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## **NZ Sport Fishing Council submission on the draft National Plan of Action for the Conservation and Management of Sharks**

### **NZ Sport Fishing Council**

1. The New Zealand Sport Fishing Council appreciates the opportunity to submit to the Ministry for Primary Industries (MPI) on management options for the southern bluefin tuna. MPI released their proposals on 11 November 2013 with submissions due by 29 November 2013.
2. 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 Roz Nelson, [secretary@nzsportfishing.org.nz](mailto:secretary@nzsportfishing.org.nz).
3. The NZ Sport Fishing Council is a national sports organisation with over 32,000 affiliated members from 55 clubs nationwide.
4. The New Zealand Sport Fishing 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)
5. The intention is to broaden NZSFC involvement in marine management advocacy, research, education and working together on behalf of our members and LegaSea supporters.
6. 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]

## Summary of NZSFC Submission

1. NZSFC is opposed to the finning of HMS sharks and the discard of the body at sea.
2. If sharks are to be landed, the NZSFC supports landing of HMS sharks with fins naturally attached, in accordance with international best practice.

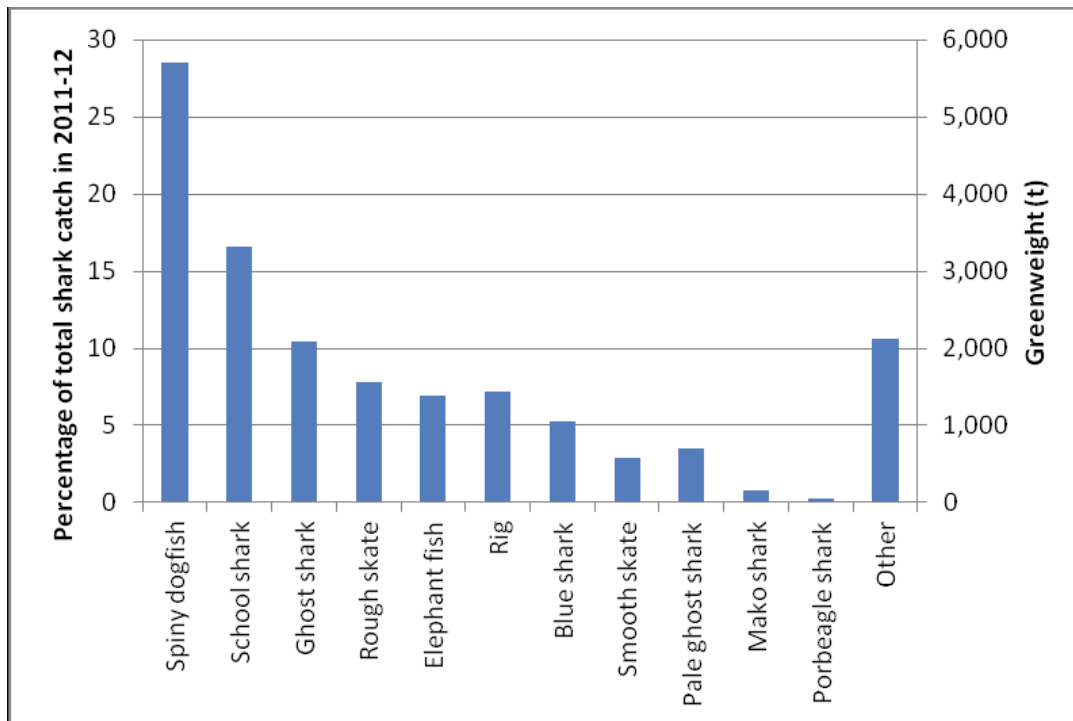
## Purpose of the NPOA Sharks

3. The Ministry for Primary Industries (the Ministry) has produced an updated National Plan of Action for Sharks (NPOA-Sharks 2013) to document New Zealand's planned actions for the conservation and management of sharks, consistent with the overarching goal of the IPOA-Sharks. The Ministry was assisted in developing the plan by other government departments including the Department of Conservation and the Ministry of Foreign Affairs and Trade, and by a range of stakeholders, all of whom have an interest in the conservation and management of sharks. Recreational fishers were not on the planning group.
4. The purpose of the NPOA-sharks 2013 is:  
To maintain the biodiversity and the long-term viability of all New Zealand shark populations by recognising their role in marine ecosystems, ensuring that any utilisation of sharks is sustainable, and that New Zealand receives positive recognition internationally for its efforts in shark conservation and management.

The NPOA-Sharks 2013 identifies goals and five-year objectives in the following key areas as

- Biodiversity and long-term viability of shark populations
  - Utilisation, waste reduction and the elimination of shark finning
  - Communication and education
  - Non-fishing threats
  - International engagement
  - Research and information
5. New Zealand has a responsibility to act in accordance with the objective of the International Plan of Action for the Conservation and Management of Sharks, which is to ensure the conservation and management of sharks and their long-term sustainable use.
  6. New Zealand must also act in accordance with the conservation and management measures of the Western and Central Pacific Fisheries Commission and the Commission for the Conservation of Southern Bluefin Tuna.
  7. This plan updates the first New Zealand NPOA Sharks completed in 2008. The term 'sharks' generally includes all species in the Class Chondrichthyes, which includes all cartilaginous fish such as sharks, skates, rays, and chimaeras.

<http://www.fish.govt.nz/en-nz/Environmental/Sharks/default.htm>



**Figure 1. The catch of QMS (89.5%) and ‘other’ sharks as a percentage of the total reported shark catch in 2011-12 (total 20 165t). The ‘Other’ category includes 40 shark species, some reported under generic codes and is likely to under-represent removals to some extent due to unrecorded discarding of minor species (non-QMS stocks may legally be returned to the sea).**

### Submission on the draft NPOA Sharks 2013

8. NZSFC have engaged in the management of highly migratory species (HMS) for many years and have been actively involved in the Highly Migratory Species Working Group and Highly Migratory Species Fisheries Plan Working Group. Public attention has focused on the HMS sharks and the practice of removing fins at sea. This is also the main issue of concern for our members. The catch and processing of dogfish, school shark, and skate is of less concern as long as stocks are sustainably managed and the fishery has limited impact on the ecosystem.
9. NZSFC is opposed to the finning of HMS sharks and the discard of the body at sea.
10. If sharks are to be landed, the NZSFC supports landing of HMS sharks with fins naturally attached, in accordance with international best practice.
11. NZSFC comments in relation to the NPOA goals and five year objectives follow:

***1. Maintain the biodiversity and long-term viability of New Zealand shark populations based on a risk assessment framework with assessment of stock status, measures to ensure any mortality is at appropriate levels, and protection of critical habitat.***

NZSFC supports a risk assessment for sharks with a focus on high risk species. For most HMS sharks there is insufficient data for a stock assessment. For the few species where reasonable catch records exist a stock assessment to establish  $B_{MSY}$  or other MSY – based reference points would have to be for the whole stock in the southwest Pacific and management measure would have to apply to the whole stock.

NZSFC keeps good records of the catch of HMS sharks by affiliated members. These will continue to be available to MPI.

There is widespread support within the NZSFC for “*best practice mitigation of risks and live release where appropriate.*”

***2. Encourage the full use of dead sharks, minimise unutilised incidental catches of sharks, and eliminate shark finning in New Zealand.***

NZSFC supports the elimination of shark finning in New Zealand, particularly for HMS sharks and better utilisation of dead sharks.

NZSFC believes that there has been a significant impact of fishing on HMS sharks and swordfish in northern New Zealand during the early 2000s when domestic longline effort peaked. Certainly the targeted catch and bycatch of mako, blue shark, porbeagle, hammerhead and thresher sharks declined during that period.

There is an issue with the vulnerability of sharks to the surface longline method. We support the intent to avoid or minimise captures of HMS sharks but where longlining is concerned it may take more than best practice guidelines or requirements to avoid catching them. If the method is catching 100 sharks as unwanted bycatch for each tuna (target species) at the beginning of the season then it is the wrong method for that time and area. As southern bluefin tuna numbers rebuild fishing methods that are more selective such as hand lining and deep trolling could eliminate shark and seabird mortality while maintaining the catch of high quality fish.

What is the point of eliminating the landing of fins only if tens of thousands of sharks are killed and dumped so that longline baits are available for tuna or swordfish?

NZSFC will assist with the objective to “*Develop and implement best practice guidelines for non-commercial fishing and handling of sharks.*”

***3. All commercial, recreational and customary fishers and interested members of the New Zealand public know about the need to conserve and sustainably manage shark populations and what New Zealand is doing to achieve this.***

NZSFC supports the dissemination of information on both the importance of sharks in the marine ecosystem and future management changes.

***4. New Zealand’s non-fishing anthropogenic effects do not adversely affect long-term viability of shark populations and consideration is given to environmental impacts.***

We agree non-fishing human induced effects are not well understood, but may be less of an issue for HMS sharks.

***5. New Zealand actively engages internationally to promote the conservation and protection of sharks, the management of fisheries that impact upon them, and the longterm sustainable utilisation of sharks.***

NZSFC supports New Zealand’s engagement in international research and management of sharks.

6. ***Continuously improve the information available from New Zealand vessels and fishers to conserve sharks and manage fisheries that impact on sharks, with prioritisation guided by the risk assessment framework.***

NZSFC supports improved information on shark biology and catch and will continue with tag and release of HMS sharks. We will encourage affiliated club members to report sightings of hammerhead sharks and to tag and release any that are caught, to assist the current research project.

**Background** From Griggs, L.R.; Baird, S.J.; Francis, M.P. (2007). Fish bycatch in New Zealand tuna longline fisheries 2002-03 to 2004-05. New Zealand Fisheries Assessment Report 2007/118.58 p.

**Table 5: Numbers of fish reported by observers during 2002–03, 2003–04, and 2004–05, and the total observed catch since 1988–89. Numbers for porbeagle and mako sharks are from 1992–93 when observers could reliably distinguish these two species. Species are ranked in descending order of abundance since 1988–89.**

Species	Scientific name	2002-03	2003-04	2004-05	Total
Blue shark	<i>Prionace glauca</i>	7 078	10 713	9 387	137 093
Albacore tuna	<i>Thunnus alalunga</i>	32 160	4 164	3 705	89 285
Ray's bream	<i>Brama brama</i>	6 424	11 845	8 423	64 029
Southern bluefin tuna	<i>Thunnus maccoyii</i>	1 700	2 064	1 159	31 601
Porbeagle shark	<i>Lamna nasus</i>	423	714	359	16 483
Dealfish	<i>Trachipterus trachipterus</i>	1 901	908	148	14 701
Lancetfish	<i>Alepisaurus ferox</i> & <i>A. brevirostris</i>	703	314	335	8 362
Moonfish	<i>Lampris guttatus</i>	736	279	453	7 289
Oilfish	<i>Ruvettus pretiosus</i>	83	90	209	6 706
Deepwater dogfish	Squaliformes	518	1 050	347	6 669
Swordfish	<i>Xiphias gladius</i>	188	396	466	5 622
Rudderfish	<i>Centrolophus niger</i>	420	739	156	4 455
Mako shark	<i>Isurus oxyrinchus</i>	334	289	421	4 242
Bigscale pomfret	<i>Taractichthys longipinnis</i>	1 010	1 077	979	4 201
Butterfly tuna	<i>Gasterochisma melampus</i>	125	81	89	3 786
Escolar	<i>Lepidocybium flavobrunneum</i>	1 111	638	64	3 641
Yellowfin tuna	<i>Thunnus albacares</i>	1 822	9	88	3 236
School shark	<i>Galeorhinus galeus</i>	113	257	274	3 148
Bigeye tuna	<i>Thunnus obesus</i>	652	236	62	2 929
Hoki	<i>Macruronus novaezelandiae</i>	216	239	97	1 736
Ray, unidentified	Torpediniformes	632	59	43	1 670
Sunfish	<i>Mola mola</i>	91	196	103	1 629
Thresher shark	<i>Alopias vulpinus</i>	165	120	71	1 188
Skipjack tuna	<i>Katsuwonus pelamis</i>	783	13	5	1 106
Dolphinfish	<i>Coryphaena hippurus</i>	204	3	2	463
Striped marlin	<i>Tetrapturus audax</i>	17	6	25	405
Barracouta	<i>Thyrsites atun</i>	2	3	3	344
Flathead pomfret	<i>Taractes asper</i>	125	54	4	341
Black barracouta	<i>Nesiarchus nasutus</i>	22	19	4	330
Shark, unidentified	Selachii	12	2	1	188
Pacific bluefin tuna	<i>Thunnus orientalis</i>	9	8	12	183
Slender tuna	<i>Allothunnus fallai</i>	3	4	4	155
Hapuku and bass	<i>Polyprion oxygeneios</i> & <i>P. americanus</i>	8	23	32	152
Shortbill spearfish	<i>Tetrapturus angustirostris</i>	65	1	1	122
Bronze whaler shark	<i>Carcharhinus brachyurus</i>	1	8	60	119
Cubehead	<i>Cubiceps</i> sp.	0	72	45	118
Ray, unidentified	Myliobatiformes	0	4	5	89
Kingfish	<i>Seriola lalandi</i>	7	3	1	78
Frostfish	<i>Lepidopus caudatus</i>	70	1	0	77
Wahoo	<i>Acanthocybium solandri</i>	69	0	0	70
Opah	<i>Lampris immaculatus</i>	1	6	0	65
Fanfish	<i>Pterycombus petersii</i>	9	2	1	60
Snipe eel	Nemichthyidae	3	3	1	52
False frostfish	<i>Paradiplospinus gracilis</i>	36	0	0	40
Bigeye thresher	<i>Alopias superciliosus</i>	1	0	13	35
Wingfish	<i>Pteraclis velifera</i>	2	5	1	33
Hake	<i>Merluccius australis</i>	4	6	5	32

**Table 7: Percentage of main non-target species that were alive or dead when observed during the 2002–03, 2003–04, and 2004–05 fishing years, by fleet, region, and fishing year. Small sample sizes (number observed < 20) omitted. 1. Sharks.**

Species	Fleet	Area	Year	% alive	% dead	Number	
Blue shark	Charter	North	2002–03	95.8	4.2	285	
			2003–04	92.2	7.8	115	
			2004–05	94.6	5.4	572	
		South	2002–03	93.2	6.8	4 730	
			2003–04	94.1	5.9	5 486	
			2004–05	95.2	4.8	3 239	
	Philippine Domestic	North	2002–03	97.0	3.0	722	
			2003–04	78.7	21.3	1 271	
		South	2003–04	87.5	12.5	24	
			2004–05	99.5	0.5	201	
<b>Total</b>			<b>92.7</b>	<b>7.3</b>	<b>18 915</b>		
Deepwater dogfish	Charter	South	2002–03	95.3	4.7	507	
			2003–04	95.8	4.2	997	
			2004–05	83.7	16.3	166	
	<b>Total</b>			<b>94.4</b>	<b>5.6</b>	<b>1 674</b>	
Porbeagle shark	Charter	North	2004–05	83.5	16.5	109	
			South	2002–03	66.9	33.1	363
				2003–04	67.2	32.8	366
	Domestic	North	2004–05	88.9	11.1	135	
			2003–04	64.8	35.3	295	
			2004–05	58.6	41.4	99	
<b>Total</b>			<b>69.0</b>	<b>31.0</b>	<b>1 419</b>		
Mako shark	Charter	North	2004–05	97.1	2.9	105	
			South	2002–03	88.7	11.3	71
		North		2003–04	92.1	7.9	76
			South	2004–05	93.1	6.9	29
	Philippine Domestic	North		2002–03	87.1	12.9	217
			2003–04	76.6	23.4	188	
			2004–05	76.6	23.4	273	
<b>Total</b>			<b>84.0</b>	<b>16.0</b>	<b>1 004</b>		