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Sustainability Review 2019
Fisheries Management
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1 July 2020

Submission: Review of snapper and red gurnard TACs in FMA 7

Recommendations

That the Minister decides the following:

1. Snapper 7 -
    a. Increase the Total Allowable Catch (TAC) by 20%, from 545 to 655 tonnes (t).
    b. Retain the existing allowance set aside to allow for recreational fishing interests, at 250 t.
    c. Retain the existing allowance set aside to allow for Māori customary fishing interests, at 20 t.
    d. Take a precautionary approach and increase the allowance for other fishing related mortality from 25 t to 35 t which is 10% of the TACC.
    e. Increase the Total Allowable Commercial Catch (TACC) to 350 t.

2. Gurnard 7 –
    a. Increase the Total Allowable Catch (TAC) by 5%, from 1176 to 1233 tonnes (t).
    b. Retain the existing allowance set aside to allow for recreational fishing interests, at 38 t.
    c. Retain the existing allowance set aside to allow for Māori customary fishing interests, at 15 t.
    d. Take a precautionary approach and increase the allowance for other fishing related mortality from 50 to 107 t which is 10% of the TACC.
    e. Take a precautionary approach and retain the Total Allowable Commercial Catch (TACC) at 1073 t.
    f. Acknowledge that GUR 7 is a low information stock that needs precautionary management so a TACC review will occur only when the next trawl survey results are available.

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 snapper and red gurnard in Fisheries Management Area 7, 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. 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 representative 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.

Background

8. Snapper occupy a wide range of habitats, including rocky reefs and areas of mud and sandy bottom. They are serial spawners, releasing many batches of eggs during spring and summer. Snapper first reach maturity from 20 to 28 cm fork length at 3-4 years of age. Water temperature appears to play an important part in spawning success and subsequent recruitment of legal size fish. Generally, strong year classes correspond to warm years and weak classes correspond to cold years. The snapper from Tasman Bay/Golden Bay (and the west coast North Island) grow faster and reach a larger average size than elsewhere.

9. There is an updated stock assessment for SNA 7 showing a significant and sustained increase in biomass following some particularly good years of recruitment (young fish entering the fishery). Data from a long running trawl survey in FMA 7 also shows a large increase in the snapper stock about 2011, when massive recruitment from the 2007 spawning season showed up in the catch.

10. A management review in 2016 increased the TACC by 50 tonnes (t), recreational allowance by 160 t and customary allowance by 4 t. The large increase in recreational allowance was based on the first few months of a NIWA harvest survey which over estimated catch significantly. The National Panel Survey estimates made by NRB were 89 t in 2011-12 and 147 t in 2017-18. There was no significant difference in the number of recreational fishers reporting snapper catch or the number of snapper kept. Almost all the increase in harvest weight was driven by the boat ramp survey estimates of snapper average weight, which rose from 0.8 kg to 1.5 kg per fish.

11. Red gurnard have a fast growth rate and relatively short lifespan, and fluctuations in recruitment may result in large fluctuations in stock biomass. The Fisheries Plenary concluded that the trawl survey data since 1992 was a better index of trends in abundance than the commercial CPUE time series, however no new trawl survey data is available this year.

12. The catch limits for red gurnard in GUR 7 were increased in 2009 and 2012.
    - In 2015 the TAC was increased from 855 to 919 tonnes and the TACC was increased from 785 to 845 tonnes.
    - In 2017 the TAC was increased to 1065 tonnes and the TACC to 975 tonnes.
    - In 2019 the TAC was increased to 1176 tonnes and the TACC to 1073 tonnes and the recreational allowance increased to 38 t.

Proposals

13. Fisheries New Zealand propose the following options for the total allowable catch (TAC), total allowable commercial catch (TACC) and associated allowances for snapper in SNA 7 and red gurnard in GUR 7 (Table 1). These include proposing TACC increases of 50 or 100 t for snapper and 107 t for gurnard. No increases are proposed for the recreational or customary allowances. Submissions are due on 1 July. The discussion document is Here

Table 1: Current and proposed TACs, TACCs and allowances (tonnes) for snapper 7 and red gurnard 7.

Stock	Option	Total Allowable Catch	Total Allowable Commercial Catch	Allowances		
				Customary Māori	Recreational	All other mortality caused by fishing
SNA 7	Option 1 *(Status quo)*	545	250	20	250	25
	Option 2	545	300↑ (20%)	20	200↓ (20%)	25
	Option 3 (working group preferred)	645 ↑	350 ↑ (40%)	20	250	25
GUR 7	Option 1 *(Status quo)*	1,176	1,073	15	38	50
	Option 2	1,283 ↑	1,180 ↑ (10%)	15	38	50

Status of the SNA 7 stock

14. The submitters have had a representative at the inshore working group meetings reviewing the data inputs and results for the SNA 7 stock assessment. The assessment shows the stock was severely over fished in the late 1970s and failed to recover for 25 years. Between the mid 1980s and 2010 the stock was below the hard limit and a rebuild plan needed to be put in place. The TAC was reduced in 1989 but since then there was an increase in TAC in 1997 and the stock continued to decline until the early 2000s (Figure 1).

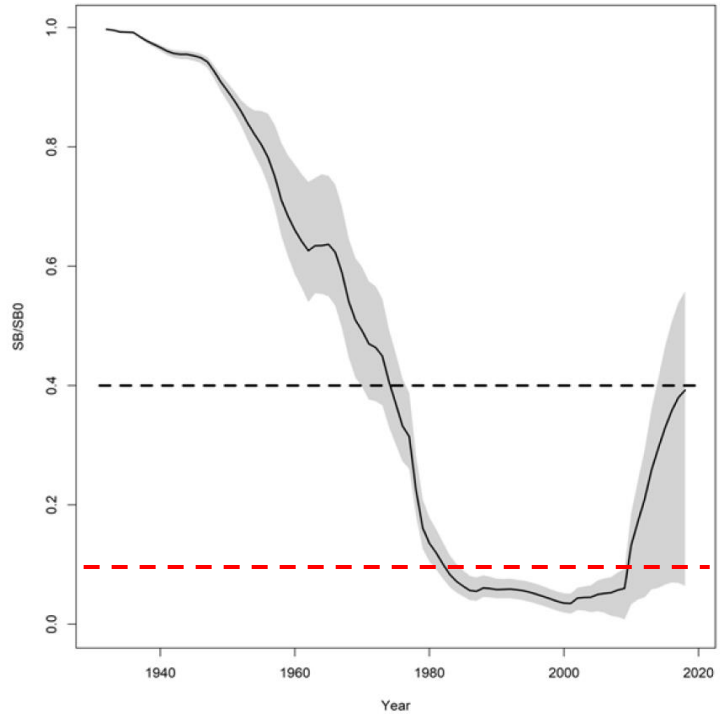

Figure 1: The spawning stock biomass (SB) estimated in the SNA 7 stock assessment model to 2019 plotted as a proportion of the unfished biomass in 1930. The shaded area represents the 90% confidence interval. The horizontal line represents the default target biomass level at 40% of the unfished level and the red dashed line represents the hard limit.

15. The rapid increase in abundance started when the 2007 year class entered the fishery in a big way in 2011. This has been followed by several other strong year classes observed in catch at age projects. The submitters accept the results of the SNA 7 stock assessment as the best available information, though some uncertainty remains about the strength of recent recruitment. On balance it seems likely that the stock will be at or above the interim target of 40% of the unfished biomass in 2020-21.

Submission SNA 7

16. Stocks that are below the hard limit must be closed and a time constrained rebuild plan implemented. This fishery was allowed to muddle on until nature produced a massive pulse of recruitment in the early 2000. In previous submissions NZSFC was concerned that the recruitment cycle may end. FNZ still need to consider this possibility.

17. Now that the interim target has been reached a TAC increase can be justified however, the submitters support harvest level that would continue to broaden the age structure and allow the stock to build resilience. The submitters support a management target of 50% of unfished biomass which is considered by many international experts to be the minimum to ensure a resilient population and to restore ecosystem function.

18. In most of our recent submissions we have preferred to support gradual increases in exploitation of rebuilding stocks with ongoing monitoring to ensure that the fisheries to not overshoot the sustainable yield. We have also agreed with most but not all options to set the recreational allowance close to current harvest estimates from the National Panel Survey. Often that has meant picking and mixing from the range of options available.

19. The recreational allowance was set at a time when there had been a sharp increase in abundance and availably in recreational snapper fishery and survey data from a few moths was extrapolated to give a harvest estimate that was too high. The submitters note that the National Panel Survey estimates of harvest increased significantly between 2011-12 and 2017-18, with almost all of this due to the increase in average size of snapper measured at boat ramps in targeted NIWA surveys.

20. Anecdotal reports of good catches of large snapper if fishers know where to go, and small snapper in some areas indicate recreational fishers are being more selective about where they fish and what the keep. The ongoing boat ramp surveys at Waikawa and Nelson will help track trends in boat traffic, catch rates and fish size.

21. The National Panel Survey estimated the landed recreational catch of 147 t plus or minus 16%. This gives a range of 123 t to 171 t. Almost all the increase in recreational harvest of snapper has been in Tasman and Golden Bays. The expansion of mussel farms is providing shelter and a ready food source for snapper, as well as new recreational fishing opportunities. The large recreational fishery in Marlborough Sounds has seen limited increase in snapper harvest so far. Snapper catch has also increasing along the West Coast.

22. There is a case for retaining head room in the SNA 7 recreational allowance. A negotiated position has been reached in the SNA 7 working group to retain the 250 t recreational allowance with the trade-off to facilitate a 100 t (40%) TACC increase rather than a more conservative 50 t (20%) TACC increase.

23. The submitters will support the working group preferred option of option 3 and ask the Minister and FNZ to support negotiations over protection of benthic habitats and snapper breeding areas by excluding trawling and dredging from inshore areas in SNA 7.

24. The submitters are deeply concerned about the effects of trawling on inshore biodiversity and productivity. If an increase in SNA 7 TACC is granted then the opportunity is there to try alternative fishing methods that protect benthic habitat, reduce resuspension of fine sediments, reduce the risk of catching Hectors dolphin and land high quality, high value fish.

25. The quota management system limits the ability of the Minister to prescribe fishing methods so spatial separation of methods in Tasman and Golden Bays would be required to provide a true test of alternative methods without disturbance from trawl gear.

26. This spatial separation may be particularly relevant as the Threat Management Plan for Hector's Dolphin introduces new set net closures from 1 October 2020 and some set net fishers may choose to switch to line fishing methods.

27. The submitters do support an increase in the allowance for other sources of fishing mortality (OSFRM) to 10% of the TACC for SNA 7. In 2019, the Minister indicated a preference for Fisheries New Zealand to move toward standardising OSFRM for inshore trawl fish stocks to 10% of their respective TACCs.

28. The submitters note that 80% of quota in GUR 7 is owned by four companies. Aggregation of quota is a serious flaw of current management that cannot be addressed while the quota management system exists. Aggregation is one of the contributing factors that led the submitters to develop the Rescue Fish policy as a viable alternative to the QMS.

Submission GUR 7

29. The catch limits for red gurnard in GUR 7 have already been reviewed three times in the last 5 years. This has increased the TAC by 38% with 90% of that as TACC increases. In 2019 the TAC was increased to 1176 tonnes and the TACC to 1073 tonnes. NZSFC opposed that increase based on the results of the 2019 trawl survey.

30. The submitters support the use of data from fishery independent surveys like the West Coast and top of the South Island trawl survey and believes they will become increasingly important as fishing gear and technology changes. The data shows that the trawl survey index from 2015 to 2019 is effectively at the same level if not slightly declining.

31. It is common that fish stocks like gurnard have natural cycles in abundance. A fundamental property of cycles is that they don't last. Significant increases in catch allowances when abundance is at a peak may exacerbate the decline when it comes. As abundance declines trawl effort can be targeted more effectively to catch the TACC.

32. There is no new independent survey data since 2019. At working group meetings on SNA 7 and FLA 7, commercial fishers said they have changed fishing gear and areas to avoid snapper and target gurnard. FNZ should absolutely expect gurnard catch and even CPUE to increase. Allowing increases in TAC each time the TACC is exceeded is a clear incentive to overfish stocks.

33. There was absolutely no incentive or need for commercial fishers to catch less that the TACC in 2018-19 because they under caught the TACC by 93 t in the previous year. This meant that they were able to carry forward 85 t of ACE, which more than covered the 22 t that they took on top of the TACC in 2018-19. In fact, commercial fishers carried forward a further 54 t into the 2019-20 fishing year.

34. There is no need or justification for a change to the GUR 7 TACC until after the next trawl survey results are available. The submitters oppose the TAC increase for GUR 7 and urge FNZ to apply the Information Principles in the Fisheries Act that require that caution be applied when making decisions, especially for low information stocks.

35. There also is no pressing need to change the allowance for recreational fishing interests as the allowance is 38 t and the recent National Panel Survey estimate is 38 t plus or minus 7 t.

36. The submitters do support an increase in the allowance for other sources of fishing mortality (OSFRM) to 10% of the TACC for GUR 7. In 2019, the Minister indicated a preference for Fisheries New Zealand to move toward standardising OSFRM for inshore trawl fish stocks to 10% of their respective TACCs. Fisheries NZ are well aware that there is no size limit for gurnard in the Fisheries (Commercial Fishing) Regulations and the long-standing practice on commercial boats of illegally discarding small gurnard which have a low market value.

37. The submitters note that 82% of quota in GUR 7 is owned by four companies. Aggregation of quota is a serious flaw of current management that cannot be addressed while the quota management system exists. Aggregation is one of the contributing factors that led the submitters to develop the Rescue Fish policy as a viable alternative to the QMS.