



11 February 2019

New Zealand Sport Fishing Council
C/- secretary@nzsportfishing.org.nz
Attention: Bob Gutsell

Regarding: 2019 Review of Rock Lobster TACs in CRA3, 4 & 8

Thank you for your recent correspondence seeking discussion of the joint submission by NZSFC, Legasea, and NZSF regarding the above topic.

Spearfishing New Zealand (SNZ) is an Incorporated Society. The committee is authorised by our constitution to represent the interests of freedive spearfishers in New Zealand. We support initiatives that we consider are beneficial to our members and will contribute to rebuilding fisheries to a healthy level that will support better utilisation of our marine resources.

The SNZ committee has perused the joint submission. **We support for the joint submission presented by NZSFC/Legasea/NZSF.** We are particularly concerned that:

- The continued size limit concession for commercial fishers disadvantages the recreational sector and in the case of stocks with increasing CPUE, the concession should be removed before considering increasing TACC
- Reports of reducing stock productivity in the lower North Island, contradictions between MPI reported stock sizes and vulnerable biomass, and gear/targeting behaviour changes all indicate to us that the current management plans are founded on incorrect data. If that is correct, then current management responses are incorrect and must be re-calculated.
- Crayfish are an important target catch for our members. Nationwide, we consider the stocks have for many years been managed to suit the interests of NZRLG, against the interests of the recreational sector. We do not consider these stocks are being maintained in a plentiful state.

- We do not support increased commercial exploitation of stocks that we consider to still be depleted (as shown by the NZSFC submission). We request these stocks should be re-evaluated in the framework of the Harvest Strategy Standard for a long-lived species with current scientific data.

Regards,

Reid Quinlan
Secretary
Spearfishing New Zealand