



Fisheries New Zealand

Tini a Tangaroa

Public Submissions Received for the 2021 October Sustainability Round

Part 3 of 4: Submissions on SNA 8 and GUR 1 proposals.

August 2021

List of Submissions & Responses for the 2021 October sustainability round

Part 3 of 4: Submissions on SNA 8 and GUR 1 proposals.

Other parts not included here:

Part 1 of 4: Multi-stock submissions from large representative bodies and organisations.

Part 2 of 4: More multi-stock submissions and submissions on the deemed values paper and southern bluefin tuna (STN 1).

Part 4 of 4: Submissions on all other stock proposals, and LegaSea form submissions.

Name/Organisation	Relevant stock proposals
Nga Hapu o Te Uru o Tainui Fisheries Forum	SNA 8, GUR 1
A. Brooks and L. Lawrence, Brooks seafood ltd.	SNA 8, GUR 1
Waikato Tainui, Te Arataura	SNA 8, GUR 1
R. Takerei, Tangata Kaitiaki Marokopa paa	SNA 8, GUR 1
P. Nicklin	SNA 8, GUR 1
C. Nicklin	SNA 8, GUR 1
M. Nicklin	SNA 8, GUR 1
G. Mackay	SNA 8, GUR 1
J. Steele	SNA 8, GUR 1
Kevin	SNA 8, GUR 1
M. Langdon	SNA 8, GUR 1
B. Dunn	SNA 8, GUR 1
B. Gillies	SNA 8, GUR 1
Ngati Kahu O Torongare / Te Parawhau Hapu Iwi Trust	SNA 8
NZ Marine Sciences Society	SNA 8
Wellington Recreational Marine Fishers Association	SNA 8
Spearfishing NZ	SNA 8
Sea Shepherd New Zealand	SNA 8
Egmont Seafoods	SNA 8
Brown and Hayman Fisheries Ltd	SNA 8
The Big Fishing Club (IGFA)	SNA 8
Forest and Bird NZ, Northern Branch	SNA 8
Mana Cruising Club	SNA 8
Guardians of Kāpiti Marine Reserve Trust	SNA 8
Raglan Seafood	SNA 8
Raglan Sport Fishing Club	SNA 8
Mana Aquatic Divers Inc.	SNA 8
Ocean Pearl Fisheries Ltd.	SNA 8
Dr. A. Towns	SNA 8
S. Taylor	SNA 8
M. Watson	SNA 8
L. Rotherham	SNA 8
K. Snow	SNA 8
S. Greene	SNA 8
P. Cane	SNA 8
T. Martin	SNA 8
B. Olliver	SNA 8
B. Gray	SNA 8
A. Russell	SNA 8
P. Garry Powell	SNA 8
S. Robert Demler	SNA 8
K. Al-Darra	SNA 8
D. Rameka	SNA 8
D. Marshall and M. Hishon	SNA 8
F. Michael brown	SNA 8

T. Haynes	SNA 8
R. Lahav	SNA 8
T. Aldrich	SNA 8
W. Fairweather	SNA 8
S. Russell	SNA 8
B. Bailey	SNA 8
N. Ward (Mako Sub Aqua / NZ Underwater)	SNA 8
K. Oxenham	SNA 8
M. Nelson	SNA 8
C. Hendricks	SNA 8
B. Pepping	SNA 8
R. Cooper	SNA 8
S. Campbell	SNA 8
A. Wallace	SNA 8
T. Simhony	SNA 8
S. Nicol	SNA 8
M. Laing	SNA 8
T. Hewetson	SNA 8
B. Rolston	SNA 8
R. Soar	SNA 8
C. Connor-Kingi	SNA 8
arnoldm86	SNA 8
A. Stretton	SNA 8
K. Blockley	SNA 8
C. Bridgman	SNA 8
G. Cummerfield	SNA 8
N. Cameron	SNA 8
A. Dawn	SNA 8
G. Grant	SNA 8
N. Colbert	SNA 8
L. Jenkins	SNA 8
J. Ann Calder	SNA 8
B. Cornish	SNA 8
P. Mulligan	SNA 8
M. Wilson	SNA 8
B. Scahill	SNA 8
B. Newsome	SNA 8
R. Davidson	GUR 1
C. Inder	GUR 1

2021 Sustainability Review
Fisheries Management
Fisheries New Zealand
PO Box 2526
Wellington 6140
New Zealand.
FMsubmissions@mpi.govt.nz

Name: Angeline Greensill
Organisations: Nga Hapu o Te Uru o Tainui

Submission: Review of Sustainability Measures for Snapper (SNA 8) for 2021/22.

Introduction :

Thank you for the opportunity to comment on the Fisheries NZ discussion paper No: 2021/109. "Review of Sustainability Measures for Snapper (SNA 8) for 2021/22"

Nga hapu o te Uru o Tainui (NHOTU) is a customary fishing forum established in 1999 after the passing of the 1986 Fisheries Act and the passing of the Treaty of Waitangi Fisheries Claims Settlement Act 1992. (TWFCSA).



In 2010 Members of NHOTU were appointed as Kaitiaki by marae to represent customary interests within gazetted Rohe Moana. Over the past 21 years NHOTU members have written submissions, participated in numerous hui, contributed to Fish plans, Threat Management plans and sustainability rounds about commercially valuable fish species.

Since that time we have witnessed decisions being made based solely on science without due weight being given to tangata whenua matauranga developed over the centuries. We look forward to our ecological view of the marine world being acknowledged one day.

NHOTU meets monthly with MPI and we note that some of the comments made during our last two hui regarding the Snapper 8 Review have been included in the discussion document under 6 Treaty of Waitangi Obligations..

We agree with the statements made by NHOTU as reported on page 5. In addition to the following comments.

Options

Fisheries New Zealand (FNZ) has proposed four potential options to increase the Total Allowable Commercial Catch (TACC) of 1300 tonnes. They propose to increase the TACC by either 25, 50, 75 or 100%. Customary and Recreational allowances would also increase. This means that those three Fishing fleets who dominate the Fishing Industry benefit the most.

Recommendation : Option 5 No increase

Increasing the Snapper quota means more trawling effort impacts negatively on the benthic communities on the sea floor who will be treated as collateral damage. Species affected by the proposed snapper increase include red gurnard, tarakihi, john dory, juvenile hāpuku and trevally. Many of these taonga species are listed in the NHOTU Fish Plan and should be fished conservatively to aid recovery.

Any increase of Snapper TACC will only benefit those who hold 28n rights of snapper 8 like Sandfords, Moana Pacific and others who were granted ITQ's.

Recommendation

NHOTU do not support an increase in the Snapper quota at this stage without supporting information regarding other species who inhabit the same ecosystem and are likely to be affected eg. Tarakihi, Gurnard.

Alternative Fishing Fleets

Young Maori trawlermen who are owner fishermen catching fish for local consumption, do not benefit from this increase as they have no quota to rely on. So more snapper, means more quota for the main Corporate fleets.

If despite our recommendation, the Minister decides to increase the allowances, than as a party to Te Tiriti o Waitangi tangata whenua would expect an increase in line with the recreational to take into account Pataka and the cultural obligations to

whanau, hapu and iwi to provide kai. We would also expect the last two Maori trawler fishermen in Kawhia harbour, (who are more endangered than the Maui Dolphin) to have access to ACE or special permits to retain and practice Maturanga Maori at sea, as the current arrangement under the QMS/TACC system is unfair.

Fisheries Characteristics

Many whanau members fish customarily to feed whanau. While the Act classifies this activity as recreational fishing, Maori carrying on the age-old tradition of 'subsistence' fishing in specific whanau spots to feed whanau, consider this custom. The increased amounts required for major events like tangi or poukai are also fished according to custom but are recorded in permits issued by kaitiaki to satisfy Fisheries regulations.

Page 24 states that harbour fishers encounter on average smaller snapper. That has not been my experience at the harbour entrance in Whaingaroa. I photographed these Snapper around June last year. They were being hauled in off the beach, every 3 -4 minutes.



In 1986 snapper had been almost fished out. (8-12% biomass). Now that the fishery has recovered, the monopolists in the fishing industry are waiting in anticipation for an increase in TACC and more money in the bank.

Recommendation

The 28N rights be abolished or depreciated in value and a new system of allocation be introduced to ensure those small whanau fishermen, with Treaty of Waitangi rights to customarily fish can do so and the environment and fishery can be sustained.

Snapper 8

Snapper 8 is far too big

Recommendation

NHOTU have requested over the past two decades that MPI create smaller local Quota Management Areas.

Other Fish

Gurnard – We do not support a TACC for Gurnard.

Conclusion

The QMS has been in existence since 1986 because the New Zealand government wanted to limit the number of commercial fish species being caught. Information used to set limits come from the fishing industry and research, not from hapu and iwi. The QMS is a flawed system as it discriminates against tangata whenua who weren't in commercially or were small individual fishermen, when the system was created. The coastal marine environment and all species in it are within the domain of Tangaroa. The rights of Tangaroa have priority over property rights created under the QMS.

Submission Form

Review of Sustainability measures for 1 October 2021

Name of Submitters: Ali Brooks & Leon Lawrence

Organisations: Brooks Seafood Ltd & Awaroa Fisheries Ltd

Fish Stocks Snapper 8 & Gurnard 1

Preferred Option

Other

Submission

Preamble

A. By the treaty of Waitangi the crown confirmed and guaranteed to the Cheifs, Tribes and individual Maori Full exclusive and undisturbed possession and Te Tino Rangatiratanga of their Fisheries.

B. The Crown recognizes that traditional fisheries are of importance to Maori and that the crowns treaty duty is to develop policies to help recognize use and management practices and provide protection for and scope for exercise of Rangatiratanga in respect of Traditional fisheries.

The statements within this preamble are direct statements from the Maori Fisheries Deed of settlement dated 23rd of September 1992, which is a legal agreement between the Crown and all Maori.

Such agreements are the Binding responsibility of both parties and the expectation that both the Crown and Maori uphold and honour the Settlement, guided by the principles of Te tiriti o Waitangi

No increase should be made to the Snapper 8 TACC until such time that due diligence has been carried out on the Gurnard, Trevally, School Shark and John Dory species to ensure that the proposed increases to Snapper TACC does not put at risk these other species.

The Fisheries Nz background information provided in discussion paper No:2021/09

States in section 11.3 Fish Bycatch

Sub section 123

That

“The increased ability to utilize SNA 8 may lead to increased fishing effort in SNA 8. Industry has indicated that it is unlikely to see significant increase in effort as changes in gear configuration to avoid snapper would be reverted back so snapper catch rates would go up with similar effort, however, this is uncertain.”

We are West Coast Trawler Fisherman operating in Snapper 8, firstly not all industry has been involved in putting together the 4 options, Moana New Zealand, Egmont Seafoods and Sanford were

all invited to the Work group sessions, prejudice and discrimination only applied to small Whanau based operators, who work closely with Whanau Hapu and Iwi in Waikato Tainui.

Season to date we have landed Pataka Kai for the wider Tribes of Waikato Tainui, including nearly all Poukai Marae, we have support from Nga Hapu O te Uru O Tainui (Customary Kaitiaki) and we have aspirations to grow Maori Fishing Identity in Waikato Tainui and Taranaki.

Such aspirations require a sustainable fishery and acknowledgement by the Crown that Maori Fisherman are Tangata Whenua Fisherman and our right to undisturbed possession of our Fisheries was Guaranteed by the Crown.

To the above statements regarding Sub section 123:

The gear configuration "reverted back" is to raise the Headline of the trawl, this would indeed see more Snapper landed per trawl effort, but would also see an additional increase of other species within the same trawl effort.

Species such as Trevally, Gurnard, School Shark, Rig and John Dory would all increase as well as Snapper in every trawl with a raised Headline.

In turn this would see the onboard fish holds filling faster and enabling vessels to be full sooner allowing more trips to be sustained within the same given weather windows, there is absolute certainty that Bycatch species to Snapper as mentioned above will have an increase in Fish caught from the vessels that are harvesting this proposed additional ace.

The last four words of Sub section 123

"However, this is uncertain."

It is a reckless approach to allow big Industry to be the only voice of Industry when discussing if additional ace will see an unlikely increase in catch effort, it is negligent to be uncertain of what the impact to other species stocks will be, especially if you are putting forward options to potentially increase Snapper 8 TACC by 100% as in option 4.

So therefore, if Gurnard (GUR1) is up for review with intentions to lower its TACC, then how is Fisheries New Zealand confident it can increase Snapper 8 to the level of a 100% increase to TACC and not have any negative impact to Bycatch stocks?

Section 9 of Fisheries act

Environmental principles

"All persons exercising or performing functions, duties or powers under this act, in relation to the utilization of fisheries resources or ensuring sustainability, shall take into account the following environmental principles:

Subsection 9a

"Associated or dependent species should be maintained above a level that ensures their long-term viability"

For the Minister to uphold this section of the fisheries act, there must be evidence to show that Gurnard 1 can be "maintained above a level that ensures their long-term viability".

Given that Fisheries Nz intends to lower the TACC for Gurnard 1, this “associated or dependent species is does not have adequate evidence to show that it can sustain significant increase to Snapper 8 TACC

Fisheries New Zealand (acting on behalf of the Crown) has a legally binding responsibility with all Maori to ensure the Sustainability of our oceans, guided by the confirmed rights and Te Tino Rangatiratanga as guaranteed under Article two of Te Tiriti O Waitangi.

The Fisheries Act

Part 2 Purpose and Principles

Section 8 Purpose

- (1) “The purpose of this act is to provide for the utilization of Fisheries resources while ensuring sustainability”.
- (2) In this act
Ensuring Sustainability means
 - (a) “Maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations and
 - (b) Avoiding, remedying, or mitigating any adverse effects of fishing on the aquatic environmentUtilization means conserving, using, enhancing, and developing fisheries resources to enable people to provide for their social, economic, and cultural wellbeing”.

Fisheries New Zealand must under this act take the potential impacts to Bycatch species seriously and cannot make a TACC increase without due diligence studies and research on the potential impacts to Bycatch species Gurnard, School Shark, Trevally and John Dory.

As per the Discussion paper No:2021/09

Fisheries New Zealand is uncertain of a potential increase in catch effort as it is solely relying on the word of Big Industry Fishing Companies.

Closing remarks

As Tangata Whenua Customary and Commercial Fisherman we strongly urge Fisheries New Zealand to consider abolishing all outstanding 28n rights of Snapper 8.

These 28N rights derive from an era when the catch effort of the fishery was so heavy that Snapper was fished to dangerously low levels and has taken over a decade to return to just above 40% unfished biomass, the catch effort that brought the Snapper down is potentially going to be re-introduced at a time when the recreational catch effort is to be considered at 3 times its allocation under the TAC.

This said it is flawed science that has been presented on the behalf of Fisheries New Zealand, that we are going to see the Snapper Fish stocks improve with such increases as per option 4.

The Quota management system discriminates against every Fisherman who entered the industry after individual transferable quotas were allocated, it is a capitalist colonial system that puts ownership of fish in the hands of a select few.

As Maori of Whakapapa to multiple Tribes of which Rohe moana is Snapper Fish management area 8, I am deeply offended that Fisheries New Zealand deems it ok to reward the very fishing companies that have 1000s of tons of quota ownership, while we and many others have no quota or certainty of access to, are left to try and lease the very crumbs that are left at ridiculous prices.

We risk our lives and the livelihoods of our Whanau to fish and try and uphold a way of life that our Tupuna carried out long before the QMS came into effect.

As fisherman on the Maui Dolphin Transition plan on a one-year special permit for snapper exploratory ace, we would like some certainty of fair and just opportunity to have continuity of access to such Special permits for the foreseeable future.

If it is to be deemed acceptable that companies can have extensive holdings of 28n rights deriving from (uncompensated loss) and overfishing, then it is most certainly acceptable that Tangata Whenua Commercial fishers can have equal opportunity for utilization of the fishery by way of Special permits for the time in which we are fishing.

Our rights were confirmed, and Guaranteed under Te Tiriti O Waitangi and the Maori Fisheries settlement is only a full and Final settlement for Mandated Iwi organizations (Iwi), Tribes.

As individual Maori Fisherman who do not own Quota, we are exercising our Article Two rights and Requesting certainty and fair opportunity to utilization of the Fishery by request of Special Permit Exploratory ace for the Foreseeable future, subject to stock assessments that raise or lower TAC accordingly.

Nga Mihi
Ali Brooks, Leon Lawrence
Our Tamariki and our Tupuna



Submission Form

Review of sustainability measures for 1 October 2021

Once you have completed this form

Email to: FMSubmissions@mpi.govt.nz

While we prefer email, you can also post your submission to:

2021 Sustainability Review, Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

Submissions must be received no later than 5pm on Tuesday 27 July 2021.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:

Name of submitter Linda Te Aho
or contact person:

Organisation (if applicable):

Waikato Tainui, Te Arataura

Email:

Fish stock(s) this submission refers to:

Snapper 8

Your preferred option as detailed in the discussion paper
(write "other" if you do not agree with any of the options presented):

Other

Official Information Act 1982

Note, that your submission is public information. Submissions may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.



This submission is made on behalf of our Iwi organisation, partners with the Crown in accordance with Te Tiriti o Waitangi, and a significant owner of Snapper 8 quota, and our tribal members who fish Snapper quota. We support the submission made by Ali Brooks.

We wish to discuss our concerns about the inequity that arises as a result of the current proposals relative to the benefit for large corporate fishing interests.

We submit that the current proposal undermines the Treaty of Waitangi Fisheries settlement and affects our claims in respect of the West Coast Harbours.

This is a significant issue, and we wish to be heard in support of this submission.

Ronald Takerei
Tangata Kaitiaki
Marokopa paa

Sustainability Review
2021
Fisheries Management
Fisheries New Zealand
PO Box 2526
Wellington 6140
FMSubmissions@mpi.govt.nz

27 July 2021

Review of fisheries management measures of Fish Stocks Snapper 8 (SNA 8) and Gurnard 1 (GUR 1) for October 2021

The submitter

1. I, Ronald Takerei, I'm a gazetted Tangata Kaitiaki for Marokopa paa, and appreciates the opportunity to submit on the review of fisheries management measures of Fish Stock SNA 8 and GUR 1 for October 2021. Fisheries New Zealand (FNZ) advice of consultation was received on the 23 June 2021, with submissions due by 27 July 2021.
2. Marokopa paa have a gazetted Rohe Moana from Waiheikuri stream to the North of Marokopa to Tirua point to the South of Marokopa and extends out to the New Zealand Economic Exclusive Zone. Within our Rohe Moana boundary, we have a Mataitai Reserve in place.
3. To the north we have an over lapping interest with Ngaati Mahuta ki Tahaaroa and to the South, Oparure paa extending the rohe moana boundary to Huikomako stream.
4. We follow the Fisheries (Kaimoana Customary Fishing) Regulations 1998 and our committed to ensuring that sustainability measures and the environmental management controls are designed and implemented through Kaitiakitanga, are achieved, and the Principles and Purpose of our Customary roles are meet.
5. We (Marokopa paa) are also affiliated with Nga Hapu o Te Uru O Tainui Customary Fisheries Forum, which is made up of Hapuu and Marae

representatives from the Te Puaha (Port Waikato) to the north to Huikomako stream to the South.

6. We (Marokopa paa) are in full support of the submission and statements provided by Ali Brooks and Leon Lawrence from Brooks Seafood Ltd & Awaroa Fisheries Ltd. Leon and Ali are a small family based owned West Coast Trawler Fishing organization operating in SNA 8, who work closely with Whanau Hapuu and Iwi within the Waikato Tainui boundaries.
7. We also support parts of the submission of the collective who are, The New Zealand Sport Fishing Council (NZSFC), The New Zealand Angling and Casting Association (NZACA), The New Zealand Underwater Association which is comprised of three distinct user groups including Spearfishing NZ, affiliated scuba clubs throughout the country and Underwater Hockey NZ. We do support the view of both parties that;
 - No increase should be made to SNA 8 TACC until such time that due diligence has been carried out on Gurnard, Trevally, School Shark and John Dory species to ensure that the proposed increases to Snapper TACC does not put at risk these other species.
 - For the 28N rights, we agree that 28N rights should be cancelled for the reasons stated by these submitters. We support these views.
 - We agree with The New Zealand Angling and Casting Association (NZACA) Collective on the Background statements stated, in their submission including the relevant bullet points and associated paragraphs.

Consultation:

8. As a Kaitiaki, our realms are not only with the sea (Tangaroa), it is also with the land (Papatuanuku) and all the waters that flow on, in and to the sea. This is what Kaitiakitanga means to us.
9. Given what is happening on land within our area (Maniapoto rohe) currently, we are dealing with, the last stage of our Treaty Settlement, RMA, 3 Water and District Plan reviews. This does present a challenge for those of us that are in the space and trying to cover these as well, and to provide a well thought out response for this submission, backed by supporting evidence within the 24-working day window time frame. Hence the reason in this submission, we have read the draft version of what the two submitters have provided and acknowledged and support their views as stated in this submission.
10. With regards to the four options that were agreed upon from the two SNA8 meetings held in Auckland during the month of May and June, hosted by Fisheries New Zealand (FNZ) and attended by Recreational, Commercial and I, on behalf of our Customary and Kaitiaki Forum, Nga Hapu o Te Uru.
11. Although Trish Rea and John attended, they not only represented the Recreational side, they also were representing some of the Northland Coastal hapuu as well.

12. This was disappointing that a collective view from Maaori could not be given. It was a view given by us, which pertains to our area of concern and not a collective within the SNA 8 area and deemed as the view of Maaori by Fisheries NZ and the Commercial sector.
13. This is not consultation. We support the statements Ali Brooks and Leon Lawrence from Brooks Seafood Ltd & Awaroa Fisheries Ltd and The New Zealand Angling and Casting Association (NZACA) Collective have stated in their submission under **Consultation**.

Maaori customary allowance and interests:

14. With regards to the customary allowance and interests, again, we have a view on an allowance. We have not had the opportunity to have a collective view with other customary kaitiaki forums within the SNA 8 area. With this in mind, an allowance figure cannot be given.

Recreational allowance and interests:

15. We support The New Zealand Angling and Casting Association (NZACA) Collective on their proposed recreational allowance increase to 1205 t per annum. We agree with the statements and paragraphs under Recreational allowance and interests.

Snapper 8 (SNA 8):

16. We support The New Zealand Angling and Casting Association (NZACA) Collective on their view of the recommendations for SNA 8 and agree with the statements and paragraphs except for 33 B for reasons stated in Maaori customary allowance and 33 F due to not enough information at this point of time to have an informed opinion.
17. I do not wish to be heard with regards to this submission, however may be present at the hearings in support of these two submitters. We look forward to the outcomes from these reviews and would like to be kept informed of future developments. My contact details are as above.

Please note, the views are from a Customary and Kaitiaki view point and experience and may differ from the of the Mandated Iwi Organisation who may represent the commercial side.

Naaku iti nei – Ronald Takerei – Tangata Kaitiaki for Marokopa paa.

From: [Nicklin, Phil \(Auckland\)](#)
To: [FMSubmissions](#)
Subject: Submission on the Snapper 8 and Gurnard 1 fisheries
Date: Wednesday, 21 July 2021 2:22:21 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)

To Whom may concern,

As a recreational fisher I have an interest in these fisheries, and in their well-being.

The snapper fishery is recovering from almost being fished to destruction and I would like to see this be a long-term recovery. The sensible approach to the fishery is to go with option 1 of the SNA 8 review document. If this proves to be too cautious an approach it can be reviewed in the future. If one of the less cautious options is chosen and proves to be damaging to the fishery it could take many years to recover again.

Decades of hard work rebuilding the fishery could be thrown away in a few years if the wrong decision is made now. I believe that the same cautious approach is called for in the gurnard 1 review, so option 3 of the GUR 1 review document should be chosen.

Also Reviews of the Fishery should be conducted on a more regular basis to better monitor ANY changes made .

Regards

Phil Nicklin.

Phil Nicklin | **Glory**

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We Secure the Future

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From: [Cecily Lee](#)
To: [FMSubmissions](#)
Subject: Submission on the Snapper 8 and Gurnard 1 fisheries
Date: Wednesday, 21 July 2021 7:53:39 PM

To Whom may concern,

As a recreational fisher I have an interest in these fisheries, and in their well-being.

The snapper fishery is recovering from almost being fished to destruction and I would like to see this be a long-term recovery. The sensible approach to the fishery is to go

with option 1 of the SNA 8 review document. If this proves to be too cautious an

approach it can be reviewed in the future. If one of the less cautious options is chosen

and proves to be damaging to the fishery it could take many years to recover again.

Decades of hard work rebuilding the fishery could be thrown away in a few years if

the wrong decision is made now. I believe that the same cautious approach is called

for in the gurnard 1 review, so option 3 of the GUR 1 review document should be chosen.

Also Reviews of the Fishery should be conducted on a more regular basis to better monitor

ANY changes made .

Cecilia Nicklin

From: Murray Nicklin <
Sent: Monday, 26 July 2021 7:07 PM
To: FMSubmissions
Subject: Submission on the Snapper 8 and Gurnard 1 fisheries

To Whom may concern,

As a recreational fisher I have an interest in these fisheries, and in their well-being.

The snapper fishery is recovering from almost being fished to destruction and I would

like to see this be a long-term recovery. The sensible approach to the fishery is to go

with option 1 of the SNA 8 review document. If this proves to be too cautious an

approach it can be reviewed in the future. If one of the less cautious options is chosen

and proves to be damaging to the fishery; it could take many years to recover again.

Decades of hard work rebuilding the fishery could be thrown away in a few years if

the wrong decision is made now. I believe that the same cautious approach is called

for in the gurnard 1 review, so option 3 of the GUR 1 review document should be

chosen.

Also Reviews of the Fishery should be conducted on a more regular basis to better monitor

ANY changes made .

Regards

Murray Nicklin .



From: [Grant](#)
To: [FMSubmissions](#)
Subject: Submission on the Snapper 8 and Gurnard 1 fisheries
Date: Thursday, 22 July 2021 6:35:56 PM

As a recreational fisher I have an interest in these fisheries, and in their well-being. The snapper fishery is recovering from almost being fished to destruction and I would like to see this be a long term recovery. The sensible approach to the fishery is to go with option 1 of the SNA 8 review document. If this proves to be too cautious an approach it can be reviewed in the future. If one of the less cautious options is chosen and proves to be damaging to the fishery it could take many years to recover again. Decades of hard work rebuilding the fishery could be thrown away in a few years if the wrong decision is made now. We are supposed to now live in a world where sustainability is a key element in our decisions.

I believe that the same cautious approach is called for in the gurnard 1 review, so option 3 of the GUR 1 review document should be chosen.

Thanks Grant Mackay

From: Julie Steele < >
Sent: Friday, 23 July 2021 10:19 AM
To: FMSubmissions
Subject: SNA review

As a recreational fisher I have an interest in these fisheries, and in their well-being. The snapper fishery is recovering from almost being fished to destruction and I would like to see this be a long term recovery. The sensible approach to the fishery is to go with option 1 of the SNA 8 review document. If this proves to be too cautious an approach it can be reviewed in the future. If one of the less cautious options is chosen and proves to be damaging to the fishery it could take many years to recover again. Decades of hard work rebuilding the fishery could be thrown away in a few years if the wrong decision is made now. I believe that the same cautious approach is called for in the gurnard 1 review, so option 3 of the GUR 1 review document should be chosen.

From: Kevin
Sent: Monday, 26 July 2021 9:19 AM
To: FMSubmissions
Subject: Submission on the Snapper 8 and Gurnard 1 fisheries

As a recreational fisher I have an interest in these fisheries, and in their well-being. The snapper fishery is recovering from almost being fished to destruction and I would like to see this be a long term recovery. The sensible approach to the fishery is to go with option 1 of the SNA 8 review document. If this proves to be too cautious an approach it can be reviewed in the future. If one of the less cautious options is chosen and proves to be damaging to the fishery it could take many years to recover again. Decades of hard work rebuilding the fishery could be thrown away in a few years if the wrong decision is made now. I believe that the same cautious approach is called for in the gurnard 1 review, so option 3 of the GUR 1 review document should be chosen.

From: Mark Langdon
Sent: Monday, 26 July 2021 2:42 PM
To: FMSubmissions
Subject: Snapper 8 Submission

As a recreational fisher I have an interest in these fisheries and their wellbeing. The snapper fishery is recovering from almost being fished to destruction and I would like to see this be a long term recovery. The sensible approach to the fishery is to go with option 1 of the SNA 8 review document. If this proves to be too cautious an approach, this can be reviewed in the future. If one of the less cautious options is chosen and proves damaging to the fishery it could take many years to recover again. Decades of hard work rebuilding the fishery could be thrown away in a few years if the wrong decision is made now. I believe the same cautious approach is called for in the Gurnard 1 review, so option 3 of the GUR 1 review document should be chosen.

Regards

From: [Dunn, Ben \(Auckland\)](#)
To: [FMSubmissions](#)
Subject: Submission on the Snapper 8 and Gurnard 1 fisheries
Date: Monday, 26 July 2021 1:15:18 PM
Attachments: [image001.jpg](#)

To Whom may concern,

As a recreational fisher I have an interest in these fisheries, and in their well-being.

The snapper fishery is recovering from almost being fished to destruction and I would like to see this be a long-term recovery. The sensible approach to the fishery is to go with option 1 of the SNA 8 review document. If this proves to be too cautious an approach it can be reviewed in the future. If one of the less cautious options is chosen and proves to be damaging to the fishery it could take many years to recover again.

Decades of hard work rebuilding the fishery could be thrown away in a few years if the wrong decision is made now. I believe that the same cautious approach is called for in the gurnard 1 review, so option 3 of the GUR 1 review document should be chosen.

Also Reviews of the Fishery should be conducted on a more regular basis to better monitor ANY changes made .

Kind Regards
Ben Dunn |

Connect with us on [LinkedIn](#)



We Secure the Future

From: Bob Gillies <[redacted]>
Sent: Monday, 26 July 2021 8:18 PM
To: FMSubmissions
Subject: FW: Snapper 8 Submission

Hello,

As a recreational fisher I have an interest in these fisheries and their wellbeing. The snapper fishery is recovering from almost being fished to destruction and I would like to see this be a long term recovery. The sensible approach to the fishery is to go with option 1 of the SNA 8 review document. If this proves to be too cautious an approach, this can be reviewed in the future. If one of the less cautious options is chosen and proves damaging to the fishery it could take many years to recover again. Decades of hard work rebuilding the fishery could be thrown away in a few years if the wrong decision is made now. I believe the same cautious approach is called for in the Gurnard 1 review, so option 3 of the GUR 1 review document should be chosen.

You guys need to listen to us recreational fishers as we are influential in our community and you need our support.

Thank you
Bob Gillies

NGATI KAHU O TORONGARE / TE PARAWHAU HAPU IWI TRUST

TE WAIARIKI NGATI KORORA NGATI TAKAPARI HAPU IWI TRUST

SUBMISSION: SN8 2021 Review for 1 October of Sustainability measures

TO: FMSubmissions@mpi.govt.nz

Submitter: Waimarie Bruce-Kingi

Hapu/Iwi: Ngati Kahu O Torongare / Te Parawhau / Ngati Tu
Te Waiariki Ngati Korora Ngati Takapari

Contact:

Email:

Submission:

My name is Waimarie Kingi I submit this submission in two parts. First as an Individual & secondly as a Hapu representative. I/we agree in parts of the proposed **SN8 2021 Review for 1 October of Sustainability measures** however oppose in parts of the **proposed SN8 2021 Review for 1 October of Sustainability measures** and call for more substantial changes to be made to reflect the feedback provided in this submission from Tangata Whenua.

Introduction:

I/we are uri of Te Waiariki, Ngati Korora, Ngati Takapari, Te Parawhau, Ngati Kahu & Ngati Tu Hapu of NGAPUHI in the Whangarei Rohe. The Crown has a number of obligations to Maori in respect of fisheries. Ensuring Maori ongoing access to fisheries for both commercial & customary purposes. Commercial through the provision of quota, and customary through the application of specific tools and regulations designed to recognise and provide for the use and management practices of Maori.

We support the works of those who have stood for the outcomes of the **WAI 1040 & WAI 262 Inquiries**, namely the **Waitangi Tribunal WAI 1040 Stage 1 findings that signatories of Te Tiriti o Waitangi did not cede their sovereignty published 2014**, and the **recommendations made in Ko Aotearoa Tenei published in 2011**.

We support the protection of Taonga & indigenous biodiversity:

We lament the losses and extinctions of the last two centuries and seek the tools to give effect to Te Tiriti o Waitangi so that mana whenua whanau/hapu may re-establish the relationships within our hapu rohe in Te Ao Turoa. The uri are active and knowledgeable about Te Ao Turoa and this matauranga is continually denigrated in modern fisheries management processes. We support the intent of the government approach to implement WAI 262 recommendations and do not wish this to be undermined by the **SN8 2021 Review for 1 October of Sustainability measures**

While the intent of this **SN8 2021 Review for 1 October of Sustainability measures** seeks to strengthen tangata whenua role in **SN8 2021 Review for 1 October of Sustainability measures** processes, in our view this **SN8 2021 Review for 1 October of Sustainability measures** will result in the commercialisation of Maturanga without protecting mana motuhake or accountability to tangata whenua of **Customary Practices through Hapu Iwi Fisheries Plan**

This **SN8 2021 Review for 1 October of Sustainability measures** to identify taonga of significance to tangata whenua, with tangata whenua consent, yet fails to state how tangata whenua will retain mana motuhake over these taonga as promised in the articles of Te Tiriti o Waitangi.

Disproportioned Regulation on Whanau, Hapu Iwi (Customary Fishing)

This **SN8 2021 Review for 1 October of Sustainability measures** goes only a short way to address the risk that these limitations will disproportionately impact on Maori, who have already given so much and could exacerbate the disadvantages created by the historic fisheries policies of the past.

That customary fisheries plan can significantly contribute to enhancing the social cultural or economic wellbeing of tangata whenua, managed in using effects management hierarchy where biodiversity offsetting or biodiversity compensation can be considered, still a cost to that would still require a qualified person, which also includes Maturanga Maori.

It is in our view whanau/Hapu aspirations in their duties towards the indigenous biodiversity seen in this policy are constrictive and results in external agencies deciding what land use results in significant contribution to social cultural and economic wellbeing, undermining mana motuhake. There is no explicit link to how these mana whenua ropu will have input to these definition

Overall concerns about further erosion of Whanau/Hapu Mana Motuhake Hapu Iwi Fisheries Management Plans must give demonstrable effect to the full articles of Te Tiriti o Waitangi. We firmly reject that the current which refer to Te Tiriti and its principles and we insist that the full protection of Whanau/Hapu role in Te Tiriti is given effect to in the development of any Hapu Iwi Fisheries Plan not just the principles of the Treaty.

Actions

I/We seek that the **SN8 2021 Review for 1 October of Sustainability measures** are explicitly made to protect Mana Motuhake as protected in Te Tiriti o Waitangi. {Separate Framework for Maori}

I/We seek that the **SN8 2021 Review for 1 October of Sustainability measures** make revision in light of this view.

Recommendations

I/We support the measures that have been outlined in the Review subject to a Separate Framework for Maori.

Date: 26 July 2021

Waimarie Bruce-Kingi – W.Kingi



Submission Form

Review of sustainability measures for 1 October 2021

Once you have completed this form

Email to: FMsubmissions@mpi.govt.nz

While we prefer email, you can also post your submission to:

2021 Sustainability Review, Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

Submissions must be received no later than 5pm on Tuesday 27 July 2021.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:

Name of submitter

or contact person: **K. Walls/President**

Organisation (if applicable):

New Zealand Marine Sciences Society

Email:

Fish stock(s) this submission refers to:

SNA 8

Your preferred option as detailed in the discussion paper

(write "other" if you do not agree with any of the options presented):

"Other" option – No increase to the TACC

Official Information Act 1982

Note, that your submission is public information. Submissions may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.



Submission:¹

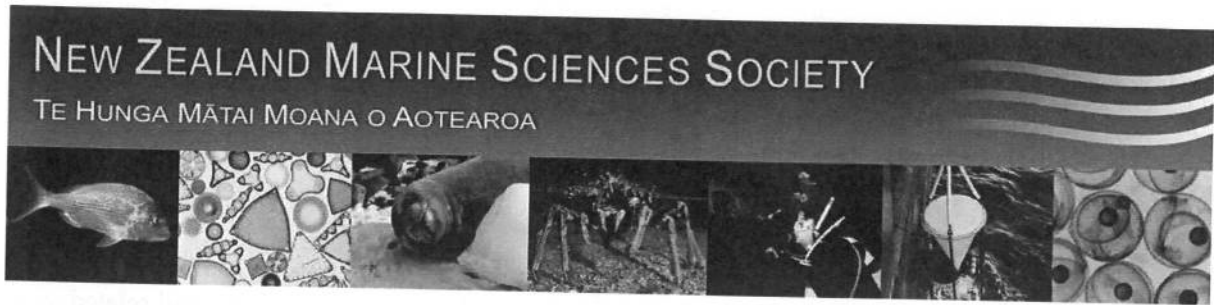
Details supporting your views:

NZMSSs prefers the alternative option "Other" - no increase to the TACC for snapper in SNA 8.

Our detailed submission is attached.

Please continue on a separate sheet if required.

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.



27 July 2021

Emailed to: FMSubmissions@mpi.govt.nz

Submission: Fisheries NZ Discussion Paper No: 2021/09, Review of Sustainability Measures for Snapper (SNA 8) for 2021/22

This submission is made on behalf of the membership of the New Zealand Marine Sciences Society (NZMSS). It is made in good faith in my role as President of the NZMSS and in accordance with the Code of Ethics and Rules of the Royal Society of New Zealand.

NZMSS supports an alternative option to the options presented in the Discussion Paper, that there is no increase to the TACC for snapper in SNA 8.

Our detailed submission is attached.

Please contact me at the email address provided below for any further information regarding this submission.

Kathy Walls

A handwritten signature in black ink that reads "Kathy Walls".

President
New Zealand Marine Sciences Society

Address for service:

Email: FMSubmissions@mpi.govt.nz

Submission: Fisheries NZ Discussion Paper No: 2021/09, Review of Sustainability Measures for Snapper (SNA 8) for 2021/22

Background to the New Zealand Marine Sciences Society

The New Zealand Marine Sciences Society, known as “NZMSS”, was formed in 1960 as a constituent of the Royal Society of New Zealand, to encourage and assist marine science and related research across a wide range of disciplines in New Zealand and to foster communication among those with an interest in marine science.

NZMSS is a professional science body and a non-profit organization. We identify emerging issues through annual conferences, annual reviews, a listserv and our website <https://nzmsp.org/>. NZMSS membership covers all aspects of scientific interest in the marine environment and extends to the uptake of science in marine policy, resource management, conservation and the marine business sector. We speak for members of the Society on matters of interest on marine research in New Zealand and we engage with other scientific societies as appropriate. Our current membership comprises over 200 members.

Our submission is consistent with the Royal Society of New Zealand Code of Ethics and Rules, in particular principles 2.1 Integrity and professionalism, 4.1 Compliance with the law and relevant standards, and 10.1 Protection of the environment (www.royalsociety.org.nz/organisation/about/code).

NZMSS Submission

NZMSS does not support an increase in the snapper quota in the fisheries management area SNA8 at this time. Almost all commercial landings of snapper are caught using gillnets and trawling as shown in Figure 3 of the Discussion Paper. These fishing methods carry a high risk of marine mammal and seabird bycatch while trawling causes significant damage to benthic habitats.

The Society recommends a more precautionary approach to allocating snapper quota, in order to avoid ‘boom and bust’ cycles with a decrease in TACC followed by recovery, then an increase in TACC causing a decline, and so on. Rather, allowing stocks to rebuild further, and maintaining them at higher biomass levels, would increase fish availability to recreational fishers and for cultural harvest, as well as to other species in the system, enhancing the role of snapper and other target fish species in the marine ecosystem. The fact that the fishery is called the “west coast North Island mixed species trawl fishery” (e.g. section 8.1 of the Discussion document) and only 15% of the snapper caught is reported as the “target” species is indicative of the poor selectivity of gillnetting and trawling on this coast. Increasing the snapper quota is not a solution to this problem. The obvious solution is to ensure more selective fishing methods are used. The Minister of Oceans and Fisheries (Parker 2021) has recommended that fishers should bring back to shore all quota species they catch, without discarding part of their catch at sea. This change should be implemented first, before considering changes to the TACC for SNA 8. This will incentivise the use of selective, sustainable fishing methods, benefiting the long-term economic and ecological sustainability of the fishery.

Increasing fishing effort using gillnets and trawling is contrary to the goals of the UN Convention on Biological Diversity (CBD 2020), the New Zealand Biodiversity Strategy targets (NZBS 2020; in particular Objectives 10 and 12 as outlined in section 7.3 of the discussion paper) and runs the risk of New Zealand losing its fish exports to the USA. To satisfy the US Import Rule (NOAA 2021), New Zealand needs to demonstrate that marine mammal bycatch is managed in a way that is comparable to US regulations. Currently, New Zealand does not comply with the US Import Rule. Most marine mammal populations have not been subject to a population survey, let alone a series of surveys to estimate population trend. Bycatch estimates are not available for most New Zealand marine mammal

species, as observer coverage is too low to provide scientifically robust estimates (Dragonfly 2021). New Zealand's standards for protecting marine mammals fall well short of US standards, including the lack of a zero-mortality rate goal, timelines for achieving sustainable bycatch, or a scientifically robust observer programme for estimating marine mammal and seabird bycatch.

The New Zealand Marine Mammal Protection Act 1978 (MMPA) provides for a population management plan (PMP) to be prepared for marine mammals. However, a PMP has been prepared for only one species, NZ sealion. A PMP was drafted for Hector's and Māui dolphins many years ago, but never completed. The current threat management plan (TMP) for Hector's and Māui dolphins is non-statutory and fails to specify recovery timelines as required under US legislation. A statutory PMP for Māui dolphins would have required recovery to a non-threatened status as soon as possible, and in any case within 20 years. This requirement has been circumvented by not completing a PMP for all but one of NZ's marine mammals.

The Roberts et al. (2019) assessment that serves as a basis for the Hector's and Māui dolphin TMP has been reviewed by New Zealand and international experts, including scientists from NOAA, the Scientific Committee of the International Whaling Commission (IWC 2019, 2021), and three international experts appointed by DOC and MPI (Taylor et al. 2018) and found to be deficient. Taylor et al. (2018) made 37 recommendations for improving Roberts et al.'s (2019) model. In 2019, the IWC Scientific Committee offered to carry out a second, independent peer review of Roberts et al. (2019). MPI asked for this review to be delayed until after management decisions were made, on the basis of Roberts et al. (2019). This has led to a court case, in the US Court of International Trade, which may result in a ban of fish exports from New Zealand to the USA.

Failure to implement rigorous, scientifically robust standards in managing fisheries bycatch over the past 50 years has likely contributed to the decline of the Māui dolphin subspecies to the brink of extinction. This is exactly the outcome that both the US and NZ MMPA (through a PMP) seek to prevent. Māui dolphin is at an extremely high risk of extinction (IUCN 2012a). The IWC (2019, 2021) and IUCN (2012b) have urged New Zealand to ban gillnet and trawl fishing in Hector's and Māui dolphin habitat. Failing to implement this level of protection risks the further decline and extinction of Māui dolphin.

Instead of increasing the snapper quota for SNA 8, we recommend a scientifically robust approach to implementing Ecosystem-Based Fisheries Management (EBFM) for this fishery, including gear controls and clear, time-based targets for reducing bycatch of protected species and a zero-tolerance approach to bycatch of endangered species. For example, using longline rather than bulk fishing methods like gillnets and trawling would reduce marine mammal bycatch to close to zero. EBFM also involves better understanding the species that utilise the habitats making up the ecosystem, in this case the North Island west coast ecosystem. NZMSS recommends comprehensive ecosystem-wide research in this area, based on the marine biogeographic region and sub-regions. Currently, the only issues considered are based around commercially viable fish species. A shift to more selective fishing methods such as longline and fish traps would be in the best long-term interest of the snapper stock, fishing industry sustainability and profitability, as well as reducing impacts on protected species and benthic habitats.

Summary and recommendations

NZMSS supports an alternative option to the four options presented in the Discussion Paper – No increase to the TACC for SNA 8. NZMSS recommends that any changes in SNA 8 quotas should be deferred to allow the stock to recover further. Further recovery would improve recreational catches and cultural harvest, as well as reducing impacts on protected species and benthic habitats. NZMSS further recommends transitioning this fishery to an Ecosystem-Based Fisheries Management approach, setting quotas for the mix of species caught currently and using more selective, sustainable fishing methods before considering any changes in quota for snapper and the other species caught in what is currently referred to as the “west coast North Island mixed species trawl fishery”. Finally, we support implementing the Minister of Oceans and Fisheries' recommendation for a “ban on discards” (Parker 2021). Increasing

fishing effort using gillnets and trawling would be contrary to the goals of the UN Convention on Biological Diversity (CBD 2020) and the New Zealand Biodiversity Strategy targets (NZBS 2020) and runs the risk of New Zealand losing its fish exports to the USA.

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WELLINGTON
RECREATIONAL MARINE FISHERS'
ASSOCIATION (Inc)



WE RECOGNISE MANAGED FISHERIES

19th July 2021

2021 Sustainability Review
Fisheries Management
Fisheries New Zealand
Po Box 2526
Wellington 6140
New Zealand
E mail: FMSubmissions@mpi.govt.nz

This submission refers to: [Review of Sustainability Measures for snapper \(SNA 8\) for 2021/22 \(mpi.govt.nz\)](#)

Fisheries NZ Discussion Paper No: 2021/09: Closing date for submissions 27 July 2021

Submission from: Jim Mikoz, President, Wellington Recreational Marine Fisheries Association.

Dear Sir or Madam

Introduction

Thanks for inviting the Wellington Recreational Fishers Association with an opportunity to evaluate the proposal from commercial fishers to MPI all allow them to increase the commercial catch of snapper in SNA 8.

In the [Review of Sustainability Measures for snapper \(SNA 8\) for 2021/22 \(mpi.govt.nz\)](#) I could not find any reason for the reported sudden increase in SNA 8 stock. I could not find any research that discussed if any of the proposed increases in commercial catch would be sustainable. I could not find if there had been any research that identified where and when and how they spawned. I could not find any research that identified the weather and sea conditions at time of spawning. I could not find any reference to recreational catch data to support the view that the snapper stock had increased.

My marine and intertidal knowledge has been recognised in the past by Government and the commercial fishing industry

I had represented the NZ Recreational Fishing Council on Mfish Midwater Stock Assessment Committee for five years. I represented recreational fishers on Mfish and MPI Recreational Advisory groups for 37 years including DOCNGO Forums and Ministry for the Environment Environmental Reporting Forums, each for five years. I became involved in the Oceans Policy working group. I found neither NIWA, DOC nor Mfish could provide proof as to where they thought yellow eyed mullet spawned and it took me only one and half hours of target fishing to prove they spawn in the intertidal zone with the capture the first ever recorded yellow eyed mullet with ripe running roe. I then found no one had recorded what they eat and set about identifying all of their food sources. I co-wrote a science paper with Ian West and Allan Heath describing one of the many food sources that yellow eyed mullet find in beach cast seaweed. The paper described how they obtain their protein by eating the life found in beach cast seaweed that has converted the seaweed cellulose into protein. Yellow eyed mullet then provide the protein to other marine species such as snapper for their successful spawning

Describing my marine knowledge to the owner and editor of the NZ Fishing Coast to Coast magazine he asked me to put my acquired marine knowledge into stories so that this knowledge could be passed onto future generations. This required a great deal of research as nothing had been written about the value of the intertidal zone to marine species nor when, where and how marine species spawn. I have written twenty two stories describing other discoveries and many aspects of the marine environment that have never been published before.

In one of my stories called "Being Stitched Up" I described why a fish stock had decreased on the East Coast and then built up on the West Coast. In that story I was describing what happens to fish stock when weather patterns change over twelve year cycles. A visible result can be seen in the heavy rain falls as the low pressure system try and lift over the high ridges in the North Island. For years I saw depressions on reaching New Zealand veering down the East Coast causing massive flooding for twelve years before a number of factors, unknown to science, caused them to start tracking down the West Coast. That story was written in 2008 at a time when the depressions were just changing direction and beginning to come down the West coast.

Another reason for the story "Being stitched up" was to identify what happened at the Ministry of Fisheries South Western Recreational Forum when the east coast fishers were complaining they could no longer catch hapuku and wanted the recreational bag limit reduced from 5 to 3. This proposal lacked research and support as a commercial boat was taking 3000 hapuku a year and it was clearly not a fishery in depletion. In 1997 I wrote a story in the NZ Seafood magazine based around the NIWA information that the East Australian current was strengthening from the Coral Sea and raising sea temperatures. I knew the east coast fishers had nothing to worry about as we were entering another 10 to 12 year weather cycle and on shore Easterly winds would now send the bait fish closer to shore on the east coast. Six months later the hapuku

stock increased on the East coast. To gain a better understanding constant off shore winds will drive the planktonic marine micro life out to sea and the whole marine chain suffers.

New Zealand is now entering another change in the weather pattern and using the information in the "Length and age composition of commercial snapper landings 2015-16" it would appear the change in weather pattern we experienced in 2008 has contributed to a very successful snapper spawning period at that time. In 2015-16 they recorded a 230mm snapper is five years old and a 36.6 cm snapper is 1.1kg. They also stated in the paper "in 2015-16 they observed a reduced growth rate compared to 1990 will undoubtedly mean a decrease in productivity in the stock".

The question now is what will happen to the snapper stock tomorrow as we are now well into the 2020 weather pattern change. E.g. 2008 + 12 = 2020. Increasing a commercial snapper take in SNA 8 without any scientific information as to how this will impact on snapper over the next five years will be pure guess work and unprofessional.

OPTION 1 is the only option to take as in five years time that stock may have collapsed

The collapse of the snapper fishery in Tasman Bay Golden Bay is described by NIWA. The stock was estimated to be 23,000 tons but by 1980 to 1990 it had been over fished to a stock level of 1600 tons. The fishery suffered a massive loss of genetic memory which by 2003 had not recovered. The report discussed the loss of water clarity having an impact and singled out bottom trawling however from a plane I saw huge bays in Marlborough Sounds just a sea of mud. The run off of mud from forestry is almost out of control in the Sounds. I was invited to give a presentation for the Bethels Fishing Club by LegaSea and after visiting the beach I saw pine plantations growing down to the sea. When it was my turn to talk from the stage in front of about 200 recreational fishers to get their attention I described what I had just seen and predicted it would be hard to catch fish in front of the pines as the pine sap was being blown into the intertidal zone and was killing the shell fish. The experienced fishers agreed. I was able to use that knowledge and photos and other facts in the MPI Proposed National Environmental Standard for Plantation Forestry and it helped have introduced a riparian planting guide for future pine plantations.

There is nothing in this discussion paper that can justify any of the options. There is no information to explain why there has been an increase in snapper in Area SNA 8. However while we are at the lower section of SNA 8 the snapper catch records of the Wellington Surfcasting and Angling Club has also shown a marked increase in snapper caught from the shore. Our records show snapper catches from the shore in 1994 to 1997 averaged 19, from 1998 to 2010 averaged 6.5, then from 2011 to 2020 averaged 58. However from 2011 to 2014 no snapper were caught by the boat competitors. Which raises the question why?

I know from my involvement in the heavy industry when pair trawling was introduced it made experienced commercial fishers more aware of another dimension to trawling techniques. Just as those who are experienced competitive recreational fishers know it is not luck that those

with experience will often catch a bag limit in a matter of hours. While a bag limit may be regularly caught by individual fishers it is not luck as I consider luck to be only one percent and the rest is made up of preparation, knowledge, experience and skill.

MPI 2015-16 research paper information

In the 2015-16 MPI research paper "Length and age composition of commercial snapper landings in SNA 8" there is described the catch of Vessel X which was greater than the other two boats catch sampled.

Mfish stock assessment information

There is another element to stock assessment that was only discovered on the Mid Water Stock Assessment committee after I asked the scientists involved to record the water temperature while recording catch details. A number of years later I met the scientist and he described stock recruitment was seen to be largely governed when the spawning times coincided with strong winds as the ocean cubed. We go through weather cycles with years like we are experiencing now with strong south easterlies, heavy rain and flooding as the weather pattern changes. Prior to 2020 we would have north westerly's arriving from late October through to late January. At the end of this weather pattern saw very warm sea water temperatures beginning in 2011 and peaking in 2018 and 2019 with about 23 degrees Celsius on the South West Coast. In summer a warm current from the Coral Sea arrives and NIWA describe it as the Australian Current.

In Wellington we would see the Victoria University trawler with a handful of students trawling into Evans Bay and picking up a net full of large snapper in front of the recreational fishers on Miramar Wharf. When I became secretary of the Wellington Surfcasting and Angling Club I was instructed to represent the club on the Mfish Fishing Liaison committee, but what for I asked? The reply was you will not know until you see something is wrong based on what you know. So began a look into another world. At the first meeting I asked for a copy of the University trawl permit and the marine scientist running the meetings must have known it was illegal. A year later another scientist began running the meetings and I had another attempt to find the permit. The permit was illegal but by that time the students thought they could get away with anything and we caught them selling the fish.

The past Parliamentary Commissioner for the Environment John Morgan Williams in a publication of his described "We live in a World where we do not know what we don't know".

Judging from what has been published by marine scientists at MPI in this SNA 8 proposal this applies to marine scientists.

Section 3 “About the stock”.

3.1 Biology #17 “they spawn near the entrances of west coast harbours’. But this comment lacks proof as NIWA when describing snapper eggs state “None have been taken in planktonic trawls over known spawning areas”. NIWA and Mfish scientists that graduated from Victoria University would know where snapper spawn but their information has not been included by MPI Management. There would not be a inshore fish that would choose to lay their eggs in cold ocean waters when they would have known waters flowing out of harbours are at the right temperature for their successful spawning.

Snapper can be found at the harbour entrances but it does not prove they were spawning there. Snapper can be found at the Wellington Harbour entrance but we know where they spawn and it’s inside Evans Bay and other bays inside the harbour. Snapper are acting the same as other marine species scientifically studied. In a Master’s thesis on blue cod by Rapson (1956) he described blue cod separate into male (80) and female (72) schools prior to spawning then on recapture of 18 fish he found most had moved 30 miles. He identified the spawning times vary with water temperature and takes place in warm sheltered sandy bays. The spawning is described, but is unlike other fish species. However sadly his paper was not published and other marine scientists came along and did not quote his Masters. NIWA carried out fish counts while two fast ferries were in operation producing twenty six two meter tidal waves a day and with their water jets blasting the sea bed and lifting the mud. Blue cod do not stay in muddy water and NIWA could not find a blue cod but Mfish used the information to reduce the recreational blue cod bag limit. After this example of marine management by Mfish I now read fisheries proposal to identify the misinformation and to see what is missing and what should be there. This proposal on SNA 8 has too much unscientific misinformation and Section 11.5 should be rewritten using practical marine knowledge.

Another paper on blue cod described they moved only a hundred meters from the Long Island Marine Reserve and failed to report they left to perform their seasonal spawning activity. These scientists were observed by divers counting the same fish three times as it went around them in the murky water. Although the Rapson Masters is held at NIWA the information Rapson obtained was from sampling thousands of fish and was not recognised until I started quoting his information. To pass on their misinformation MPI tried to sell the idea to experienced recreational fishers that blue cod spawn in the cold waters of the Cook Strait many hundreds of meters deep. Then MPI tried to make everyone believe the little blue cod measuring 2 cm swim miles into the Sounds to be caught in Picton. The world is too small for MPI to make up fairy tales. A study by Rocco and Sutton (2002) found blue cod grow 8-10 cm in their first year and reach 15-20 cm in their second year and a fish of 30 cm is five years old.

The study by Rapson could have been describing yellow eyed mullet as they arrive in separate schools to spawn in the intertidal warm waters. Knowing this we found tarakihi and red gurnard also separate into male and female schools with males arriving a month earlier than the females before travelling into warmer inshore waters to spawn. We had an experienced recreational fisher describe in a Coast to Coast story how he and a friend would travel into the

waters at the end of the salt water wedge of an estuary and watch the snapper spawning. I have a commercial fisher friend who yearly watches grey mullet spawning at the end of the salt water wedge in the Hutt River.

I have spent some time watching yellow eyed mullet and figuring out their spawning times. They are dependent on water temperature, moon phases and they do not leave the warm waters of an estuary until they can swim quite strongly. One day we found ourselves anchored up fishing for snapper in warm water and a large school of kahawai arrived, we then watched as female kahawai and male fish formed into groups and began spawning all around us. The process they went through was the same as yellow eyed mullet and goldfish. This process has been described as the female swims in circles with the males bumping her until the eggs are released with yellow eyed mullet the males and the salt water wedge push the eggs into the raupo reeds. What we have seen is not all female fish spawn at the same time and form groups.

I have included a video of how fish develop. The same method is used by all marine fish.

<https://www.youtube.com/watch?v=pJNClyvuNa0>

MPI in this paper is the comment that “the eggs would arrive in the oceans”. MPI this is not how snapper stocks arrive in our oceans as they arrive out the warm waters of harbours and estuaries as fry.

Snapper eggs do not just arrive in the ocean as they begin life in the warmer waters of harbours and estuaries when a water temperature of 21 degrees C is reached. The adult fish return to their traditional spawning area using their genetic memory. The Tasman Bay and Golden Bay snapper stock almost collapsed as the trawlers took out almost all of the stock including the larger fish and the genetic memory of the school was lost. Without a school of fish having a combined genetic memory the school does not know where to go for food or where to spawn. This was identified in the book “COD” by Mark Kurlansky as to why the cod fishery in the Northern Hemisphere collapsed.

The information in the MPI [Review of Sustainability Measures for snapper \(SNA 8\) for 2021/22 \(mpi.govt.nz\)](#) has not addressed that Option Four could seriously collapse the snapper SNA 8 fishery and reduce it to the poor catches of snapper our Wellington based shore fishers experienced from 1997/2010 and the four years our boat fishers never caught a snapper.

Once in the protection of native raupo reeds from Pied Shags after about four hours the eggs of yellow eyed mullet develop into fry some with their egg bags still attached. They eat algae as all small fish do and then spend time taking shelter in the ribbons of Nana Eelgrass and Raupo with other just hatched marine species. At night they feed on mysid shrimps as an estuary can have 295 per square meter which is a major food source for small and large yellow eyed mullet. The mysid shrimps are also be a major food source for all young fish as mackerel can be seen feeding on them at night. For example 2 to 5cm yellow eyed mullet will not leave an estuary. We see fish eggs floating onto Petone Beach after a southerly if they are lucky as councils all

around NZ remove native intertidal plants and replace them with boulders so that rats can have a feed.

Marine science students at Victoria University were discovering where and when snapper spawned as they dissected the 8 to 10 kg snapper that were either about to spawn or had ripe running roe. I have yet to meet a marine scientist who describes fish eggs turn into larval. I know land based scientists who describe that fly, moth and butterfly eggs turn into larval and then hatch and maggots turn into blow flies. Maggots is another name for larval. Fish develop from the eggs and are called fry of about 2mm. They carry the remains of the egg for 2 to 3 days and after 28 days they are 10mm. The MPI Plenary paper carries serious misinformation as it describes fish fry as larval 124 times.

Information not mentioned in this snapper paper

There is no recognition of the massive increases in sounder technology that we as recreational fishers have access to. We know commercial sounders are mapping the sea bed and commercial can see fish stack up in what were once hidden guts in reefs. MPI and Government are either intentionally hiding the truth or being conned by the commercial industry. The new commercial sounders are mapping the sea bed and producing sea bed charts in detail. We have cheaper sounders that can identify the sea bed and the fish size and specie but the MPI standard of information in this discussion paper on SNA 8 is inadequate. MPI you must be aware that the electronic information is then distributed to other fishing contractors of the large commercial fishing companies.

Commercial fishers are being instructed on how best to improve their catch rate. MPI there is no balance to your information you have failed to describe the advances in this discussion paper. The lack of information in this paper is a copy of the misinformation presented to the public on the blue cod fishery. Being involved in fisheries management for 34 years it is a small World as I was informed the submissions from recreational fishers were defaced with rude comments and the information ignored. This resulted in the collapse of the blue cod fishery in the Marlborough Sounds. Those responsible were protecting commercial fishing interests who were allowed to cod pot in known spawning grounds which we warned about.

The reasons why there has been an increase in commercial catch snapper 8 has not been explored.

There is no mention of the increase in snapper in areas where there has been no netting bans to protect Hector dolphins. Yet commercial could have supplied the information. There is no mention of the food sources snapper eat. This discussion paper lacks information as there is no graph describing the length of the snapper landed as is done with other commercial fish species e.g. Gemfish and hoki. Therefore the stock that has been recorded in tonnes could well be under the legal length. There is no recognition of the informal marine knowledge that those at the consultation meetings must have had and would have passed onto to those managing this fishery.

Government funding misused

In 2003 NIWA and MPI when allocated by the *Foundation of Research Science and Technology* (FRST) \$32 million through a project called "*Natural Ecosystems*". This was intended to allow science to gain a better understanding of our fisheries and you have obviously failed to use any of the money for that purpose. NIWA used the money to trip around the Antarctica, which is not what its intended purpose was.

Section 11.5 Habitats of particular significance #133.

The \$32 million could have been used to prove what recreational and Maori fishers already know as we know where they spawn. The marine scientists who attended Victoria University in Wellington would also know this. As students they trawled around Wellington Harbour for years scooping up trawl net after trawl net of large spawning snapper as they knew where and when they spawned, just as recreational fishers know. I put a stop to this trawling of spawning snapper through the Mfish Fishing Liaison Committee when I identified they were selling them without a permit and the fishing permit was illegal.

Science knows nothing about the intertidal zone

While on the DOC NGO forum I discovered the New Zealand Coastal Policy Statement did not mention the intertidal zone. I wrote to Rt Hon Helen Clark describing what was missing and worked with Hon Chris Carter to help direct a review. Through a Power Point presentation to the Board of Enquiry and then to the NZ National Policy Statement for Freshwater Management I was able to describe the value of the intertidal zone to marine species. Of the four hundred submissions to both Boards of Enquiry the submission I compiled for the WRMFA was the only one describing the value of the intertidal zone to marine species.

Scientists at NIWA and Mfish lack practical marine knowledge

Scientists from NIWA and MPI admitted at a Ministry for the Environment Environmental Reporting Forum that they know nothing about the value of the intertidal zone to marine species. The Forum was annually attended by over 200 people representing councils and environmental groups from all around New Zealand and I had asked that the value of the intertidal zone be discussed. NIWA and MPI scientists were asked to describe the intertidal zone at the next meeting. The next year they began a presentation and after six slides they stopped and informed the meeting they knew nothing more and could not describe the value of the intertidal zone. They then reported their funding had been cut and asked for ideas to get some funding.

So I asked: "*what was the monitoring programme's outcome and what could we learn from it and would it not be better to sell the value of the intertidal zone to marine species as this could be seen as an outcome*". The suggestion was not accepted and instead I received from the NIWA scientists "*we cannot use your information as you are not a scientist,*" yet they had just

told everyone at the meeting they knew nothing about the intertidal zones value to marine species.

In this paper it has been described Maori intend to use commercial vessels

Section 6 Treaty of Waitangi 6.1 #44. Customary allowance to be increased. But there is no mentioned by how much, when and if that will be reviewed in five years time.

Commercial vessels from another zone

A number of recreational fishers are reporting commercial vessels arriving from South Island ports at night and can be seen and photographed fishing off the west coast. Some years back a recreational fisher came across commercial boat fishing in the Kapiti Marine Reserve, yet DOC did nothing.

Function and names of our native intertidal plants unknown to science

In the \$32 million FRST programme we were asked to look at our Nationally Recognized Databases where I found there was not a nationally recognized Plant Database that named a native intertidal plant. I became involved in correcting the error and had a number included in DOC plant identification and the NZ Plant Database. If NIWA had used the money correctly then the function of our native intertidal plants would be known today.

Section 11.5 Habitats of particular significance

Section # 135 in this section there is the Statement *“environmental factors affecting egg and “larval” survival in the oceans have had greater influence on the number of fertilised eggs surviving to adulthood.”* Overseas scientific research has established fish eggs do not survive in cold ocean water. MPI you have made the statement in the Review of Sustainable Measures for yellow eyed mullet and now in the Review of Sustainable Measures for snapper that **“fish eggs turn into larvae”**.

In the Fisheries Assessment Plenary, May 2021

Stock Assessments and Stock Status, Volume 3: Red Cod to Yellow-Eyed Mullet

The term **“larval”** appears 124 times in the Plenary. This is most unprofessional for marine scientists at MPI to use the term maggots to describe the young of marine or fresh water fish. Larval is not a scientific description of any marine life. Fish eggs do not develop into **larval they develop into fry**. Nowhere on the internet libraries are fish young called **larval**. The term **“larval”** is used to describe insects by land scientists as they describe caterpillar young as larval and fly larval as maggots.

MPI you are still producing misinformation which directly impacts on the snapper sustainability. Bait fish are equally important to snapper, blue cod, red gurnard and trevally.

Research in SNA7 between 2006 and 2019 noticed a higher recruitment that in previous years and this has been linked to higher water temperatures. There are also statements that snapper

research has not taken place on the west coast snapper SNA 8 and the only research was in SNA 7. There is information describing why and how scalps impact on snapper stock, yet MPI have not identified this.

This review of SNA 8 should have been done last year as part of the request by the then Minister of Fisheries Hon Stuart Nash as he informed me that MPI was developing an Ecosystem Based Inshore Working Plan and he had asked me to help by providing the information I had gathered to write a number of stories for the NZ Fishing Coast to Coast magazine. There is something seriously wrong at MPI as no one acknowledged the information I sent. It was only acknowledged by Adam Watson after I raised the failure of MPI to acknowledge the information at the Porirua Review of sustainability measures for 1 October 2021 snapper meeting.

I have included a video of how fish develop. The same method is used by all marine fish.

<https://www.youtube.com/watch?v=pJNClyvuNa0>

I spent five years representing the NZ Recreational Fishing Council on the Mfish Mid Water stock assessment committee. I predicted the gemfish fishery would collapse and advised the council who forwarded the prediction to the Minister of Fisheries. I was stopped in the street and was criticized by NIWA scientists for making the prediction as they told me not everything is presented at stock assessment meetings and I was not a marine scientist. But I had heard what was being said and NIWA and Mfish had rubbished the technical information being presented. It came as no surprise when four years later the NIWA scientists wrote a story in the NZ Seafood magazine describing the gemfish fishery had collapsed. Proving you do not have to have a degree in marine science just common sense, a passion for the marine environment and the ability to listen.

Section 7.2 #54 Regional Councils

There is an impression that MPI are in the process of devolving management of the intertidal zone to regional Councils. The comment that each regional council has multiple plans to manage the coastline is new to me and the GWRC. They called a public meeting to discuss the realignment of the Hutt River and I raised a concern that the section of the river where grey mullet can be seen spawning should be retained. The GWRC replied "we are not interested in your environmental concerns". I emailed the GWRC Chair Daran Ponter raising a concern that the work planned for the Waikanae River will expose the banks to erosion and destroy a traditional yellow eyed mullet spawning zone. His reply "are you just stirring shit or do you want to know?" I never received a reply describing what was planned.

We have had the experience of past regional councillors appointed as commissioners one stood up and abused the DOC scientist and me when we raised a concern that waste water will flow through the marine reserve. Another past GWRC councillor appointed as commissioner abused submitters then when I spoke told the hearing "He was sick of people describing the marine environment, sit down".

Section 11.5 Habitats of Particular Significance

#133 “includes areas likely to be important for snapper spawning.” Has MPI no knowledge where snapper spawn after all of these years of research? At resource consent hearing for the Kiapara Harbour under water turbines submitters described the Harbour was a snapper spawning area and the young would be destroyed passing through the blades. The MPI scientists replied how do you know they spawn there? Then they told those raising the concern to prove they spawned in the harbour. I fished the Kaipara Harbour competing in a New Zealand and Angling and Casting Association National Fishing Competition, boat section and experienced the thousands of small snapper feeding as if they were as piranhas, such was their hunger for food.

While on the DOCNGO forum there was a proposal presented to build an underwater wind farm in the Cook Strait. I asked DOC “How will the whales, seals, pilot whales and marine life survive the impact of the blades as they pass through the Cook Strait”. DOC did the research and we were informed the wind turbine blade tip speed would be 28 kilometres an hour and nothing would survive. We did not hear any more about under water turbines again. I became involved in a project to install a tube type generator off Moa Point but those involved underestimated the Wellington South Coast marine environment and six months later it was reduced to a wreck.

On the west coast in a highly productive snapper and trevally fishery GWRC have just released a resource consent application to discharge waste water into rock pools barely 700 meters from Titahi Bay Beach. The immediate area is a very important snapper fishery and MPI must become proactive in protecting snapper spawning areas and not dismiss recreational fishers concerns. Coastal management must use the term used in this paper “areas likely to be important for snapper spawning”. This type of snapper management must also include MPI acquiring a lot better marine knowledge than has been put on display in **#133** and **#135**.

This whole **Section 11.5** is unresearched and contains far too much misinformation and vague comments. Making comments like “reasons unclear,” “may affect the survival,” are just comments and guesses and “could also be supported”. It reflects badly on the marine knowledge on those who wrote this whole section and the reasons they put forward to increase the TAC and TACC. Taking this a step further the TACC increases could also be described as “reasons unclear”, “may affect” and “could also be supported”.

11.5 Habitats of particular significance

135 describes pollution and sedimentation

Yet it is the regional council’s lack of marine management who are the primary cause. The GWRC mismanagement of sediment has resulted in Porirua Harbour losing one meter of depth in ten years. At one of four public meetings called to discuss the sediment in Porirua Harbour the GWRC representative described the regional council had a plan to dredge Porirua Harbour and dump the dredge waste on Plimmerton Beach. The public were not impressed and this

plan describes the GWRC lack of marine knowledge. Porirua Harbour in 1961 was major snapper and grey mullet spawning area but poor land management by GWRC has destroyed the Nana eelgrass beds.

On the Wellington South Coast GWRC granted resource consent to mine sand from the outlets of two lakes. Without sand the outlets became a soak pit as the lake water disappeared into the boulders and shingle and no water reached the sea. The lakes are an environmental disaster as the GWRC has prevented marine fish such as (yellow eyed mullet) and fresh water species from accessing their traditional spawning grounds. In 1999 the GWRC granted themselves resource consent to fill in the submarine fresh water springs in Wellington Harbour with 200,000 tonnes of dredge waste and a major snapper feeding ground was destroyed. This madness also led to the collapse of the Wellington aquifer ability to supply fresh water for future generations. They granted resource consent to push mud from the dredge waste over the Hutt River mouth into Wellington Harbour smothering intertidal life with huge balls of mud. They have just destroyed a major yellow eyed mullet spawning and food source in the Waikanae River. The Plan will require a lot of consultation work by the MPI as I have only seen MPI and the Ministry of Fisheries at the resource consent to mine iron sands off Patea.

Information gathered by NIWA, MPI, Mfish and DOC was withheld from publication

There was a lack of communication between NIWA, MPI, Mfish and DOC management when they jointly produced a publication titled "***Threat Management Plan for Maui Dolphins.***" The publication has failed to record that yellow eyed mullet and native freshwater fish will leave a river, stream or shallow harbour when it becomes muddy after heavy rain or strong winds as their gills would become clogged with mud. Those involved in the study described, at a meeting, what they observed.

They saw dolphins feeding on the yellow eyed mullet and native fresh water fish arriving on the rivers and swimming in and out of the surface bubble of mud. Those involved in the research expressed disappointment that within MPI and the DOC someone had prevented this information being recorded in the "***Threat Management Plan for Maui Dolphins***" booklet.

There were 298 pages in the publication and there were only twelve lines describing pollution as a threat and not one word describing where the dolphins were obtaining their food source. Reading the report it was obvious that the writers had another agenda as almost all of the pages were blaming commercial netters for the loss of Hector Dolphins. I carried out some research and asked four commercial netters who have been netting continually for fifty years if they had caught a dolphin and not one had caught a dolphin.

Scientific misinformation from DOC

DOC produced a draft of their publication ***The Regions Estuaries*** and in the draft they called the fish they saw anchovies. I had been invited to comment on the draft and informed them that anchovies do not enter fresh water. Ten years later the final version was published but in 440 pages they still could not scientifically identify the fish they saw. The fish they saw could have

been the young of grey mullet, yellow eyed mullet, kahawai, flounder, trevally, stargazer or snapper as they all spend much of their lives in fresh water. In that publication they incorrectly described the yellow eyed mullet life cycle as they said "*they only or occasionally enter an estuary*" when in fact other research describes they spend 70% of their life in fresh water. Then DOC describes "yellow eyed mullet feed in the sediment". This is also totally incorrect.

In the over one hundred yellow eyed mullet we dissected to learn about their food sources we never found one spec of mud nor the remains of any fish. We also never found them in muddy water. The Mfish Discussion Paper on yellow eyed mullet describes that yellow eyed mullet eat fish. Past scientists, David H Graham in his book "*A Treasure of New Zealand*" and R M McDowall in his book "*New Zealand Freshwater fishes*", describe they never found fish in their guts. Now I am reading a discussion paper on snapper 8 that clearly has not had any input from anyone with any practical marine and intertidal knowledge.

The lack of ecosystem based marine knowledge by MPI management will impact on snapper

On the North Island West coast there is a total netting ban to protect Hector Dolphins yet Government through the MPI and DOC have proved they know absolutely nothing about their food source. There is only misinformation about where snapper and yellow eyed mullet spawn as well.

There has been no allowance made at all for the destruction of what was once their massive food supply as the bait fish (yellow eyed mullet) they feed on has been severely reduced due to the loss of beach cast seaweed.

The MPI has failed to acquire any knowledge of the value of beach cast seaweed to marine species. It has therefore failed to protect the major food supply of yellow eyed mullet. This failure has directly allowed 43 councils to remove beach cast seaweed every two weeks from their managed beaches all around New Zealand. The loss of their food source has had serious repercussions on Hector Dolphins and snapper as they have lost their major food source. The Ministry of Fisheries have proved they have failed to understand the importance of beach cast seaweed to marine species as since 2001 the beach cast seaweed has been commercially harvested.

There has been no allowance made for the loss of the micro food source yellow eyed mullet find in beach cast seaweed and sand that is now being destroyed by the Government approved extraction process that requires using ten tonne loaders, truck and trailers over beaches.

MPI has made no allowance to prevent the sand and the beach cast seaweed being taken to the rubbish tip or crushed to death.

MPI is totally responsible for the decline in yellow eyed mullet fish stocks and for preventing all marine species in that food chain including Hector Dolphins, kahawai, red gurnard and snapper from obtaining an adequate food source.

There has been no allowance made for the local and regional councils spraying weed killer along coastal banks that scientific research by the Porirua City Council discovered kills another major marine food source, mysid shrimps and shellfish.

There has been no allowance made for the loss of algae that the bait fish yellow eyed mullet can be seen feeding on in streams and tidal flats that is now smothered in mud by the GWRC sediment traps failure which were not designed for the regions type of rock.

There has been no allowance made for the loss of algae along miles of coastline that is being poisoned by the sap of pine plantations.

There has been no allowance made for the mud that is running off land into streams from pine harvesting and the construction of haul out sites in streams.

There has been no allowance made for the use of aluminium sulphate as a flocculent in sediment traps. The theory is that the chemical attaches to the mud and settles in the pond, but as few ponds are cleared when it rains they overflow into streams and into the intertidal zone, killing all aquatic life.

NIWA identify land based effects on coastal fisheries

The lack of understanding by those who do not access the sea can be judged in a NIWA study in 2008. It describes the difficulty they had in making allowances for the land based effects on coastal fisheries. The 2008 paper titled *a review of land based effects on coastal fisheries and supporting biodiversity in New Zealand* by Morrison, Lowe, Parsons, Usmar and McLeod says that "little is known scientifically about our inter-tidal zone or the impacts of our actions upon it." On page 25 when trying to describe the impact of mud and silt on marine species, they said, "Most of our current knowledge concerning the effects of suspended sediments on fish is based on freshwater species." Then they further state that "most existing information of the effects of suspended sediment is based on acute exposure laboratory experiments, with little empirical information available on chronic responses to high concentrations for extended periods, especially for marine species, or under natural field conditions".

NIWA then fumbled their way writing a paper in 2009 called *The Living World* in which they stated "until quite recently, not a lot was known about the importance of estuarine habitats to fish in New Zealand". They should have said NIWA has gone from "knowing little about the intertidal zone" in 2008 to "not knowing a lot" in 2009 which means the same thing. NIWA managers have failed to provide any research as in 2002 they were provided with a lot of information and failed to act or carry out any research to confirm what was told to them.

MPI catch records document the impact of mud on fishery

The MPI catch records have documented how muddy water will affect marine species. At a FMA 2 & 8 Recreational Fishing Forum we discussed the catch details of blue cod commercial cod potting in Area 8 which is Whanganui. Prior to the Whanganui floods of 2007 there were

four commercial fishers cod potting taking a reasonable catch. After the floods there were thirteen commercial fishers but combined they could only catch a quarter of what was caught before the floods

Identifying the beginning of the marine food chain

The New Zealand Biodiversity Strategy in Objective 10: Describes "Ecosystems and species are protected, restored, and resilient and connected from mountain tops to oceans."

In **Section 7.2** it describes **Regional Councils that have coastal boundaries within Snapper 8** each will have multiple plans to manage the coastal and freshwater environments. When I was invited to join the Oceans Policy working group there was only two people in this section group, I and one other. In Wellington we have the Greater Wellington Regional Council that has a complete lack of marine and intertidal knowledge and a reluctance to consult.

Recent catch levels and trends

Section 8.1 Commercial. #58 describes only some fish caught with snapper, but has not listed all of the others.

Impact of underwater noise on snapper

There has been no allowance made for under water noise. A report came out of the Tauranga Harbour when the past Minister of Fisheries Hon John Luxton appointed Judge Tapsell to find a cause as to why the snapper numbers had declined. He found it was caused by the environmental damage to the snapper spawning areas and loss of native wetland plants. He also noted that the wading birds and pied shags that have migrated in recent years were eating the small snapper, trevally and bait fish including yellow eyed mullet after they had began life.

The impact of underwater noise was identified by commercial fishers in Tauranga who described that after a powerboat race the snapper would leave the harbour for three weeks before returning. Likewise a speedboat race in Wellington Harbour drove over four hundred flat fish into a set net, that normally only produced ten on each setting. The report therefore identified underwater noise as a major factor in fish disappearing which would include yellow eyed mullet.

Loss of bait fish at Whitianga and Whangamata identified

There was no allowance made by the councils building the Whitianga estuary as a major yellow eyed mullet spawning habitat and food source was destroyed when they replaced the native raupo reeds with boulders and the mysid shrimps lost their habitat and food source.

No allowance was made by the council at Whangamata for the mysid shrimps and the micro life that lives in the interface of the both waters when they filled in a fresh water spring in the intertidal zone and made a car park over it. The council removed the native raupo reeds that the mysid shrimps live in that had historically provided yellow eyed mullet with a food source.

The Ministry of Fisheries were unable or unwilling to provide any technical support to the past Minister of Conservation Hon Chris Carter when he raised concerns about the loss of the major food source in the region for marine species.

Loss of a water flow impacts on bait fish

No allowance was made by the council in the Hokianga Harbour that severely reduced the water flowing into an estuary alongside the Opara and Ohuri towns. This was done against the advice of experienced Maori in the area who knew the stream dried up every ten years but also historically they would catch yellow eyed mullet in it.

No allowance was made for the GWRC environmental madness that in 1970 prevented yellow eyed mullet travelling into and out of the Parangarahu Lakes Area. Prior to 1970 Wellington Harbour was full of yellow eyed mullet and they provided a major food source for many marine species and dolphins. Since introducing a management plan for the lakes seven years ago the GWRC has failed to allow freshwater fish and yellow eyed mullet back into the Parangarahu Lakes Area.

Research from Otago University has proven that all freshwater species travel in and out of the sea all of their lives. They established the importance of a continuous flow of water to the sea from our rivers and streams. This team led by Gerard Closs included Bruno David, Lindsay Chadderton, Bernard Barry and Andrew Markwitz researched the life cycle of the giant kokopu and discovered "by using microchemistry on their otolith that native freshwater fish travel in and out of the sea throughout their life cycle." The GWRC has been advised of this but still they prevent native freshwater fish, eels and yellow eyed mullet from returning to the Parangarahu Lakes Area.

The importance of a water flow from streams, rivers and lakes to the sea.

MPI, NIWA and DOC have displayed a terrible lack of intertidal and marine knowledge throughout the discussion paper on snapper and their bait fish yellow eyed mullet. All of these Government departments and the GWRC could well learn from the forefathers of the Waimate District Council who in 1896 built then rebuilt what is called the Waihao Box on the Lake Wainono catchment along the coast of the Waimate Lake which has allowed yellow mullet to migrate into fresh water from the sea. The website displays massive schools of yellow eyed mullet in the catchment and when the conditions become suitable they return to the sea. The web site on the Waihao Box also contains a video by Gordon Lawrence that shows the box surrounded in native raupo reeds that in summer would attract yellow eyed mullet to spawn there.

<https://www.youtube.com/watch?v=-f8Vd6LQeyA>

In 1999 through the Easter break yellow eyed mullet proved they spawn in the intertidal zone when the estuary at Kuaotuna was cut off from the sea once again. Inside the lagoon was trapped a massive school of yellow eyed mullet numbering many tens of thousands measuring

around 70 millimetre or more. This estuary had become blocked off for some months prior. For the Ministry of Fisheries and NIWA to describe that yellow eyed mullet spawn out at sea after seeing this would prove they have another agenda. To believe their own rubbish scientists at both NIWA and Ministry of Fisheries would also have to believe yellow eyed mullet can transport tens of thousands of their eggs over the Kuaotuna estuary sand bar and into the estuary. They can't as the yellow eyed mullet spawn in the warm waters of the intertidal zone, not in cold waters miles out at sea.

Conclusion

Everything is connected so to not understand one element places the whole SNA 8 stock at serious risk of collapsing. The information in this [Review of Sustainability Measures for snapper \(SNA 8\) for 2021/22 \(mpi.govt.nz\)](#) is seriously under researched. This fishery is about to go through a change in environmental conditions for the next twelve years which I have attempted to explain using past history. What will really happen, who knows, but what will the fishery be like in five years time if the weather change impacts on the recruitment of snapper and the commercial catch will be unsustainable. If this goes ahead MPI will have to have a better management plan than they demonstrated in the Marlborough Sounds for the blue cod fishery. Our catch records suggest we will again go back in time to a reduced snapper fishery here in Wellington. MPI fishery management will again be exposed to believing the misinformation that their scientists have provided while all the time others like us are exposing that this SNA 8 proposal will not be sustainable.

With caution we would agree to Option 1 but this paper has demonstrated MPI know very little about this fishery and an over catch could seriously place this fishery in a state of collapse as over fishing has been done to snapper in the past. Re Golden Bay.

I have through the Mid Water stock assessment committee correctly predicted the gemfish fishery was about to collapse which it did four years later. Through the recreational advisory group I warned the proposal put forward by MPI to manage the Marlborough Sounds blue cod fishery was inadequate to restore stock and recreational fishers had their bag limit reduced while the commercial caught all of the spawning stock at time of spawning. I objected to a MPI proposal to reduce the recreational bag limit of hapuku as I proved environmental factors had reduced the hapuku stock on the East coast, not fishers and the fishery was not under threat. At a Minister of Fisheries Quota Setting Meeting commercial had no answer to a Green Peace request to stop the commercial blue fin tuna fishery over the full moon on the South Island West Coast. I was able to describe why such a move would destroy the tuna commercial fishery. The Ministry of Fishery accepted the information and the commercial industry representative Mr Peter Talley and another representative thanked me and the proposal was withdrawn.

Yours sincerely

Jim Mikoz, President

Wellington Recreational Marine Fishers Association since 2008 and Secretary from 2000 to 2008

Honorary Vice President

New Zealand Angling and Casting Association since 1996.

Past Secretary of the Wellington Surfcasting and Angling Club from 1987 to 2014, 27 years.

Represented the Wellington Regions marine recreational fishers from 1987 to 2018, on Mfish Fishing Liaison committees, FMA 2 & 8 Recreational Advisory Forums and Mfish Recreational Policy Advisory Groups, 31 years.

Made the only submission and power point out of 400 received to both the New Zealand Coastal Policy Statement review and the New Zealand National Policy Statement for Freshwater Management that described the value of the intertidal zone to marine species.

Co-wrote a science paper that described how kelp flies provide the protein to yellow eyed mullet and from them to other marine species and dolphins.

Represented all NZ recreational marine fishers on DOC NGO forums from 2005 to 2011, 6 years.

Represented the New Zealand Recreational Fishing Council on the Mfish Mid Water stock assessment committee for 5 years.

Represented all New Zealand marine recreational fishers on the Ministry for the Environment Environmental Reporting Forums for 5 years.

In 2003 I was invited by the Foundation of Research, Science and Technology to take part in a research program called "Natural Ecosystems."

Information describing the value of the intertidal zone to marine species was accepted at two separate NZ Environment Court hearings.

Represented all NZ recreational marine fishers on the various stages of the proposed NZ Ocean Policy and Economic Exclusion Zone working group.

Represented the regions recreational marine fishers on the Wellington City Council wastewater community group since 2003 and identified errors in the resource consent conditions. Then helped Wellington Water Ltd to correct the condition and introduced a procedure so that waste water samples are not confused with the properties of seawater again. Wellington Water Ltd is now using the correct procedure in the HCC and Porirua waste water sampling method.

Represented the regions recreational marine fishers on the Hutt City waste water community group since 2009.

IN THE MATTER OF:

**REVIEW OF SUSTAINABILITY MEASURES FOR 2021:
SNA 8**



SUBMISSION OF SPEARFISHING NEW ZEALAND INCORPORATED

27 JULY 2021

The Submitters

1. Spearfishing New Zealand Incorporated (SNZ) represent the interests of freedive spearfishers in New Zealand. We are a distinct sub-group of the recreational fishing sector.
2. The SNZ Committee is empowered by our constitution to liaise with government to ensure the interests and views of spearfishers in New Zealand are represented.
3. SNZ reports directly to approximately 8,458 divers nationwide. The wider freedive spearfishing community is approximated by the 17,000 members of the most active (NZ) social media pages in our sport.
4. Spearfishers target snapper in various areas of SNA 8. This is a taonga species for us. Whilst we make up a small component of the recreational catch, it is extremely important to us as a food source for subsistence fishers, and for sporting enjoyment.

Option 4 Supported

5. We Support Option 4 (TAC 4152 t, TACC 2,600 t, Cust 100 t Rec 1205 t, Other 247 t)
6. The reasons for this are:
7. We are mostly concerned that catch settings are set sustainably, and in accordance with the Harvest Strategy Standard ($\geq 40\%$ B0 for SNA8). It is a moment worthy of celebration when stock assessments show convincingly that the Fisheries Act has paid off for a stock and stakeholders can again increase catches to share in the success arising from the appropriate use of the QMS.
8. In deciding on this option we have relied upon MPI advice at paragraph 90 of the Discussion Document. This, to us, is key to the current deliberations:

90. At the end of 10 years, the projections estimate that the biomass will decline to some degree under all options, but retains a 90% or better probability of being above 40% of the unfished level in 2031 and a better than 45% probability of being above 50%.
9. We feel it would be detrimental to the integrity of the QMS if catches are *not* increased when it is possible to do so in full compliance with the Harvest Strategy Standard.

SNZ thanks MPI for the opportunity to submit on this important issue, and look forward to assisting MPI in future decision making that affects our members.

Kind Regards,

A handwritten signature in black ink, appearing to read 'R. Quinlan', with a long horizontal flourish extending to the right.

Reid Quinlan
Secretary
Spearfishing New Zealand Incorporated



Submission Form

Review of sustainability measures for 1 October 2021

Once you have completed this form

Email to: FMsubmissions@mpi.govt.nz

While we prefer email, you can also post your submission to:

2021 Sustainability Review, Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

Submissions must be received no later than 5pm on Tuesday 27 July 2021.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:

Name of submitter or contact person:	
Organisation (if applicable):	Sea Shepherd New Zealand
Email:	
Fish stock(s) this submission refers to:	Snapper SNA8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	OTHER

Official Information Act 1982

Note, that your submission is public information. Submissions may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.



Submission:¹

Details supporting your views:

Seriously don't know why you bother going out for submission when you have a history of ignoring the majority of the submitters' feedback anyway. It just appears as a cynical exercise in box ticking/engagement.

NOTED, the proposed increase in trawling/snapper was never brought up by you in the recent US Court of International Trade case, which is not a great look.

Sea Shepherd along with the IWC, IUCN and multiple local and international scientists would like to see all trawling and gillnets removed from Maui habitat out to the 100m depth contour. Increasing trawling activity will obviously just increase risk to this critically endangered marine mammal.

Thanks

Please continue on a separate sheet if required.

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.



EGMONT SEAFOODS

27th July 2021

Sustainability Review 2021

Fisheries Management Fisheries New Zealand

Email: |

Submission on the SNA 8 Review

This submission is made by Keith Mawson the Managing Director of Egmont Seafoods Ltd which represents 20 full time employees, 6 x vessel owners & 15 crew. I am 60 years of age and have been the majority shareholder of Egmont Seafoods Ltd since 1986 being a total of 33 years in the fishing industry. Prior to the fishing industry I was employed as a Legal Executive for 4 years and 3 years as a Financial Services Representative. My son Caleb Mawson is also a shareholder in Egmont Seafoods Ltd. Caleb is a Chartered Accountant who started his employment at Egmont Seafoods in March 2017 as part of the succession planning for the business and myself.

I have been actively involved in a number of stakeholder organisations within the fishing industry and I am currently a Director of Southern Inshore and an Executive member of the NZ Federation of Commercial Fisherman.

Egmont Seafoods Ltd has been in operation since 1986 supplying fish to both the domestic & export markets. The company handles approx 700 tonnes of fish per annum with around 50% of the product sold and consumed locally in Taranaki and the balance being sold within NZ or exported to markets in Australia, USA, Europe & Asia.

The majority of the fish landed into Egmont Seafoods Ltd is caught between Cape Egmont in the south & Raglan in the north out to 12 nautical miles. We have 2 x trawlers, 2 x set net vessels and 2 longline vessels landing fish into New Plymouth.

The Taranaki Fishing Industry has been impacted significantly over the past 15 years by closures to provide protection for Maui Dolphins. During this period we have also found it increasingly difficult to operate because of the increasing abundance of Snapper and trying to avoid catching it as we do not hold or have access to any volume of SNA 8 ACE. The deemed value has also been set at very stringent levels which has driven the ACE price to the same level as the landed price of the fish.

We have requested over recent years for either the TACC to be reviewed or the deemed value adjusted to allow the local fishers to transition from set netting to the other methods such as longlining or trawling. Whilst there has been no access to additional SNA 8 ACE and excessive ACE rentals it has not been financially viable for fishers to target species or use fishing methods that catch large volumes of Snapper.

It is important that all fishstocks are managed to ensure long term sustainability for all sectors of NZ society including recreational, customary & commercial fishers. We applaud Fisheries NZ for the

success of the rebuild of the SNA fishstock from 8-12% of B_0 to now 56% of B_0 over the past 16 years. We believe that it is now time for all sectors to benefit and have access to this increased fishstock providing it is managed at or above the stock harvest strategy default of 40%.

We have always supported science that enables good management decisions and as more information is gathered the accuracy of the science will improve. The science for SNA 8 is comprehensive and includes 3 recent trawl surveys together with CPUE analysis, length at age information and modelling. The science supports an increase in the TAC with increased allocations to all sectors.

Egmont Seafoods supports Option 4 TAC and allowances

We support Option 4 for the following reasons:

- The stock Harvest strategy has a current default management target of 40% SB_0 and the current SNA 8 spawning biomass was estimated at 54% SB_0 which is well above the management target.

Stock Status	
Year of Most Recent Assessment	2021
Assessment Runs Presented	Base Case model
Reference Points	Interim Target: 40% B_0 (HSS default) Soft Limit: 20% B_0 (HSS default) Hard Limit: 10% B_0 (HSS default) Overfishing threshold: $F_{SB40\%}$
Status in relation to Target	$B_{2020-21}$ was estimated to be 54% B_0 ; Likely (> 60 %) to be at or above the target
Status in relation to Limits	Soft Limit: Very Unlikely (< 10%) to be below Hard Limit: Exceptionally Unlikely (< 1%) to be below
Status in relation to Overfishing	$F_{2020-21}$ was estimated to be 81% $F_{SB40\%}$. Overfishing is Unlikely (< 40%) to be occurring.

- All of the options including the highest catch scenario (4,152 tonnes) being Option 4 results in an increase in the biomass by 2026 to reach 57% of the unfished level with a probability of 84% of being above 50% B_0 .
- The projections in the 2021 Plenary on SNA 8 indicate that the stock biomass will continue to increase during the 5-year projection period due, in part, to the contribution of the exceptionally large 2016 year class.
- Recruitment was well above average during 2005-2018 with exceptionally high recruitments estimated for 2006 and 2016 to 2018. Projections under recent recruitment (the average over the most recent 10 years of recruitment data) showed substantially more optimistic biomass trajectories. The management options have been developed using the long-term average recruitment projections to mitigate the risk that recruitment is not sustained at the current high levels into the next 5 and 10 year periods. If recruitment continues at current levels then the biomass predictions are very conservative giving Fisheries NZ confidence that the biomass will be above the current default management target in 2031.
- We believe that the current high recruitment is also due to a number of factors other than water temperature and natural conditions. The fisherman over the last 10 years have adjusted their trawl gear to have low headline heights which allows the larger breeding

Snapper to swim over the net. Also most of the set net fisherman have been removed from the west coast north island fishery and if they are operating they are fishing further out to sea leaving the inshore areas available for larger spawning Snapper. Over the past 10 years we have seen a reduction in the quantity of large breeding Snapper being landed into Egmont Seafoods which could be assisting the current high recruitment rates.

- The SNA 8 fishstock has rebuilt very well since 2005 when the catch allocations were reduced for all sectors. The commercial sector has been very responsible generally fishing within its allocation of 1300 tonnes whilst the recreational sector has enjoyed the increased abundance of Snapper and fished up to 300% of its allocation.
- There is a small core fleet of vessels fishing on the West Coast North Island that have a high level of monitoring with cameras on board and also observers. The fleet have had high levels of monitoring and scrutiny over a long period of time due to the measures and restrictions to protect and obtain information on Maui Dolphins. This level of surveillance and monitoring provides confidence that the reporting of catch by the West Coast fishers is accurate.
- All of the options include an allowance for other mortality which is approximately 10 % of the proposed TACC allowance. The default assumption is that Other Sources of Fishing Related Mortality added 20% to catches prior to the introduction of Snapper into the QMS in 1986 and 10% thereafter. The Plenary noted that 'the basis for this assumption should be revisited particularly for the latter period. In particular, it is important to identify whether there are any regulations or changes in fishing behavior that could have resulted in step changes'. For SNA 8 the 10% allowance should be revisited and adjusted due to the level of monitoring on the vessels in the SNA 8 fishery and the certainty of the volume of commercial catch and reporting. I believe that for SNA 8 the Other Mortality should be closer to 5 % which provides some comfort that the projections under Option 4 would be conservative.
- There are 932.4 tonnes of preferential Section 28N rights associated with the SNA 8 stock. Option 4 provides for the preferential rights to be extinguished and provides all quota owners with an increase in the tonnage of SNA 8 that they own. If all of the Section 28N rights are extinguished then future decisions on the TAC and TACC by Fisheries NZ will impact all quota owners proportionately meaning that they will benefit or suffer dependant on the health and abundance of the fishstock.
- The improving health of the fishery over the past 16 years has meant it has become increasingly difficult for the Taranaki fisherman to target their preferred fishstock which they own ACE for or have access to. The Taranaki fisherman and quota owners do not hold much SNA 8 quota so all of their ACE is caught as a bycatch of targeting other species. Sourcing additional SNA 8 ACE is expensive and the ACE is not readily available even at high prices. As the SNA 8 fishstock has improved it has become difficult to avoid catching volumes of Snapper which has meant the fisherman have had to move away from productive fishing areas at times to avoid catching Snapper. In addition the Taranaki fisherman have had multiple fishing area restrictions imposed since 2003 to protect the Maui Dolphin habitat which has pushed fishers further off the Coast. Fishing in deeper water and further off the coast has pushed the fishers into areas where they catch more Snapper and less of their target species which has exacerbated their problem.
- The increasing health of the SNA 8 fishstock has restricted Egmont Seafoods ability to grow as fisherman catches are restricted trying to avoid catching Snapper. Our business has also been significantly impacted by Maui Dolphin restrictions and our fisherman couldn't

transition to other fishing methods because we did not own SNA 8 quota or have access to SNA 8 ACE. It has been a very frustrating 10 years when you have a healthy fishery on your doorstep but you cannot access it because of restrictions or lack of SNA 8 ACE. An increase in the SNA 8 TAC and TACC will assist the local Taranaki fisherman to be more profitable and viable and also investigate alternative fishing methods such as longlining.

- We are supportive of robust management and continuing stock assessments and science for the SNA 8 fishery. With increased catch by all sectors it is imperative that Fisheries NZ continues regular and effective management of the SNA 8 fishstock. The management & monitoring should include but not be limited to the continuation of a trawl survey, CPUE, tagging study, catch sampling and the utilisation of technology. The delay in this SNA 8 review due to the lack of trawl surveys and ongoing monitoring since the late 1990's has meant that fishers, quota owners, processors and the general public have not been able to benefit from the increased abundance of the Snapper stocks in recent years.
- We support the establishment of a stakeholder group to discuss and provide advice for an ongoing monitoring plan. This group should be a multi-stakeholder group that has representation from all sectors with a geographic spread.
- Fisheries NZ needs to obtain better catch and landing information from the recreational and customary sector so that they have accurate information for assessing the health and abundance of fishstocks. The commercial catch and impact on fishstocks is known through electronic reporting and catch landing information but the assessments for the recreational & customary catch is vague. Good fisheries management requires good information of the harvest across all sectors and it is important that this is captured. The recreational & customary sector along with Fisheries NZ need to find a way where they can capture and report their catch easily and accurately. This is a shared fishery and there should be a shared responsibility to provide catch information.

There have been comments and concerns from some sectors that if there is a large increase in the TAC and TACC that the fishery will collapse. That there will also be increased commercial effort and pressure on the fishery and that there will be additional environmental and benthic impact. I will address these concerns and make comment on them separately.

Fisheries collapse and decline

We hear comments from the recreational and environmental sector expressing their concerns that the SNA 8 fishery is likely to collapse or decline if there a substantial increase in the TAC and the TACC. These concerns are based on historical events that happened in the 1970's prior to the Quota Management System in 1986. Fishing at that time was unregulated with pair trawling and Japanese fishing operations with catches peaking in excess of 7,500 tonnes. We are now in a regulated, highly monitored fishery where the commercial catches are known on an hourly basis. We also have better science and stock assessments that monitor the stock abundance & the health of the fishery. If there is good fisheries management on a regular basis then the fishery will not collapse as timely harvest adjustments can be made to ensure the health and abundance of the Snapper fishstock.

Increased Commercial Pressure and Effort

The fisherman in Taranaki and elsewhere have been actively avoiding catching Snapper and changed their gear setup to mitigate their Snapper catch. They have reduced the headline height and moved the headline back on their trawl nets to allow the Snapper to swim over their nets. They have also reduced their towing speed to allow the larger Snapper to swim away from their gear. These adjustments have also reduced the catch of other fish species that swim off the bottom such as

Trevally, Jack Mackerel and Baracoutta. Whilst adjusting their gear to mitigate the Snapper catch they have made changes to target fish on the sea floor such as Gurnard, John Dory & Spotty Dogfish. The lowered headline height on the nets and slower towing speed has reduced the overall volume of fish being caught per tow so the trips on the 2 local trawlers have increased from 3-4 days to 4-6 days to ensure that they catch enough fish to make the trip economic. This also means that they are burning more fuel per fishing trip than they have historically as they are doing more tows. Increased access to SNA 8 ACE will allow the fisherman to make adjustments to their nets where they catch more Snapper and associated species such as Trevally, Jack Mackerel, Barracoutta etc. This will mean that the fisherman's catch volume per tow will increase and they will spend on average less days at sea with less tows. If the TACC on Snapper was increased to 2,600 tonnes (Option 4) I don't think there will be increased effort due to the gear adjustments that the fisherman will make to increase their catch making their fishing far more economic. In fact we may see a reduction in pressure and effort due to the shorter trips and increased catch per tow. Sanford who are the largest quota owner of SNA 8 and hold the majority of preferential Section 28N Rights have indicated that they will not put additional vessels into the fishery and will look to assist contract fishers with whom they already have arrangements and also fishers and operators that have been impacted by the Maui Restrictions. These fishers and operators are smaller family owned businesses that would not be looking to increase the number or size of vessels that they operate.

Increased Environmental and Benthic Impact

As mentioned above the fisherman have been trying to avoid catching Snapper so that have reduced the headline height on their gear and had it harder on the bottom to target Gurnard, Spotty Dogfish etc. Increased access to SNA 8 ACE will allow them to lighten the bottom contact of their fishing gear which will reduce the benthic impact. They are however fishing on mud & sand so the benthic impact is minimal. The fisherman have been very successful in reducing their Snapper catch and increasing the catch of other species such as Gurnard. There is some concern however that whilst this has been successful in the short term it might have some consequences in the long term. The fisherman should however be targeting and catching the healthiest and most abundant fishstock which in this case is Snapper. Trying to avoid catching Snapper could be having a detrimental impact on other fishstocks in the fishery so an increase in the SNA 8 TACC would allow harvesting of the dominant fish species on the West Coast North Island.

Deemed Values

The current stringent deemed value rates for SNA 8 has been effective in maintaining catches within the TACC but it has driven the ACE price to access SNA 8 to extremely high levels. Egmont Seafoods currently pays the fisherman \$6.75/kg for whole landed Snapper but the ACE price to access SNA 8 ACE is \$6.00 - \$7.00/kg. The ACE price is therefore at the same level as the price we pay the fisherman meaning there is no return to the fisherman if they need to access ACE. This is a ridiculous situation when you have a healthy and abundant Snapper fishery which is sitting at 54% SB₀ and well above the default management target of 40% SB₀.

Egmont Seafoods supports Option 2 for the standard deemed value rates for SNA 8.

Submitted by:

Keith Mawson

Email: _____

Work _____

Mobile _____

Brown and Hayman Fisheries Ltd

5/1/2021 10:00 AM

27th July 2021
Sustainability Review 2021
Fisheries Management, Fisheries New Zealand
Email: FMSubmissions@mpi.govt.nz

Submission on the Review of Sustainability Measure for Snapper (SNA8) for 2021/22

I would like to say that whoever may read my submission could please keep an open mind as to what I have said and see this submission within the context it is meant. I don't mean to offend the person who reads this submission, I haven't constructed it as I would like and some of it may be disjointed. I have run out of time to put any more work into it so I apologise for how it may be presented. There was much more I would have liked to have said. Thank you.

I am 57 years old, a second-generation NZ fisherman operating a family business employing five people. I have fished almost exclusively trawling out of New Plymouth for 40 years. I have been the Skipper of the fishing vessel Receiver for about 30 years.

We own just over 200 tonne of mixed species quota, 12.233T of SNA8 with 2.4T of 28N rights. We are the largest private owners of SNA8 quota and the sixth largest quota holders of SNA8 with less than 1% of the current TACC.

10 Current and proposed TAC, TACC and allowance settings

Table 5: Summary of current and proposed catch settings for SNA 8 from 1 October 2021.

Figures are all in tonnes. Option

	TAC	TACC	Allowances
Customary Māori	Recreational		All other mortality caused by fishing
Current settings	1,785	43	312
Option 1	3,065 □ (1280 t)	100 □ (57 t)	160 ↑ 📞 📄 📁
Option 2	3,437 □ (1652 t)	100 □ (57 t)	182 ↑ 📞 📄 📁 ◆
Option 3	3,794 □ (2009 t)	100 □ (57 t)	214 □ (84 t)
Option 4	4,152 □ (2367 t)	100 □ (57 t)	247 □ (117 t)

BROWN AND HAYMAN FISHERIES LTD SUPPORT OPTION 4.

The science shows that this fishery is robust enough to support this Option. Option 4 is conservative in that it is based on long term average recruitment not recent recruitment. Some of the data from the last two years of trawl surveys have been set aside because of the large SNA catch and what it would have done to the modelling. 10% of TACC mortality is also high with the monitoring in the SNA8 fishery. We are tracked in real time and have to record catch within hours of landing. We have 3 cameras operating on our vessel. It is my assertion that when we have another stock assessment which is absolutely critical in the future this fish stock will have increased further.

Our wish for Option 4 is based on science. Unlike the other options particularly Option 1 and 2 which have no basis in the science at all. The proponents of Option 1 and 2 really base their views on not wanting the commercial fishing industry to have any more access.

I do not believe FNZ would present us with an option that was detrimental to any fish stock.

MY EXPERIENCE IN THIS FISHERY

I have operated the same vessel with the same horsepower in the same fishery out of the same Port (New Plymouth) catching fish for the same LFR for thirty years. I believe this is a good base to have a view on the SNA8 fishery. Some years ago, prior to the latest SNA8 trawl survey I said to a NIWA scientist in my opinion SNA8 stocks have increased five-fold since the introduction of the QMS.

In this time, I have had to alter my fishing gear and practices to avoid catching SNA. This includes fishing at night, fishing in deeper water, towing slower, fishing with a reduced headline height (nominal 5 metre headline height down to 1 metre), removing the square from the net (the veranda the headline has in front of the ground rope), having a net with incredibly low wings, reducing floats on the headline, and other commercially sensitive practices. This is a de-evolution of fishing net technology which now has us towing the type of fishing net that was towed at the turn of the century over 100 years ago when trawling first began in New Zealand and we are de tuning this fishing gear!

Because of these absurdities the most prolific and dynamic stock is a bycatch while other stocks that were bycatch are now target species.

We are literally taking stocks such as GUR, FLA, TAR, RCO, RSK, SSK, SPO etc out from underneath the SNA8 biomass while also leaving behind with the snapper *KIN, BAR, JMA, KAH, FRO, WAR, TRE (of which we once owned 117 tonnes and now own 75T), we now only catch between 5 and 15T of TRE per year. This means we now tow a net with a much longer ground rope "harder down" (heavier bottom contact) this in conjunction with reduction in catch means fishing trips can now be 4-5 days long instead of 2-3 days long probably doubling our benthic impact and carbon footprint. I know there has been concern that if access to the SNA8 stock were to increase it may increase benthic impact and carbon footprint. It may be counter intuitive, but the inverse is true.

These longer fishing trips put pressure on the crew, their families, fishing gear, machinery and the fishing vessel etc with much higher expenses and lower returns.

What I have outlined above is a simplification of this situation but is reflective of what is happening without going into complexed detail.

OUR CURRENT SITUATION

This year we have caught 27T of SNA8 up to the end of June and was informed by the LFR we sell our catch to that they have run out of SNA8 ace with still 4 months of the fishing year left. We catch about 30T of SNA8 a year about 10% of our annual catch (in the fishing year 2015/16 we caught 47.313T the last year we used a high lift net and in the fishing year 2018/19 we caught 22.67T of SNA8 with a low lift net). As we mitigate our SNA catch by detuning fishing gear etc our SNA8 catch increases due to the expanding SNA8 biomass.

OUR HOPES FOR THE FUTURE

Going forward we would need to be able to access at least 50T of SNA8 ace before we could even think of doing any significant alterations to our current fishing set up. To change the setup of our fishing gear to allow us to catch our 75T of TRE quota would mean we would probably have to access something like 100T of SNA8 ace. I don't know where this amount of access would come from.

REALITIES OF CURRENT FISHING SET UP

In my estimation we currently have something like 300T of SNA, 75T TRE, 70T BAR, 8T JMA, 5T KAH, 5T KIN, 5T WAR, 5T FRO, 5T SQU going between my trawl doors down my sweeps and over the top of my net. You would have to wonder about the sanity of this situation, not to mention the unnecessary benthic impact and carbon footprint.

QUOTA, ACE VALUATIONS AND LEASE PRICES

The current market value for SNA8 quota is about \$100,000 per tonne (if it were to be on the market) which is totally unaffordable for most fishermen while GUR8 for example is about \$2,000 per tonne. SNA8 has a market price 50 times greater than GUR8, some other species are basically worthless, SQU1T, GSP7, LEA2. In my view SNA8 quota should have a market value of \$50,000 per tonne or less. As a quota owner this would reduce the value of my asset significantly, but it would be more rational and equitable. This could come about with Option 4 TAC increase and Option 2 deemed values.

To lease SNA8 Ace today costs between \$6.50-\$7.00 per kg if you can get it. We get paid \$6.75 per kg for our SNA, which is about what we could lease it for. The LFR I fish for pays us \$6.75 per kg with a lease cost of \$6.00. That is a net value of \$0.75, after we have caught our 12.223T of SNA ace. Currently they cannot access any SNA8 ace.

This is the largest FMA8 inshore fish stock that has expanded 5-6 times in the last 20 years. It retails in supermarkets for up to \$50kg filleted with about 30% recovery that means the green weight price for this fish is about \$17kg.

Currently SNA8 is not a fish stock we get any value from, it is slurried and packed which makes it one of our most labour-intensive species to handle, quite frankly if it were possible not to catch it at all we would be better off because we could lease the quota we own for as much as we get paid for catching it and not have to handle the product. Driving these absurd outcomes is the current deemed value regime.

DEEMED VALUES - BROWN AND HAYMAN FISHERIES SUPPORT OPTION 2

Current deemed values from \$5.40 up to \$22.00 per kg are what drive up the lease price of SNA8 ace. This deemed values regime is totally inappropriate for such a healthy fish stock especially if you compare it to the deemed value regime currently in existence in the TAR East Coast fishery.

I think of the two options Option 2 is most appropriate.

ACKNOWLEDGMENT OF THE SUCCESS OF THE QMS RE SNA8

We acknowledge the success of the QMS, the management strategy has resulted in this rebuild of this highly valued fish stock. A five or six-fold rebound in this stock over 20 years is remarkable. It has however come at great pain to a lot of operators in this fishery and some earlier management measures would have been welcome and may have lessened the need for such radical changes in our fishing gear and fishing practices. This stock dropped to below the hard limit 10% of B Zero luckily the current policy of closing a fishery if the stock dips below the hard limit wasn't implemented when this occurred. This would have been devastating for the inshore fishing industry in FMA8 and would have been unnecessary. I hope FNZ can also acknowledge FNZ's ability to rebuild stocks so rapidly and can appreciate the power of these fishery controls and measures. Going forward with good timely decisions underpinned by good science will ensure well managed stocks, I assume the issue will be the cost of such detailed management.

BIODIVERSITY

I am concerned when there are expressions of having to be conservative regarding SNA8 stocks. They are 54% B Zero and increasing. I would have thought in regard to the biodiversity SNA is a stock that has very good relative abundance. There are concerns for other parts of the marine environment, for example PAD8 stock appears to be at total collapse. This has not occurred due to fishing; it is assumed amongst a lot of fishermen this has occurred because of the large SNA and SPO stocks predated on PAD8. Snapper predate on small fish and this imbalance may be detrimental to other fish species such as GUR. I wonder if some of the issues around the scallop fisheries could be attributed to snapper predation, the sharp decline in scallop fisheries appears to be in conjunction with the large increase in SNA stocks. Trawling is constantly referred to as an indiscriminate form of fishing, the assumption implied is that it is destructive. Trawling is heavily regulated and monitored, it catches fish stocks proportionately whereas if you have a fishing method that targets only one or two species its impact can be disproportionate.

SNAPPER CATCH NOW COMPARED TO HISTORIC CATCH

With such a low headline height the size composition of our SNA catch is much reduced, the much larger fish that were caught with a high headline height, more speed and pair trawling now swim away from our fishing nets. These larger fish have much larger gonads and spawn much more productively (this was confirmed to me by an MPI fisheries scientist) going forward this may increase the productivity of the SNA8 stocks.

A large snapper would struggle to fit under my headline, we never catch the 25 lbs plus snapper anymore.

With Option 4 implemented not only will the value of SNA8 quota be rationalised, in conjunction with reduced deemed values, as in Option 2, the lease costs will come down. This should enable our industry to get snapper to the consumer at a more affordable price.

Snapper stocks are increasing around NZ not just in area 8

The fishing industry is the vehicle by which New Zealanders can reap the benefit of this remarkably recovering fish stock. So, this is an opportunity for a benefit to everyone who gets to consume this product, not just a benefit to the fishing industry.

Submitted by:

Curly (Ian) Brown

Brown and Hayman Fisheries Ltd



Submission Form

Review of sustainability measures for 1 October 2021

Once you have completed this form

Email to: FMsubmissions@mpi.govt.nz

While we prefer email, you can also post your submission to:

2021 Sustainability Review, Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

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Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:

Name of submitter or contact person: Alastair Ritchie	
Organisation (if applicable):	Co-founder of The Big Fishing Club (IGFA)
Email:	
Fish stock(s) this submission refers to:	SNA8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	25% increase is the least damaging option on the table.

Official Information Act 1982

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With the pressure on snapper stocks nationwide with many areas in deep trouble it doesn't make sense to increase commercial take to levels that have proven to decimate stocks in SNA8 in the past. If anyone in the Govt can read the act properly, Moyles law specifically, it says commercial interests are 3rd in line behind NZers and Maori. This seems to have been long forgotten. Protect the rights of NZers and this precious resource against the well funded lobbyists from the commercial sector.

Please continue on a separate sheet if required.

Royal Forest and Bird Society, Northern Branch, Whangarei.

email

19/07/2021

Submission to the Fisheries NZ on their Proposal to Increase the Total Allowable Commercial Catch of the SNA8 area from North Cape to Kapiti.

From the Northern Branch of Forest and Bird

Points we would like considered.

1. The Fisheries Act 1996 Part 2, no 8, **Purpose 2b** states :
[ensuring sustainability means] avoiding, remedying, or mitigating any adverse effects of fishing on the environment.
2. The Fisheries Act Part 2, no 9, **Environmental** principles states
 - a: associated or dependent species should be maintained above a level that ensures their long term viability
 - b: biological diversity of the aquatic environment should be maintained
 - c: habitat of particular significance for fisheries management should be maintained
3. The Fisheries Act Part 2 , No 10 **Information** principles states
 - a: decision should be based on the best available information
 - b: decision makers should consider any uncertainty in the information available in any case
 - c: decision makers should be cautious when information is uncertain, unreliable or inadequate
 - d: The absence of any information should not be used as a reason for postponing to achieve the purpose of this Act.

The probable outcome of Fisheries Proposal is that there would be a massive increase in bottom trawling. Bottom trawling is indiscriminate in what it catches. The large weighted nets sweep up everything in its way into the nets.

Other species in the area such as, gurnard, tarakihi, john dory and trevally will get swept into the net. There are no biomass estimates for these species so their status is unknown.
To mitigate [from the Act] any adverse affects from this Proposal the increase should be kept to a minimum.

The Environmental principles state associated species should have a maintenance level that ensures their longterm viability.
If the biomass of those species is not known the maintenance level cannot be finalised.

If the maintenance level is not known of the associated species in the SNA8 area how can the biological diversity of the area be maintained?

Information principles in the Act state that decision makers should be cautious when information is inadequate or in this case it seems is not available.

If fish biomass is known there is higher resilience in that ecosystem. With climate change affecting different species of fish in different ways biomass will be an everchanging component of any ecosystem.

The Precautionary Principle which all ecological decisions need to have as a component should quite clearly be used as a tool in this proposal.

Regards Bev Woods Secretary Nth Branch Royal Forest and Bird.



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Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details: Mana Cruising Club 5 Pascoe Avenue, Paremata, Porirua 5026

Name of submitter Robert Paulin. Secretary of Mana Cruising Club or contact person:

Organisation (if applicable):

Mana Cruising Club

Email:

Fish stock(s) this submission refers to:

SNA 8

Your preferred option as detailed in the discussion paper

(write "other" if you do not agree with any of the options presented):

Other

Official Information Act 1982

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Submission:¹

Details supporting your views:

Please see attachment

Please continue on a separate sheet if required.

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

Submission on “Review of Sustainability Measures for Snapper (SNA 8) for 2021/22” – Fisheries NZ Discussion Paper No: 2021/09.

Who are we.

This submission on Review of Sustainability Measures for Snapper (SNA 8) for 2021/22 is made by the Mana Cruising Club (MCC). The club is based at Mana Marina in Porirua at the Southern North Island. The club has 981 members and those members own 869 boats including 487 trailer boats and 382 moored vessels. The market value of the members vessels would be in the vicinity of \$150 million. Nearly all the members are recreational boaties.

Why are we submitting

We are submitting because all our members enjoy fishing. All members would like to be able to catch snapper for their own consumption and to share with their friends and family. Catching snapper in our cruising grounds is not an easy process. Our fishing opportunities are more limited by weather than other areas, we are very close to Cook Straight and get to “enjoy” Cook Straight weather.

Catching snapper when we can fish is not an easy task, many of our snapper fishing trips return empty handed or with minimal catch; it is a rare day when our catch is limited by bag limits. The Discussion Paper gives the impression that it is difficult to avoid catching snapper, this is very definitely not our experience. Our members would be delighted if the fishery recovered to the extent that it was difficult to avoid catching snapper and hope to see the day when it happens, however it has not happened yet.

Are we an important sector of the national economy

Relative values of commercial and recreational sectors

A comprehensive Fisheries Report that looked into the role of commercial fishing to the New Zealand economy was produced by Business and Economic Research Limited (BERL) in 2017. The Report concluded that in the five years to 2015, commercial fishing provided a direct output value of \$1,727 million (or \$345.4 million annually) and a total output value of \$4,179 million (or \$835.8 million annually). The Report highlighted that in the five years to 2015 on average inshore fishing produced a total output value of \$1,197 million (\$239.4 million annually), total contribution to GDP of \$460 million (\$92 million annually).

By comparison the report produced by the South Australian Centre for Economic Studies in 1999 titled Value of New Zealand Recreational Fishing undertaken for the New Zealand Ministry of Fisheries estimated that the annual value of recreational fishing in New Zealand was \$973.5 million annually. The report includes “*However, it must be noted that these figures are based on recurrent expenditure only and do not take into account any capital expenditure (such as boats and rods) or multiplier effects.*”

There is a more recent report dated March 2016 by the New Zealand Marine Research Foundation titled “Recreational Fishing in New Zealand – A Billion Dollar Industry”. This report values recreational fishing at \$946 million of direct expenditure annually which generates \$1.7 billion of economic activity.

It should be noted that all recreational fishing takes place in the inshore fishery. From these reports it is apparent the comparative values of commercial and recreational fishing are:

	Commercial Inshore (Annual Millions 2017\$ _s)	Recreational Annually	Recreational/Commercial
Direct	\$92	\$943 (1999\$ _s)	10.25
Output	\$239.4	\$1,700 (2016\$ _s)	7.10

From these reports it is apparent that the value recreational fishing sector is approximately 10 times the value of the inshore commercial fishing sector. We hope the Minister takes account of the value of the sectors when making his decision and gives appropriate emphasis to the recreational fishing sector.

Is the consultation genuine

Fisheries New Zealand (FNZ) booked a room for consultation at Mana Cruising Club. They did not tell the club why they required the room and they did not ask the club to inform its members that the consultation was taking place. This is not genuine consultation. The writer found out about the "consultation" by chance through a third party.

What is our view

Success or otherwise of the Quota Management System

FNZ's Discussion Paper tells us that the snapper stocks in SNA 8 plummeted to a low 6% of unfished biomass in 1987 and remained at very low levels until 2009. The Quota Management System was introduced in 1986. The first 23 years of operation of the Quota Management System had minimal impact on snapper biomass in SNA 8. The biomass has recovered since 2009 mainly due to exceptionally high recruitment in 2006 and again in 2016 to 2018. The Discussion Paper does not give reasons for the periods of high recruitment and leaves the impression that FNZ do not understand the mechanisms behind these periods of high recruitment. In plain English the recovery of the snapper biomass in SNA 8 since 2009 could be more to do with good luck than good management.

Projections into the future

Of more concern is that because we do not understand the factors that result in high or low recruitment future periods of very low recruitment cannot be ruled out. Any modelling of future stock numbers should not only consider average recruitment but some sensitivity testing based on very low recruitment.

Lessons from History

The following catch landing figures have been obtained from figures 2 of the Discussion Paper. The annual percentage spawning biomass figures (S_B/S_{B0}) have been obtained from Figure 13 of the Discussion Paper.

Prior to 1953 the landed commercial catch was about 300 tonnes per annum or less. During this period the spawning biomass declined from something close to 100% of the unfished biomass (S_B/S_{B0}) to about 92%.

The landed commercial catch from 1953 to 1973 was relatively steady at about 1,300 tonnes per annum. During this period the fishery declined from 92% to about 40% (S_B/S_{B0}).

From 1974 until 1984 the landed commercial catch was typically at or above 3,000 tonnes per annum and the rate of S_B/S_{B0} decline was (surprisingly) only slightly faster than it had been in the 1953 to 1973 period. S_B/S_{B0} reached a minimum of about 6% in 1987. S_B/S_{B0} remained very low (<20%) until the mid 2000s when it recovered as a result of exceptionally recruitment.

Summarising the above, the SNA 8 fishery has shown in the recent past that:

1. With commercial landing at 1,300 tonnes per annum it can go into very rapid stock decline; and
2. Commercial landings at about 3,000 tonne per annum exacerbate the rapid decline of S_B/S_{B0} , leading to a predictable collapse of the fishery.

It is difficult to accept FNZ's modelling showing that at 54% S_B/S_{B0} the fishery can sustain TACC of 2,600 tonnes per annum with minimal predicted decline in S_B/S_{B0} . The modelling does not correlate at all with the recorded behaviour of the fishery since 1953.

The Discussion paper makes no mention of calibration and validation of the modelling. Frankly if the model has not been calibrated and validated against historical data it should not be given any creditability and if it has been calibrated and validated against the historical data that process should be reported upon in the Discussion Paper.

What of the future

The fishery has shown us (during the 1974 to 1984 period) that when the landed commercial catch is allowed to rise above 1,300 tonnes per annum it will collapse. Figure 13 of the Discussion Paper shows that there is an opportunity to grow the biomass substantially in just a few short years. If the TACC is left at its current level of 1,300 tonnes per annum the fishery may be expected to grow to about 80% of the unfished biomass. However there is a significant risk that the fishery will collapse at this level of TACC – S_B/S_{B0} reduced from 80% to 40% between 1953 and 1973 when the Landed catch was at about 1,300 tonnes per annum.

The fishery was last at 80% of the unfished biomass in the mid 1960s and it should be allowed to recover to at least that level before any increase in the TACC is even discussed. Do not miss this opportunity to have an abundant fishery.

Key points of this submission

- A. Our objective is to ensure that the Minister takes the precautionary path that at least maintains the Snapper 8 stock at current levels. The last time the Total Allowable Catch (TAC) was as high as now proposed, over 3000 tonnes, the stock was in steep decline and it took many years to recover;

- B. The predictions of the model do not correlate with the observed response of the fishery in the past. The model should be both calibrated against historical data and validated against historical data and the results of that process reported;
- C. There should be no increase in the TACC at this stage;
- D. FisheriesNZ should set a formal target of achieving 80% B_0 in SNA 8 and schedule a stock assessment in 2030 followed by a review of the TAC in 2031.
- E. Having effective cameras on all commercial fishing boats should be a prerequisite for any increase in the TACC;
- F. There should be no change to the current Annual Catch Entitlement/Deemed Value regime until a stock level of 80% B_0 is achieved;
- G. An increase in the Maori customary allowance to 100 tonnes would represent a very low risk to the fishery and is supported;
- H. The allowance for recreational catch within the TAC should be increased in line with the National Panel Surveys;
- I. There should be no change to the recreational bag limits;
- J. The Minimum Legal Size (MLS) should be the same for recreational and commercial fishers. An increase in the MLS above 27cm should be considered, a MLS of 30cm would be supported;
- K. The club is very concerned about the damage caused by bottom trawling. Bottom trawling should be prohibited within the 12 mile limit in all New Zealand's territorial waters; and
- L. Set netting is an indiscriminate fishing method that should not be permitted for amateur or commercial fishers.



Guardians of Kāpiti Marine Reserve Trust

**Submission to the Snapper (SNA8) Review of
Sustainability Measures for 2021/22
July 2021**

(For further information please contact Ben Knight by email to
)

1. Introduction

- 1.1. This submission has been prepared by Chris Paulin and Ben Knight on behalf of the Guardians of Kāpiti Marine Reserve Trust (GoKMR).
- 1.2. GoKMR's is a registered charitable trust whose purpose and mission is to advance and promote the conservation and protection of the Kāpiti Marine Reserve and surrounding marine environment for the benefit of the local community now and for future generations.
- 1.3. GoKMR represents a network of marine users, recreational and commercial fishers, boaties, divers, marine scientists, educators, conservationists and other members of the local community with a shared interest in the management, protection and enhancement of the Kāpiti Marine Reserve and surrounding environment.

2. Summary of our submission

- 2.1. The proposed increases to the total allowable catch (TAC) and total allowable commercial catch (TACC) for the Snapper quota management area known as Snapper 8 (SNA8), which includes the wider Kāpiti marine area (stretching from Pukerua Bay in the south to the Otaki rivermouth in the north), is of concern to the Guardians of the Kāpiti Marine Reserve Trust.
- 2.2. If the proposed increases for SNA 8 go ahead there could be an up to doubling of the total allowable commercial catch (an increase of 1300 tonnes) which will inevitably lead to an increase in the amount of trawling around the marine reserve and within the wider Kāpiti marine area with no benefits for locals and significant negative impacts such as damage to sensitive benthic habitats including rhodolith beds, recently discovered anemone beds and areas of sponge gardens and other encrusting biogenic habitats (much of which are not well spatially documented or understood).

3. Kāpiti specific considerations

- 3.1. The issues that surround increasing the snapper TAC within SNA 8, in relation to the Coastal Marine Area, cannot be viewed in isolation from the surrounding environmental and cultural context.
- 3.2. Kāpiti marine reserve is one of New Zealand's oldest and largest coastal marine reserves. It enjoys widespread support by the local community and iwi. The marine reserve does not exist in isolation from the wider marine area and any negative impacts of fishing activity within the wider Kāpiti marine area will also impact on the health and abundance of the marine reserve.
- 3.3. Fundamental to the securing local community and iwi support for the marine reserve when it was first proposed in 1991/92 was the

establishment of a no-trawl zone for the wider Kāpiti marine area (see <https://www.doc.govt.nz/globalassets/documents/conservation/marine-and-coastal/marine-protected-areas/kapiti-marine-reserve-conservation-management-plan.pdf>)

- 3.4. This no-trawl zone was established “to promote the concept of a buffer area around the marine reserve to enhance the habitat within the reserve and prevent false alarms of illegal fishing.”
- 3.5. This no-trawl agreement has been actively renewed by DoC or MPI in the past ten years with a consequent increase in the amount of trawl fishing activity observed and reported to both the GoKMRT and DoC. The increase in trawl fishing activity in the past ten years has rapidly eroded the social licence for commercial fishers to operate within the Kapiti marine area and is considerable on-going concern to both the GoKMRT and wider community. See our [facebook group](#) for recent posts and discussion about this issue by our members.
- 3.6. The GoKMRT and local community expect this agreement to be upheld and it is the view of the GoKMRT that MPI should prioritise the reinstatement of this agreement with the trawl fishing industry immediately.
- 3.7. Cultural concerns and impact on fisheries, reefs, benthic habitats (including the aforementioned benthic habitats including rhodolith beds, anemone beds and sponge gardens), and islands with high cultural value have been the subject of significant community interest throughout the west coast of the North Island for a considerable period.
- 3.8. There is evidence of consistent occupation by Maori for centuries throughout the west coast of the North Island adjacent to the area SNA 8. This has resulted in a considerable number of iwi and hapu having a continuing interest in this area, and it being the subject of dispute, warfare and changes in occupation during various periods both pre- and post-European.
- 3.9. Accordingly, not only has there been, and currently are, rich ecosystems created by the confluence of land, fresh water and sea water, (including northern and southern flowing coastal currents); but also a heavy overlay of Maori interests within this area, together with the imposition of more recent European occupation and interest.
- 3.10. The Kāpiti marine area provides habitat for a rich variety of fish, including pelagic, benthic and demersal species. The area has numerous reefs and underwater habitats that become areas for the concentration of fish, leading to the area being regarded both by Māori and by European as a rich food basket for kai moana.
- 3.11. The Guardians have noted recent concerns (these have also been shared widely in the local community through social media) regarding

the increasing areas of kina barren and kina over abundance around Kāpiti.

3.12. Snapper, one of the kinas few natural predators, play a predatory grazing role in the ecosystem and devouring the kina stocks down to a more balanced and natural level thus allowing kelp forests to regenerate. We find this observed increase in kina barrens incompatible with MPI's assertion that snapper stocks have increased to a level where the TACC can be increased.

3.13. Given the known oceanographic currents and biogeographic regions, it is inconceivable that the Kāpiti snapper stocks could be managed efficiently within SNA 8 while most (94%) of the fishery is located several hundred kilometres north. In 2017 a New Zealand Fisheries Assessment Report noted that there was insufficient catch and effort data available to monitor CPUE trends from the area south of Cape Egmont, which includes the Kapiti region (Statistical Area 039). (<https://fs.fish.govt.nz/Doc/24487/FAR-2017-45-SNA8-CPUE.pdf.ashx>). (<https://www.mpi.govt.nz/dmsdocument/45484-Review-of-sustainability-measures-for-snapper-SNA-8-for-202122>)

3.14. Snapper numbers within the wider Kāpiti marine area have increased in abundance in recent years, although anecdotally the fish caught around Kāpiti seem to represent one or two distinct year classes with few smaller fish (pers. obs.).

3.15. The drivers of this increase in snapper abundance are not well understood with the consultation document pointing to an exceptional 2016 spawning and recruitment year being a likely driver alongside longer term catch limits reductions.

3.16. The great unknown is the role that climate change has or may play in Snapper abundance in the future and the models MPI are using do not provide any certainty regarding the likely status of this stock beyond a 5-10 year window.

4. **Consideration of other legal controls and frameworks**

4.1. Given these outstanding and high natural values that have been identified within the SNA 8 Management Area we submit that further controls are required to avoid adverse effects on those values.

4.2. This involves matters of some considerable complexity, both in relation to the values identified by the general public, iwi and fishers, and also in relation to the interaction of various legislation and most particularly the Fisheries Act 1996 and the Resource Management Act 1991 (RMA). The New Zealand Coastal Policy Statement 2010 (NZCPS) overlays and informs much of the debate in relation SNA 8.

- 4.3. The Environmental Court has made interim determinations in relation to claims for Areas of Significant Cultural Value (ASCV) in the Coastal Marine Area in the Bay of Plenty Region, where there have been issues in relation to infrastructure within Significant Biodiversity areas, and have been the subject of a recent High Court decisions in relation to activities permitted within various overlays, including Biodiversity and areas of Significant Cultural Value.
- 4.4. Furthermore, given the importance of this issue to the general public, local iwi, MPI and fishing industry, we recommend that all trawling within SNA 8 be embargoed until the implications of the RMA can be addressed. Specifically:
- (a) investigate the relevant context of the RMA, particularly sections 5 and 8 as they relate to the obligations under the Act, s 32 and the relevant parts of sections 67 and 68;
 - (b) consider the relevant provisions of the NZCPS, especially the provisions in Policies 11(a) and (b), 13, 14 and 15(a) and (b) and examine how this is being implemented in relation to these issues and identify the potential adverse effects of bottom trawling on the significant indigenous biodiversity, outstanding natural features, outstanding natural landscapes, and areas of significant cultural value.

5. Summary

- 5.1. Based on the evidence provided in the Review of Sustainability Measures for Snapper (SNA8) 2021/22 consultation document, it is clear that it is not fully understood why there are currently more adult sized Snapper in this fishery management area. It is also not known if the trend will continue into the future! A precautionary approach is therefore prudent and recommended with further evidence of the drivers of this measured increase in biomass required before any additional TACC can be allocated.
- 5.2. The proposed commercial catch limit increases will inevitably lead to a reduction in the number of fish available for recreational and customary fishers to catch and this is acknowledged in the consultation document. It will also see other fish stocks typically caught as bycatch such as trevally, John dory and gurnard also taken in larger numbers commercially alongside other undesirable impacts such as marine mammal, sea bird and other non-target species bycatch and the well documented damage to the habitats that support this abundance in the first place - and all at the expense of our local recreational and customary fishery!
- 5.3. The Guardians of the Kāpiti Marine Reserve consider that an efficient and productive local recreational and customary snapper fishery in the waters surrounding Kāpiti marine reserve is a fantastic resource that we want to retain and protect so that future generations can enjoy this

connection with the marine environment and provide an ongoing resource for tangata whenua, recreational and commercial stakeholders.

- 5.4. Given all the above considerations, it's hard to see why anyone - other than the small number of commercial quota holders who will directly financially benefit would support the proposed catch limit increases (In fact a total of 16 SNA 8 quota holders have preferential "28N" rights, with two holders having 96% of the rights, and in fact the percentage share of other local quota holders in the fishery will decrease!).
- 5.5. Any increased trawl fishing effort in particular will result in significant impacts on local biodiversity and significant natural areas, along with reduced availability of fish for tangata whenua, recreational and local commercial fishers.
- 5.6. We submit that the best practice approach would be to place an embargo on all trawling south of Cape Egmont until additional information is available on the local stock status.
- 5.7. Because the risks of the uncertainties in the current stock assessment can only be managed through ongoing monitoring and assessment, we consider that the snapper stocks south of Cape Egmont should be assessed again within five years and sustainability measures reviewed when more adequate data are available.



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While we prefer email, you can also post your submission to:

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Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:

Name of submitter or contact person:	
Organisation (if applicable):	Raglan seafoods
Email:	
Fish stock(s) this submission refers to:	Sn 8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Email above

Official Information Act 1982

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1. This is a significant increase. It should be shared to the existing fishers and Iwi and Ace holders, so that the fishing communities can benefit from the local West Coast Ports, the employment and the infrastructure needed to operate the vessels which will also support local bodies to maintain Wharfs.
2. At present there are only 6 inshore trawlers operating on the West Coast. All require 40 ton of sna ace, a total of 240 ton sna ace, which will enable them to harvest 300 ton of fish stock to create a sustainable, economical fish plan.
3. Currently the two New Plymouth trawlers hold some of their own Ace and some for Sanfords and Iwi. They are experiencing some problems from constant harvesting gurnard with low headline gear and now noticing the gurnard fishery weakening.
4. Kawhia vessels don't hold any ace but have all there ace supplied by Tainui.
5. Two Raglan trawlers have a historical catch history. Once the Quota was sold to Tainui it was taken away from the port. The two remaining trawlers have been in a vulnerable position ever since. Although the Port is geographically in a good position, it has been restricted on any growth because the availability of sna 8. If this increase is managed properly, then this is the biggest opportunity that can help the West Coast port to become viable again and provide employment.
6. We have always been mindful of working with shared fisheries and this will enable to have manageable fish plan again.



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Submitter details:

Name of submitter or contact person: Raglan Sport Fishing Club. Ken Barry President	
Organisation (if applicable):	Raglan Sport Fishing Club
Email:	
Fish stock(s) this submission refers to:	SNA8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Option 1. Prefer no increase at all until proper science is done.

Official Information Act 1982

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Submission Snapper 8 review submission

1. The Raglan Fishing Club was founded in the year 2000 and currently has 550 members with another 800 anglers in contact who fish the area. Although the club was only founded 20 years ago, the club is the largest fishing club in the Waikato. It is a known fact that only 10% of recreational fishers belong to any fishing/boating club, so the Raglan Sport Fishing Club undertakes the responsibility of representing all fishers by default who fish out of Raglan. This includes those who visit from other areas.
2. Raglan Coastline produces some of the best Snapper and Gurnard fishing in New Zealand. Raglan recorded 150 weighed and tagged Stripe Marlin this last season and accommodated boats from all over the North Island.
3. Recreational fishing is by far the most common activity hosted in the marine environment; it puts food on the table and brings people to coastal towns to relax and enjoy the great outdoors. Recreational fishing pumps more money & jobs into the New Zealand economy than the total exports of commercial fishing interests. The significant contribution of recreational fishing to the social cultural and economic wellbeing of the people and communities of the Waikato Region should be recognised in the review of SNA8
4. RSFC has played a huge roll in the rebuild of SNA8 thru the efforts of the late Sheryl Hart. After much harassment of the Conservation Dept in the 90s, Maui dolphin were finally DNA recognised as a separate species thanks to Sheryl's persistence . In 2000/2001 SNA8 review, Sheryl as a delegate to Big Game Council and rep to Recreational Fishing Council and was involved in the Working Group which brought in the first One NM trawling ban and Three NM trawling Bubbles around Harbours in SNA8. In 2008 as a representative of NZBGC and NZRFC again in the Working Group for the Maui dolphin Threat Management Plan which implemented the Second NM trawl ban. Sheryl was convinced that the second NM trawl ban was the major factor in the recovery of SNA8 and that significant attention should be placed on mapping and scientifically proving such is the case. With this knowledge we can improve all fisheries around NZ. Our preference is for no change to the TAC until this work is done.

Option 1 only can be implemented because there has been no scientific studies done on why the snapper have come back. Trawl surveys may tell you there are a lot of snapper returned after 40 years but by catch that is effected in this fishery also has not been accessed to a level that gives anybody confidence in this process. 2NM trawl bans at minimum should be placed the length of west coast (SNA8) Effort to accurately assess recreational catch needs to be still implemented

All SNA8 inshore fin fish should be allocated into SNA8 boundary and assessed to 50% of original biomass which then should be imposed as the hard line bottom limit.

Any future plans associated with SNA8 should enhance this fishery to level where all stake holders can extract their sustainable share, removing damaging seabed trawling practices and looking for a suitable replacement solution to monitor the health of this ecosystem.



Setting lower TAC levels allows this fishery to strengthen its position as a holistic dominated ecosystem that doesn't require huge areas put in no take reserves.

The decision that minister David Parker has to front for future generations of New Zealanders is a sustainable ecosystem by;

1. Producing this governments promise of a oceans and fisheries holistic approach to manage North Island Westcoast (SNA8) and all other New Zealand fisheries
2. All fish stocks to be comprehensivly surveyed and rebuilt to 50% of original Biomass in this Westcoast fishery.
3. Follow through with scientific evidence that all bottom trawling needs to be fazed out of NZ waters because of its destructive effect on the seabed.
4. Don't believe that it's Sanfords god given right, after playing a major role in destroying this fishery from the 1970s to the mid 1980s to then automatically hold a dominating position/controlling interest in and over SNA8.
5. Deemed values should remain at the same level, because commercial catch will increase to the point that there is minimal effect on companies bottom line, only the holistic Fishery suffers.

Thank you for acting in best interest of our Fishery.



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Submitter details: Mana Aquatic Divers

Name of submitter Allan Davidson, Secretary for Mana Aquatic Divers Inc

Organisation (if applicable):

Mana Aquatic Divers Inc

Email:

Fish stock(s) this submission refers to:

SNA 8

Your preferred option as detailed in the discussion paper
(write "other" if you do not agree with any of the options presented):

Other

Official Information Act 1982

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Submission:¹

Details supporting your views:

Please see attachment

Please continue on a separate sheet if required.

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

Submission on “Review of Sustainability Measures for Snapper (SNA 8) for 2021/22” – Fisheries NZ
Discussion Paper No: 2021/09.

Who are we.

This submission on Review of Sustainability Measures for Snapper (SNA 8) for 2021/22 is made by the Mana Aquatic Divers Inc (MAD). The club is based from the Mana Cruising Club at Mana Marina, Porirua at the Southern North Island. MAD is an NZUA affiliated dive club with 42 members and most members have been diving and fishing the region well before the QMS was introduced, with many having grown up in the area with several members former commercial Paua divers so we retain a strong historical knowledge of our regions fisheries.

Why are we submitting

We are submitting because all our members enjoy diving and fishing. All members would like to be able to catch snapper for their own consumption and to share with their friends and family. Snappers are one of the more a difficult species to catch in our region via our 2 main fishing techniques, ie: spearfishing or boat rod fishing, however anecdotally we have caught more snapper in recent years with Tasman warmer temperatures, which takes fishing pressure off traditional regional species like Blue Cod, Terakihi and Butter Fish. We note our fishing opportunities are also more limited by weather than other areas due to our boating access being adjacent the Cook Straight and associated weather.

While becoming more abundant, snapper is still not a commonly caught species by our members and it requires more effort for less return. Many of our snapper fishing trips return empty handed and our annual prize for the largest snapper has sometimes not been claimed no snapper have been weighed in some years, and it is rare day our members catch snapper bag limits. We find the Discussion Paper misleading; it creates a false impression it is difficult to avoid catching snapper which is definitely not our members experience. It would be a significant Fisheries Management achievement if this fishery recovered to that extent, and it has certainly not happened yet.

Are we an important sector of the national economy?

Relative values of commercial and recreational sectors

A comprehensive Fisheries Report that looked into the role of commercial fishing to the New Zealand economy was produced by Business and Economic Research Limited (BERL) in 2017. The Report concluded that in the five years to 2015, commercial fishing provided a direct output value of \$1,727 million (or \$345.4 million annually) and a total output value of \$4,179 million (or \$835.8 million annually). The Report highlighted that in the five years to 2015 on average inshore fishing produced a total output value of \$1,197 million (\$239.4 million annually), total contribution to GDP of \$460 million (\$92 million annually).

By comparison the report produced by the South Australian Centre for Economic Studies in 1999 titled Value of New Zealand Recreational Fishing undertaken for the New Zealand Ministry of Fisheries estimated that the annual value of recreational fishing in New Zealand was \$973.5 million annually.

The report includes “However, it must be noted that these figures are based on recurrent expenditure only and do not take into account any capital expenditure (such as boats and rods) or multiplier effects.”

There is a more recent report dated March 2016 by the New Zealand Marine Research Foundation titled “Recreational Fishing in New Zealand – A Billion Dollar Industry”. This report values recreational fishing at \$946 million of direct expenditure annually which generates \$1.7 billion of economic activity.

It should be noted that all recreational fishing takes place in the inshore fishery. From these reports it is apparent the comparative values of commercial and recreational fishing are:

	Commercial Inshore (Annual Millions 2017\$s)	Recreational Annually	Recreational/Commercial
Direct	\$92	\$943 (1999\$s)	10.25
Output	\$239.4	\$1,700 (2016\$s)	7.10

From these reports it is apparent that the value recreational fishing sector is approximately 10 times the value of the inshore commercial fishing sector. We hope the Minister takes account of the value of the sectors when making his decision and gives appropriate emphasis to the recreational fishing sector.

Is the consultation genuine?

Fisheries New Zealand (FNZ) booked a room for consultation at Mana Cruising Club MCC). They did not advise the MCC nor our Dive Club why they required the room nor ask the MCC to inform members that the consultation was taking place. This is not genuine consultation and the author was advised of this about this “consultation” through third parties.

What is our view

Success or otherwise of the Quota Management System

FNZ's Discussion Paper tells us that the snapper stocks in SNA 8 plummeted to a low 6% of unfished biomass in 1987 and remained at very low levels until 2009. The Quota Management System was introduced in 1986. The first 23 years of operation of the Quota Management System had minimal impact on snapper biomass in SNA 8. The biomass has recovered since 2009 mainly due to exceptionally high recruitment in 2006 and again in 2016 to 2018. The Discussion Paper does not give reasons for the periods of high recruitment and leaves the impression that FNZ do not understand the mechanisms behind these periods of high recruitment. In plain English the recovery of the snapper biomass in SNA 8 since 2009 could be more to do with good luck than good management.

Projections into the future

Of more concern is that because we do not understand the factors that result in high or low recruitment future periods of very low recruitment cannot be ruled out. Any modelling of future stock numbers should not only consider average recruitment, but some sensitivity testing based on very low recruitment.

Lessons from History

The following catch landing figures have been obtained from figures 2 of the Discussion Paper. The annual percentage spawning biomass figures (S_B/S_{B0}) have been obtained from Figure 13 of the Discussion Paper.

Prior to 1953 the landed commercial catch was about 300 tonnes per annum or less. During this period the spawning biomass declined from something close to 100% of the unfished biomass (S_B/S_{B0}) to about 92%.

The landed commercial catch from 1953 to 1973 was relatively steady at about 1,300 tonnes per annum. During this period the fishery declined from 92% to about 40% (S_B/S_{B0}).

From 1974 until 1984 the landed commercial catch was typically at or above 3,000 tonnes per annum and the rate of S_B/S_{B0} decline was (surprisingly) only slightly faster than it had been in the 1953 to 1973 period. S_B/S_{B0} reached a minimum of about 6% in 1987. S_B/S_{B0} remained very low (<20%) until the mid 2000s when it recovered as a result of exceptionally recruitment.

Summarising the above, the SNA 8 fishery has shown in the recent past that:

1. With commercial landing at 1,300 tonnes per annum it can go into very rapid stock decline; and
2. Commercial landings at about 3,000 tonne per annum exacerbate the rapid decline of S_B/S_{B0} , leading to a predictable collapse of the fishery.

It is difficult to accept FNZ's modelling showing that at 54% S_B/S_{B0} the fishery can sustain TACC of 2,600 tonnes per annum with minimal predicted decline in S_B/S_{B0} . The modelling does not correlate at all with the recorded behaviour of the fishery since 1953.

The Discussion paper makes no mention of calibration and validation of the modelling. Frankly if the model has not been calibrated and validated against historical data it should not be given any credibility and if it has been calibrated and validated against the historical data that process should be reported upon in the Discussion Paper.

What of the future

The fishery has shown us (during the 1974 to 1984 period) that when the landed commercial catch is allowed to rise above 1,300 tonnes per annum it will collapse. Figure 13 of the Discussion Paper shows that there is an opportunity to grow the biomass substantially in just a few short years. If the TACC is left at its current level of 1,300 tonnes per annum the fishery may be expected to grow to about 80% of the unfished biomass. However there is a significant risk that the fishery will collapse at this level of TACC – S_B/S_{B0} reduced from 80% to 40% between 1953 and 1973 when the Landed catch was at about 1,300 tonnes per annum.

The fishery was last at 80% of the unfished biomass in the mid 1960s and it should be allowed to recover to at least that level before any increase in the TACC is even discussed. Do not miss this opportunity to have an abundant fishery.

Key points of this submission

- A. Our objective is ensuring the Minister takes a precautionary path that maintains Snapper 8 stock at current levels. The last time the Total Allowable Catch (TAC) was as high as now proposed, over 3000 tonnes, the stock was in steep decline, and it took many years to recover;
- B. The predictions of the model do not correlate with the observed response of the fishery in the past. The model should be both calibrated against historical data and validated against historical data and the results of that process reported;
- C. Our membership want **no increase in the TACC** at this stage;
- D. Fisheries NZ should set a formal target of achieving 80% B_0 in SNA 8 and schedule a stock assessment in 2030 followed by a review of the TAC in 2031.
- E. Having effective monitored cameras on all commercial fishing boats should be a prerequisite for any increase in the TACC;
- F. There should be no change to the current Annual Catch Entitlement/Deemed Value regime until a stock level of 80% B_0 is achieved;
- G. **An increase in the Maori customary allowance to 100 tonnes** would represent a very low risk to the fishery and **is supported**;
- H. The allowance for recreational catch within the TAC should be increased in line with the National Panel Surveys;
- I. There should be **no change to the recreational bag limits**;
- J. The **Minimum Legal Size (MLS) should be the same for recreational and commercial fishers**. An increase in the MLS above 27cm should be considered, a **MLS of 30cm would be supported**;
- K. The club is very concerned about the damage caused by bottom trawling. **Bottom trawling should be prohibited within the 12 mile limit in all New Zealand's territorial waters**; and
- L. **Set netting is an indiscriminate fishing method that should not be permitted for amateur or commercial fishers in all regions**, not just those that are frequented by endangered marine mammals.



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Submitter details:**Name of submitter**

or contact person: Robert Ansley

Organisation (if applicable):

Ocean Pearl Fisheries Limited

Email:**Fish stock(s) this submission refers to:**

SNA8

Your preferred option as detailed in the discussion paper

(write "other" if you do not agree with any of the options presented):

Option 4

Official Information Act 1982

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Submission:¹

Details supporting your views:

Firstly, I'd like to commend Fisheries NZ on the efforts of rebuilding the snapper 8 fish stocks.

With the SNA8 stocks exceeding 50% of the unfished biomass with all options showing the fish stock to stay above 50% in the next 5 years, I believe option 4 is the fairest option across the board.

With the loss of my set net fishery for the TMP for Maui & Hector's dolphins, I am now 100% long line fishing off the west coast of the north island from New Plymouth. Snapper has taken over the Taranaki fishery & now exceeds 85% of my catch. Without any increase in the TACC and access to SNA8 I am very concerned I will have no fishery left at all.

Therefore, I believe option 4 in combination with a lower deemed value rate will hopefully secure my future in the fishery with easier access to SNA8 ACE at a reasonable rate.

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

TO:

2021 Sustainability Review
Fisheries Management
Fisheries New Zealand
PO Box 2526
Wellington 6140

Dear Sir or Madam,

**Submission on
Review of Sustainability Measures for Snapper (SNA 8) for 2021/22**

(Fisheries NZ Discussion Paper No: 2021/09)

I support further limits to the total snapper catch in SNA 8 and a ban on bottom trawling fishing methods.

I support a comprehensively researched approach to future snapper fishing in SNA 8, based on the implementation of the Aotearoa New Zealand Biodiversity Strategy (Te Mana o te Taiao). Objective 10 states that “ecosystems and species are protected, restored, resilient and connected...”

The health of all the SNA 8 marine ecosystem, all fish species and not just the snapper stocks, must be accurately researched, assessed and protected. Bottom trawling is destructive of the marine environment and especially of the species that inhabit the sea floor. This catch method must be stopped to safeguard the remains of our valuable marine biodiversity and ocean wildlife.

Any decisions regarding changes in snapper catch limits must only be made with a view to supporting the protection of our complete marine environment, for the future.

Accordingly, the Total Allowable Catch (TAC) 1 - 4 options should be rejected.

Signed,

Dr Alison Towns

Auckland



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Submitter details:

Name of submitter Stu Taylor or contact person:	
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	SNA 8 Snapper Fishery
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Option 1- to increase the TAC for SNA 8 to 3,065 tonnes. This includes adjustments to the allowances, as well as a small increase to the TACC (23%). And Deemed value Option 1 Special differential deemed value rates commence once catch exceeds Annual Catch Entitlement (ACE) by 10% and increase at 10% intervals.

Official Information Act 1982

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I believe we should take a cautious approach to increasing the limits due to the historical overfishing during the last two decades. Rebuilding the stocks will have a greater economic, cultural and social benefit through recreation and tikanga that outweigh increasing the catch limit further.

Lets protect this fishery for future generations.

Further measure to protect the fishery could be implemented such as requiring all vessels to use precision seafood harvesting equipment and mandatory observers on board.

From: Murray Watson
Sent: Thursday, 22 July 2021 11:13 PM
To: FMSubmissions
Subject: SNAPPER 8 DEEMED VALUES

To whom it may concern,

I wish to comment on Deemed Values for SNA8.

In the last season the best Ace price for lease i could get was \$7.00 per kg with a value of \$8.00 back to the boat, cant survive on that.

I have caught my small SN8 holding this year plus other quota i leased in with \$1.00 return per kg to the boat.

I would be very much in favour of the new proposed deemed rates which would obviously make the boat price more sustainable.

If the quota is made more available by the large quota holders i would be able make my fishing business more sustainable.

Kind regards

Murray William Watson

From: Lee Rotherham
Sent: Thursday, 24 June 2021 11:09 AM
To: FMSubmissions
Subject: Snapper 8 management options

Option 1 should reflect the maximum increase. We have managed to get SNA8 to a level which the Hauraki Gulf and SNA1 aspire to. Don't stuff it up now by moving quickly to a position of overfishing.



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Submitter details:

**Name of submitter
or contact person:** Keith Snow

Organisation (if applicable):

Email:

Fish stock(s) this submission refers to:

SN8

**Your preferred option as detailed in the
discussion paper**
(write "other" if you do not agree with
any of the options presented):

Option 1 or less

Official Information Act 1982

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Submission:¹

Details supporting your views:

Need to take a precautionary approach.

Assessments made in 2021 could be affected by significant reduction of recreational fishing in 2020 due to covid restrictions.

Risk of underestimating the historical and future recreational catch is high.

As SN1 collapses, introduction of more marine protected areas and the greater understanding of small boats crossing the various bars encourages new fishes to the area and the recreational catch will increase. Anecdotally boat ramp usage seems to be increasing.

Please continue on a separate sheet if required.

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.



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Submitter details:

Name of submitter
or contact person: Steven Greene

Organisation (if applicable):

Email:

Fish stock(s) this submission refers to:

Snapper (SNA8)

Your preferred option as detailed in the
discussion paper
(write "other" if you do not agree with
any of the options presented):

Option 1

Official Information Act 1982

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Submission:¹

Details supporting your views:

Option 1 is my preference as a recreational fisherman as it is the most precautionary option, this is preferable for the following reasons:

- Historical overfishing shows this fishery is susceptible to overfishing and I do not want a repeat of this 'heavily depleted' state the fishery experienced in the 1960's and 1970's.
- The data in the review - Fisheries NZ Discussion Paper No: 2021/09, is somewhat unreliable in its nature, this unreliability of data is even referenced within the document itself.
- The QMS is a reactive management tool, with a significant lag/recovery time for overfished fisheries therefore the most precautionary approach should be taken as to ensure stocks remain healthy. This is evident in the proportion of proposed reductions in catch limits of many species summarised in the table on the Review of sustainability measures for 1 October 2021 page.
- If this precautionary option results in further small increases in biomass (40%+ of unfished), this will continue to have positive impacts to the recreational and customary stakeholders who can continue to enjoy the abundant fishery we have experienced in recent years. This will also encourage further recreational fishers & charter operators to join the fishery, which has a significantly higher financial benefit to small coastal communities that support the SNA 8 fishery, compared to if further quota was to be allocated and fished as TACC
- A 23% increase in TACC is a **significant** increase (nearly a quarter), rather than a "small increase" as described in the review document.

Please continue on a separate sheet if required.

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Submitter details:

Name of submitter or contact person: Paul Cane

Organisation (if applicable):

Private

Email:

Fish stock(s) this submission refers to:

West Coast Snapper

Your preferred option as detailed in the discussion paper
(write "other" if you do not agree with any of the options presented):

To continue with the current Commercial and recreational snapper take limits as they are working to rejuvenate the fish stocks

Official Information Act 1982

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Submission:¹

Details supporting your views:

The increase in Snapper biomass since the latest restrictions were introduced

Please continue on a separate sheet if required.

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Submitter details:

Name of submitter Timothy Martin or contact person:	
Organisation (if applicable):	N/A
Email:	[Redacted]
Fish stock(s) this submission refers to:	SNA8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Other

Official Information Act 1982

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Submission:¹

Details supporting your views:

There should be no increase to the TACC. All trawling should be banned from SNA8 as it is a destructive outdated practice than needs to be stopped. The current TACC is more than adequate for commercial fishing. Our fish stocks need to recover further towards the original bio mass.

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Submitter details:



Name of submitter: BRAD OLLIVER
Contact person:

Organisation (if applicable):

Private

Email:

Fish stock(s) this submission refers to:

SNA8

Your preferred option as detailed in the discussion paper
(write "other" if you do not agree with any of the options presented):

OTHER

Official Information Act 1982

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Submission:1

Details supporting your views:

If the stock has only recovered to 54% I recommend not raising it by any at the moment. Why ruin stock that's still on the way up. At least get it to 90% then you can increase the quota by 25% and see how that works. I personally think increasing it now is a big mistake and stocks will deplete for future generations to enjoy. Let our backyard regrow.



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While we prefer email, you can also post your submission to:

2021 Sustainability Review, Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

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Submitter details:

Name of submitter or contact person: Brendyn Gray	
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	SN8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Other

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Submission:¹

Details supporting your views:

Leave the quota as is.

Please continue on a separate sheet if required.

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

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Submitter details:

Name of submitter or contact person: Amie Russell	
Organisation (if applicable):	
Fish stock(s) this submission refers to: SN8	
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	No Increase preferred, least option available at 25%

Official Information Act 1982

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Submission:

Details supporting your views:

I wish for this fishery area to stay healthy, the decision to lower the quote to 1300 Ton was the best thing to happen to this area but the re-generation could still be better, do not take this commercial request to increase please!



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Submitter details:

Name of submitter or contact person: Phillip Garry Powell	
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	SNA 8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	25%

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Submission:¹

Details supporting your views:

It has taken close to 40 years to get to where we are. Yet still we are not at 100% natural stock, or even close to it.

To increase the quota at this point is, too early.

The area needs more time to recover from what commercial fishing did to it in the 60s, 70s and 80s.

I notice you do not have an option for 0% increase, which to me is the only option, however, as we do not have that option, I have gone with 25%

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Submitter details:

Name of submitter
or contact person:

Simon Robert Demler

Organisation (if applicable):

Email:

Fish stock(s) this submission refers to:

SN8 2021 review

Your preferred option as detailed in the
discussion paper
(write "other" if you do not agree with
any of the options presented):

Other

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Submission:¹

Details supporting your views:

I'm a recreational fisherman and spear diver I would like their to be no increase in the take of snapper for SN8. We should be aiming for the restoration of the fishery to the original biomass. This will help us restore the balance of the marine ecosystem and in particular restrain the growth of Kina barrens in the Hauraki Gulf.

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Submitter details:

Name of submitter or contact person:	Kaarem Al-Darra
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	SNA8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Other, I don't believe there should be any change or increase in the TACC or TAC, because the fishery should be left to keep recovering. If TACC is to be increased it should be the absolute minimum "Option 1, 23%".

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There is no need to increase the take of fish in the SNA8 area purely for money making reasons.

The government doesn't own the fish, the commercial operators don't own the fish, and neither do recreational fishermen.

Leave it as it is now so that future generations can enjoy this fishery without undue pressure for purely profit making reasons.

Please continue on a separate sheet if required.



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Submitter details:

Name of submitter

or contact person: DAYNE RAMEKA

Organisation (if applicable):

Email:

Fish stock(s) this submission refers to:

SN8

Your preferred option as detailed in the discussion paper

(write "other" if you do not agree with any of the options presented):

0%

If 0% is not an option, then 25%!!!

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The fish belong to the people. Stop being greedy. Try and gain an iota of intelligence and understand that this primitive way of fishing is outdated and unsustainable and detrimentally damaging to the oceans! Think with ya heads and hearts and get back to reality. You are ruining the oceans for the rest of us you greedy

Please continue on a separate sheet if required.



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Submitter details:

Name of submitter
or contact person: DONNA MARSHALL AND MATT HISHON

Organisation (if applicable):

Email:

Fish stock(s) this submission refers to:

SNA8

Your preferred option as detailed in the
discussion paper
(write "other" if you do not agree with
any of the options presented):

25%

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To Whom has the power to make a difference,

In todays climate and current state of our natural world Matt and I totally disagree with increasing the Quota for the multi million fishing Industry to become even richer while decimating more of our fish stocks with no thought to future generations of NZs. 25% increase is more then PLENTY ENOUGH!! ONLY the fishing industry and Government benefit from this no one else! Does IMP our Government need reminding at what happened in the 80'S along the west coast with Snapper at 8-12% of its natural stock until measures were taken!! This is MADNESS at its best and if IWI have any respect for there Kia Moana and the future generations (because they say they do) then they need to prove it! The fish in the sea belong to all NZERS not big companies who export it all and who time and time again knowingly flout the rules because MONEY is there only objective. Use the lessons the past has provided or we are distained to repeat history.

Matt and Donna



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Submitter details:

Name of submitter **Frederick Michael brown**
or contact person:

Organisation (if applicable):

Email:

Fish stock(s) this submission refers to:

[Review of sustainability measures for snapper \(SNA 8\) for 2021/22](#)

Your preferred option as detailed in the discussion paper
(write "other" if you do not agree with any of the options presented):

Other. But if an increase is going to be given it must be Option 1

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Submitter details:

Name of submitter or contact person:	Tyrone Haynes
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	SNA8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Other

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Fish stocks in the SNA8 are increasing and back at 54% biomass according to research. This does not mean they are back at levels that are sustainable. This means we should keep doing what we are currently doing until we get well over 80% and then it would make sense to look at increasing catch limits. However increasing catch limits now will just ruin all the good work we have done and plunge Biomass % into dark depths they will never be able to recover from. We need to look at the big picture and not the short term gain. Everywhere I freedive I see more and more kina barrens and this is proof that we are having too much of an impact on the snapper and crayfish population. I'm not sure how many of you actually freedive regularly but if you did you would know that the ocean has changed vastly in the last 10yrs. I implore that we uphold the current quota for the sake of our oceans and our future generations of New Zealanders

From: Ronen Lahav
Sent: Tuesday, 13 July 2021 9:12 AM
To: FMSubmissions
Subject: Snapper Fishing and Trawling

Hello,

I am writing to express my opposition to the re-opening of fisheries and snapper targeting on the North Island West Coast. While numbers have clearly improved, they remain well below acceptable levels. Benchmarking improvements off of a 'historical low' and opening commercial limits because levels are not critical is irresponsible and risky, with a high chance that we will simply return to critical levels again.

In particular, trawling and dredging create such ecological destruction and indiscriminate catch that they cannot be considered sustainable.

I think trawling and dredging should not be allowed. The current limits should remain in place for longer and biomass targets should be more accurately detailed, measured and researched prior to any changes being enacted.

Sincerely,

Ronen Lahav.

From: Travis Aldrich
Sent: Tuesday, 13 July 2021 10:28 AM
To: FMSubmissions
Subject: opposition

Hello,

I am writing to express my opposition to the re-opening of fisheries and snapper targeting on the North Island West Coast. While numbers have clearly improved, they remain well below acceptable levels. Benchmarking improvements off of a 'historical low' and opening commercial limits because levels are not critical is irresponsible and risky, with a high chance that we will simply return to critical levels again.

In particular, trawling and dredging create such ecological destruction and indiscriminate catch that they cannot be considered sustainable.

I think trawling and dredging should not be allowed. The current limits should remain in place for longer and biomass targets should be more accurately detailed, measured and researched prior to any changes being enacted.

Sincerely,

--

Sent from myMail for Android



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Submitter details:

Name of submitter or contact person:	William Fairweather
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	SN8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Limited to 25%

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From: Sam Russell
Sent: Tuesday, 13 July 2021 12:21 PM
To: FMSubmissions

Hello,

I am writing to express my opposition to the re-opening of fisheries and snapper targeting on the North Island West Coast. While numbers have clearly improved, they remain well below acceptable levels. Benchmarking improvements off of a 'historical low' and opening commercial limits because levels are not critical is irresponsible and risky, with a high chance that we will simply return to critical levels again.

In particular, trawling and dredging create such ecological destruction and indiscriminate catch that they cannot be considered sustainable.

I think trawling and dredging should not be allowed. The current limits should remain in place for longer and biomass targets should be more accurately detailed, measured and researched prior to any changes being enacted.

Sincerely,

SR

Sent from my iPhone



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Submitter details:

Name of submitter
or contact person: Ben Bailey

Organisation (if applicable): NA

Email:

Fish stock(s) this submission refers to: SNA8

Your preferred option as detailed in the
discussion paper
(write "other" if you do not agree with
any of the options presented):

Other. I think there should be zero commercial snapper fishing in SNA8. See below for why.

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Submission:¹

Details supporting your views:

Firstly, let me say that although I love fishing, I live in Christchurch and the changes in the laws won't affect me at all. Except for the fact that general environmental changes affect everyone. I have never caught a snapper in my life and have nothing to gain either way.

However, here is why the decision to fish SNA8 is naïve and short sighted at best, and downright insane at worst.

SNA8 is not a standalone ecosystem and supports:

A– NZ's total fisheries.

B – The greater North Island snapper habitat.

C –The entire ocean, as everything is connected.

I think that SNA 8 needs to remain unfished by commercial fishing vessels, especially any form of bottom trawling.

Bottom trawling destroys all the natural habitat in a region beyond repair. This reduces the ocean's ability to store NZ's carbon emissions and reduces all life in the area.

The reason SNA 8 needs to stay unfished is because it supports SNA1. Snapper no longer breed in the Hauraki Gulf, as Auckland fisherman have fished it beyond any natural limit. The snapper that are now caught in the Gulf, have swum round the top of the North Island from SNA8. Until SNA 1 has recovered, SNA8 needs to be left alone, as it supports another whole ecosystem. There needs to be a Rahui on all snapper fishing in SNA1, until it has fully recovered to 66% of natural levels. Then, and only then, should commercial snapper fishing be allowed in SNA8. Again, bottom trawling needs to be left in the past.

Please continue on a separate sheet if required.

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Submitter details:

Name of submitter or contact person:	R Neil Ward
Organisation (if applicable):	Mako Sub Aqua / NZ Underwater/ local fishing
Email:	
Fish stock(s) this submission refers to:	Snapper TAC in SNA 8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Option 2

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Submission:¹

1. Having attended a consultation meeting and discussed the data and proposal I consider that "steady as she goes" is the best approach given that the snapper biomass has recovered well so it would be foolish to increase TAC any higher than Option 2 and see another collapse of the stock. My reason is mainly due to the historical slow response to adjustments under the FMA rules due to infrequent and underfunded stock assessments.
2. I think the proposal for customary and recreational catch is fair as this currently healthy activity supports a significant commercial and community value.
3. I think it is essential to improve monitoring and stock assessment by whatever means that works. It is important to involve customary and recreational fishers in this process.
4. I would prefer to see the target biomass be closer to 50% to be cautious. Subsequent reviews may vary this at a later date if stock continues to be maintained or increase.
5. I think all options must bring balance and sustainability to provide for all aspects of social, commercial and cultural wellbeing. Hence my view for Option 2.
6. I think bottom trawling should not be allowed primarily, especially in sensitive areas. This method yields a lower grade of catch commercially hence the lower profitability for fishers. The increased by catch by this method is also not a long term solution for a healthy fishery. Better methods should be encouraged and researched. The ecosystem damage done by bottom trawling is basically not sustainable if what aspire to a healthy and viable fishery.

Please continue on a separate sheet if required.

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Submitter details:

Name of submitter or contact person: Kerry Oxenham	
Organisation (if applicable):	n/a
Email:	
Fish stock(s) this submission refers to:	SNA 8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Option 1: 23% increase to the TACC

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Submission:¹

Details supporting your views:

Take a conservative and more sustainable approach. Propose no more than a 23% increase in TACC, reassessing the biomass annually.

Please continue on a separate sheet if required.

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Submitter details:

Name of submitter

or contact person: Mike Nelson

Organisation (if applicable):

n/a

Email:

Fish stock(s) this submission refers to:

SNA 8

Your preferred option as detailed in the discussion paper

(write "other" if you do not agree with any of the options presented):

Option 1: 23% increase to the TACC

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Submission:¹

Details supporting your views:

Take a conservative and more sustainable approach. Propose no more than a 23% increase in TACC, reassessing the biomass annually.

Please continue on a separate sheet if required.

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Submitter details:

Name of submitter or contact person:	C. HENDRICKS
Organisation (if applicable):	n/a
Email:	
Fish stock(s) this submission refers to:	SNA 8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Option 1: 23% increase to the TACC

Official Information Act 1982

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Submission:¹

Details supporting your views:

Take a conservative and more sustainable approach. Propose no more than a 23% increase in TACC, reassessing the biomass annually.

Please continue on a separate sheet if required.

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.



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Submitter details:

Name of submitter or contact person: Brad Pepping	
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	SNA8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Other

Official Information Act 1982

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Submission:¹

Details supporting your views:

I am delighted that the SNA8 area has shown a recovery from historic lows. However I am deeply concerned about this proposal

1. Any increase in the total TAC should be kept to a minimum and monitored closely to make sure we do not fall below the minimum default target
2. The default minimum of 40% is too low and should be set at 50% with the upper target being 60%
3. I am concerned about the increase in bycatch of other species that have not recovered as much as snapper. Including:
4. Currently I have fished the Manukau harbour for up to 10 years and I have caught plenty of snapper but not one of them was legal size. This to me says something about the health of our fishery

Destructive fishing methods

One of the reasons the fishery has recovered is the 4nm set net ban and 2nm trawl ban. This has given the sea floor a chance to recover and provide life/food for the fish. Increasing the trawl ban to 4nm would help the recovery further. This should also be set round the whole country.

However we should be looking to change the fishing practices that are destroying the sea floor and have a high mortality rate. Having such a high allowance for waste is disgusting. There are new technologies that are way less destructive.

One possible option is square mesh. Whereby the undersized fish are less likely to be caught and has the added benefit of reducing fuel for operators.

However I am unsure just how much better this is on the sea floor. Other options are long line which gives a higher quality product and is more sustainable.

Studies have shown that the destruction of the sea floor releases more carbon than the aviation industry.

If you are truly interested in sustainability then we should be changing the way we do things.

Fish for the future.

Please continue on a separate sheet if required.

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.



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Submitter details:

Name of submitter or contact person:	Regan Cooper
Organisation (if applicable):	n/a
Email:	[REDACTED]
Fish stock(s) this submission refers to:	SNA 8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Option 1: 23% increase to the TACC

Official Information Act 1982

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Submission:¹

Details supporting your views:

Take a conservative and more sustainable approach. Propose no more than a 23% increase in TACC, reassessing the biomass annually.

Please continue on a separate sheet if required.

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Submitter details:

Name of submitter or contact person:	Scott Campbell
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	SN 8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	25% increase only

Official Information Act 1982

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I am a recreational fisherman and a Chef Lecturer at one of NZ's biggest polytechs.

One of the subjects I teach is sustainable fishing and how as Chefs we can help this by buying ONLY fish that is sustainable caught. We also talk about quotas and how increases in quotas affect the fishery. I would be gutted if I had to tell my students that the NZ government has increased the snapper quota by any more than 25%. We need to protect our resource not decimate it!!

As a recreational fisherman I have seen the snapper fishery recover very well over the past several years in the Wellington region. Any more than a 25% increase in the quota will have a devastating effect on the recreational scene!! At the moment I am allowed to take 10 snapper in a days fishing. This is too much in my opinion and would be pleased to see this reduced by half. I only keep one or two fish for a feed and the rest go back if I've had a good day.

So please, please, please do not bow to commercial interests and let there be snapper for my grand kids to catch and their grand kids in years to come,

Regards, Scott.



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Submitter details:

Name of submitter or contact person: Alexander Wallace	
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	Snapper plus other targeted species in SNA 8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Other.

Official Information Act 1982

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contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

Submission:¹

Details supporting your views:

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Whilst the scientific evidence would appear to suggest a recovery in the overall snapper population in the SNA 8 area, my personal experience is quite the opposite; Over the past 5 years I have noticed a considerable reduction in both the number of snapper caught and the size of snapper caught.

I am a recreational fisherman who regularly fishes the approaches to the Manukau Bar in an area South to Hamiltons Gap and North to Piha to a range extending 15km offshore. Where previously the fish were larger and more plentiful, I now struggle to catch a 'decent' amount; 4 or 5 fish in the 4-6lb range. Whereas it used to be very rare to see juvenile snapper outside the harbour, they are increasingly common. Whilst I appreciate this could indicate there are more younger fish, it is noticeable to me that there are a lot less of the bigger fish.

Whatever the current state of the fishery - and even if it is as strong as the science would appear to suggest, - it is disappointing that the quota cannot be kept 'as is' or better yet at reduced rates. At a time when many other fish species around the country are under pressure and at severely reduced numbers wouldn't it make sense to nurture one species, in one area, that is (apparently) in a healthy state?

It also concerns me that in increasing the snapper quota there will be an inevitable increase in catch of other species - ie gurnard and john dory.

Of the 4 alternatives suggested I am not in agreement with any option and would prefer the quota to be kept at its current levels. Many experts advise that a 50% reduction on the natural biomass of a species is a healthy amount to fish down to. With the snapper at that level now, surely it best to retain the current quota and not jeopardise the numbers of gurnard and john dory, which will no doubt suffer further from the increased fishing pressure.

Another issue is the damage to the seabed from increased trawling. Whilst this review does not pertain to that issue, I think it's a worthwhile consideration as damage to the environment in this way should not be increased.

Please continue on a separate sheet if require

From: Tomer Simhony
Sent: Saturday, 17 July 2021 10:41 PM
To: FMSubmissions
Subject: Snapper (SNA 8) Submission

Tēnā koe,

My name is Tomer Simhony and I would like to submit on the Snapper (SNA 8) TACC review.

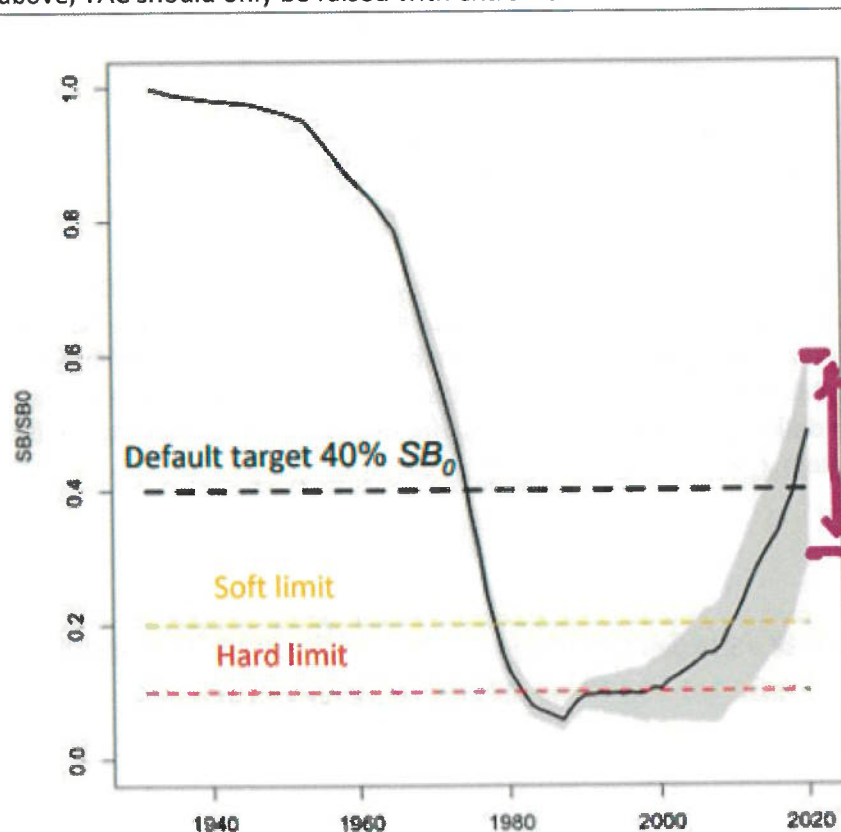
I don't strongly support any of the four options presented, as I believe that they are not conservative enough. Of the four options proposed, I support option 1 the most, though I believe it is not comprehensive enough in protecting the health of the entire fishery and ecosystem.

I would encourage the minister to not choose from any of these options and select a plan that is less aggressive than option 1.

My reasoning are presented below:

1. There is a high chance that the fishery has not recovered to 40% biomass yet. The 95% confidence interval is 95% confident in the RANGE of where the mean/median may lie. It is NOT 95% confident in the projected median (hard black line).

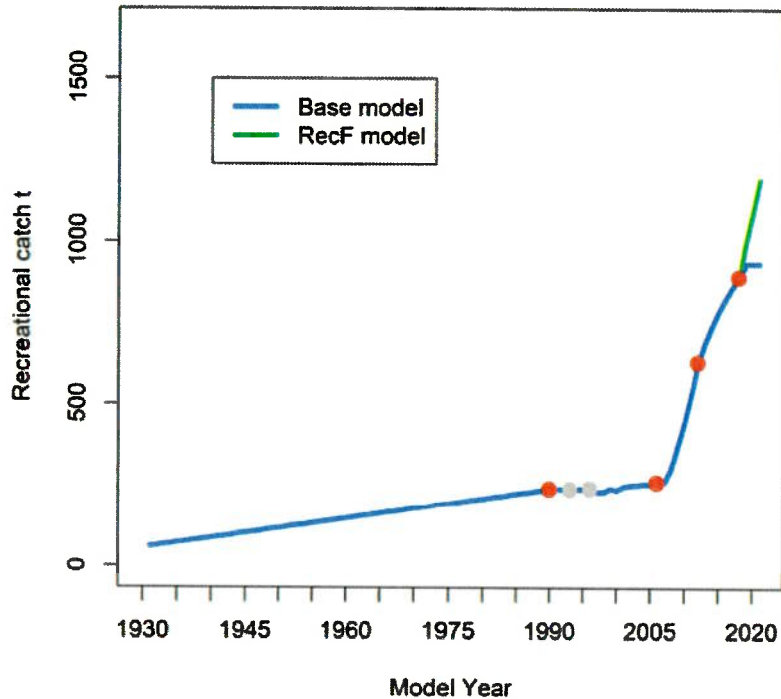
Due to the fact Snapper were almost fished to local extinction in SNA8, combined with the statistical fallacy I described above, TAC should only be raised with extreme



caution.

2. Lack of transparency from commercial reporting.
Due to the lack of observers on commercial boats or cameras operating around the fleet, a cautionary approach should be used when deciding to raise the TAC. There are not enough incentives for commercial fishing vessels to report by catch, marine mammal and seabird casualties.

3. Fishing methodologies pose a danger through bycatch, protected species and benthic habitats. The fishing vessels ("small to mid-size trawl vessels, with a small number of Danish seine, bottom longline and set net operators also present")
I'm particularly concerned about
 - The high number of protected species such as seals, sea lions, and dolphins that can be caught in **trawling**.
 - The damage to benthic habitats of **bottom trawling** (which I believe should not be allowed in the EEZ).
 - The damage to benthic habitats with weight dragging from **bottom long-lining**
 - The high seabird and marine mammal that can become hooked or entangled from **long-lining**.
 The source for this information is Sustainable Seas by Lucy Brake and Raewyn Peart
4. Snapper should not be targeted because it is not a high-yield fish stock. They are slow breeders and cannot cope with the fishing pressure they are under.
5. Recreational fishing fishers are catching **more than twice their allowance**. Therefore, raising commercial limits poses a greater risk to the health of the fishery than if recreational fishers were within their allowance. Furthermore, recreational fishing is **increasing rapidly** (as per Figure 12).

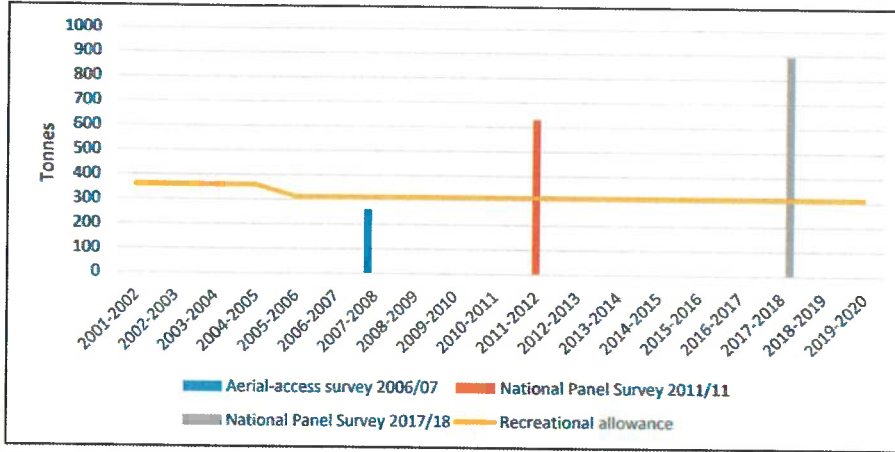


6. The sustainability goals of the strategy is not supported by the lack of certainty in Option 2, 3 and 4. The report "[acknowledges] uncertainty in how the fishery will respond to a significant increase in TAC."
7. It is impossible to create a sustainable fishing plan that focuses on a single species rather than the ecosystem as a whole. Multi stock management approach or mauri-based systems should be used.
8. The Deemed Value Guidelines proposed under all the options worry me as allowing significant overcatch. Don't fix a working system. Maintain high standards of bycatch

Questions for submitters:

1. I do support the creation of a SNA 8 monitoring plan. I think an annual survey of all fish stock is appropriate.

2. The current "recreational controls" seem to be totally failing at maintaining recreational catch at the set allowance. See Figure 8.



3. I have grave concerns about potential impacts of the proposed options on the aquatic environment.

Thank you for your time in reading my submission. I look forward to reading the Minister's response and hope that a cautious approach that focuses on long term sustainability and rejuvenation of all NZ ocean life will be taken.

Ngā mihi,



Tomer Simhony

Marketing

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Submitter details:

Name of submitter or contact person: Scott Nicol	
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	SNAB
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Other-The TAC should not be increased.

Official Information Act 1982

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I believe that the TAC should not be increased in the SNA8 region.

The data that you have provided on the MPI website does show the biomass increasing since the implementation of the cuts in 2005. However even the most conservative of catch increases proposes an increase of **72%** on current TAC. I fail to see how a 72% increase is a conservative approach. If you have to make an increase make it a small increase in the TAC. Increase the Maori Customary rights and if you have to then increase the commercial take but not by 70%.

Furthermore the overlapping GUR1 fishery is proposed to be decreased due to the declining biomass. I see very little reference in the study to how the different species overall benthic environment interacts. It makes inferences about the catch limits will affect different species within the area except to note that GUR being a benthic species may be targeted more due to their being an over supply of snapper. I do not agree with simultaneous in similar areas increasing one species TAC while reducing another. Why not let the biomass continue to increase until well above 60% then re-assess option along with recoveries to other species. You have no reference to any data on **INCREASING** a TAC following a biomass recovery and assuming that it will decline at the same rate as before the recovery is problematic

No mention of the fragile climate environment and volatile market forces currently affecting the New Zealand market. All research and data, and it is all we must go on, was from a more "stable" climatic time. A more conservative approach is needed to see how fish stocks react to rising sea level temperatures and acidity.

I support a monitoring group being created, in fact I find that this data from commercial fishing boats with a history of warping catch recording and with a vested interest in the fishery to have provided accurate information. Studies need to be done on the Benthic environment, which as we saw with Orange Roughy are very poorly understood. Trawling has a devastating effect on the benthic environment and our "Management" is outdated which is confirmed by the %40 biomass limit. It is human arrogance to say that 40% of what an untouched fishery would be is an acceptable level to maintain a biomass at.

No I do not believe these proposed increases adequately provide for social, and cultural wellbeing. I believe they are rooted in economic wellbeing which is disappointing but indicative of MPIs outdated views towards conservation.



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Submitter details:

Name of submitter or contact person: Mark Laing	
Organisation (if applicable):	NA
Email:	
Fish stock(s) this submission refers to:	SNA 8 snapper
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Option 1 – which allows for a 23% increase in Total Allowable Commercial Catch

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Submission:¹

Details supporting your views: Firstly, I would like to acknowledge Fisheries New Zealand for the work it is doing in an attempt to protect our coast lines and fish stocks for future generations of New Zealanders. New Zealand fisheries are fragile and have been cronicly overfished since the 1970's.

My prinicple concern is that the proposed increase in the commerical snapper take in SNA 8 is based on a "latest data" and assumptions that it "might" be above management targets. We have all seen how past decisions based on "the latest data" have gone horribly wrong and taken decades to resolve.

I urge you to take a conversative approach and only consider an initial 23% increase in the TACC in SNA 8 and then continue to actively monitor and manage the situation as proposed, with potential for future incremental increases.

The reason for this is so much good work has been done to get the stocks back to where they are, why would we risk undoing this in a short space of time with a doubling of quota?

If the fish stocks on the West Coast are in fact recovering as rapidly as some data suggests, then **this approach makes good commercial sense**. Why not allow for a rapid increase over the next five years to get the stocks up to a significantly higher level which would then ensure a more sustainable longer term take.

If the commerical operators are genuinely committed to long term sustainability of the fish stocks as they purport (rather than near term export earnings and dividends for shareholders) then they should also support this approach as it will ultimately provide them with better longer term returns.

From a personal perspective, I've fished (recreationally) in various parts of New Zealand over the last 5 decades. These include: Wellington, Marlborough Sounds, Northland, Bay of Plenty, Hauraki Gulf and in the last two years I've started fishing on the West Coast out of the Kairpara.

The West Coast of the North Island is the only one of these areas that doesn't appear to be cronicly over fished and has a "more natural level of fish stocks" and venturing out there is an extraordinary experience.

The planet is at a tipping point, with dramatically rising temperatures, over population, deforestation, loss of top soil and food shortages. We need to be making hard decisions now to protect our planet for future generations and this requires a sustainable approach. **Please be conservative in your approach to SNA 8 so it doesn't end up like the Hauraki Gulf.**

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

From: Terry Hewetson ·
Sent: Monday, 19 July 2021 10:45 AM
To: FMSubmissions
Subject: Rapiro Beach

Hi
I fish regularly on this West Coast beach and catch snapper and kahawai.

I believe the quota needs to reflect the long line fishing that is currently in high numbers.

This should be reduced to a daily catch that is significantly lower than the current numbers. A daily quota would be more reasonable not the per person quota that currently exists.

Kind Regards,

Terry Hewetson · terry.hewetson@fish.govt.nz

terry.hewetson@fish.govt.nz | <https://www.fish.govt.nz/>

From: sarah rolston
Sent: Wednesday, 21 July 2021 7:28 AM
To: FMSubmissions
Subject: SNA 8

Hi Guys

This email is on behalf of myself only. I have fished on and lived on the West Coast of the NI all my life, firstly with my family via Kontiki's and for the last 35 years as a surfcaster. I fish the entire coastline from 90 Mile beach down to the Kapiti/Wellington coast but primarily target the greater Whanganui area. Over the summer months in all those years there has always been a snapper fishery if the water/sea conditions were good but some years have definitely been harder than others. The last couple of years have been good with good numbers and size of fish.

I support OPTION 1. Lets stay with a conservative approach. As I have seen mentioned in other submissions all fishers whether commercial, customary or recreational are getting better and have access to better information and equipment to target fish. In addition there are more recreational fishers targeting snapper with particular pressure on the first 2 kilometres from shore, this additional pressure may get a lot worse with Hauraki Gulf fishers targeting new waters on the West coast.

Please be conservative with this decision, we have all seen the disasters that can happen if we are too positive. We can monitor this fishery more closely and reassess this decision in 5 years time or in fact at any time in the future but it is a lot harder to solve from a low biomass position.

Please feel free to contact me for further information if required

Brent Rolston

--

Brent and Sarah Rolston



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Submitter details:

**Name of submitter Rob Soar
or contact person:**

Organisation (if applicable):

Email:

Fish stock(s) this submission refers to:

SNA8

**Your preferred option as detailed in the
discussion paper**

(write "other" if you do not agree with
any of the options presented):

Other

Official Information Act 1982

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I fish regularly from the beach in the Bayleys Beach, Dargaville area with a torpedo and I firmly believe that there should be no changes to current limits for recreational or commercial fishing in the SNA8 area.

It is great to hear that the status of the stock of snapper in this area has increased in recent years and I believe we need to manage it sensibly for this to continue for generations to come.

If any changes were to be made, I would like to see commercial fisheries develop new and more environmentally friendly fishing methods than netting which basically takes everything in its path and destroys the ocean floor.

Let's continue to manage and grow our fisheries so that future generations can continue to enjoy catching snapper and other species like we can now.

From: [Chantez Connor-Kingi](#)
To: [FMSubmissions](#)
Cc:
Subject: Review of sustainability measures – 2021 October Round
Date: Tuesday, 20 July 2021 11:10:41 AM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)

Kia ora

I would like to add this submission based on the presentation presented SNA 8 in June 2021 – I believe this presentation was miss leading due to the fact, their where no Maturanga Maori components in this presentation and research, which like to high light this was very disappointing as this presentation was delivered to Maori for Maori to give their view? I don't believe the research conducted was sufficient enough to allow us to say increase the snapper quota.

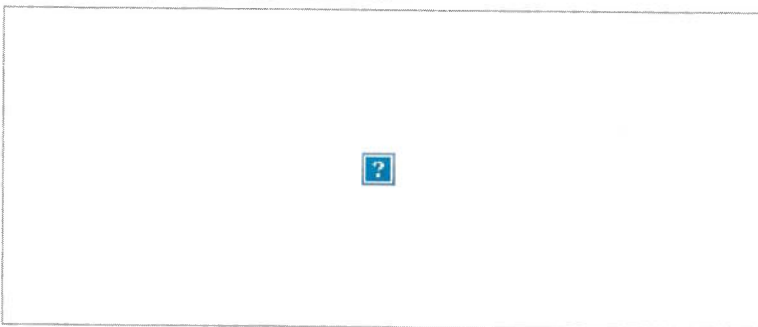
Research should not be used in a capacity to implement change, until Maturanga Maori research has been used or combined with the information received in this report. Its only fair that Maori should be given the opportunity to ask of these options as our view was totally missed out, I believe also that what's another year or two to wait for the quota to be increased we need to get this right instead of leaving it for our next generation to fix. This submission is made from individual view, I also represent Ngati Kahu o Torongare, I came along to listen.

Ngā mihi

Chantez Connor-Kingi

Hapū Coordinator

Northland Regional Council » Te Kaunihera ā rohe o Te Taitokerau



From:
To: [FMSubmissions](#)
Subject: Review of sustainability measures – 2021 October Round
Date: Wednesday, 21 July 2021 10:55:30 PM

Against any increase of SNA8 as this increase affects inshore fishing and other kaimoana other than snapper. Also, there is no increase in the recreational take of this species only a decrease the last change, so if no change to the recreational then there should be no increase for the commercial.



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Submitter details:

Name of submitter or contact person: Andy Stretton

Organisation (if applicable):

Email:

Fish stock(s) this submission refers to:

SNA 8

Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented): Other

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Submission:¹

Details supporting your views:

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.



I do not support any increase in the total allowable commercial catch.

The area should be allowed to continue to recover, that is in our best long term interest.

Please continue on a separate sheet if required.



Submission Form

Review of sustainability measures for 1 October 2021

Once you have completed this form

Email to: FMsubmissions@mpi.govt.nz

While we prefer email, you can also post your submission to:

2021 Sustainability Review, Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

Submissions must be received no later than 5pm on Tuesday 27 July 2021.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:

Name of submitter
or contact person: Karen Blockley

Organisation (if applicable):

Email:

Fish stock(s) this submission refers to: SNAPPER 8

Your preferred option as detailed in the discussion paper
(write "other" if you do not agree with any of the options presented): OTHER – I do not agree with any of the options

Official Information Act 1982

Note, that your submission is public information. Submissions may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.



Submission:¹

Details supporting your views:

The last total Snapper 8 catch over 3000 tonnes, as proposed how, the stock was in steep decline, and it has taken 33 years to rebuild Snapper 8 areas. If the proposal for commercial catch limits are increased, this means more trawling and in areas currently lightly fished. Trawling is an indiscriminate, bulk harvesting method that catches by-catches such as gurnard, trevally, john dory, terakihi and juvenile hapuku. Unfortunately there is insufficient data on these vulnerable species at risk from trawling.

Since 2008 the Trawler exclusion for zone 4 nautical miles off the coast to protect Maui Dolphin.

The last 2 recreational harvest surveys were 2012 630 tonnes and 2018 892 tonnes. The proposes allowance to increase to 1205 tonnes (estimated catch from the fishery now)

I would like keep the present Snapper 8 quota and review this in 3 years. This will enable the rebuild of gurnard, trevally, terakihi, john dory and hapuku to 50% of unfished stock size.

Less trawling and adopt more selective fishing technologies, use more reliable and frequent reliable reviews on commercial catch rates

Regards Karen Blockley

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

From: craig bridgman <craig.bridgman@xtra.co.nz>
Sent: Sunday, 25 July 2021 1:33 PM
To: FMSubmissions
Cc: Kenneth Barry
Subject: Snapper 8 submission

Submitter Details

NAME : Craig Bridgman
ORGANISATION : Recreational Fisher
EMAIL : craig.bridgman@xtra.co.nz
FISH STOCKS SUBMISSIONS REFERRED TO: Sna 8
PREFERRED OPTION: Option 1

Introduction

As a recreational fisherman of 25years on the West Coast predominately out of the Raglan Port I forward my submissions to the review of SNA 8 snapper Fishery. I attended a presentation at the Raglan Club. one of the presenters was an analyst Adam who represents MPI. His presentation was informative. He opened with the main point being sustainability of the fishery but as he went on it was directed towards economics by one large company Sanfords being a driver in the document. It was clear in the presentation by Sam from legacy and was supported by evidence-based data that the true reason for the review is about large companies having a monopoly over the control which comes down to profit with no support to kiwis whose right it is to go fishing and catch a feed for family and friends. When the question of where does the majority of fish end up it was exported overseas. I use the scenario of the East Coast being a good example of a fishery that has been raped to support overseas demand and profit by large companies

I also note there were 4 options tabled to the meeting all with an increase in snapper only for region 8. It is common practice to throw in a large increase in one of the options knowing it will not get the support. It is there to take the heat of other options and to pacify the resisters when the final outcome is made public. I would also challenge the words of Public Consultaion that this is a box ticking exercise as part of the process. In my experience we have alot of public consultation but very few go the way of the public who are against the subject.

I see this review being no different as there is no option of leaving it as status quo. All options are of an increase in favour of the commercial sector.

SUBMISSIONS

1 Postpone the review until there has been further research completed taking in to account by catch (gurnard, trevally, Kawhai, all other fish stocks.). The review is all about snapper and they reside with other spices so those species will be captured. It would be sad to see if beneficiaries of any quota increase ask for an increase in following years.

2 By annual review of the stocks. This review has taken a long time to get to this stage. If stocks are reduced by a poor breeding season or disease and we do not have by annual evidence based data it could be years before any changes are made if the fishery is depleting.

3 Fishing methods. No pair trawling. Review of trawling methods net height and width. There is supporting evidence of long lining and other fishing methods being both friendly to the eco system (sea bed floor) and economically viable.

4 Any increase being fairly allocated to all commercial fishers not just the big three. Small operators (Raglan sea Foods as an example) who have for many years and who are still operating being given a fair opportunity to obtain their own quota .

Submissions from
Craig Bridgman
Recreational Fisher

SNA 8, TACC INCREASE SUBMISSION

From: Gavin Cummerfield, 26 July 2021

1. The SNA 8, TACC increase be limited to 25% (option 1), for 5 years and subject to confirmation of catch sustainability by regular biomass surveys.

This is because:

- (a) The SNA 8 recovery is quite patchy in the Manawatu area. This autumn many who fished at 20m–30m depth did not catch fish. Fishing has been better at 50m–60m depth. In 2017 and 2018 the snapper was spread more evenly. (I have found this by talking to people returning from fishing trips.)
- (b) Snapper recruitment in SNA 8 has been patchy (see SNA 8, Fisheries NZ data), peaking in 2018 and then decreasing rapidly. This follows the water temperatures which peaked in 2018. The recruitment is quite variable and may not be sustained.

The snapper recovery has been a delight. A cautious approach to increases in the TACC are recommended because of the patchy recovery and recruitment in 1(a) and 1(b) above. Avoid another collapse in SNA 8, and subsequently another 30 years recovery.

When a fish population collapses it takes far too long to change the commercial catch limits. The collapse was usually ignored, and the fishing effort shifted to another resource.

Fifty years ago, my recreational fishing bag would contain about one third snapper. The other species then caught in the Manawatu area, have now been fished to near commercial extinction. When fishing at around 50m depth, half the catch was usually terakihi. Exceedingly rare now. Rig, once plentiful, is now extinct in the area. To avoid this happening to SNP 8, increase the TACC only gradually.

2. The current recreational controls seem to provide for a reasonable catch. If the SNA 8 biomass reduces, do not reduce the recreational catch. Adjust back the TACC accordingly.

3. I do not support the current default target biomass of 40% for the SNA 8 fishery. This is too close to the recent collapse down to 8% - 10%. A higher target of 60% would enable steady fishing and enable the snapper population to stay in the upper half of the unfished biomass.

4. I think option 1, adequately monitored, would provide for social, economic, and cultural wellbeing. My fishing companions and I get a boost from a good day fishing, with snappers to take home. Boating and fishing clubs are often valued social centres of the community. The fairly high cost of boating on the west coast provides an economic benefit to local business. A balance between recreational, customary Maori and commercial fishery would support these benefits.

5. I recommend that any increase in the SNA 8, TACC, be limited to set line fishing, to protect the sea bottom and the benthic life from trawling and enable more selective, less wasteful commercial fishing.

Ensure current holders of unused quota use sustainable fishing methods for the extra quota. If not, find a way to shift the extra quota to set line commercial fishers.

6. There seemed to be a variation within the SNA 8 area. The snapper recovery in the southern part seems to be less than the central part (anecdotal information). The Manawatu area snapper recovery is slower and to only about 30% of the unfished biomass (see para 1).

Please break up the quota in the SNA 8 area and avoid an onslaught of trawling in the Manawatu/Rangitikei area. This fragile, mostly mud, sea bottom is too easily affected by

trawling. It disturbs the snapper bulking up on shellfish, in the autumn, before they leave in the early winter.

Similarly protect other vulnerable parts of SNA 8 from intensive trawling.

From: Neil garf6614 < >
Sent: Thursday, 22 July 2021 8:01 AM
To: FMSubmissions

Follow Up Flag: Follow up
Flag Status: Flagged

Option zero for Snapper 8 submission. The fishery needs to rebuild stocks.
No increase for commercial take.
Neil Cameron

Review of sustainability measures October 2021: SNA 8

Submission by:

Alan Dawn

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Summary;

I support increasing the TAC,
Do not support allowances as suggested,
Support stronger recreational controls,
Support a higher target biomass,
Support a SNA8 Monitoring program,

I have fished in the SNA8 area since about 1973, both as a commercial and non-commercial fisher. With my partner we have a small quota holding with 28n Allocation rights.

I have seen the fishery decline and rebuild over that period and agree the stock is healthier now than I have ever seen it.

TAC level setting:

It is patently obvious that all stakeholders; customary, recreational, commercial and environmental groups have a common aspiration for SNA8. That is, a healthy, sustainable and abundant fishery with low risk of decline to previous levels.

Accepting that the fishery is currently healthy and abundant, the issue is one of risk of decline. Obviously there are natural fluctuations such as recruitment and such risk may change with the climate; however all risks including human involvement can be manageable with better control and monitoring.

The discussion document states: *There is an 84% probability that under a TAC of 4,152 tonnes the 2026 biomass will be above 50% BO. (para 104, page 20).*

84% probability of the biomass being 25% above the current target biomass seems an acceptable level of risk, but with proper monitoring and control that probability should improve.

Accordingly, I support Option 4; that is, increase the TAC to 4152 tonnes.

Allocation and Control:

The purpose of the Fisheries Act is to provide for the utilisation of fisheries resources while ensuring sustainability. Ensuring sustainability means maintaining the potential of fisheries resources to meet the needs of future generations while managing the adverse effects of fishing on the environment.

The Supreme Court (Kahawai) acknowledged that the purpose statement incorporates two competing social policies and noted that both are to be accommodated as far as is practicable in the administration of fisheries under the QMS, and that, '[I]n the attribution of due weight to each policy that given to utilisation must not be such as to jeopardise sustainability.'¹

However, during a time when allowances were reduced to rebuild the stock, the recreational allocation of 17% of TAC increased uncontrolled to 67% of the current TAC, see table below.

	TAC	Commercial	% TAC	Recreational	Allocation % TAC	Actual % TAC
Current allowance (T)	1785	1300	73%	312	17%	67%
Proposed, Option 4 (T)	4152	2600	63%	1205	29%	

The Office of the Prime Minister's Chief Science Advisor also notes, "...that improving our estimates of recreational catch and incidental fishing mortality will be essential for enhancing the sustainability of our fisheries, as well as confronting the challenge of shared fisheries".²

Recreational fishing is effectively open access and as such has long been understood to bring important losses.^{3 4 5} Negotiations are not possible in open access or within traditional effort regulation. There can be unlimited numbers of parties and none has legal standing to engage in group negotiations to protect the ecosystem.

Maori are also concerned: "...in some cases we are seeing proportional reductions in the access we have to sustainably available fisheries because of the lack of enforcement of recreational allowances; reallocating quota in shared fisheries to a less regulated recreational sector contradicts the objectives of the Deed of Settlement and the spirit of collaborative management of marine resources...cultural and community values along with the value of quota under the QMS depend on vibrant fish stocks and healthy ecosystems. These positive incentives also generally apply to other quota holders within the QMS. The unregulated growth of sports fisheries presents a direct threat to the property rights held by Māori under the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992 as well as the integrity of the QMS in general.."⁶

¹ Recreational Fishing Council Inc v Sanford Limited and Ors [2009] NZSC 54, [2009] 3 NZLR 438 at [39]

² [Context – The future of commercial fishing in Aotearoa New Zealand | Office of the Prime Minister's Chief Science Advisor \(pmcsa.ac.nz\)](#)

³ (Gordon, H. S. (1954). The economic theory of a common-property resource: The fishery. Journal of Political Economy, 62(2), 124–142.

⁴ Hardin, G. (1968). The tragedy of the commons. Science, 162(3859), 1243–1248

⁵ Scott, A. (1955). The fishery: The objectives of sole ownership. Journal of Political Economy, 63, 116

⁶ [TOK1902-Marine-Property-Rights FA-Interactive-002.pdf \(teohu.maori.nz\)](#) page 8

Quite obviously, current management has been totally inadequate to manage harvest within allocation as required by law and could well be challenged in the courts if continued.

Given that the most recent estimate of recreational harvest from the 2017-18 NPS showed a harvest of 892 tonnes⁷ extrapolated to 1205 tonnes currently, and anecdotal evidence pointing to an established black market in the SNA8 fishery, it is time recreational fishing entered the Quota Management System to be controlled as effectively as the Commercial sector.

I would suggest that the Option 4 TAC be retained at 4152 tonnes and the recreational allocation be set at 1000 tonnes, with all other allocations unchanged except for an increase in "Other Mortality" to allow for uncertainties.

The recreational allowance could be managed by producing a number of tags equivalent to the allocation divided by the average weight of fish (e.g., 333,333 if the average weight of fish caught is 3 kg over 1000 tonnes).

Each fisher could pay a small annual licence fee and be given an annual allocation of say 100 tags. The tags could be sequentially numbered and entered on a database linked to each licence with the fisher responsible for fitting a tag on capture and reporting online details of estimated length or weight, effort to catch, place caught, etc. Tags could be tradable with changes in ownership made online and the tags should obviously be irremovable once fixed to a fish.

Incentives for compliance can be managed through spot fines and when fisheries inspectors find tag-free fish over a threshold level, the fishery could be closed for the rest of that year.

The recreational sector has resisted either licensing that could limit entry or formal inclusion into the QMS. This opposition is understandable from the point of view of individual sports fishers because access historically has been free and open.⁸

The situation, however, is not sustainable over the long term. It would not be sustainable for fish stocks or values to vessel owners or their customers even if the commercial fishery was totally banned from specific areas.⁹

Aside from these political considerations, equally there is support from many non-commercial fishers, particularly those who fish for sustenance. There should also be support for reform in environmental groups and the general public. There is ample evidence catch-share programs result in promoted ecosystem stewardship.¹⁰

Support for a higher target biomass:

Apart from the commercial sector which is closely monitored with cameras and constant position reporting, there are uncertainties in actual mortality.

⁷ [Review of sustainability measures for snapper \(SNA 8\) for 2021/22 \(mpi.govt.nz\)](#) cl 69, p12

⁸ Borch, 2010; Council of Outdoor Recreational Associations of New Zealand, 2017.

⁹ [TOK1902-Marine-Property-Rights_FA-Interactive-002.pdf \(teohu.maori.nz\)](#) page 57

¹⁰ Dewees, 1998; Squires et al., 1998; Campbell et al., 2000; Branch, 2009; Yagi et al., 2012

Given the preference from all responsible parties for abundance and sustainability, there is a strong case for increasing the target biomass to take a more conservative approach and I would suggest 50% to 60% of an unfished biomass.

SNA8 Monitoring Program:

I support the suggested SNA8 Monitoring plan.¹¹ Previous comments apply, particularly the need for closer monitoring of the recreational sector. Part of the recreational licence fee could contribute towards costs.

The commercial sector would appear to be adequately monitored in real time. I understand CPUE data is constantly monitored and length frequency could easily be monitored through landings at processing points.

A more collaborative approach with Maori may provide better data on customary take.

Deemed Values:

I would support continuation of the current Deemed Value regime. If there is more ACE available there should be no risk of exceeding catch entitlements. Also, there is a knowledge bank of where and how to avoid snapper if necessary.

Environmental Interactions:

Marine mammals are well covered by the existing threat management plan with Maui dolphin mortality risk close to zero.

Seabirds are also covered by the National Plan of Action. There is technology and information available to minimise any threat from increased fishing activity from any sector.

Fish bycatch is not an issue when covered by ACE and sold in the market.

Benthic impacts are reducing through technology. It is possible that commercial trawling may change to more passive methods such as long lining in response to the need to reduce emissions and also availability of more ACE, with associated reductions in benthic impact.

Habitats of particular significance are covered by existing protections and unlikely to be impacted by any increase in fishing.

Consideration could be given to the accumulated emissions from a large fleet of small vessels using two stroke outboard motors. A 2007 NIWA study put the pollution at ten times that of a four stroke engine.¹²

¹¹ [Review of sustainability measures for snapper \(SNA 8\) for 2021/22 \(mpi.govt.nz\)](https://www.mpi.govt.nz/~/media/documents/default.aspx?resid=3444&resourcetype=1) 15.1 p27

¹² <https://envirolink.govt.nz/assets/Envirolink/24-wcrc4.pdf> cl3,p4

From: glen grant <ggrant@...>
Sent: Monday, 26 July 2021 5:45 PM
To: FMSubmissions
Subject: Sn8 submission

I believe the current biomass is still too low to allow fishing quota increases. 40% is insufficient and it should be set at 60%.

I am opposed to bottom trawling at all levels of biomass. It is an indiscriminate unreasonably destructive fishing method and should not be allowed anywhere in New Zealand's economic zone.

From: Katriona Calder
Sent: Monday, 26 July 2021 3:50 PM
To: FMSubmissions
Subject: snapper 8 review

Hi

I am a recreational fisherman living in Helensville.

I have been fishing the Kaipara Harbour and the adjoining West Coast for 30 years.

During this time, I have seen the snapper fishery, particularly on the West Coast improve in terms of the number and size of the fish that have been caught during more recent years.

I cant say the same for the gurnard nor the flounder where the numbers seemed to have declined significantly during this period (based on my experience targeting these species).

I believe that the reduction in bottom trawling has had a positive effect on this change in snapper numbers and **totally oppose increasing the snapper quota in this fishery.**

My concern is that during the past 10 years there has been a massive increase, in the number of recreational fishers, fishing in the Kaipara and the West Coast. I believe this is largely driven by the fact that you can still take 10 fish and the size limit of 27 cm still applies and it is more difficult to catch snapper on the Huaraki gulf as well other factors like immigrants and general population who enjoy the opportunity we have in NZ to catch fish.

I believe the increase in recreational pressure on the fishery, along with an increase in the commercial catch limit will ultimately result in a decline in the snapper numbers.

As a recreational fisher, in order to protect the fishery I would be happy to support changes to further protect the fishery.

These being

- Reduce daily recreation snapper take to 7 per person in snapper 8
- Increase minimum size to 30 cm
- Consideration be given to banning fishing during the spawning period (recreational and commercial)
- Support an educational program to encourage fishers to take the first 7 they catch, using larger hooks and handling methods to reduce mortality amongst smaller fish that are released.

Should the increase in the quota be agreed to I would like to see this quota be limited to long line fisherman.

Thanks for the opportunity to make a submission.

Regards Neil Colbert



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Submitter details:

**Name of submitter
or contact person:** Lyle Jenkins

Organisation (if applicable):

Email:

Fish stock(s) this submission refers to: SNA8

**Your preferred option as detailed in the
discussion paper**
(write "other" if you do not agree with
any of the options presented): Option 4 TAC Allowance & Option 2 Deemed Values

Official Information Act 1982

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Firstly I would like to congratulate Fisheries NZ on a job well done. The SNA8 stock increase has been phenomenal and the science behind this review is top notch.

I am a commercial set net fisherman based in New Plymouth.

I support option 4 TAC Allowance for the following reasons:

- The science! The science behind this review is of excellent quality and overwhelmingly justifies a major increase of the TAC
- My own experience. The increase in stock size is such that it now hampers my ability to catch my target species (SCH & SPO), I now catch SNA everywhere I fish and have even had to abandon some productive fishing grounds because there is too much SNA and the quota is so hard to get. If this resource is not used to its full potential I fear that I will have to abandon more grounds making my business not viable.
- Reserves: With the existing restrictions to trawl & set net fishing for the protection of the Maui Dolphin most of the West Coast North Island out to 50m is a reserve and includes most of the SNA spawning grounds.
- Viability of inshore fishing fleet: If the increase is not high enough and the stocks keep increasing a lot of small inshore fishermen will be put out of business. This is an opportunity for the current fleet to maximise their time at sea and will result in less effort per fishing trip reducing the imagined environmental damage.
- Consumers: I have heard of worries that a big increase in the TACC will lead to a reduction in the value of the fish. I see this as a good thing as it would hopefully mean that consumers will have access to NZs favourite fish at a more reasonable price.

My Concerns:

- Spatial Effort: I would like to see the catching effort spread more over the SNA8 area. If this is not controlled better there is likely to be local depletion in areas such as 90mile beach and local increases in areas such as the North Taranaki Bight.
- NGO's: I expect there will be huge opposition to increases from the likes of LegaSea who are actively encouraging people to follow their lead while not giving them the full facts. Rather they rely on emotive propoganda and misinformation to sway the public. They do not seem to care for the majority of Kiwis who lack the resources or inclination to catch their own fish and rely on the commercial fishermen to supply the shops. I sincerely hope that Fisheries NZ & the Minister see these bulk submissions for what they really are!

Deemed Values:

I support Option 2 for the Deemed Values for the following reason:

- High deemed values has led to an artificial value placed on the lease price of SNA8 quota. This has seriously impacted the viability of my business. Lower deemed values should mean lower lease prices making SNA a welcome bycatch rather than a burden.



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Once you have completed this form

Email to: FMSubmissions@mpi.govt.nz

While we prefer email, you can also post your submission to:

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Submitter details:

Name of submitter or contact person	Julie Ann Calder
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	SNA8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	No Increase in the total allowable commercial catch

Official Information Act 1982

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Submission:¹

Details supporting your views:

Trawling should be abolished on the North Island West Coast, if not all of New Zealand.

It has taken years to rebuild the West Coast Snapper population and this practice will see this population diminish in addition to other species.

I am a supporter of LeagSea in advocating for no increase in commercial catches of west coast snapper.

I believe bottom trawling threatens the biodiversity of snapper and other species

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

From:
Sent: Monday, 26 July 2021 9:52 PM
To: FMSubmissions
Subject: FW: Fisheries New Zealand proposals for Snapper 8

I write regarding the proposed changes for snapper 8.

I have been a recreational fisherman here in New Zealand for more than 50 years. As a boy I would go with my grandfather on the charter boat from the bottom of queen street in Auckland for a day's fishing in the Hauraki Gulf. In those days we used handlines with packets of trevally for bait and put fish into a fiber sack tied to the ships rail. One sack of good prime fish was enough. It was exhilarating stuff and along with the line cuts on our hands, sense of companionship and tall stories, we never had to go far to catch a good feed of fish to bring home. My point here is that this is a far cry from today's situation in the Hauraki Gulf with supposedly world class quota management and Fisheries New Zealand overview. Now we see necessary, knee jerk, reactionary measures to limit fishing access for both commercial and recreational fisherman to save a severely declined fishery.

This example does not fill me with any confidence or sense of surety that the long term sustainability of New Zealand fisheries is being well served by the decisions of the public servants at the ministry.

The area off the west coast of the North Island known as snapper 8 has previously experienced a decline similar to the Hauraki Gulf situation now. Only by reducing the allowable commercial take and preventing trawling within 4 nautical miles has the fish bio mass slowly recovered. When I say recovered, I understand it is back to only some 50% of the original biomass and this is after 33 years of regeneration.. My concern here is – are we going to once again decimate this fishery? Last time when the fishery severely declined the commercial take was 3000 tons pa. What is currently proposed by the ministry is a take of 2600 tons which is a doubling from the currently allocated 1300 tons pa.

Are we determined to decimate all our fish stocks for the sake of a quick profit?

It seems to me and using the Hauraki Gulf example, the fisheries ministry does not have a real handle on how to maintain or manage fish stocks.

The other point I would make is that bottom trawling is a very non discriminatory way to catch fish. Whilst not being "green" I do care about our environment and future sustainability. To take all fish and damage the bottom life in an area trawled seems contrary to good management of New Zealand. Surely targeting snapper via long line allows selectivity of the catch and does not cause denigration of the ocean floor. There are small fragile populations of other species within snapper 8 that would all be seriously impacted with wholesale bottom trawling.

In summary I emphasise that the responsibility of Fisheries is to protect and ensure the sustainability of the fish stocks of New Zealand. Let us not have a repeat of the Hauraki Gulf example or the previous decline experienced in snapper 8 by overfishing. Let's for a change see some fortitude and forward thinking to maintain and sustain this great resource in snapper 8 for everyone.

Yours sincerely

Brian Cornish



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Submitter details:

Name of submitter or contact person:	Paul Mulligan
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	SNA8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Option 1

Official Information Act 1982

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Given the uncertainties cited in the report a very cautious approach is required to avoid the potential for unexpected outcomes. Of the options provided Option 1 allows the opportunity to test the impact of the change while minimising the risk to the fishery.

Of particular note in the data:

- 1.) Current stock levels are highly influenced by two short periods of “exceptionally high recruitment”. In the event that recruitment in the next 5 years falls to the lower end of the observed range increasing catch rate has the potential to negatively impact fish stocks.
- 2.) Similarly the observed periods of “exceptionally high recruitment” will have lifted the “long term average recruitment” figures used in the determination of future stocks. The report would have benefitted from a similar analysis using and average excluding the years of high recruitment and a low range example.
- 3.) Of concern is the apparent resurgence in Bottom Trawl, largely at the expense of Precision Bottom Trawl. The impact of habitat destruction caused by Bottom Trawl techniques is difficult to determine, however providing incentive to further increase the activity seems contra to the stated desire to maintain the health of the overall fishery.
- 4.) With reference to the graphic top of page 9 it is clear that landings between 1990 and 2005 were circa 1700 MT. From a depleted stock situation this level did not allow the fishery to rebuild, leading to the reduction in 2005. Option one effectively returns the limit to levels observed in the 1990 – 2005 period, albeit on significantly higher stock levels. Given the uncertainties associated with the data the highest level of TACC should initially not exceed the level observed in the 1990 – 2005 period.
- 5.) Data presented in “Length and age composition of commercial snapper landings in SNA 8, 2015–16” suggests snapper are maturing at a slower rate than previously observed. Decisions related to the TAC need to factor in a safety margin to account for the possibility that factors such as climate change are impacting the validity of extrapolating historical data into the future.

Personal Observations (15 years fishing out of Raglan):

- 1.) The reliability of the snapper fishery has gradually improved. However, the data suggests a dramatic improvement, and this is not supported by observation.
- 2.) Unsurprisingly the proportion of older (larger) fish in the typical catch has decreased. Catches are increasingly dominated by fish in the 35 – 40 cm range – this being especially evident in the 20/21 season.
- 3.) Getting out of Raglan (and other west coast ports) is not a trivial exercise for recreational fishers. I support retaining the current catch limit of 10 snapper per person but would support lifting the size limit from 27cm to 30cm. However, I accept that this would be challenging for those who fish in the harbours.
- 4.) Similarly the commercial limit of 25cm seems very low. I wonder how you get a fillet off a fish that small. However, putting small dead fish back in the ocean makes no sense either. I support the mandatory use of selective techniques that minimise damage to habitat and juvenile fish.



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Once you have completed this form

Email to: FMSubmissions@mpi.govt.nz

While we prefer email, you can also post your submission to:

2021 Sustainability Review, Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

Submissions must be received no later than 5pm on Tuesday 27 July 2021.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:

Name of submitter or contact person:	Marianne Wilson
Organisation (if applicable):	Legasea, Maui and Hector's Dolphin Defenders
Email:	
Fish stock(s) this submission refers to:	SNA8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	OPTION ZERO - No increase to the TACC (Total Allowable Commercial Catch)

Official Information Act 1982

Note, that your submission is public information. Submissions may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.



Submission:¹ Dear Minister,

I am horrified that opening up the Snapper8 area to commercial fishing is even being considered, when we now know that bottom trawling causes damage to the ecosystem that may not be repaired for thousands of years.

Multiple species are threatened with depletion including the Maui dolphin which is about to become extinct under this government's watch. The planet is at a crisis point and we know that a healthy ocean is an extremely important carbon sink as long as it is allowed to flourish and not be plundered as it has been in the recent past. Please protect this area with zero commercial fishing. We wouldn't deliberately destroy the Great Barrier Reef but inexplicably we are considering allowing commercial interests to plunder our own fish stocks and destroy our own precious marine environment.

No more trawling on the North Island's west coast.

I am concerned that it has taken 33 years to rebuild west coast snapper to abundant levels.

I support LegaSea in advocating for no increase in commercial catches of west coast snapper.

I want David Parker, Minister of Oceans and Fisheries, to take an ecosystem based approach and not increase commercial catches of west coast snapper.

I support the Minister to conduct another review of west coast snapper in 3 years time.

I want David Parker to make a conservative snapper decision so depleted species such as gurnard, trevally, tarakihi, john dory and kahawai can rebuild to healthy levels.

I believe bottom trawling is bad for the marine environment.

I believe that an increase in bottom trawling will threaten biodiversity and the future success of snapper and other species on the west coast.

I support the Minister to extend the 4 nautical mile trawl exclusion zone offshore to all of the west coast snapper zone.

I am concerned that not enough information is being collected to better understand the bycatch associated with bottom trawling

Kind regards, and thank you for your support

Marianne Wilson

Legasea supporter

Maui and Hector's Dolphin Defenders

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.



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Submitter details:

Name of submitter or contact person: Bryan Scahill	
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	Snapper 8
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	other

Official Information Act 1982

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I do not support the commercial fishing industry increasing their snapper take above the current 1300 tonnes. I believe that even though the snapper fishery has recovered to 54% of the level of 35 years ago it is still not adequate. I believe that it would be foolish to squander the gains that have been made just for the greed of the commercial sector. I believe that it should be rebuilt to in excess of 100%. This will not take as many years as previously because there will be a bigger population breeding.

Building the stocks up to around 100% should be seen by the fishing industry as "money in the bank".

In Summary: leave the commercial take at current level of 1300 tonne.

Kind regards

Bryan Scahill

From: [Info](#)
To: [FMSubmissions](#)
Subject: RE: Fwd: West Coast North Island snapper fisheries - feedback
Date: Wednesday, 28 July 2021 1:16:32 PM

----- Original Message -----

From:
Sent: 27/07/2021 6:32 PM
To: info@mpi.govt.nz
Subject: Fwd: West Coast North Island snapper fisheries
Please forward to the correct email address as the one on the website was wrong. Regards Bill Newsome

----- Forwarded message -----

From: Bill
Date: Tue, 27 Jul 2021, 8:06 am
Subject: West Coast North Island snapper fisheries
To: <fisheries.review@mpi.govt.nz>

~~I am a 65 year old male I have been~~ fishing since I was 16 as a recreational Fisher over this time there has been a noticeable decline in the fish stocks on the West Coast we seem to be trapped into this way of thinking where we sell off our fish stocks as quick as we can we sold our kawaii to Australia for pet food we used to have one or two acres of kawaii on the service feeding now we are lucky if you see 4 gether at once our snapper seems to be recovering after being fished out a number of years back we have the few Hector dolphins to thank for that .Seems to be we're heading to a New Zealand without fish the government gets a minimal tax return for stripping our waters of its fish (we need to ban bottom trawling) I would like to see the commercial and the recreational snapper limit halved until the snapper fisheries get back to 45% of its original stock otherwise we are going to lose it a New Zealand without fish what is wrong with you people is it the only way that we have it making money is to sell off our fishing stocks the New Zealand with its quota management system has allowed the commercial fishes to gear up with massive ships to strip our oceans of the fish which they are very successful at doing and they think this is the only way to make a living. Ban bottom trawling in New Zealand Waters would be a great thing to do for New Zealand fisheries It would be nice to see in my retirement years The fishery start to recover. Sincerely Bill

From: Rodney Davidson
Sent: Wednesday, 23 June 2021 2:53 PM
To: FMSubmissions

Dear Sirs,

Thank you for your service and extending me an invitation to submit my thoughts and opinion relative to current fisheries considerations under consultation and discussion as a quota owner and professional qualified fisherman as is my right.

My quota holdings include Gur1 so I will comment on just one aspect I noticed needing comment. As stated, landings have dropped to 35 % of TACC and it seems you do not have an answer to why this is possible in any way at all. Being the who and what you are it seems that you are looking for any and all other possibilities OTHER than the FACT that the commercial fleet numbers have declined to 10 % approximately of the pre quota management working vessel totals, (681 EU registered fish rooms left nationally as of this date) of previously approximately 6000 vessels with EU registered fish rooms for annual inspection by food safety authorities. (a separate and unassailable Government body for manipulation of figures totals by MPI fisheries.) ie; Woke manipulation! Malicious and vicious and so very intentional as it has unfolded.

Rotten to the core and so working to the detriment of the national fishery. Treachery in the extreme sense to your purpose of a Primary Industry of New Zealand and the professional fishermen of this country now voting to leave because of this management. Facts now acknowledged that there are only three hundred ' working ' vessels left in the whole country ' needing cameras ' to cover the whole fleet stated just last week by Minister Parker.

Total abuse / contempt and mental aspect intentionally driven on to the professional fishers of this country. Vessels and manpower and countless experience lost to New Zealand that can not be replaced now. Fish quota stolen by MPI management re N 28 fish stock rights and not yet returned is one huge aspect that should have been returned so many many years ago as an absolute abuse of power and contempt and a huge festering injustice still in play and which you are so aware of too.

The stupidity and fact that you all sucked up to the ' concept ' of a NEW 2002 species (given the name Maui / Noah,s dolphin) somehow magically discovered by academics, seemingly working hand in glove with Greenpeace, to pull off a coup of incredible success and to extend it to the extreme level it has gotten to at this stage too and to the detriment of the National fishery it has. They are laughing at you as are so many of us!

Return my full N 28 fish stock rights with full compensation immediately. Rodney Lawson Davidson Fin 8420552.

Couple this with current M bovid actions and current farmers speaking out as to huge financial loss and mental abuse they suffered under MPI and you have the most despised uniform in the history of New Zealand. Blatant fact and incurring the hatred of this arrogant and intentional aspect of those that don them. All nil contributors to the nation and the residents of the country in any way at all.

Finally, no one owes or has ever owed a ' Maori ' anything ever in any aspect whatsoever. ' They ' where not ever the first people of this land. We owe them nothing that we all are not entitled too.

Rodney Davidson



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Submitter details:

Name of submitter or contact person:	Cameron Inder
Organisation (if applicable):	
Email:	
Fish stock(s) this submission refers to:	GUR1
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Option 3

Official Information Act 1982

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Submission:¹

Details supporting your views:

Given it is not known why Gur1 numbers are well down it stands to reason to take the most conservative approach to enable this stock to replenish. Option 3 provides that of the 3 options presented.

It is already far too hard for the vast majority of NZ public to regularly catch a decent meal of blue cod, or gurnard or snapper in a small boat close to their own coast without risking life going far out to sea or in bad weather. The lucky few recreational fishers know where the few good remaining spots are. The rest typically come home with barely anything or strike by pure luck. It's sad when its now cheaper to buy Gurnard (and snapper) from the supermarket while paying \$35-\$40/kg which is just ridiculous and unobtainable for so many NZ families, than obtain it by fishing. Commercial fishing, especially bottom trawling benefits the few at the cost of so many. Its depleting our abundance of prime fish that is rightfully every New Zealanders to enjoy and have cheap easy access to in a small boat or off the rocks. It is daylight robbery that our coastal fish can be pillaged commercially and sent overseas to the highest bidder, to line the pockets of just a few thousand people while depleting the resource to dangerously low levels and ruining access to fresh fish for so many in our own country. We should have abundance of provision for our own country first. We are blessed in NZ to be surrounded by water yet its so hard to get a decent catch of Gurnard or Snapper or Blue Cod without risking life going far off shore.

I am concerned not enough information is being collected to better understand the stock status of GUR1 or why it appears to have depleted so much.

Please continue on a separate sheet if required.

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.