

Bob Gutsell  
President  
NZ Sport Fishing Council  
PO Box 54242, The Marina  
Half Moon Bay, Auckland 2144  
[secretary@nzsportfishing.org.nz](mailto:secretary@nzsportfishing.org.nz)



Sustainability Review 2019  
Fisheries Management  
Fisheries New Zealand  
PO Box 2526  
Wellington 6140.  
[FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

1 July 2020

## **Submission: Review of the pōrae TAC in POR 1**

### **Submission summary**

1. The submitters support option 1 retaining the status quo.
2. The case for increasing the TAC in POR 1 is very weak.
  - a) There is no clear rationale for the 8 t TACC increase in POR 1 as commercial catch has been stable or declining.
  - b) The recent recreational harvest estimate was 6.7 t with a coefficient of variation (CV) of 36%, so no different to the current allowance of 6 t.
  - c) There is no rationale in the discussion document for the increase in the customary allowance.

### **The submitters**

3. The New Zealand Sport Fishing Council (NZSFC) appreciates the opportunity to submit on the proposals to review Total Allowable Catch (TAC), allowances and the Total Allowable Commercial Catch (TACC) for pōrae in Fisheries Management Area 1, with submissions due 1 July 2020.
4. The New Zealand Sport Fishing Council is a recognised national sports organisation with over 36,200 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](http://www.legasea.co.nz). Together we are 'the submitters'.
5. 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].
6. The submitters note the consultation time frame of 26 working days for this process. This time frame has allowed some consultation with local recreational interests, our affected clubs and

other representatives organisations including the New Zealand Angling and Casting Association. This year the sustainability round includes 12 inshore species in 15 QMAs which has stretched our resources.

7. Our 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).

## The Proposal

8. Fisheries New Zealand is proposing to review the sustainability measures for pōrae in Quota Management Area (QMA) pōrae 1 (POR 1) for the 1 October 2020 fishing year.
9. The majority of commercial catch is taken by set net from east Northland in POR 1, with the fishery extending into POR 2 around the northern stock boundary at the top of the North Island.
10. Pōrae is a shared fishery, although its importance to recreational fishers is usually as a welcome bycatch rather than a target species. Pōrae is also listed as a taonga species for some North Island Iwi in their respective Iwi Fisheries Forum fisheries plans.
11. Industry has requested a review of management settings for both POR 1 and POR 2, including considering adjustments to the TACCs, and consideration of the stock boundaries.
12. FNZ are proposing to increase the TAC from 75 tonnes to 88 tonnes, which is an approximately 17% increase as part of this review (Table 3). Catch limits and allowances for POR 1 have not been reviewed since pōrae was introduced into the quota management system (QMS) in 2004.

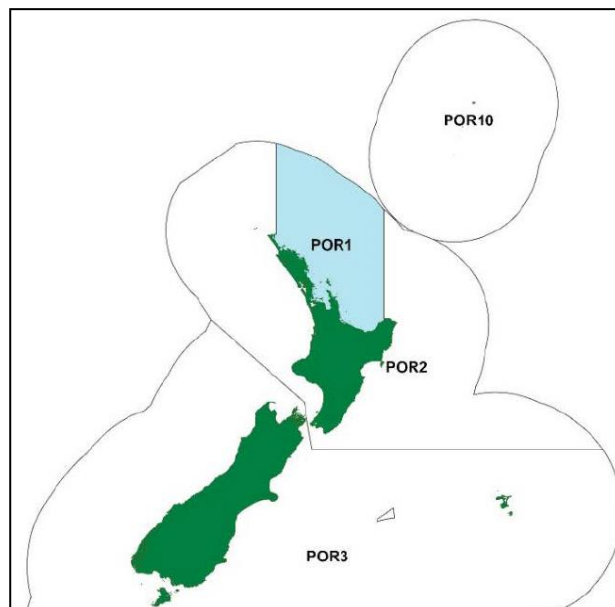
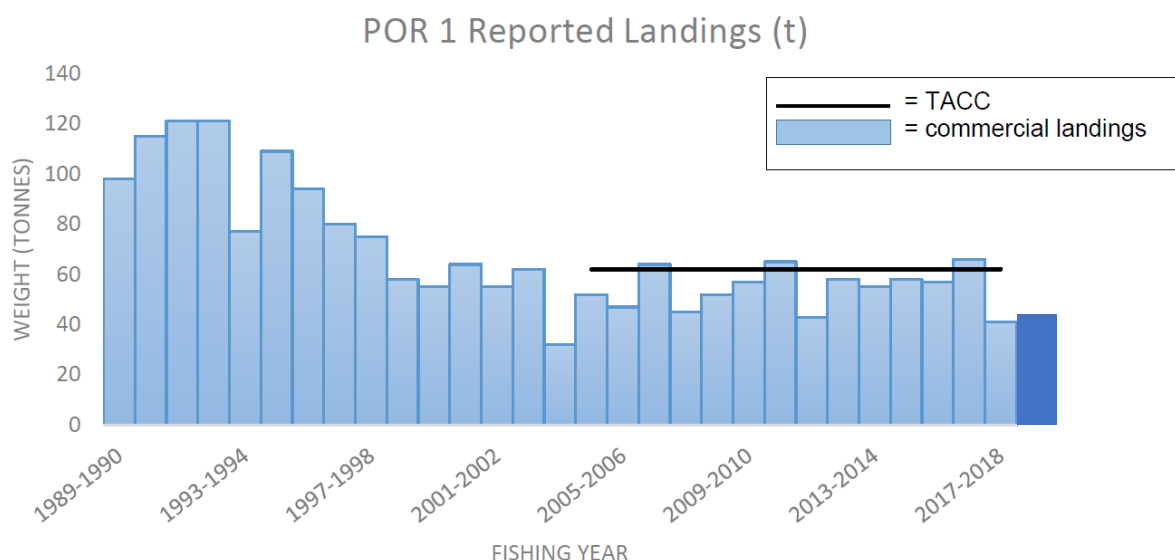


Table 3: Options for varying TAC, TACC and allowances in tonnes for POR 1 from 1 October 2020.

Option	Stock	Total Allowable Catch (tonnes)	Total Allowable Commercial Catch (tonnes)	Allowances		
				Customary Māori (tonnes)	Recreational (tonnes)	All other mortality to the stock caused by fishing (tonnes)
Option 1 (Status quo)	POR 1	75	62	3	6	4
Option 2	POR 1	88 ↑ (17%)	70 ↑ (13%)	3	8 ↑ (33%)	7 ↑ (75%)

## The Submission

13. FNZ is basing the increase to the TAC/TACC, “in line with the upper level of commercial catch since 2001. The proposed increase is modest to reflect the low level of information available, and lack of knowledge as to whether an increase may pose a risk to sustainability.”
14. Pōrae falls into group 3 of FNZ Draft National Inshore Finfish Fisheries Plan, “which recognises that pōrae is subject to less fishing pressure than some other stocks, and that less comprehensive information for management is required. The general approach is to minimise management costs by using catch trends as the key monitoring tool.”
15. There is no record in the POR 1 commercial catch history, or in the graph below, being 8 t above the current TACC of 62 t since 2001. In fact, the most recent fishing year reported catch was 43t, just 64% of available ACE. The highest catch since pōrae was introduced to the QMS was 65.9 t in 2016-17 which was 98% of available ACE. What is more the annual deemed value rate starts at \$1.50 per kilo while the average port price in 2018-19 increased to \$3.95 in POR 1.
16. The submitters do not support the use of maximum commercial catch as the bench mark for TACC increases in any stocks. The quota management system is failing if there is little incentive to limit commercial catch to the TACC, but a strong incentive to over catch and ask the Minister for more quota.
17. FNZ has to acknowledge that there are natural cycles of abundance and availability of fish populations as well as cycles in fishing activity and market demand for particular species. It is also clear from Figure 2 in the discussion document that there has been no trend in commercial catch history since the late 1990s. Catch on its own is a poor measure of stock abundance but under FNZ group 3 criteria no catch trend should mean no need for change.



**Figure 2: Commercial landings and TACC for POR 1**

18. The higher catch in the early 1990s was caused by a surge in set net fishing on reefs for species not included in the quota management system. The concerns raised in the Set Net Review about the removal of long lived resident reef species and ghost fishing by lost nets remain. There are spawning aggregations of pōrae in late summer that are targeted by some set net fishers and increasing the TACC may increase this activity.
19. What is needed is a detailed characterisation of all pōrae fisheries. There may be some core areas of catch and effort where CPUE would be worth examining. The current cost recovery model is a disaster for the majority of species currently deemed to be “ low information stocks”. Regular monitoring and periodic analysis is deemed to be too expensive for the size of the fishery. Trawl surveys can provide fishery independent information on distribution and abundance of the main species, but these were discontinued in the North Island due to cost cutting.
20. The case for increasing the TAC in POR 1 is very weak. There is no clear rationale for the 8 t TACC increase in this QMA. The recent recreational harvest estimate was 6.7 t with a cv of 36%, so no different to the current allowance of 6 t. There is no rationale in the discussion document for the increase in the customary allowance. There is evidence that the recreational catch has declined between National Panel Surveys and that commercial catch reached the lowest level in the last two years since it became a quota species.
21. If the plan is to merge POR 1 and POR 2 so the commercial trawlers can shift ACE from the depleted northeast coast on to the northwest coast then FNZ need to produce a detailed characterisation of all pōrae fisheries and provide a clear management strategy and justification.
22. The submitters support option 1 retaining the status quo.