreational allowance of 8 t was under caught every year between 2012-13 and 2015-16. There is no record of permitted catch under the customary fishing allowance. Commercial fishers are able to carry over up to 10% of uncaught ACE they hold at the end of the fishing year. Over the last 4 years commercial landings exceeded the TACC once, by 8 t, in 2013-14 (Table 2). In 2016-17 when the recreational catch did exceed the allowance for the first time, the TACC was under caught by 58 t and ACE under caught by 15%.

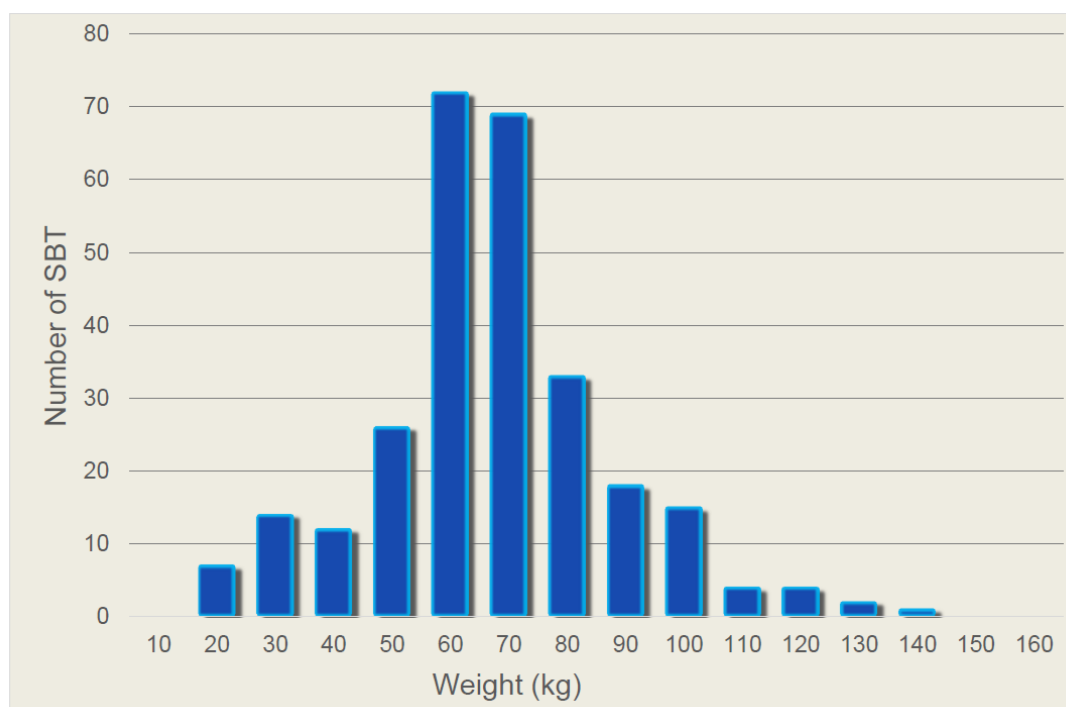
**Table 2:** Total Allowable Commercial Catch (TACC) and landed commercial catch in tonnes by fishing year. Uncaught ACE can be carried over to the following year but is not fully caught. (Source Fish Serve 5-Nov-2017)

Fishing year	2013-14	2014-15	2015-16	2016-17
TACC (t)	817	971	971	971
Commercial landed catch (t)	825	923	949	913
Uncaught TACC (t)	-8	48	22	58
Annual Catch Entitlement (t)	943	1044	1075	1075
Percent of ACE caught	87%	88%	88%	85%

18. **NZSFC supports an in-season increase in the TAC to allow for increased utilisation by the recreational and commercial sector.**
19. The 88 t increase allowed for by CCSBT is just 0.5% of the 2018 Global TAC and not allocating this increase would have no effect on the spawning stock biomass, which is currently rebuilding strongly.

## Recreational catch in 2016-17

20. The rapid development of the recreational fishery for Southern Bluefin tuna off Cape Runaway in mid-2017 caught many people by surprise. Thanks to some excellent information from tuna longline fishers and a social media storm, hundreds of anglers were gamefishing in July with great success. Thanks largely to the hard work by members of the Waihou Bay Sport Fishing club and the patience of returning anglers, we have weigh station data for a high proportion of landed catch. This is useful for describing the fishery and estimating total recreational harvest.
21. MPI have used a preliminary version of this data in their Discussion Paper, but it is concerning that they have not used the updated catch totals as presented by the NZSFC at the High Migratory Species Fisheries Plan meeting on 20 November 2017.
22. NZSFC clubs recorded 266 landed Southern Bluefin tuna and 13 released from the east coast recreational fishery, mostly during late June and July 2017. The peak days were over the weekend of 14 and 15 July, when 124 fish were caught, nearly half of the total. There are no records for unsuccessful trips, but the average catch across all successful boats that weekend and overall was 1.5 tuna per trip.
23. Most of the landed tuna were over 60 kg and the average weight was over 72 kg (Figure 2). It is rare to find Southern Bluefin tuna of this size reasonably close to the coast in such large numbers.



**Figure 2:** The weight distribution of east coast North Island southern bluefin tuna caught by anglers in 2017.

24. The total landed weight of Southern Bluefin tuna recorded by clubs in 2016-17 is 19.4 tonnes. MPI Amateur Charter Vessel logbooks recorded 47 SBT with an estimated weight of 1.9 t from the South Island in 2016-17. A conservative estimate of unreported catch would be about 15%, which, when added to reported catch, would give a total of 24.3 t landed recreational catch in the last fishing year.

25. There is already considerable anticipation in recreational fishing circles about the Eastern BOP fishery in 2018. A number of charter boats have received bookings for Bluefin trips and private fishers are planning fishing trips in July. While it is possible that the SBT may be further off shore in 2018, the distance and conditions of Cape Runaway in July are not as challenging as fishing off the West Coast of the South Island on the hoki grounds in August, or fishing the King Bank or Middlesex Bank north of the Three Kings Islands where the Tasman Sea clashes with the Pacific Ocean, or even crossing the bar from North Island west coast harbours and fishing many miles offshore.
26. So, there are competent fishers and capable vessels to find these fish again. Commercial catch records show that these tuna are in this eastern BOP area every year at this time and catch rates can be high. While there are no guarantees, the expectation from MPI that 2017 was a one-off opportunity seem unlikely. *“The recreational sector benefited from particularly favourable conditions in terms of weather and proximity of the fish, and it is unlikely that those conditions will prevail from year to year.”* [MPI, Discussion Paper 2018]
27. The stock assessment and commercial catch rates in New Zealand indicate that SBT numbers and size continue to improve. It seems unlikely that this trend will change any time soon.
28. NZSFC will be promoting voluntary measures to encourage recreational fishers to catch and release more SBT. There is a risk that if NZSFC and affiliated clubs try to impose strict voluntary limits some recreational fishers may avoid weigh stations and recording their catch. There is also a concern that our recommended voluntary limits may be used by MPI as a benchmark for hard regulatory limits. Sport fishers spend a lot of time and money for the chance of catching their first big tuna. The allowances and regulations set in 2018 must provide the opportunity for this fishery to develop responsibly, without turning fishers away.
29. In the interests of conservation and maximum utilisation, the NZSFC will expand its FishCare material to include information on handling and release of SBT and the importance of looking after the fish that are kept, to avoid wastage of these valuable fish.
30. The Eastern Bay of Plenty Southern Bluefin tuna fishery is a very new and “raw” fishery and NZSFC can influence many fishers to act responsibly, but not all.
31. Clubs will be encouraged to record details of all SBT catch. It is likely that a research project funded by MPI will survey fishers returning to Waihou Bay boat ramp to collect catch and effort information. The National Panel Survey may also collect some data during 2018 on the national recreational harvest of SBT. Collecting good information on actual catches and fisher attitudes is important for setting allowances and regulations, but will take time.

### **Setting the allowance for recreational fishing interests**

32. The 20 t allowance as part of an in-season adjustment to the TAC may be seen as a stop-gap measure considering the uncertainty about the availability of SBT off the Eastern Bay of Plenty. NZSFC is concerned that this may set a bench mark for the following 3 years and any increase in allowance 2019 or 2020 would be seen as a reallocation by quota holders.
33. **NZSFC submits that a 40 t allowance be made for recreational harvest** in the in-season adjustment to the TAC, to keep options open when we do have data on the size of the catch in 2018.
34. There will not be time to assess the success of the 2018 recreational fishery before proposals are drafted for the Discussion Paper on 1 October TAC, TACC and allowances. The current

options of no increase in the allowance for recreational fishing interests or a 12 t increase do not cover the range of possible outcomes in 2018, nor as this fishery matures in subsequent years.

35. An adequate allowance must be made for recreational interests because the Minister has a statutory obligation to manage catch within the TAC and New Zealand's international allocation, however there is uncertainty about recreational fishing effort and harvest over the next three years.
36. SBT are caught by commercial fishers of Hawke Bay and East Coast in June as they move north. Satellite tagging data show some fish off East Northland in July and August, at a time of year when there are few other deep water fishing opportunities. There have been SBT caught in these areas in the past with very limited fishing effort.
37. Even if bag limits are introduced in 2019 it is hard to believe that recreational harvest will remain below 20 t if fishing effort doubles or triples.
38. As we have seen with marlin, it takes a few years to develop a strong catch and release ethic in a fishery, and when there are a lot of new entrants wanting a fish of a lifetime release rates are generally low.
39. NZSFC submit that a 40 t recreational allowance option is included in the Discussion Paper on setting the 1 October TAC and that this is clearly signaled in the Final Advice Paper for the current in-season adjustment.