

New Zealand Big Game Fishing Council

(Incorporated)

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NZ Big Game Fishing Council Submission on the QMS Introduction Standard

NZ Big Game Fishing Council

1. The NZ Big Game Fishing Council (NZBGFC) was formed in 1957 to act as an umbrella group for sport fishing clubs and to organise a tournament that would attract anglers from around the world. Club membership has grown steadily and we now represent over 30,000 members in 60 clubs spread throughout NZ. We still run the nation-wide fishing tournament, which has evolved over time and remains successful.
2. NZBGFC compile and publish the New Zealand records for fish caught in saltwater by recreational anglers and are members of the International Game Fish Association who compile world record catches.
3. In 1996 NZBGFC 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 inshore species.

The Proposal

5. The Ministry of Fisheries is proposing that a standard for assessing non-Quota Management System (QMS) stocks or species be established. This will be an annual process that will apply criteria for identifying potential candidates for introduction in the next three years. The Government has an underlying preference to manage stocks within the Quota Management System.

6. The statutory considerations as to whether a stock or species may be introduced to the QMS are summarised as;
 - Whether existing management is maintaining the potential of the stock to meet the reasonably foreseeable needs of future generations.
 - Whether existing management avoids, remedies or mitigates any adverse effects of fishing on the aquatic environment.
 - Whether existing management provides access that enables social, cultural and economic well-being.
7. Candidate stocks are those listed on Schedule 4C and 4D of the Fisheries Act, and those that have a relatively large or changing commercial catch. Hammerhead shark is the only species on the schedules with some recreational catch. Two values will be used to define a significant change for a given stock in the last three years:
 - Catch exceeding 20 tonnes for any of the 6 month periods and the difference in catch between the minimum and maximum 6 monthly totals exceeding fifty percent of the minimum 6 monthly total;
 - Catch exceeding 100 tonnes for any of the 6 month periods.Other proposed criteria include anecdotal information on sustainability or utilisation issues, international obligations or an adverse environmental effect on the marine environment.
8. Candidate stocks will be graded by MFish on the likelihood and severity of possible impacts of maintaining the existing management measures. How soon the impact may occur and the uncertainty in the information may also be considered.
9. The information used and results of the risk evaluation will be released as an Initial Position Paper (IPP) for consultation.
10. Finally a schedule of stocks for introduction to the QMS will be produced for the next three years. This will be reviewed annually with the introduction of new stocks and inclusion of new information where available for stocks that remain on the schedule.

Our Submission

11. There are few high value species that remain outside the QMS. Most of these are highly migratory species (HMS) like albacore and skipjack tuna. New Zealand only fishes part of their natural range. Management will be the responsibility of the Western and Central Pacific Fisheries Commission (WCPFC). The Standard must recognise that significant change in availability of HMS species in some 6 month periods is not a trigger for introduction under criteria 3 (Variation in Catch).
12. Anglers from around the country and around the world fish northern New Zealand for marlin over summer and autumn. New Zealand striped marlin are the largest in the world but our catch rates are low by international standards. Catch rates for Northland charter boats average about 0.25 striped marlin per vessel day (1 fish in 4 days) in a good year and there have definitely been more good years than bad since the regulation prohibiting the commercial harvest of marlin was introduced.¹ However, we have seen that following a few poor marlin seasons people fish less, club membership falls, and the economic benefits for our member clubs and regional economies, especially in Northland and the Bay of Plenty diminish. Currently regulations prohibit the retention of marlin on commercial vessels caught in New Zealand waters. The recreational fishers we represent are strongly opposed to the reestablishment of a commercial marlin fishery in New Zealand.

¹ Holdsworth et al 2003. Factors affecting striped marlin catch rate in the New Zealand recreational fishery. *Marine and Freshwater Research*. Volume 54, 473–83.

13. The QMS is a tool designed for managing commercial fisheries via TACC, ITQ and ACE. While an allowance can be made for non-commercial fishers for stock, the QMS cannot be used for allocating shares within the recreational fishery. Therefore there is no benefit from having species that cannot be landed by commercial fishers in the QMS. The only practical reason for introducing a species to the QMS would be to manage the commercial harvest.
14. We are concerned that the proposal will classify a species which has “exclusion of access to one or more sectors” and where this has “already occurred” as High Risk in the definitions of Severity and Likelihood. This may automatically make them candidate stocks for introduction.
15. Therefore we submit that the Ministry need to provide a mechanism that will make it clear that non-commercial species are not eligible for introduction to the QMS. If the Ministry want to change the status of any of those species prohibited for sale then first they should propose a review of those regulations through the annual consultation round. The QMS introduction standard must not be used as a backdoor means of commercialising these species.
16. There are also the 19 species of long lived, resident, reef fish that are currently non-commercial species. Some of these may also meet one of the criteria for introduction but are prohibited from sale to prevent target fishing over reefs in northern waters using set nets.
17. For species that are listed on the 3 year introduction schedule it is important to be able to update and review those stocks annually, where new information is available.

Summary

18. The QMS has been effective in restructuring the fishing industry and for managing some commercial fisheries. There is no benefit from having a non-commercial species in the QMS. The only practical reason for introducing a species to the QMS would be to manage the commercial harvest.
19. The QMS introduction standard needs to include a mechanism or classification that will make it clear that non-commercial species are not eligible for introduction to the QMS. This standard must not be used as a backdoor means of commercialising these species.

Thank you for the opportunity to express our views on the fisheries standards.

Jeff Romeril
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