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Sustainability Review 2021
Fisheries Management
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5 February 2021

Review of Flatfish 2 (FLA 2) management measures for 2021/22

Recommendations

The Minister –

1. Sets the FLA 2 Total Allowable Commercial Catch at a level equivalent to the average commercial catch over the last 10 years, about 200 tonnes per annum.
2. Initiates a process to split the FLA 2 Quota Management Area into separate management areas based on the separate fisheries.
3. Reviews the fishery and sets new area based management with revised commercial catch limits, CPUE and recreational harvest estimates in 3 years time.
4. Rejects option 3 proposed in the Discussion Paper No: 2020:28 for FLA 2.

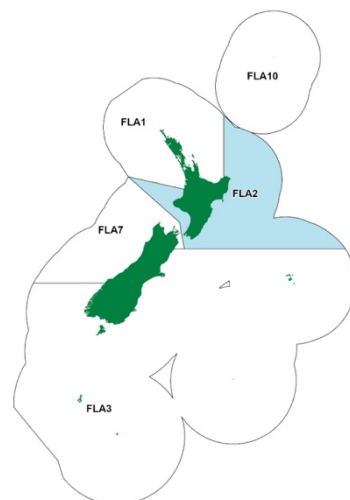
The submitters

5. The New Zealand Sport Fishing Council (NZSFC) appreciates the opportunity to submit on the proposals for the future management of Flatfish 2 (FLA 2) for 2021/22. Fisheries New Zealand (FNZ) advice of consultation was received on 9 December 2020, with submissions due by 5 February 2021.
6. The NZ Sport Fishing Council is a recognised national sports organisation of 55 affiliated clubs with over 36,200 members 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.
7. The New Zealand Angling and Casting Association (NZACA) is the representative body for its 35 member clubs throughout the country. The Association promotes recreational fishing and the camaraderie of enjoying the activity with fellow fishers. The NZACA is committed to protecting fish stocks and representing its members' right to fish.

8. Collectively we are *'the submitters'*. The joint 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].
9. Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from these reviews and would like to be kept informed of future developments. Our contact is Helen Pastor, secretary@nzsportfishing.org.nz.

Background

10. Flatfish 2 is a large Quota Management Area (QMA) extending from Cape Runaway to Tirua Point (FMAs 2 and 8). FLA 2 quota covers eight species of flounder, sole, brill and turbot.
11. In FMA 2 most of the catch is taken by trawling from Hawke’s Bay to Gisborne with the main species being sand flounder and New Zealand sole. There is also the much less common black flounder which is a species with a long history of importance to Iwi in the Hawkes Bay area. Some catch is taken by setnet in southern North Island areas. These combined species were introduced to the Quota Management System (QMS) in 1986 with a Total Allowable Commercial Catch (TACC) of 670 tonnes (t), which increased to 726 t (9%) following Quota Appeal Authority hearings.
12. Most flatfish are fast growing and short lived and abundance can vary from year to year. The TACC for FLA 2 is the smallest of the main QMAs and was initially set about double the average catch from the mid-1980s, to allow for increased catches of flatfish in years of higher abundance.
13. The TACC has never been fully caught in the last 34 years and there has been a long-term decline in commercial landings in FLA 2.



FNZ Proposals

14. Fisheries New Zealand (FNZ) propose significant cuts for the TACC while retaining current customary and recreational allowances. Option 2 would bring the TACC down to estimates of average commercial catch reported over the last 10 years. Option 3 is based on catch in 2016-17 and will constrain future catch near current catch levels, and limit utilisation in all of FLA 2.

Table 2: Summary of current and proposed catch settings for FLA 2 from 1 October 2021. All figures are in tonnes. Figures in parentheses indicate the change from current settings.

Option	TAC	TACC	Allowances		
			Customary Māori	Recreational	All other mortality caused by fishing
Current settings	-	726	-	-	-
1 (Set a TAC & allowances)	782	726	10	10	36
2	230	200 ↓ (526 t)	10	10	10
3	163	136 ↓ (590 t)	10	10	7

Submission

15. The submitters support removing the head room from over allocated TACCs that fail to manage commercial harvest in any effective way. Flatfish were one of a number of species that were assumed to have highly variable recruitment and abundance, and which had excessive quota tonnages set in the 1980s.
16. Most the data used to monitor the FLA 2 fishery comes from two of the eight FLA species and from specific areas in Hawke's Bay and the Gisborne area. There is likely to be a strong spatial influence on catch rates and total catch in these areas. No spatial data was used in the FLA 2 Catch Per Unit of Effort (CPUE) standardisation because of misreporting of catch and effort in statistical area 14, off Napier, prior to the introduction of the more detailed Trawl Catch Effort Return in 2008. There is evidence of some spatial effects in NZ sole and sand flounder CPUE since 2008 but data are limited.
17. There is no quantitative stock assessment that can inform the status of the flatfish stocks or predict the effect of limiting catch. There are too many species and areas for a start within the large FLA 2 Quota Management Area. Trawl catch per unit effort (CPUE) is often not a reliable index of abundance for bycatch species and there have been many changes in net design and in mesh size since 1990.
18. The recreational and customary Maori fisheries for flatfish are also long established and highly valued. It appears that recreational catch has increased in recent years in FMA 8 (6.0 tonnes with a CV of 0.43) on the west coast of the North Island according to the results of the 2017-18 National Panel Survey. The recreational harvest estimate for all of FLA 2 was 9.1 tonnes (CV 0.41). The submitters support retaining the current 10 tonne allowance set aside to allow for recreational fishing interests and 10 tonnes for Maori customary fishing interests.
19. The submitters support a conservative approach to setting the Total Allowable Catch (TAC) and Total Allowable Commercial Catch (TACC) in FLA 2. The catch decline in the main target fishery and data used in the CPUE analysis comes from a relatively small core area in Hawke's Bay (Figure 11) of a large QMA around the lower half of the North Island. It appears from the published catch analysis that there are large areas in FLA 2 where the populations are seldom fished. Specific measures need to be taken to protect the viability of the black flounder population in Hawke's Bay however, a TAC reduction on its own is not sufficient.
20. The submitters have developed the Rescue Fish policy package as an alternative to the Quota Management System. Rescue Fish seeks to rebuild depleted fish stocks and restore biodiversity. To achieve those outcomes mobile, bottom contact bulk harvesting methods such as trawling and dredging will be prohibited from the inshore zone. In the interim, this submission supports a conservative TAC and smaller quota management areas, both elements of the Rescue Fish policy.

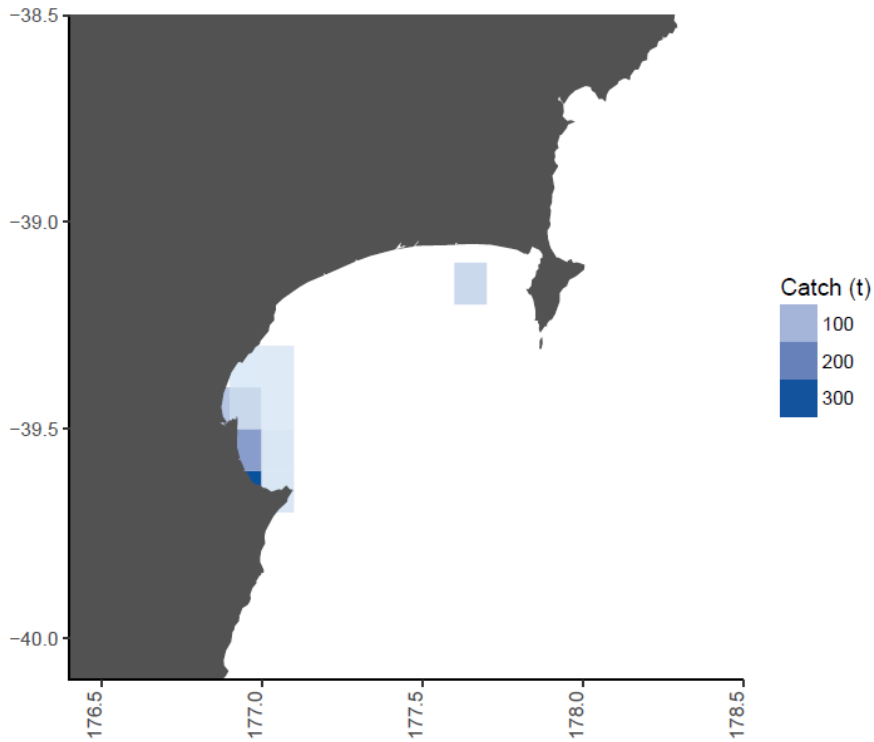


Figure 11: The spatial distribution of catch within FLA 2, based on TCER data. Catches are aggregated to 0.1° x 0.1° cells, and only cells with at least 20 records between the 2008 and 2016 fishing years are displayed.

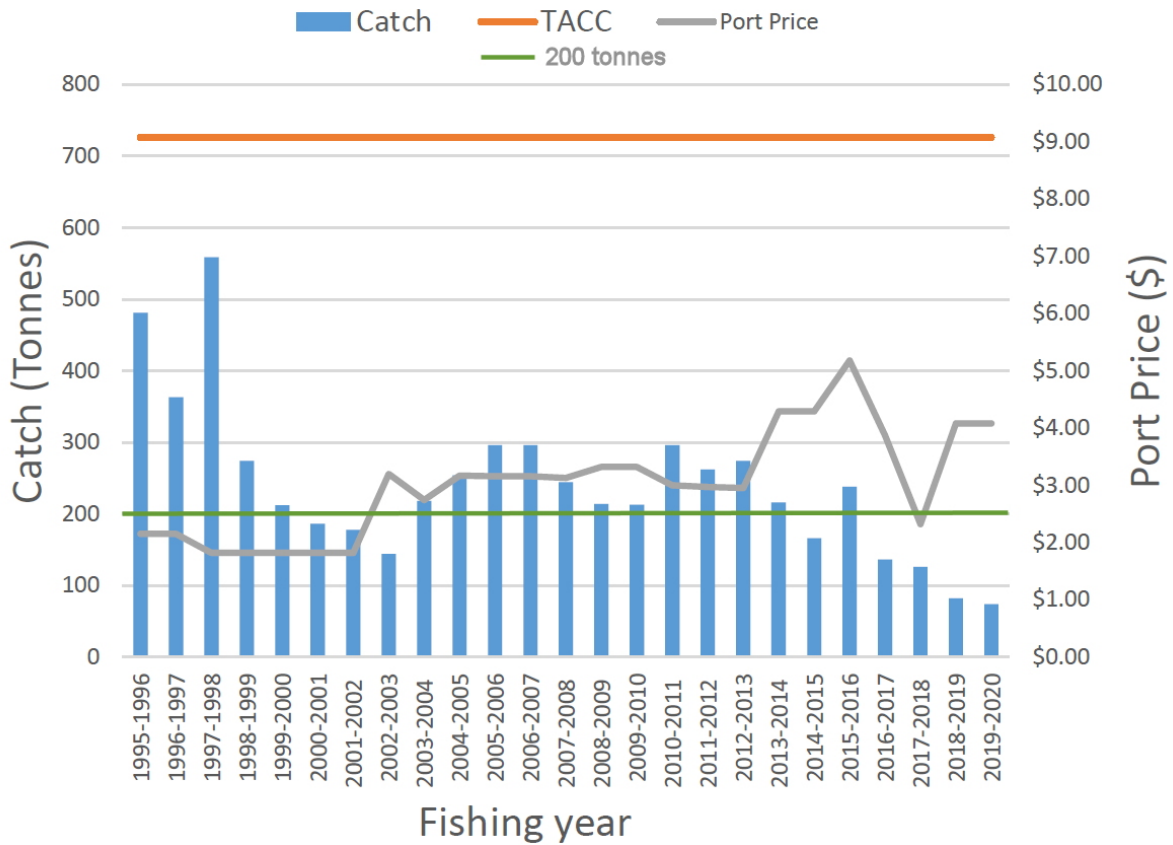


Figure 2: Annual commercial catch of flatfish in FLA 2 since 1995 (blue) with current TACC in orange and option 2 in green. Average port price calculated by Fisheries New Zealand in grey.

21. The submitters support a staged approach to the sustainable management of this fishery. To achieve that the Minister must -
 - a. Set the TACC at the average FLA 2 commercial catch over the last 10 years, about 200 tonnes. This will allow core fishers to remain viable and avoid the use of in-season adjustments which are inefficient and not suitable in the areas where most of the catch is landed.
 - b. Initiate a process to split the FLA 2 QMA into separate management areas based on the separate fisheries. Splitting quota by area and obtaining agreement from the required proportion of quota holders will be easier with an adequate and realistic TACC.
 - c. Review the fishery and set new area based management with revised commercial catch, CPUE and recreational harvest estimates in three years time.
22. The submitters do not support option 3, which proposes a TACC of 136 tonnes based on commercial catch in the 2016-17 fishing year. This makes almost no allowance for fluctuations in abundance or fisheries inside or outside the core area. The Quota Management System fails to manage stocks where quota is over allocated and fails to equitably allow for independent commercial fishers who have personal quota holdings when large reductions in TACC are made.
23. There is public support for local, high value fisheries if they are well operated and managed. We note that some commercial fishers who have invested considerable time and money in innovative catch and marketing initiatives are frustrated by the lack of support from the fishing industry and government agencies.
24. If we aspire to having abundant fisheries we must firstly set realistic catch limits and better manage our fisheries to meet the social, economic and cultural needs of the communities that are committed to innovating and protecting the value of these fisheries for future generations.