



**Fisheries New Zealand**

Tini a Tangaroa

## **Public Submissions Received for the 2021 October Sustainability Round**

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

**August 2021**

## List of Submissions & Responses for the 2021 October sustainability round

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

**Other parts not included here:**

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

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

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

Name/Organisation	Relevant stock proposals
J. Skeates (MSc)	STN 1, SNA 8, HPB 1 & 2
A. Turnwald	SNA 8, HPB 1 & 2, GUR 1
A. Flavell	HOK 1, LIN 5, SKI 3 & 7, CDL 1, STN 1, SNA 8, HPB 1 & 2, GUR 1, GUR 7, BCO 3, SCH 5
K. Mason	HOK 1, LIN 5, SKI 3 & 7, CDL 1, STN 1, SNA 8, HPB 1 & 2, GUR 1, GUR 7, BCO 3, SCH 5
B. Price	HOK 1, LIN 5, SKI 3 & 7, CDL 1, STN 1, SNA 8, HPB 1 & 2, GUR 1, GUR 7, BCO 3, SCH 5
M. Optimum	SNA 8, HPB 1 & 2, GUR 1
O. Clark	STN 1, SNA 8, HPB 1 & 2
A. Fulford	STN 1, HPB 1 & 2
A. Schmid	STN 1, SNA 8, GUR 1
R. Peart	STN 1, SNA 8
S. Newland	STN 1, HPB 1 & 2
J. Elliot	SNA 8, BCO 3
Liveable Communities Inc.	SNA 8, BCO 3
Council of Outdoor Recreation Associations of NZ Inc. (CORANZ)	DV paper, SNA 8
Marlborough Recreational Fishers' Association (MRFA)	DV paper
LegaSea, J. Heath	DV paper
LegaSea joint submission with NZ Sports Fishing Council	STN 1
Kowhai Media Ltd / New Zealand Geographic	STN 1
Goodfishing – M. Greenland	STN 1
T. Dalton	STN 1
D. Airey	STN 1
P. Burt	STN 1
D. Henry	STN 1
C. Pullman	STN 1
C. O'Neil	STN 1
D. de Bruin	STN 1
C. Gollop	STN 1
J. Burton	STN 1
P. MacGregor	STN 1
K. Oxenham	STN 1
C. Huband	STN 1
L. Wallace	STN 1
C. DeLacey	STN 1
D. Peters	STN 1
R. Palmer	STN 1
Stu	STN 1



# Submission Form

## Review of sustainability measures for 1 October 2021

**Once you have completed this form**

Email to: [FMSubmissions@mpi.govt.nz](mailto: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.

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**Submitter details:**

<b>Name of submitter or contact person:</b>	John Skeates MSc
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fish stock(s) this submission refers to:</b>	STN 1
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	Option 2

**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.



Southern bluefin tuna is a recreational species of increasing interest to recreational fishers. Particularly as the yellowfin tuna species has become an increasingly rare catch due to stock depletion in NZ waters. Given an increasing number of NZ recreational fishers chasing this fish, and this is on a marked increase, it is appropriate to increase the quota allocated to recreational fishing.

Current recreational quota is just 3% of the TACC, and thus having little impact on the overall species. Due to the location of fishing for the bluefin tuna, the ability for recreational fishers to access this stock is very weather dependant, much more so than the bigger commercial boats. Thus recreational fishers are likely to have the ability to have much lesser impact on the bluefin tuna stock.



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**Submitter details:**

<b>Name of submitter or contact person:</b>	John Skeates M Sc
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fish stock(s) this submission refers to:</b>	SNA8
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	OPTION 1

**Official Information Act 1982**

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A cautious stock management approach is called for.

Stock levels will depend very much on recruitment. In the SNA8 Review paper Point 84 refers to the 'exceptionally high recruitment for 2006 and 2016-2018'. Figure 14 shows a big drop in recruitment for 2020. Recruitment is highly variable. Global warming will have an impact. Point 139 (under Uncertainties & Risks) highlights this. Now is the time to be conservative to see the SNA8 stock build.

Past high commercial catches have devastated SNA8 – Figure 11 shows that catches at the 1500 tonnes is sustainable over long periods. Once commercial catches got above 4000 tonnes as in the late 1960s-1980s, stock levels eventually collapsed. In those times the Recreational Catch was probably relatively low as the amateur vessels capable of going out into the Tasman were not readily available so this level of commercial catch may have been close to the total catch. Currently proposed Options 3 & 4 have the TAC around the 4000 tonne level which is too excessive for this stock.

Current Deemed Value levels have been effective at supporting the rebuild of the stock (Point 143), and should be maintained. Point 144 refers to setting the level to 'avoid incentives to discard' – given that cameras are going on boats, and greater accountability demanded of fishers, this should not be a basis for reducing Deemed Values.

SNA8 catch is mostly by trawl methods. This damages the benthic communities. Increases in TAAC will increase this damage. Historically trawlers have been seen working very close to west coast beaches, though this has improved around Auckland as the trawlers have been pushed offshore. Exclusion zones for trawlers should be established along all the coastline for SNA8. Pair trawling should be banned.

Relatively few commercial fishers benefit from SNA8 (Point 61) with just 2 vessels catching 40% of the current TAAC, and 13 vessels in total catching 80% TAAC. Any increase in TAAC will likely benefit only a few, while maintaining the current TAAC (or close to it) will result in continued rebuilding of the SNA8 stock that will provide benefit to the many recreational and customary fishers, and reduce catch effort for the commercial industry.

The invasive Asian Date Mussel is altering the habitat of west coast harbours, and particularly taking over native eelgrass habitat. Snapper feed on these, and larger snapper will be better at predateding these than smaller fish. Therefore keeping higher numbers of snapper, and particularly larger ones, is important at controlling this pest.

As a 65 year old I have lived on the edge of the Manukau Harbour all my life – 30 years ago I tried and gave up fishing for snapper in the Manukau as only juvenile snapper were caught – instead I focused on the Waitemata Harbour. In the last 3 years I have switched to the Manukau Harbour finding that within it I can get a good feed of snapper (often in the 400-500mm range) out of a small boat. The number of snapper is not just important but maintaining, and increasing the size of fish in this fishery is very important.

A level of 40% Bo for SNA8 is too low. At this level the original ecosystem is still majorly altered, with snapper levels reduced by 60%, and great reductions in the older larger fish which play a key role in the ecosystem. A level of 70-80% Bo would allow this fishery to return towards what it should be. Relatively few people would benefit from any increase in TACC, where the benefits are much broader if TAAC is not increased.

In terms of social & cultural wellbeing. The building west coast snapper fishery, provides an alternative to Waikato, Auckland and Northland recreational fishers to fishing in the depleted and under pressure SNA1 fishery. These fishers are beginning to experience fishing more like it used to be in NZ. However there is still some way to go, and the older larger size fish stock (with snapper living to 60 years) still significantly diminished due to the overfishing in the 1960s to 1980s. A longer period with no increase in TAAC is required to restore this fishery.



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**Submitter details:**

<b>Name of submitter or contact person:</b>	John Skeates MSc
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<b>Organisation (if applicable):</b>	
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<b>Email:</b>	
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<b>Fish stock(s) this submission refers to:</b>	HPB 1 & 2
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<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	OPTION 3
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The commercial harvest has been dropping for some time so clearly current harvest level is not sustainable, and a significant reduction in harvest level is required to rebuild the stock. The TACC level is way too high, and not being achieved, so a marked reduction in commercial take is required.

Currently the estimated recreational harvest is 75 tonnes compared to the commercial harvest of 280 tonnes. The recreational harvest is already comparatively small and changes to the recreational quota will not make such significant differences to the stock, so it is the commercial sector reductions that will have by far the greatest impact.

Hapuka and bass are an important recreational fish species, which increasingly over the years have become out of the reach of recreational fishers as the inshore fishery has become more and more depleted. Restoration of this fishery so recreational fishers can enjoy it is of very important social & cultural importance. Restoration of these important species to much closer levels to their original biomass is critical.

Given the paucity of knowledge of these species, great caution is required. And urgency to reduce the take given how long the catch rate for this species has been in decline.

## Fisheries NZ SNA8 for 2021/22

### SUBMISSION (email ...)

I am Andrew Turnwald who started commercial fishing in the mid-1970s and purchased a 15m Danish Seine vessel 'Dorothy' in 1978.

Since then, I have owned and skippered my own vessels until the sale of inshore trawler 'Joanne' in late 2019. No other persons have operated vessels in my ownership.

I have a science background and have submitted personal submissions on relevant fishing matters when the opportunities avail.

My areas of inshore fishing cover from North Cape to Gisborne targeting Sna, Gur and Tar, and when working the west coast from Ninety Mile Beach to New Plymouth mainly targeting Gur, Jdo and Fla.

From 1978 to 2010, my home port was Auckland and sometimes Tauranga in some winter months. From 2010 to 2020 I was domicile in Mangonui (northland) targeting Tar.

In 2021 I am currently working on a 15m trawler based in Raglan targeting Gur, Jdo and Sna.

### SNAPPER 8

I first fished the west coast of the North Island in 1981 in Fisheries Stat areas 047-041.

There was significant effort from pair trawling and little noticeable effort, until the last few years, from recreational fishers. The anecdotal comments were that recreational fishing was mainly surfcasting and inner harbour.

During the 1990s and up to 2010, I was Danish Seining between Ninety Mile Beach and Tirau Pt targeting Gur but with the greatly reduced effort from trawling and particularly Pair Trawling the increase in abundance of Sna became problematic.

Section 8.3 I concur with the observation that recreational fishing out of the Manukau, Waikato and Raglan over the past few years has become quite evident and it is hard to believe that there is no mortality attributed to recreational effort, in particularly, sheltered waters or near coastal and that all mortality is due to commercial effort. See 10.2.3

Environmental Factors: The landmarks used for marking and avoiding foul bottom gradually being lost and changed by the growth of the exotic pine/ eucalypt forestry. This forestry has possibly caused runoff issues for littoral and near coastal habitat for marine life.

In summary, I support FNZ and its rationale for an increase in Sna8 but acknowledge there could be adverse impact on the FNZ proposal to reduce Gur1 when it comes to quota balancing.

## Fisheries NZ GUR1 for 2021/22

### SUBMISSION (email [REDACTED])

I am Andrew Turnwald who started commercial fishing in the mid-1970s and purchased a 15m Danish Seine vessel 'Dorothy' in 1978.

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I have a science background and have submitted personal submissions on relevant fishing matters when the opportunities avail.

My areas of inshore fishing cover from North Cape to Gisborne targeting Sna, Gur and Tar, and when working the west coast from Ninety Mile Beach to New Plymouth mainly targeting Gur, Jdo and Fla.

From 1978 to 2010, my home port was Auckland and sometimes Tauranga in some winter months. From 2010 to 2020 I was domicile in Mangonui (northland) targeting Tar.

In 2021 I am currently working on a 15m trawler based in Raglan targeting Gur, Jdo and Sna.

### GURNARD 1

During the 1990s and up to 2010, I was Danish Seining between Ninety Mile Beach and Tirau Pt targeting Gur but with the greatly reduced effort from trawling and particularly Pair Trawling the increase in abundance of Sna became problematic.

The depth range I fished when targeting Gur was 20m to 70m but most of the time 20m to 40m and these depths are now in the TMP zone particularly affected from Manukau to Tirau.

Section 8.1 Para 38 shows that approximately 2/3 of Gur1 is caught in Gur1w.

Section 3.1 Para 10 demonstrates that the preferred habitat is near coastal and shallower than 60m.

The TMP was legislated in 2020 and that measure provides significant reduction in effort in recognized Gur areas and that measure alone will probably significantly help the Gur stock to rebuild provided the Gur can withstand the increasing pressure from Sna where both stocks will be competing for food and territory.

Section 8.3 Para 46 Recreational catch and effort in the 'TMP' will assist in data collection of size and population from ramp (or other) surveys.

In summary: With the recent TMP and proposed TAC etc. I see no scientific reason to set 100 tonnes for TACR when Section 8.3 Para 46 indicates a significantly lower landing estimate. The lowering of TACC at this stage does not have scientific merit. Valid science is required to quantify the current policy measures before a movement in the TACC can be validated. Options 2 and 3 can only be seen as political rather than scientific.

## Fisheries NZ HPB1 and HPB2 for 2021/22

SUBMISSION (email [REDACTED])

I am Andrew Turnwald who started commercial fishing in the mid-1970s and purchased a 15m Danish Seine vessel 'Dorothy' in 1978.

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In 2021 I am currently working on a 15m trawler based in Raglan targeting Gur, Jdo and Sna.

### HPB1 and HPB2

Section 2.4 I partook in a FNZ meeting/discussion at Napier earlier this year chaired by Charli and Monique.

The resource is shown to be in a very poor state and reduction in effort and catch is essential for rebuild.

The TACC will need to be reduced option 2 or 3.

Section 8.3 Recreational bag limit will need to be reduced to 2 with a possible vessel limit too.

The bag limit needs to be separated from the Kingfish.

Also, with the dynamic positioning equipment along with other technologies available on small craft, the recreational pressure is increasing. The increased use of electric reels allows fishers to use multi hook droppers with the maximum permissible 25 hooks per line. There is easy potential for the maximum bag limit to be exceeded and the excess catch has little or no chance of survival. Such excess catch is wasted from an over stressed resource.

I suggest a limit of 2 hooks per line for this fishery.

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**From:** Alex Flavell-Johnson  
**Sent:** Thursday, 24 June 2021 9:07 AM  
**To:** FMSubmissions  
**Subject:** Review of sustainability measures for 1 October 2021

I oppose any increase to TAC for all species listed in the Review of sustainability measures for 1 October 2021.

I support the proposed decreases for all species listed.

Of particular concern are Hāpuku & Bass stocks - With decreasing stocks, concern from Tangata whenua & recreational fishers, and the significant lack of knowledge over these species and their management, it is my view that there should be no targeted commercial fishing of these species.

This also applies to other species on the list for review - that have declining stocks and/or a lack of knowledge. Commercial catch should be ceased until stocks have fully recovered and a clear understanding of how to sustainably manage them is developed.

Ngā mihi nui,

Alex Flavell-Johnson



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**Submitter details:**

**Name of submitter  
or contact person:** Katherine Mason

**Organisation (if applicable):**

**Email:**

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

Snapper, Ling, Gemfish, Southern Bluefin tuna, Red Gurnard

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

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

Other - Do not increase any catch limits for any fish.

**Official Information Act 1982**

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I support all decreases in catch limits that have been proposed, but do not support the increase of any catch limits.

There is not sufficient data, research or knowledge about our current marine environment to support increasing TAC / TACCS / catch limits of any fish species. In particular the current default target biomass is arbitrary and needs much further research.

I understand that the minister has a legal obligation to act in a precautionary way if information is poor, uncertain or incomplete.

The fish levels are NOT back to the levels naturally occurring before fishing began, and we do not know enough about the impact of these low stock levels on all other sea creatures, including sea birds, marine mammals etc, to risk increasing fishing activity.

At this point we have little impact on how climate change may negatively affect fish numbers in the very near future

Until cameras are on ALL boats we don't know the current situation with by-catch, killing of endangered birds/fish/mammals so do not know the impact that any increase of quota will have on this illegal activity. In particular I am very concerned about any negative impact on the maui dolphin, as well as bird by-catch including flesh-footed shearwater, white capped albatross and the Black petrel. Not only are seabirds killed through the current practices, but many are suffering from malnutrition.

Until there is NO chance of by-catch of any sort (fish and otherwise) then no limits should be increased. If limits are increased then the killing of other species, which have potential sustainability risks, will surely increase.

The fishing methodologies are not selective enough to enable increasing any catch limits without risk to other fish stock.

The catch limits for any fish caught through deep sea trawling should ideally be reduced to zero – given the huge destruction and negative impacts of that methodology, sometimes in areas where no prior research has ever been undertaken.

Congratulations on reducing catch limits, which I wholly support, but please **do not increase any limits**. We need improved transparency, research and understanding of all the negative outcomes of commercial fishing of these stocks before such fishing activity is allowed to increase

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**From:** Brian Price ·  
**Sent:** Tuesday, 6 July 2021 5:49 PM  
**To:** FMSubmissions  
**Subject:** Review of sustainability measures – 2021 October Round

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you for considering my correspondence.

Biomass needs to slowly increase back up to high levels, 80% is what our citizens want, not a box of fish fingers on special at the supermarket.

The unsustainable pressure we are placing on this ecosystem is what our science is telling us.

So how about we listen and slow this greedy big business down. NZ citizens are watching now, cameras are turning on, we see the wastefulness.

We need to support using what we already have and wasting less of it.

What will our children say about what happened when we were in the wheelhouse ?

Time for change.

Regards

Brian Price

**Background;** Almost all of the non-commercial fin-fish-stocks in the north (area 1) are overfished and depleted (Flatfish, Gurnard, Hapuku, John Dory, Red Snapper, Snapper, Trevally, Tarakihi,). Also Crayfish 1 & 2 & 3 are overfished and depleted. They have been overfished and depleted for very many years and the Minister and MPI have long ignored this or done little and late.

Of what fish are left, Kingfish and Kahawai (and now Snapper 8, at long last) are assessed as not being so, but even for Kahawai, many fish are removed from the stock to provide Australian Crayfish bait. It would be better to leave them in the stock. This overfishing and depletion of northern stocks is all of the following;

1. Commercially, often bad (eg high catching costs & small fish)
2. Ecosystem-wise, bad always,
3. Legally, is always against the spirit of the law (MSY or better) and often is against the letter of the law ie when TAC/TACCs are re-set under s13. Under s13 (& none of these stocks are s14) setting catch limits **that will achieve** MSY or better is not one option, it is the only option ie is the requirement, period. Under s13, making management less bad (eg catch limits less excessive, eg S.Nash FLA1 2018) is not an option. Setting catch limits that will achieve **MSY** (or better) **biomass** (not MSY yield in the good years) is all that is legal.
4. Noncommercially, bad always.

Is overall bad in every way possible. However for those who can get away with ignoring the time-bound requirements of s 13(2)(b)(ii), not fixing these problems postpones the cost of action. But it means also delaying benefits. So Snapper One gives us just ~ 8,000 tonne of yield but which could be 50% more (& more ecosystem benefits) every year if MSY was achieved.

Northern inshore fisheries are overfished and depleted, and have been for many years, almost without exception. Moves to improve things are stymied at every turn eg longstanding overfishing and depletion ignored, FLA1 TACC decision, marine reserves & parks, gear limits, measurement of effects, inconvenient research (eg alternative research/information indicating Cra 2 is very heavily overfished even to the point of much lowered recruitment).

**FLA1 example;** The Minister in 2018 for FLA1 set illegally high catch limits; which are beyond MSY biomass yield (see s13, with benefit of doubt to precaution, as per “must”), while ignoring the option of Schedule 2, and locking the recreational & customary allocations into 10% & < 20% of before, (90% & 80% lower than the previous Minister’s allocation), and re-allocating the purported shares in the fishery (from 67% commercial to 90% commercial) and acting against ecosystem considerations for abundance, and making for expensive commercial fishing, and acting against the Harvest Strategy Standard, and disregarded Official advice for moderation and made no active provisions for the further rebuild, research and management that should have accompanied such an excessive decision. In essence S.Nash in 2018 harmed the FLA1 fishery and resource in all of the listed ways above. Then he went and did it all again with Terakihi 1. That was yet more grossly bad northern inshore finfish management, and it is still not the end of it.

**High Court;** In a Judgement released 16 June 2021 High Court Judge Gwyn J., pointed out what should have always been blindingly obvious to anyone, let alone MPI. That is, that the Fisheries Act first and foremost always requires management of the stock (such as under a s13 TAC) that will produce the OUTCOME of taking the stock to a biomass (TARGET BIOMASS) that is at or above MSY and within at a reasonable rate (TIME TO TARGET). An entirely secondary consideration is allocation and related demands.

MPI has said it will give effect to this decision (as if they needed to say, that they will actually follow our law).

**The Core problem with this CON-sultation;** MPI has made a fool or worse, of itself in this consultation by completely ignoring the Gwyn decision, despite saying they wouldn't. The Evidence for that is, from the Gurnard review & consultation, which has;

- No stock target nor time to target, which is against s13.
- No consideration of what part of s13 is being followed ie is it 13(2) or 13(2A). That is against s13 and also s12 for proper Consultation.
- As option 1, a TAC of 2,328 T when the total current adult biomass appears to be (Figs 6&7&8 at ~1,000T Areas 8&9 + ~ <1,000T Area 1) = <2,000 T Total, and with a declining trend). So Option 1 seems to be for a TAC higher than current Biomass estimates, which is against s13.
- Option 2 appears to propose a TAC of 2/3 of the size of the adult biomass. Option 3 appears to propose to allow taking half the total adult biomass annually.
- By the way some anecdotal (ooh-err) evidence is that the fish are now generally smaller and fewer / harder to catch, just like with John Dory .....

Similarly the Sna8 and Hapuka reviews propose TACs and tonnages without regard to considering and consulting as per the law that was so painstakingly explained by Gwyn J.

**The Way Forward;** While there seems to be the need to reduce the allowed tonnages in Gurnard and Groper and also an opportunity to allow a higher Snapper 8 tonnage, the Minister and his Ministry must follow our law. This consultation and its proposed action/s do not follow the law and instead are overall actively against the law.

**Action required;** Re-do these 3 TAC reviews. Further consult when you are ready to follow the law. Ideally also then, you will have some idea about what is going on ie better than para 37 where you appear to not have any ideas as to why the Gur catch has declined from ½ to 1/3 of the TACC (and yet still find yourselves able to promote as Option 1 a TACC of 90% of current). Come back and consult properly including with information on;

1. what is your target (MSY, or OptimumSY, or relatively-nice-so-many-say, or what?)
2. where you assess the stock is in relation to target
3. proposed stock management and with time to target,
4. Or if not following s13(2) then what is the s13(2A) proposed way forward
5. what is the proposed sharing of cost and benefit and over time.

Otherwise, these reviews just further perpetuate status quo illegal mis-management.

Yours truly, Max Optimum



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**Submitter details:****Name of submitter****or contact person:** Oliver Clark**Organisation (if applicable):****Email:****Fish stock(s) this submission refers to:**

SNA 8, STN 1, HPB 1 &amp; HPB 2

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

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

SNA 8 – Option 1

STN 1 – Option 2

HPB 1 and HPB 2 – Option 3

**Official Information Act 1982**

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## SNA 8

- My preferred option is Option 1. There is too much uncertainty in the stability of the current fishery and how it would respond to increased pressure for me to possibly support a significant increase to TACC. Why risk undoing the great progress that has been made since 2005 by considering such huge catch increases, particularly in a fishery that has such huge value to iwi and subsistence fisherman as well as recreational fishers. It would be much more sensible and sustainable to make small incremental increases and monitor the impact of these.
- I also cannot support a significant increase to TAC in a predominantly trawler based commercial fishery. The fact that bottom trawling still makes up a significant portion of commercial fishing effort in any of NZ's fisheries is crazy. We should be moving to minimise this fishing technique as much as possible in order to preserve habitat and vulnerable non-target species. What impact will this huge increase in trawler activity have on the biomass of other species that share the area such as terakihi, john dory, gurnard, trevally. As far as I can tell there are currently no biomass estimates on these species for this area. How can a decision with such enormous potential impact on these species be made without any information at all on the current condition of these fish stocks.

## STN 1

- My preferred option is Option 2. This increase in TAC for the STN 1 fishery must be allocated to recreational fisherman. The huge explosion in popularity of this recreational fishery needs to be accounted for, particularly considering the recreational catch estimates for the previous 3 out of 4 years have well exceeded the allowance and the current season is likely to see an even greater catch numbers. This is fast becoming a hugely valuable fish stock to NZ recreational fisherman and a massive economic boost to East Cape towns and the NZ recreational fishing industry. These fish are hugely prized by NZ fisherman and each fish landed is likely to have had \$1000's of dollars spent chasing it, all money that is pumped back into the NZ economy. To not recognize the growing importance of this fishery to recreational fisherman would be mad.
- Not allocating this increase in TAC to recreational fisherman would also put NZ at great risk of exceeding our national allocation under CCSBT as the recreational effort in this fishery is only going to increase in the coming years.

## HPB 1 and HPB 2

- I strongly support Option 3. These fish are very slow-growing and territorial, making them extremely vulnerable to overfishing. In my first-hand experience, and the experience of all other recreational fisherman I have spoken to who fish the mid to upper North Island, the state of this fishery has absolutely plummeted in recent years and is at huge risk of collapse. Considering the very low knowledge surrounding these stocks, this recreational experience cannot be ignored (particularly when commercial catch trends support it) and it is absolutely crucial that severe measures are put in place to save this fishery from near-extinction in this area. I strongly support the most severe cuts to catch for both commercial and recreational fishing catch as I believe this is what is required to prevent this fishery from collapse within the next 10 years.

I'd also just like to say that all 3 of these fisheries (SNA 8, STN 1 and HPB1/HPB2) mean a huge amount to me as a recreational fisherman and also as a kiwi. Please, please, please do what is right for the sustainability of these fisheries so that my kids can experience the amazing beauty and bounty of the ocean as I have. I urge you to honestly consider the interest of the all kiwis and act on the side of caution when it comes to sustainability. Surely the health of our fishery is worth more than the back pocket of quota holders and fishing corporations.

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**From:** Andrew Fulford  
**Sent:** Tuesday, 27 July 2021 4:56 PM  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for Hāpuku and Bass (HPB 2) for 2021/22 - Submission

Hello,

Please find following my submission regarding the Review of Sustainability Measures for Hāpuku and Bass (HPB 2) for 2021/22.

The Hāpuku fishery in the area that I have primary concern with – Hawke Bay and South of Cape Kidnappers to the Madden Banks – which has been decimated over the last few decades.

What was once a viable and reliable fishery for recreational take has now collapsed to the point where catching a Hāpuku (Groper) has become next to impossible in areas accessible by most recreational fishermen.

One anecdote that demonstrated this is the fishing spot called “Post Office Rock”. The name was given to this large underwater rock (found approximately 8 nm east of Waimarama) by commercial fishermen in 1950’s and 1960’s as a place that was as a way to get substantial injections of finance into their Post Office Savings Bank Accounts at the time by catching large quantities of Groper with relevant ease. This fishing spot was also highly consistent as a place that recreational fishermen could easily catch a feed of Groper for the table. In the last decade or so the catches of Groper off this particular spot have dwindled to become a rarity and the latest reports of fishing from the “Post Office Rock” are that there has not been a single Groper caught in the last 12 months or so. The Groper fishing in the area has effectively collapsed.

I can also remember in the 1970’s that Groper were readily caught a short distance SE Bare Island (in about 40 – 50m depth). I have caught Groper there myself as a younger man and watched many other boats haul up sometimes large Groper too. This particular fishery collapsed in the late 1970’s.

My son is now 21 years of age and is a keen fisherman who has frequented many fishing trips looking for Groper off the Central Hawkes Bay Coast from Hawke Bay south to off Kairakau. He has yet to see a Groper caught or land one himself. This is a sad indictment of the status of the Groper fishery.

I therefore strongly support the maximum reduction of the TACC for Hāpuku/Groper fishing in the HBP2 region from both the Commercial and recreational perspective.

Questions for submitters on options for varying TACs, TACCs and allowances:

- Which option do you support for revising the TAC and allowances? Why?

**Option 3. The fishery is in a state of collapse/near collapse and urgent significant conservation measures are needed.**

- If you do not support any of the options listed, what alternative(s) should be considered? Why?

**Reduce the Commercial catch to zero for a number of years to allow the stock to replenish. Also consider closing all Groper fishing during the spawning season.**

- Are the allowances for customary Māori, recreational and other sources of mortality appropriate? Why?

**No – limit 1 Groper per person for recreational fishermen.**

- Do you think these options adequately provide for social, economic, and cultural wellbeing?

**As the fishery stands at present no – if it can be rebuilt then yes.**

- Do you have any concerns about potential impacts of the proposed options on the aquatic environment?

**Only that they do not go far enough to protect the fishery/resource and biodiversity of the deeper marine ecosystem.**

Kind regards,

Andrew Fulford

**Andrew Fulford**



# Submission Form

## Review of sustainability measures for 1 October 2021

**Once you have completed this form**

Email to: [FMsubmissions@mpi.govt.nz](mailto: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:** Andrew Fulford

**Organisation (if applicable):**

**Email:**

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

Southern Bluefin Tuna

**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:<sup>1</sup>

### Details supporting your views:

The Southern Bluefin Tuna (SBT) resource has only just begun its recovery. The immediate target for biomass is 30% of unfished levels and the resource is sitting still well below that number. Current quotas/limits must remain until the fishery has responded with a strong and sustainable recovery to at least 30% of previous prefished levels and ideally to 50% of prefished levels. The SBT fishery is susceptible to seasonal variation, fishing piracy and may be negatively impacted with climate change effects. Increasing catch limits now increases that susceptibility to adverse effects and could set-back the population recovery substantially.

Please continue on a separate sheet if required.

---

<sup>1</sup> 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 Form

## Review of sustainability measures for 1 October 2021

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---

**Submitter details:**

**Name of submitter  
or contact person:** Andrea Schmid

**Organisation (if applicable):**

**Email:**

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

Snapper, Southern Bluefin Tuna, Red Gurnard, Kingfish

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

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

Other, no increase in catch limits for commercial and  
recreational fishing

**Official Information Act 1982**

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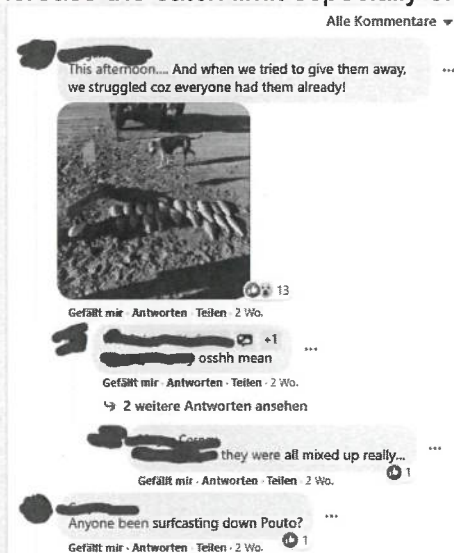


The presented options are based on data referring mainly at the stock take in recent years. This data isn't sufficient to estimate the future increase or decrease of the biomass. The ocean temperature has been significantly increased in the last couple of years, especially in summer. As it is estimated this trend will go on. The outcome on the fish biomass and single species is widely unknown. Further environmental hazards are threatening especially migratory species but also other.

Furthermore, we experience higher pressure on recreational fishing along the Westcoast in Northland as there are more and more people visit for fishing from further south and the east coast. So even the catch limit per person or bag stays the same, more fish will be caught as there is a significant new pressure on the Westcoast.

Also, this generation of recreational fisher is not having sufficient environmental and sustainable believe and knowledge to raise the recreational fishing limit. People sadly do take still more fish as needed or can be used privately, to get to the catch limit. Massive amounts of fish are rotting away in fridges and get thrown away unused. It is sadly not uncommon to get asked at the beach access or in facebook groups if you want to take some fish as people just went over there and their family's needs.

People do not know where to go with the fish caught but also do not want to stop catching before hitting the catch limit. This is an unnecessary waste of fish and therefore there is no need at al to increase the catch limit especially on snapper for recreational fishing.



This is a current screenshot and happens like that along Ripiro Beach pretty much every sunny weekend. The next generations will be hopefully taught to be more resourceful and responsible but currently recreational fisher are just about the catch limit, if they need or want that number of fish or not. Therefore, catch limits for recreational fishing should not be increased.

Fishing can and was unsustainable in the past but it can't be sustainable enough going into the future. To create buffer and prepare us for an uncertain future and climate, the biomass in the ocean should be kept as high as possible. Therefore, species which are just recovering should not be fished stronger at the moment, neither recreational or commercial. There is no harm in monitoring and protecting the recovery of the species for a longer period and come to a conclusion once we understand the impact of climate change on our oceans and fish species further. As we have seen in the past the biomass of fish can decline rapidly but the recovery needs decades. Fishing limits are increased quickly but limiting them again is always associated with protests from recreational and commercial fishing. Therefore, it is not the time yet to increase fishing quota. Fish species which are sadly still in decline will need better protection. The ocean is an vulnerable environment, changes to the climate and other effects will have an massive and unforeseen impact on (fish) species and their reproduction. We should use the recovery of the species to prepare,



build up a healthy biomass and going strong into an unknown future, so generations after us will be able to go fishing and create income.

There is totally no harm and no loss in not increasing catch limits.

Kind regards

Andrea

Please continue on a separate sheet if required.



# Submission Form

## Review of sustainability measures for 1 October 2021

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**Submitter details:**

**Name of submitter Randal Peart  
or contact person:**

**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):

No commercial TAC and minimal recreational TAC

**Official Information Act 1982**

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## Submission:<sup>1</sup>

### Details supporting your views:

Kaipara harbour is a snapper breeding ground for much of the upper north island. I am concerned fishing activity in SNA 8 would have wider effects than the west coast.

The recreational bag limit should be 3 fish over 30cm in length.

There should be no commercial fishing of snapper.

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<sup>1</sup> 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 Form

## Review of sustainability measures for 1 October 2021

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**Submitter details:**

<b>Name of submitter or contact person:</b> Sean Newland	
<b>Organisation (if applicable):</b>	Personal submission
<b>Email:</b>	
<b>Fish stock(s) this submission refers to:</b>	Southern Bluefin Tuna Hapuka/Bass
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	SBT – Option 2 of the options provided. Additionally submit that 1) a maximum daily boat limit (for both recreational and charter vessels) be set at 4 (four) per day and 2) a personal accumulation limit of 2 SBT and 3) an annual limit of 2 fish per person in any calendar year.  Hapuka/Bass – Option 2 for both areas. Additionally, I submit that a maximum daily boat limit (for both recreational and charter vessels) be set at 6 (six) per day.

**Official Information Act 1982**

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**Details supporting your views:** SBT – the historical commercial take is within the currently TACC and a) shows no immediate potential for increase (i.e. catch to lift to the current TACC) and b) there would seem no demand by the commercial sector to increase the TACC. The recreational take has however increased to the point that recent historical take has exceeded the rec quota. In the absence of regulatory actions to reduce the recreational take to fit within the Rec quota there would seem no defensible viable alternative if NZ is to meet our international fisheries management obligations with respect to this species, other than to increase the Rec quota.

I would submit that even having done so the additional 14T would, under the current stock management regime, still see the recreational take exceed the new Rec quota. For this reason I strongly submit that additional management controls should be implemented, including:

- A daily per boat limit of 4 (four) SBT retained. This would apply to all non-commercial vessels, and would therefore include charter vessels.
- A personal accumulation limit of 2 (two) SBT. These are very large fish that provide a significant volume of meat. No one legitimately needs more than 2 of these (some would argue more than 1!) before harvesting a further fish.
- A per person limit of 2 (two) SBT retained in any calendar year. Reasoning as above – these are large fish and a prized sports fishing target. They have never been a traditional recreationally targeted food fish within NZ. Taking an approach of limiting the take would seem the most ethically and rationally appropriate if the objective is ensuring the long-term sustainability of the resource while allowing the ever increasing number of rec fishers who wish to target this species to do so. It would also provide NZ with a more defensible position in relation to our international obligations with regard to SBT management within our waters (given the history of rec over catch vs rec quota). While recognising that this would be difficult to officially monitor and police the fact that such a limit was in place alongside the likelihood of significant self-monitoring by the rec sector/game fishing clubs and the limited landing sites for such fish (generally confined to Gisborne, Waihou Bay, Te Kaha, Whakatane, and Tauranga) suggests it would be effective.

## Hapuka/Bass

I support Option 2 for both areas. I do so on the following basis:

- A reduction in TACC is supported by the commercial sector. A 40% reduction would seem supported by the information provided in the consultation document while not so impacting individual commercial operators as to put them out of business.
- These fish are large, provide a lot of meat, and can often be targeted during aggregations or at specific points by the recreational fisher. Improvements in fishing and boating equipment is seeing an increasing pressure put on the stock – greater numbers of fishers, improved ability to target etc. No one actually needs more than 2 of these fish to feed themselves or their family. Too often social media (such as the Deep Drops FB page) show large numbers of these fish being taken regularly by the same individuals or groups. Our current approach has not managed this resource at all well.



- Given these species are long lived and tend to have a confined home range the potential for local extinction, or at best local scarcity, as a result of recreational fishing is significantly higher than with more mobile and earlier maturing species. The potential for a single boat to remove a large biomass from a fishing spot is high, both with private boats and those fishing from charters (many of which do target these species).
- 
- I am not even 50 and have gone from seeing hapuka caught from shore (southern HB) to being a species that is now generally confined to offshore reefs. The size of the fish taken (and which people seem excited by) has dramatically decreased in this time also. I would argue that many "pup" hapuka are now taken well before they have any chance to breed. Given these fish are commonly taken from depth and unsuitable for release the species needs to be managed in a different way using reduced take limits. As the current management regime seems not to be working effectively AND harvest pressure would seem to be increasing, retaining the status quo would arguably be mismanagement of the resource of the highest order.

For these larger and more at risk species (at least initially) why do we (recreational fishers) not have access to and a requirement to USE technology to record takes in real time? For example, if there are too many boats without access to a smart phone on board I'd be extremely surprised. Why not require all boats landing SBT, Hapuka and Bass (as examples) to photograph the accumulated take prior to landing and record these via app.

Even if there was no data access at that point the data was captured and available for checking by fisheries officers on landing, and then downloaded once access was available.

While this is self-reporting it would:

- Provide catch data to help ensure properly/better informed management of the populations
- Provide additional legal "heft" should fisheries officer identify people exceeding their limits OR not or mis-recording their take. Put a decent penalty along side this and you would change behaviours for the vast majority.

If not this approach then we start heading to the need for uniquely identifiable, individually allocated "tags" that need to be applied to fish when taken as per the US game laws. This may be an appropriate approach to take should annual (SBT) or much reduced (hapuka/bass) limits come in to play as a means to ensure harvest within limits is able to be monitored. As an example:

- An individual is required to obtain individually identifiable tags that must be applied to each hapuka once landed on board prior to the boat returning to shore. They can get these as a book of 20 registered against them personally. They can obtain more once they have used them all but should they 1) not apply them or 2) they apply someone else's/someone else uses theirs these become offenses.
- Also provides data on maximum likely harvest (how many tags are provided).

Simple and cheap to set up given current technology using web based system, photo ID, and fishing shops as service providers.

---

**From:** Jason Elliott  
**Sent:** Monday, 12 July 2021 7:34 PM  
**To:** FMSubmissions  
**Subject:** Review of SNA 8 Snapper fishery

Hi There,

I write in support of option 1, an increase of Total allowable catch of 25%.

This is the lowest increase level. My reasons for choosing this option are as follows:

- snapper are key supporters of the ecosystem, being instrumental in managing Kina barrens and subsequently maintaining kelp forests.
- only 15% of snapper caught was the target species at the time, this would indicate an increase in allowable catch would further increase the pressure on other fish stocks
- trawling is a horrific practice. Anything we can do to decrease the amount of trawling is a benefit. Imagine if a farmer, sitting on his tractor, rounded up his cows while dragging a giant rake through his paddock? With each pass slowly tearing up the productive capacity of that paddock, and after all the grass is gone, the constant disturbance prevents any regrowth from occurring. That is what is happening when we trawl. Just because we can't see something, doesn't mean it isn't happening, and just because we don't see the sea floor each day, doesn't mean we aren't destroying it bit by bit. It is a mindblowingly short sighted practice.

Alternatively though not considered as an option I would support a trade of Snapper catch between SNA 1 and SNA8. I.e. MPI giving and MPI taking away. Give them extra quota on the west but take away quota in the east (1 for 1 swap) in order to rebuild fish stocks there. A snapper is a snapper to them, it all costs the same in the supermarket.

To the MPI person reading this, thanks and keep up the good work. Not an easy gig you have but one that the public really appreciate. I hope people are polite.

Kind Regards,  
Jason

**From:** [Jason Elliott](#)  
**To:** [FMSubmissions](#)  
**Subject:** SUSTAINABILITY MEASURES FOR BLUE COD BCO3  
**Date:** Thursday, 22 July 2021 6:07:58 PM

---

Hi There,

I write in support of option 3.

My primary reason is the ban of inshore trawling. Trawling is an indiscriminate form of harvest and very destructive to the sea floor. This is not sustainable practice. We are doing the commercial guys a favour by ensuring that they don't harm the productive capacity for the future. I also support the reduction in the commercial quota which will allow the fishery to be repaired. We should have the aim of returning to abundance, not squabbling over a small number of fish. If the fishery is allowed to properly rebuild, we can all then take more fish sustainably.

Thanks for reading this, it must be really tough reading through the vast array of submissions so I am stoked that you have made it this far on my submission, good to know they actually get read! Yay democracy.

Kind Regards,  
Jason

## Liveable Communities (Auckland ) Inc

P O Box 15605

New Lynn

Auckland 0640

17 July 2021

[FMsubmissions@mpi.govt.nz](mailto:FMsubmissions@mpi.govt.nz)

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

Dear Sir/ Madam

### Submission on SNA 8 for 2021-2022

1. Preferred option:

We do not support any of the TAC 1-4 options.

We do support a **reduction** in existing snapper fishing catches in SNA 8 and the banning of bottom trawling and all similar environmentally destructive fishing methods.

We support comprehensive research into the effects of the current fishing on all fish stocks, the marine ecosystems and biodiversity.

2. We are extremely disappointed to see that none of the TAC options include a no change / zero option or a reduction in the total fishing catches in SNA 8.

None of the suggested TAC 1-4 options offer better protection of all fish stocks or the marine ecosystems in SNA8. All will result in further destruction of our degraded marine environment and biodiversity. Therefore options 1-4 should be rejected.

3. Te Mana o te Taiao – the Aotearoa New Zealand Biodiversity Strategy sets out :

**Objective 10:** Ecosystems and species are protected, restored, resilient and connected from mountain tops to ocean depths.

**Objective 12:** Natural resources are managed sustainably.

However, none of the suggested TAC 1-4 meet these two objectives.

Where is the research that shows conclusively that 1-4 or even a no change / zero option means that all marine species and ecosystems in SNA 8 are being managed sustainably and all species protected?

Given the physical dragging nature and catch-all effects of bottom trawling, there are negative impacts on the sea floor ecosystems and the totality of the fish stocks with this method. Any increase in the snapper catch will mean an increase in ecosystem damage. Where is the research to show the full effects on the marine ecosystems of this bottom trawling and Danish seining?

This research is surely required **before** any proposal to maintain or increase the catch limits are considered.

4. What are the present states of the trevally, kahawai, gurnard, tarakihi, and John dory species in SNA 8? Where is the research regarding the present numbers of these species?

How much bycatch and undersize snapper are being caught at present? How much unwanted fish is being dumped overboard at present?

Why don't all trawlers have on-board cameras to record what is actually being caught at present?

What has been the outcome of the measures that were introduced to strengthen the protection of Māui dolphins and reduce the risk of capture? What is the status of the populations of these mammals in SNA 8 at present?

Improved methods of gauging the recreational catch are needed to fully understand the volume and types of fish caught.

Again, we all need this information in order to assess the impacts of the present fishing activities **before** any increases in snapper catch limits are mooted.

## 5. Organisation:

Liveable Communities is a community inter-neighbourhood organisation based in central - west Auckland, which seeks to improve the safety and health of our communities, and to protect and sustain our natural environments.

We have a number of supporters who grew up going fishing with their whanau, fathers and/or parents, and are knowledgeable regarding SNA 8 and other areas and harbours.

Thank you for this opportunity to submit.

Yours sincerely

Phil Chase  
Spokesperson  
Liveable Communities Inc

**Liveable Communities (Auckland ) Inc**

P O Box 15605

New Lynn

Auckland 0640

19 July 2021

[FMsubmissions@mpi.govt.nz](mailto:FMsubmissions@mpi.govt.nz)

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

Dear Sir/ Madam

**Submission on Review of Sustainability Measures for Blue cod (BCO 3) for 2021/22**

1. Preferred option:

We support the reduction of the commercial TACC down to 100 tonnes.

{We believe there must be meaningful cuts in the commercial fishers catch limits since there are no reliable stock assessments of blue cod.}

We support the moving of fish trawlers to beyond the 12 mile limit for their fishing.

We support further comprehensive research into the current state of blue cod stocks.

We support further comprehensive research of the current fishing on all fish stocks, the marine ecosystems and biodiversity in the areas of BC03.

2. We support the full and proper implementation of Te Mana o te Taiao – the Aotearoa New Zealand Biodiversity Strategy which sets out :

**Objective 10:** Ecosystems and species are protected, restored, resilient and connected from mountain tops to ocean depths.

**Objective 12:** Natural resources are managed sustainably.

A significant decrease in both commercial and recreational catches is now necessary to properly implement ANZ Biodiversity Strategy, and to ensure the future protection of our marine ecosystems, all fish species and ocean biodiversity.

3. Along with the above full research is required on:

How much bycatch is being caught at present? How much unwanted fish is being dumped overboard at present?

All trawlers must have on-board cameras to record what is actually being caught at present.

4. Organisation:

Liveable Communities is a community inter-neighbourhood organisation based in central - west Auckland, which seeks to improve the safety and health of our communities, and to protect and sustain our natural environments.

We have a number of supporters who grew up going fishing with their whanau, fathers and/or parents, and are knowledgeable regarding SNA 8 and other areas and harbours.

Thank you for this opportunity to submit.

Yours sincerely

Phil Chase  
Spokesperson  
Liveable Communities Inc

---

**From:** Andi Cockroft  
**Sent:** Tuesday, 27 July 2021 3:58 PM  
**To:** FMSubmissions  
**Subject:** Submission on Snapper 8, 2021/22.

## **Council of Outdoor Recreation Associations of NZ (CORANZ)**

### **Submission on Snapper 8, 2021/22.**

**Introduction:** CORANZ is a national outdoor recreational organisation's forum and advocacy of which sea fisheries and recreation form an important part.

**Submission:** Snapper are a slow-growing fish and consequently it takes decades to restore stocks after overfishing. Snapper are just showing signs of recovery but it will take many more years to rebuild a stable fishery.

**CORANZ urges:-**

A ban on trawling on the North Island's west coast.

No increase in commercial catches of west coast snapper.

The need for more enlightened management and an appreciation of the longevity of snapper hence caution and not reckless commercial exploitation

Regular credible reviews (every 3 years) to monitor progress with more research

Extend the 4 nautical mile trawl exclusion offshore to all of the West Coast snapper areas

Better management of depleted kahawai stocks within the food chain is important (vital) to bottom species like snapper and birdlife.

**President: Andi Cockroft**

**CORANZ**



Virus-free. [www.avast.com](http://www.avast.com)

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**From:** Andi Cockroft <  
**Sent:** Tuesday, 27 July 2021 3:28 PM  
**To:** FMSubmissions  
**Subject:** Submission on Review of Deemed Value Rates for Selected Stocks 2021/22.

**Council of Outdoor Recreation Associations of NZ (CORANZ)**  
**Submission on Review of Deemed Value Rates for Selected Stocks 2021/22.**

**Discussion Paper 2021/16**

**Introduction:** CORANZ is a national outdoor recreational organisation's forum and advocacy of which sea fisheries and recreation form an important part.

**Submission:**

CORANZ supports the Review's proposed new deemed value rates and in particular for the Marlborough blue cod fishery, an important recreational fishery. The rationale as in the Review for increasing the BCO7 deemed value rates to match the true commercial value of the fish landed will bring them in line with other blue cod fisheries e.g. BCO3.

The Marlborough Sounds blue cod fishery despite a poorly based ban in 2008 (poor methodology in research) and mismanagement (e.g. slot rule) and discrimination against the recreational sector, is in relatively good heart. A major problem is the destruction of habitat by siltation from commercial forestry clear-felling.

The fishery needs sound, sensible management.

However, the proposed new deemed values will prevent overfishing by commercial.

Blue cod is priced at exorbitant prices on shop shelves (high value) which could lead to over-fishing.

Realistic deemed value settings will be a factor in guarding against over-fishing.

**President: Andi Cockroft**  
**CORANZ**



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**From:** [Tony Orman](#)  
**To:** [FMSubmissions](#)  
**Subject:** Deemed Values (BC07)  
**Date:** Tuesday, 27 July 2021 12:57:45 PM

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**Submission from Marlborough Recreational Fishers' Association (MRFA) on the Review of Deemed Value Rates for Selected Stocks for 2021/22. Fisheries New Zealand Discussion Paper No: 2021/16**

The Review of Deemed Value Rates for Selected Stocks for 2021/22 includes BCO7. This submission is on the BCO7 fishery, and not any other fish stocks listed in the Review. Our organisation represents the Marlborough recreational fishing public. The objectives of MRFA are to promote and advocate for sustainable management of fish stocks and fish habitats in the Marlborough Sounds and elsewhere in the region. The address for service for this submission is: Attn: Secretary MRFA Emma Dewhirst,

As per the question in Section 6 of the Review, MRFA supports the Review's proposed new deemed value rates for BCO7. We agree with the rationale outlined in the Review for increasing the BCO7 deemed value rates to match the true commercial value of the fish landed, and to bring them in line with other blue cod fisheries such as BCO3. The Marlborough Sounds have suffered (and continue to suffer) from erratic, poor management of the BCO fishery (and other fisheries). The slot rule was a disaster and research has been poor or lacking.

The proposed new deemed values are necessary as an integral part of getting the settings right and preventing commercial overfishing. We note that the commercial value of blue cod has recently skyrocketed, (\$60 recently in Blenheim supermarkets) so there needs to be a strong disincentive to prevent overfishing. Correct deemed value settings are an integral part of doing this.

Yours faithfully Emma Dewhirst (secretary)



**Fisheries New Zealand**

Tini a Tangaroa

# Submission Form

**Review of sustainability measures for 1 October 2021**

**Once you have completed this form**

Email to: [FMsubmissions@mpi.govt.nz](mailto: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:

Jason Heath

Organisation (if applicable):

...

Email:

Fish stock(s) this submission refers to:

KIN8 Deemed Values

Your preferred option as detailed in the  
discussion paper

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

DO NOT AGREE TO  
Reducing the deemed values

## 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:**

**Details supporting your views:** I have read the Kingfish (KIN8) fishery information while some is correct, there are a lot of false and misleading statements there provided by Fisheries New Zealand.

The Disclaimer statement by Fisheries New Zealand on page 2 of the Review of Deemed Value Rates for Selected Stocks for 2021/22 says it all:

Quote **"While every effort has been made to ensure the information in the publication is accurate, Fisheries New Zealand does not accept any responsibility or liability for error of fact, omission, interpretation or opinion that may be present, nor for the consequences of any decisions based on this information.**

If Fisheries New Zealand cannot stand by what they have wrote, they shouldn't have bothered writing this document as it is nothing more that rubbish bin material.

Frozen kingfish is worth around \$2/kg in the document- I highly doubt this.

You can hardly buy bait at \$2/kg.

The information has been supplied by the main companies who have problems with deemed value bills in KIN8 and other fisheries, which they are trying to push down before cameras come in as that's when New Zealand will get a true picture of what's really happening over the horizon on these larger fishing trawlers.

While fish prices have fallen due to Covid 19 over the last year, you don't see the Minister reducing Deemed Values on most Stocks by up to 50%- this is clearly pushed by corporate fishing companies like it was in other kingfish areas in previous years.

One would have to ask why is KIN8 getting the deemed value cut in half?

The fishery is already massively over fished plus the TACC was increased from 45 tonnes up to 80 tonnes and it is still getting over fished this current season.

I have included KIN8 landings and KIN8 returned to the sea – which paints a picture of substantial over fishing of this important recreational fish stock.

The volume of kingfish that has been returned to the sea is massive and in some fishing years nearly more that the commercial fishing TACC itself.

Should the deemed value be reduced on KIN8 this would allow massive overfishing of KIN8, (more than they are currently doing), as it would incentivise the larger trawlers targeting jack mackerel and barracouta off the West Coast of the North Island to increase their catches of jack mackerel and barracoota while decimating the KIN8 stock and paying a small deemed value for their over fishing, which would make their operations more profitable.

Instead of decreasing the deemed values on KIN8 the Fisheries Minister should be putting cameras on the large trawlers in KIN8 to see how much KIN8 they are dumping over the side dead and writing it down as returned to the sea alive.

If you look at the KIN8 volumes that have been returned to the sea ( supposed to be alive ) , think of huge trawl nets getting hauled in with tonnes of fish is them, all getting squashed and yet the kingfish are surviving and getting chucked over the side alive- this sounds very odd.....

**Fishing Season Starting 2019 Deemed Value Totals**

Independent Fisheries Ltd	KIN8	Deemed Value Invoice	\$46,800.47
Maruha (NZ) Corporation Ltd	KIN8	Deemed Value Invoice	\$149,965.00
Sanford Ltd	KIN8	Deemed Value Invoice	\$390,079.88
Sealord Charters Ltd	KIN8	Deemed Value Invoice	\$188,662.91
Sealord Group Ltd	KIN8	Deemed Value Invoice	\$298,780.83

A massive incentive for the larger companies to get the Deemed Value reduced which will save them hundreds of thousands of dollars annually.

Since KIN8 has just had a large increase from 45 tonnes up to an 80 tonnes TACC, the Minister of Fisheries should take a more cautious approach with this stock since it is getting massively over fished each year and has been for years.

A responsible Minister of Fisheries would leave the deemed values where they are for another 3 fishing seasons at least to watch what happens in this important shared fishery.

If the larger trawlers are finding it that hard with the by catch of KIN8 they should leave the area and let other smaller fishers catch the quota who will then sell the fish at a much higher price due to the quality of the fish and better markets.

Bulk fishing is not the way of the future and New Zealand needs to up its game in the fishing industry and lean towards higher value.

**The Alternative should be considered as follows by a responsible Minister of Fisheries**

**Leave the Deemed Values of KIN8 at the current levels**

**Or**

**If the commercial fishing industry feels so strongly about reducing the Deemed Value of KIN8 they should have cameras installed by October 1<sup>st</sup> 2021 on all vessels that catch jack mackerel and barracouta on the West Coast of the North Island and South islands along with 24/7 observer coverage on their boats, then the public will see how much kingfish is dumped over the side of these larger fishing trawlers.**

**Should the Minister of Fisheries decrease the Deemed Value of KIN8, it will show that the Commercial Fishing Industry has captured the Minister of Fisheries and this should therefore lead to an enquiry by a government department.**

**The New Zealand Commerce Commission would be a good start.**

**Jason Heath**



# Fisheries New Zealand

Tini a Tangaroa

## OFFICIAL INFORMATION ACT REQUEST

I refer to your official information request on \_\_\_\_\_ relating to the amount of KIN8 that is being put back into the water under schedule 6 for the following fishing seasons:

- 2016-2017
- 2017-2018
- 2018-2019

The following information is released to you under the Official Information Act 1982 (OIA):

Fishing Year	Fishstock	Fishstock Description	Destination Type	Greenweight Kg
2016- 2017 (Oct)	KIN8	Kingfish 6 & 9 (combined)	QMS returned to sea, except 6A	35,793
2017- 2018 (Oct)	KIN8	Kingfish 8 & 9 (combined)	QMS returned to sea, except 6A	18,800
2018- 2019 (Oct)	KIN8	Kingfish 8 & 9 (combined)	QMS returned to sea, except 6A	11,026

**Fisheries New Zealand**  
**Fisheries Science and Information**  
Charles Fergusson Building, 34-38 Bowen Street  
Wellington 6011, New Zealand  
mpi.govt.nz

## ACE Owned by Stock



Date as at: **15 October 2013**  
Fishing Year: **Starting Oct 2012**

Stock	Client	Catch until month	Total ACE	Total catch	Balance
KIN8	9790598 - Adroit Enterprises Limited	September	1,012	1,012	0
KIN8	8460042 - Amaltal Fishing Co Limited	September	545	545	0
KIN8	9120022 - Antons Trawling Company Limited	September	0	99	-99
KIN8	8431017 - Arthur John Harvey	September	258	258	0
KIN8	9792038 - Brown & Hayman Fisheries Limited	September	36	30	6
KIN8	8650079 - Christopher David Powell	September	943	943	0
KIN8	8860044 - Christopher Robin Parris	September	4	4	0
KIN8	9792078 - Compass Rose Fishing Limited	September	1,893	1,893	0
KIN8	9360041 - Crusader Holdings Limited	September	16	16	0
KIN8	9560007 - D and N Fishing Limited	September	92	92	0
KIN8	8610017 - David Charles Olsen	September	1,440	0	1,440
KIN8	9110055 - Eden Phillip Axe	September	37	37	0
KIN8	9410003 - Hare Patau Hohepa Te Pania	September	0	10	-10
KIN8	8471188 - Independent Fisheries Limited	September	2,912	5,379	-2,467
KIN8	9410040 - John William Smart	September	673	673	0
KIN8	9760215 - Justin Searle	September	215	215	0
KIN8	9791460 - Lines Fishing Limited	September	120	120	0
KIN8	9791194 - Mark Stephen Hartstone	September	2	0	2
KIN8	9720178 - Maruha (N.Z.) Corporation Limited	September	2,131	3,827	-1,696
KIN8	9760141 - McDonald and Brown Fishing Limited	September	63	62	1
KIN8	8452571 - Murray William Watson	September	7	7	0
KIN8	9791923 - Nino's Limited	September	14	14	0
KIN8	9792320 - Ocean Pearl Fisheries Limited	September	730	730	0
KIN8	9060076 - Pursuit Fishing Limited	September	43	43	0
KIN8	9790548 - RMD Marine Limited	September	4,038	3,678	360
KIN8	8452133 - Robert William Saunders	September	44	36	8

KIN8	8422125 - Sanford Limited	September	20,559	22,426	-1,867
KIN8	9260031 - Sealord Charters Limited	September	6,750	22,421	-15,671
KIN8	9790332 - Silverspray Fishing Limited	September	16	14	2
KIN8	9792996 - Tasman Marine Services Limited	September	630	630	0
KIN8	9460072 - Thompson Trawlers Limited	September	14	0	14
KIN8	8411728 - Tony Alan Mullins	September	53	53	0
KIN8	8462516 - Waikawa Fishing Co Limited	September	30	22	8
KIN8	9720253 - Warrick Lloyd Harris	September	22	39	-17
KIN8	9792594 - Waters Contracting Limited	September	152	150	2
KIN8	9420082 - Wild Fish (NZ) Limited	September	112	159	-47
KIN8	9792658 - Wild West Fish Limited	September	48	48	0

If you have any queries regarding this report please contact the FishServe helpline stated below.



## ACE Owned by Stock

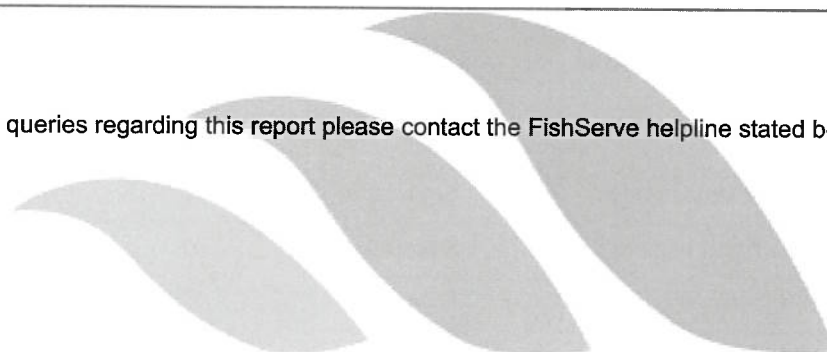


Date as at: **15 October 2015**  
Fishing Year: **Starting Oct 2014**

Stock	Client	Catch until month	Total ACE	Total catch	Balance
KIN8	9793296 - Adam David Davey	September	262	236	26
KIN8	9790598 - Adroit Enterprises Limited	September	170	283	-113
KIN8	8460042 - Amaltal Fishing Co Limited	September	256	256	0
KIN8	9120022 - Antons Trawling Company Limited	September	102	102	0
KIN8	8431017 - Arthur John Harvey	September	18	18	0
KIN8	9793133 - Astrid NZ Limited	September	3,243	3,243	0
KIN8	9791771 - Atiawa ki Whakarongotai Holdings Limited	September	18	0	18
KIN8	9792038 - Brown & Hayman Fisheries Limited	September	158	262	-104
KIN8	9460086 - Charlie Lloyd	September	1	0	1
KIN8	8650079 - Christopher David Powell	September	173	173	0
KIN8	9792078 - Compass Rose Fishing Limited	September	791	1,319	-528
KIN8	9560007 - D and N Fishing Limited	September	261	259	2
KIN8	9791836 - Eden Fishing Limited	September	12	12	0
KIN8	8660084 - Grant Eden	September	51	51	0
KIN8	9160055 - Heather Isobel Heberley, Joseph Arthur Heberley	September	26	26	0
KIN8	8471188 - Independent Fisheries Limited	September	3,458	5,949	-2,491
KIN8	9410040 - John William Smart	September	731	731	0
KIN8	9760215 - Justin Searle	September	224	219	5
KIN8	9792205 - Maadhouse Limited	September	233	233	0
KIN8	8411926 - Malcolm Robert Pinkney	September	65	65	0
KIN8	9720178 - Maruha (N.Z.) Corporation Limited	September	2,232	4,811	-2,579
KIN8	8840068 - Matthew John Whittaker	September	50	13	37
KIN8	9760141 - McDonald and Brown Fishing Limited	September	1	0	1
KIN8	9791350 - Nella Holdings Limited	September	265	290	-25
KIN8	9792320 - Ocean Pearl Fisheries Limited	September	347	347	0

KIN8	9510010 - Paul Stephen Davies	September	0	10	-10
KIN8	9060076 - Pursuit Fishing Limited	September	180	180	0
KIN8	9791995 - Raglan Trawling Limited	September	3	0	3
KIN8	9790548 - RMD Marine Limited	September	7,798	7,833	-35
KIN8	8452133 - Robert William Saunders	September	42	39	3
KIN8	8422125 - Sanford Limited	September	17,187	23,351	-6,164
KIN8	9260031 - Sealord Charters Limited	September	5,986	13,841	-7,855
KIN8	9791241 - Tane Wayne Mason	September	53	53	0
KIN8	9792996 - Tasman Marine Services Limited	September	2,079	2,029	50
KIN8	9460072 - Thompson Trawlers Limited	September	11	11	0
KIN8	9792594 - Waters Contracting Limited	September	199	197	2
KIN8	9792236 - Wellington Trawling Company (2008) Limited	September	10	9	1
KIN8	9420082 - Wild Fish (NZ) Limited	September	469	1,246	-777
KIN8	9792658 - Wild West Fish Limited	September	124	207	-83

If you have any queries regarding this report please contact the FishServe helpline stated below.



## ACE Owned by Stock



Date as at: **15 October 2016**  
Fishing Year: **Starting Oct 2015**

Stock	Client	Catch until month	Total ACE	Total catch	Balance
KIN8	9793296 - Adam David Davey	September	246	246	0
KIN8	9790598 - Adroit Enterprises Limited	September	237	347	-110
KIN8	8460042 - Amaltal Fishing Co Limited	September	10	10	0
KIN8	8431017 - Arthur John Harvey	September	18	18	0
KIN8	9793323 - Bell Fisheries Limited	September	202	202	0
KIN8	9792038 - Brown & Hayman Fisheries Limited	September	208	303	-95
KIN8	9792078 - Compass Rose Fishing Limited	September	648	953	-305
KIN8	8660084 - Grant Eden	September	292	292	0
KIN8	9160055 - Heather Isobel Heberley, Joseph Arthur Heberley	September	35	35	0
KIN8	8471188 - Independent Fisheries Limited	September	3,001	5,871	-2,870
KIN8	9410040 - John William Smart	September	697	693	4
KIN8	9760215 - Justin Searle	September	182	173	9
KIN8	8410178 - Kevin Ross Bellingham	September	33	33	0
KIN8	9520007 - Leslie Raymond Adams	September	0	7	-7
KIN8	9792205 - Maadhouse Limited	September	52	52	0
KIN8	9793578 - Macnicol Fishing Limited	September	53	53	0
KIN8	8411926 - Malcolm Robert Pinkney	September	50	50	0
KIN8	8610036 - Mangonui Fisheries Limited	September	15	0	15
KIN8	9720178 - Maruha (N.Z.) Corporation Limited	September	1,510	2,452	-942
KIN8	8840068 - Matthew John Whittaker	September	25	0	25
KIN8	9791350 - Nella Holdings Limited	September	168	168	0
KIN8	9791923 - Nino's Limited	September	160	160	0
KIN8	9792320 - Ocean Pearl Fisheries Limited	September	232	232	0
KIN8	9060076 - Pursuit Fishing Limited	September	60	59	1
KIN8	9790548 - RMD Marine Limited	September	6,726	6,488	238
KIN8	8452133 - Robert William Saunders	September	77	77	0
KIN8	8422125 - Sanford Limited	September	17,772	24,734	-6,962

KIN8	9260031 - Sealord Charters Limited	September	10,486	17,259	-6,773
KIN8	9792996 - Tasman Marine Services Limited	September	1,451	1,451	0
KIN8	9460072 - Thompson Trawlers Limited	September	50	50	0
KIN8	9792594 - Waters Contracting Limited	September	91	89	2
KIN8	9792236 - Wellington Trawling Company (2008) Limited	September	10	10	0
KIN8	9420082 - Wild Fish (NZ) Limited	September	299	299	0

If you have any queries regarding this report please contact the FishServe helpline stated below.



## ACE Owned by Stock

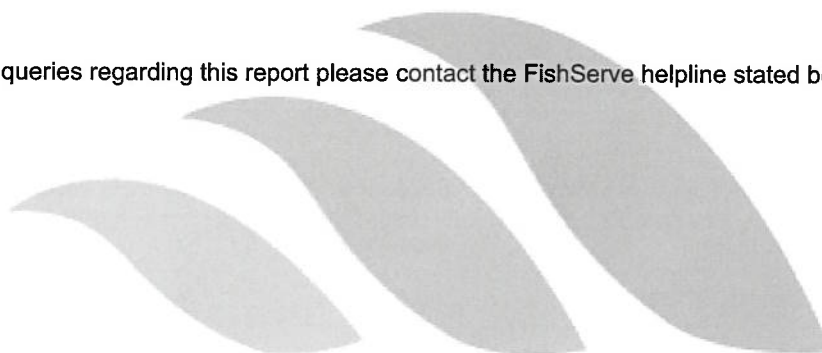


Date as at: **15 October 2017**  
Fishing Year: **Starting Oct 2016**

Stock	Client	Catch until month	Total ACE	Total catch	Balance
KIN8	9793296 - Adam David Davey	September	241	236	5
KIN8	9790598 - Adroit Enterprises Limited	September	570	570	0
KIN8	9793323 - Bell Fisheries Limited	September	12	11	1
KIN8	9720272 - Benjamin Newsome Turner	September	160	157	3
KIN8	9792038 - Brown & Hayman Fisheries Limited	September	131	127	4
KIN8	9792078 - Compass Rose Fishing Limited	September	593	593	0
KIN8	9560007 - D and N Fishing Limited	September	8	8	0
KIN8	9720247 - Douglas Argyle Dobbs	September	11	11	0
KIN8	9791836 - Eden Fishing Limited	September	72	72	0
KIN8	8660084 - Grant Eden	September	273	272	1
KIN8	8471188 - Independent Fisheries Limited	September	4,396	4,722	-326
KIN8	9710052 - John Robin Dyer	September	12	11	1
KIN8	9410040 - John William Smart	September	224	202	22
KIN8	9760215 - Justin Searle	September	233	219	14
KIN8	9792205 - Maadhouse Limited	September	85	85	0
KIN8	9793578 - Macnicol Fishing Limited	September	248	262	-14
KIN8	8411926 - Malcolm Robert Pinkney	September	117	117	0
KIN8	9720178 - Maruha (N.Z.) Corporation Limited	September	3,518	5,255	-1,737
KIN8	8840068 - Matthew John Whittaker	September	3	0	3
KIN8	9760141 - McDonald and Brown Fishing Limited	September	72	72	0
KIN8	8452571 - Murray William Watson	September	27	27	0
KIN8	9791350 - Nella Holdings Limited	September	189	189	0
KIN8	9791923 - Nino's Limited	September	72	72	0
KIN8	9792320 - Ocean Pearl Fisheries Limited	September	1,667	1,635	32
KIN8	9510010 - Paul Stephen Davies	September	85	85	0
KIN8	9792472 - Peniamina Tailoa Kofe	September	0	5	-5
KIN8	9060076 - Pursuit Fishing Limited	September	11	10	1

KIN8	9790548 - RMD Marine Limited	September	2,036	1,925	111
KIN8	8422125 - Sanford Limited	September	11,947	10,767	1,180
KIN8	9793626 - Santy Maria Fishing Limited	September	4,332	3,906	426
KIN8	9900017 - Saunders Trawling Limited	September	48	48	0
KIN8	9260031 - Sealord Charters Limited	September	11,681	13,685	-2,004
KIN8	9640045 - Splashzone Limited	September	343	343	0
KIN8	9760013 - Stuart William Morrison	September	50	50	0
KIN8	9792996 - Tasman Marine Services Limited	September	1,163	1,163	0
KIN8	9792581 - Trinity Fishing Limited	September	0	13	-13
KIN8	9720253 - Warrick Lloyd Harris	September	6	6	0
KIN8	9792594 - Waters Contracting Limited	September	61	59	2
KIN8	9792236 - Wellington Trawling Company (2008) Limited	September	8	7	1
KIN8	9420082 - Wild Fish (NZ) Limited	September	554	554	0

If you have any queries regarding this report please contact the FishServe helpline stated below.



## ACE Owned by Stock



Date as at: **15 October 2019**  
Fishing Year: **Starting Oct 2018**

Stock	Client	Catch until month	Total ACE	Total catch	Balance
KIN8	9793296 - Adam David Davey	September	241	225	16
KIN8	9790598 - Adroit Enterprises Limited	September	527	787	-260
KIN8	8431017 - Arthur John Harvey	September	138	138	0
KIN8	9730104 - B & G Fishing Limited	September	8	8	0
KIN8	9720272 - Benjamin Newsome Turner	September	125	113	12
KIN8	9792038 - Brown & Hayman Fisheries Limited	September	44	44	0
KIN8	9900406 - Claude Franklyn Fill, Warren Leslie Fill	September	0	6	-6
KIN8	9792078 - Compass Rose Fishing Limited	September	937	1,402	-465
KIN8	8610017 - David Charles Olsen	September	6	6	0
KIN8	9720247 - Douglas Argyle Dobbs	September	270	270	0
KIN8	9790210 - Douglas Fishing Limited	September	44	44	0
KIN8	8660084 - Grant Eden	September	93	89	4
KIN8	8471188 - Independent Fisheries Limited	September	3,910	8,370	-4,460
KIN8	9710052 - John Robin Dyer	September	86	86	0
KIN8	9410040 - John William Smart	September	376	354	22
KIN8	9760215 - Justin Searle	September	282	281	1
KIN8	9793578 - Macnicol Fishing Limited	September	713	713	0
KIN8	9720178 - Maruha (N.Z.) Corporation Limited	September	935	5,987	-5,052
KIN8	9900166 - Matthew Edgar Lyons	September	465	690	-225
KIN8	8840068 - Matthew John Whittaker	September	71	71	0
KIN8	8452571 - Murray William Watson	September	12	42	-30
KIN8	9791350 - Nella Holdings Limited	September	76	76	0
KIN8	9791923 - Nino's Limited	September	622	629	-7
KIN8	9792320 - Ocean Pearl Fisheries Limited	September	2,766	4,135	-1,369
KIN8	9060076 - Pursuit Fishing Limited	September	52	50	2
KIN8	8462172 - Rex Samuel Sellers	September	5	5	0
KIN8	8422125 - Sanford Limited	September	16,299	30,973	-14,674

KIN8	9793626 - Santy Maria Fishing Limited	September	5,974	5,974	0
KIN8	9900017 - Saunders Trawling Limited	September	96	95	1
KIN8	9260031 - Sealord Charters Limited	September	4,488	16,592	-12,104
KIN8	8462165 - Sealord Group Limited	September	3,450	12,462	-9,012
KIN8	9792355 - South Taranaki Fishing Charters Limited	September	4	4	0
KIN8	9760013 - Stuart William Morrison	September	23	23	0
KIN8	9792996 - Tasman Marine Services Limited	September	735	735	0
KIN8	9030064 - The Tauranga Fishing Company Limited	September	22	22	0
KIN8	9792594 - Waters Contracting Limited	September	2	0	2
KIN8	9420082 - Wild Fish (NZ) Limited	September	1,179	1,228	-49

If you have any queries regarding this report please contact the FishServe helpline stated below.



## ACE Owned by Stock



Date as at: **27 July 2021**  
Fishing Year: **Starting Oct 2020**

Stock	Client	Catch until month	Total ACE	Total catch	Balance
KIN8	9793296 - Adam David Davey	June	504	61	443
KIN8	9790598 - Adroit Enterprises Limited	June	2,081	2,203	-122
KIN8	9791390 - Altair Fishing Limited	June	9	9	0
KIN8	9791803 - Aotearoa Quota Brokers Limited	June	3,666	0	3,666
KIN8	8431017 - Arthur John Harvey	June	35	35	0
KIN8	9791771 - Atiawa ki Whakarongotai Holdings Limited	June	112	0	112
KIN8	9793323 - Bell Fisheries Limited	June	65	65	0
KIN8	9720272 - Benjamin Newsome Turner	June	128	0	128
KIN8	9792038 - Brown & Hayman Fisheries Limited	June	233	85	148
KIN8	9792078 - Compass Rose Fishing Limited	June	384	384	0
KIN8	9792578 - Danté Fishing Limited	June	56	56	0
KIN8	8610017 - David Charles Olsen	June	75	0	75
KIN8	9790210 - Douglas Fishing Limited	June	998	156	842
KIN8	9900396 - Eastern Fishing Limited	June	64	32	32
KIN8	8650034 - Egmont Seafoods Limited	June	2,144	0	2,144
KIN8	9900270 - Fish To Fish Limited	June	3	0	3
KIN8	9740068 - Gary Fraser Bevin	June	1	0	1
KIN8	9900258 - Heberley Brothers Limited	June	10	10	0
KIN8	9140091 - Ika Toa Limited	June	118	0	118
KIN8	8471188 - Independent Fisheries Limited	June	3,820	3,520	300
KIN8	9410040 - John William Smart	June	5	0	5
KIN8	9900414 - Lee Fish Limited	June	92	0	92
KIN8	9793578 - Macnicol Fishing Limited	June	1,692	1,693	-1
KIN8	8610036 - Mangonui Fisheries Limited	June	28	0	28
KIN8	9720178 - Maruha (N.Z.) Corporation Limited	June	1,177	3,557	-2,380
KIN8	8840068 - Matthew John Whittaker	June	4	9	-5
KIN8	8920089 - Moana Pacific Fisheries Limited	June	3,628	0	3,628

KIN8	8452571 - Murray William Watson	June	20	13	7
KIN8	9791923 - Nino's Limited	June	43	43	0
KIN8	9792320 - Ocean Pearl Fisheries Limited	June	1,229	937	292
KIN8	9900119 - Pania Reef Fisheries Limited Partnership	June	27	27	0
KIN8	9791817 - Pelagic Fishing Limited	June	0	9	-9
KIN8	8422125 - Sanford Limited	June	30,090	31,821	-1,731
KIN8	9793626 - Santy Maria Fishing Limited	June	6,184	6,336	-152
KIN8	9900017 - Saunders Trawling Limited	June	185	186	-1
KIN8	9260031 - Sealord Charters Limited	June	289	9,324	-9,035
KIN8	8462165 - Sealord Group Limited	June	11,727	15,812	-4,085
KIN8	9420013 - Simon Rusbridge	June	290	0	290
KIN8	9900541 - Taharoa Holdings Limited	June	154	0	154
KIN8	9900376 - Takitimu Seafoods Limited Partnership	June	5,270	0	5,270
KIN8	8462926 - Talley's Group Limited	June	2,565	0	2,565
KIN8	9792996 - Tasman Marine Services Limited	June	231	231	0
KIN8	9900434 - Venture Harvesting Limited	June	18	18	0
KIN8	8462516 - Waikawa Fishing Co Limited	June	40	0	40
KIN8	9792594 - Waters Contracting Limited	June	12	12	0
KIN8	9420082 - Wild Fish (NZ) Limited	June	566	566	0

If you have any queries regarding this report please contact the FishServe helpline stated below.

Fishstock Code	Fishing Year	Total Greenweight (kg)
KIN8	2012/13	44,188.00
KIN8	2013/14	17,482.00
KIN8	2014/15	9,424.00
KIN8	2015/16	28,841.00

Bob Gutsell  
President



Fisheries New Zealand  
PO Box 2526  
Wellington 6140  
[FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

27 July 2021

**Submission:** We support an increase to the Southern bluefin tuna (STN 1) Total Allowable Catch and an allowance of 34 tonnes for recreational fishing interests.

### Recommendations

1. The Minister increases the Southern bluefin tuna (STN 1) Total Allowable Catch (TAC) by 14 tonnes (t) and increases the recreational allowance by 14 t, from 20 t to 34 t.
2. FNZ recognise that a significant recreational fishery has developed for southern bluefin tuna off northeastern New Zealand.
3. FNZ advise the Minister that setting the right allowance for a new recreational fishery is critical to avoiding allocation disputes in the future.
4. FNZ advise the Minister that the submitters support an increase of 14 tonnes to allowance for recreational harvest and maintain that an annual allowance of 40 tonnes is required to allow this fishery to develop responsibly.
5. FNZ advise the Minister that the New Zealand Sport Fishing Council and LegaSea will continue to promote voluntary limits and responsible fishing practices in this fishery.

### The submitters

6. The New Zealand Sport Fishing Council (NZSFC) appreciates the opportunity to submit on the proposals for the future management of Southern bluefin tuna (STN 1). Fisheries New Zealand (FNZ) advice of consultation was received on 23 June, with submissions due by 27 July 2021.
7. The New Zealand Sport Fishing Council is a recognised national sports organisation with over 36,000 affiliated members from 55 clubs nationwide. The Council has initiated LegaSea to generate widespread awareness and support for the need to restore abundance in our inshore marine environment. Also, to broaden NZSFC involvement in marine management advocacy,

research, education, and alignment on behalf of our members and LegaSea supporters. [www.legasea.co.nz](http://www.legasea.co.nz). Together we are 'the submitters'.

8. The submitters are committed to ensuring that sustainability measures and environmental management controls are designed and implemented to achieve the Purpose and Principles of the Fisheries Act 1996, including "maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations..." [s8(2)(a) Fisheries Act 1996]
9. Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from these reviews and would like to be kept informed of future developments. Our contact is Helen Pastor, [secretary@nzsportfishing.org.nz](mailto:secretary@nzsportfishing.org.nz).

## Background

10. Management of southern bluefin tuna (SBT) throughout its range is the responsibility of the Commission for Conservation of Southern Bluefin Tuna (CCSBT) of which New Zealand is a founding member. Japanese longliners were catching 1000s of tonnes of SBT a year in New Zealand waters (1960s to 1980), mostly prior to the establishment of the Exclusive Economic Zone (EEZ). The New Zealand Sport Fishing Council (NZSFC) supported the "New Zealandisation" of our tuna fishers in the 1980s and early 1990s.
11. Historically, there has been a small recreational fishery based out of Fiordland and SBT are taken as a by-catch of the Pacific bluefin tuna fishery out of Greymouth and Hokitika. In 2017 a new, more accessible recreational fishery off Cape Runaway developed. Good catch rates and favourable weather attracted hundreds of anglers to the eastern Bay of Plenty at short notice.
12. Southern bluefin tuna had a domestic catch limit of 420 tonnes (t) since early 1990s. On introduction to the QMS in 2004 the Total Allowable Commercial Catch (TACC) was set at 413 t, with a recreational allowance of 4 t, a customary allowance at 1 t and other sources of fishing related mortality at 2 t. There have been a series of in-season increases following allocation decisions by the CCSBT. In 2018 the Total Allowable Catch (TAC) was set at 1088 t, with a TACC of 1046 t, a recreational allowance of 20 t, a customary allowance at 2 t and other sources of fishing related mortality at 20 t (Figure 1). The NZSFC continues to advocate that an annual allowance of 40 t is required to allow the responsible development of recreational fishing for southern bluefin tuna.
13. The reported catch worldwide was around 14,000 t for a long time. CCSBT agreed to reduce global catches by 20% in 2010 to 2011 (to 9,449 t). The Commission has since determined that the spawning stock biomass of SBT is on track to meet the international management target of 30% of the unfished spawning stock biomass by 2035 at current catch levels. A technical adjustment to the stock assessment has increased New Zealand's SBT allocation by 14 tonnes for the next 3 years.

## Proposals for southern bluefin tuna

14. The options in the Fisheries NZ discussion document include: Option 1. Increase the commercial catch limit (TACC) by 14 tonnes; Option 2. Increase the allowance for recreational interests by 14 tonnes (Table 1).

Table 1: Current and proposed catch settings for STN 1 from 1 October 2021. Figures in tonnes.

Option	TAC	TACC	Allowances		
			Customary Māori	Recreational	All other mortality caused by fishing
Status Quo	1,088	1,046	2	20	20
Option 1	1,102 ↑ (14 t)	1060 ↑ (14 t)	2	20	20
Option 2	1,102 ↑ (14 t)	1,046	2	34 ↑ (14 t)	20

15. There have been significant increases in the Total Allowable Commercial Catch (TACC) since the introduction of southern bluefin tuna to the QMS in 2004, and little change to the recreational allowance. The addition of 14 t to the allowance for recreational fishing from October this year will take it from 1.8% to 3.0% of the revised Total Allowable Catch (TAC). (Figure 1).

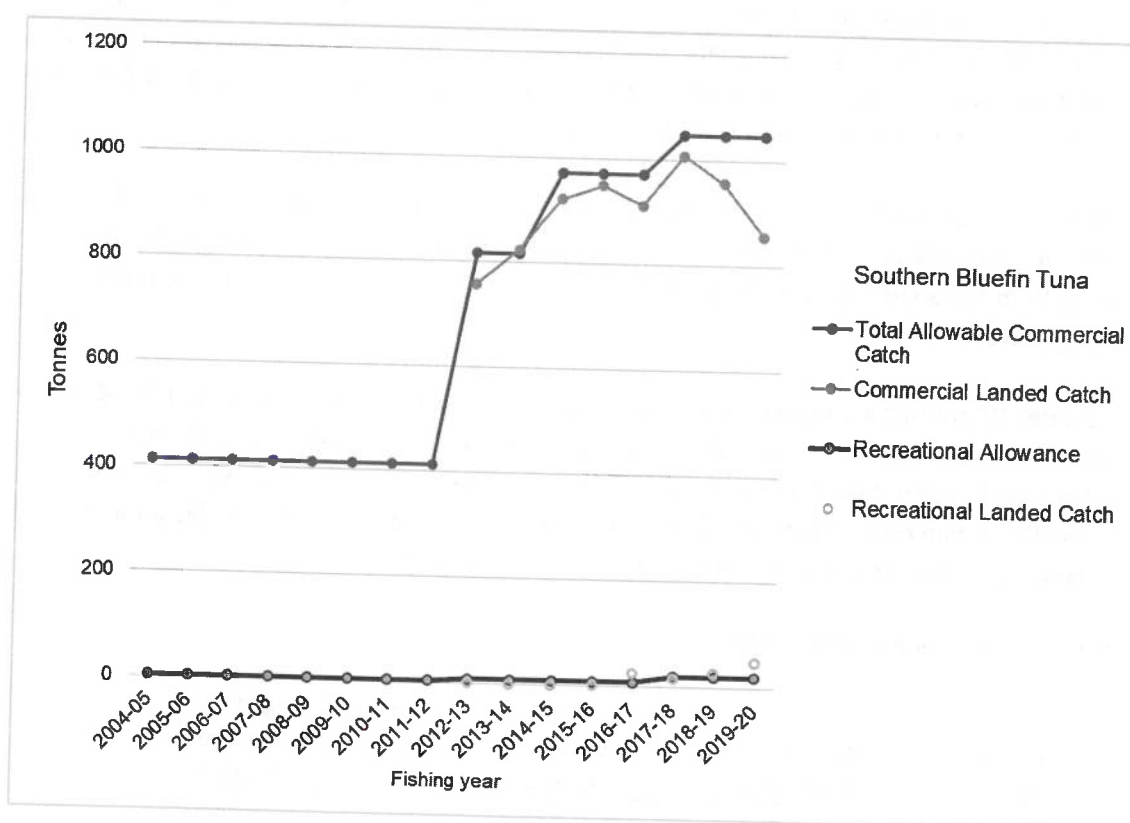


Figure 1: The allowances for commercial and recreational fishers for southern bluefin tuna made under the Quota Management System including the in-season adjustments made in 2017–18 and the TAC decision in 2018.

## Response to proposals

16. The submitters support the increase in the STN 1 TAC of 14 t as allowed for by the CCSBT. It represents just 0.07% of the 2021 Global TAC, and not allocating this increase would have no effect on the spawning stock biomass which is currently rebuilding.
17. The New Zealand TAC has been regularly under caught in recent years. The recreational allowance of 8 t was under caught prior to 2017. In 2016-17, when the recreational catch did exceed the allowance for the first time, the TACC was under caught by 58 t and ACE under caught by 15%.

## Recreational catch

18. The rapid development of the recreational fishery for southern bluefin tuna off Cape Runaway in 2017 caught many people by surprise. Information from tuna longline fishers and a social media storm saw hundreds of anglers gamefishing in July. Thanks largely to the hard work by members of the Waihou Bay Sport Fishing club and the patience of returning anglers, we have weigh station data for a high proportion of landed catch. This is useful for describing the fishery and estimating total recreational harvest.
19. NZSFC clubs recorded 266 landed southern bluefin tuna and 13 released from the east coast recreational fishery, mostly during late June and July 2017. Most of the tuna caught in the North Island were over 60 kg and the average weight was 72 kg. Worldwide it is rare to find large southern bluefin tuna reasonably close to the coast in large numbers.
20. The total landed weight of southern bluefin tuna recorded by clubs in 2016-17 was 19.4 tonnes. The Amateur Charter Vessel logbooks recorded 47 SBT with an estimated average weight of 40 kg from the South Island in 2016-17. A conservative estimate of a total recreational catch in 2016-17 was 24.3 t.
21. Fisheries NZ contracted a project to survey fishers at the Waihou Bay boat ramp in 2018 and to compile weigh station records from fishing clubs, Amateur Charter Vessels records, and recreational catch taken on commercial vessels (s111) from around New Zealand. The recreational harvest estimate in 2017-18 was 15 tonnes. This estimate includes an additional allowance of 15% for unaccounted recreational catch (Table 2).

Table 2: Current and proposed catch

Fishing Year	Number of SBT landed	Harvest weight (t) recorded	Harvest weight (t) adjusted for unaccounted catch
2016-17	313	21.3	24.3
2017-18	202	12.3	15.0
2018-19	349	21.2	25.9
2019-20	587	42.6	48.9

22. In 2018 the submitters supported a 40 t allowance for recreational harvest as the best option to allow this fishery to develop responsibly. The southern bluefin tuna stock is increasing and there remains strong interest in catching large tuna in June and July when few other gamefish are around. Prior to this, the 8 tonne allowance was primarily for the summer and autumn fishery off the south west of the South Island.
23. A recommendation from the Waihou Bay Sport Fishing Club in 2018 asked fishers to limit their landed catch to one southern bluefin tuna per boat, per day. This voluntary measure was promoted by other NZSFC clubs that year and included in the LegaSea FishCare guide<sup>1</sup> prior to the regulation change to one southern bluefin tuna per angler, per day.
24. The FishCare guide includes information on best practice methods for handling SBT prior to release and the importance of looking after the fish that are kept, to maintain quality and avoid waste of these valuable fish.
25. This year the submitters support the Minister in implementing Fisheries New Zealand's Option 2: increase the TAC by 14 t and use that increase to set aside an allowance for recreational fishing interests of 34 tonnes from 1 October 2021, noting also that an annual allowance of 40 tonnes is required to allow this fishery to develop responsibly.

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<sup>1</sup> [https://fishcare.co.nz/wp-content/uploads/2021/06/fishcare-bluefin-update\\_june21.pdf](https://fishcare.co.nz/wp-content/uploads/2021/06/fishcare-bluefin-update_june21.pdf)



# Submission Form

## Review of sustainability measures for 1 October 2021

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**Submitter details:**

<b>Name of submitter or contact person:</b>	James Frankham
<b>Organisation (if applicable):</b>	Kowhai Media Ltd / New Zealand Geographic
<b>Email:</b>	
<b>Fish stock(s) this submission refers to:</b>	STN-1
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	Other

**Official Information Act 1982**

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**Submission:<sup>1</sup>**

**Details supporting your views:**

See attached letter.

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<sup>1</sup> 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.

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

July 22, 2022

**SUBMISSION**  
**REVIEW OF SUSTAINABILITY MEASURES FOR**  
**SOUTHERN BLUEFIN TUNA (STN 1) 2021/22**

Dear Minister

*New Zealand Geographic* has reported on the state of New Zealand's marine environment, fisheries and the fate of individual stocks for more than 30 years. Across that period the trajectory has been one of significant decline, despite New Zealand's claim to 'world leading' quota management.

While a handful of fish stocks are seeing small increases as a result of tighter bag limits (such as snapper in some FMAs), most are in a depleted condition with less than 20% of original biomass, and others have crashed to local functional extinction, which is the direct result of commercial influence at a regulatory level, the dismissal of sound science and poor-quality decision-making.

As an independent media outlet<sup>1</sup> it is not our role to lobby government or advocate for stronger regulations, only to provide information to the public, point out where our public policy and personal decisions are taking us and our environment, and apply best available science to answer some of the looming questions. This is the purpose of this submission.

It is evident from our research and reporting that New Zealand's governing strategy for fisheries is to manage the ecosystem at a state of low abundance to maximise current but not long-term yield, despite the risks of doing so. It is also permissive of exploitative behaviour from some industry bodies which hold unusual influence over government and fisheries regulation.

This is not an opinion. Managing the snapper and crayfish populations to historic low abundances on the north-east coast of New Zealand, for instance, has resulted in the functional extinction of crayfish in the Hauraki Gulf, and approximately half the rocky reef structure on the Northland

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<sup>1</sup> For avoidance of doubt, Kōwhai Media Limited (publisher of New Zealand Geographic) has no commercial interests in fisheries, no interests as recreational stakeholders and no formal ties with iwi. We are not funded by any other organisation and do not receive funds for our journalism other than what is consistent with retail, subscriptions and advertising revenue for a media company.

and Auckland's east coast ecologically flipping to urchin barrens—large areas of rock devoid of kelp. This is called trophic cascade, an ecosystem collapse that is the direct result of ill-formed policy and poor management. Marine scientists have warned of this outcome since the 1970s.

Last month *New Zealand Geographic* published a feature on tuna that was seven years in the making and visited fisheries in Australia, New Zealand and the South Pacific. It has been syndicated to *Australian Geographic* and will run there next month. The story demonstrates how good fisheries management can turn prospects around for a species. See <https://www.nzgeo.com/stories/billion-dollar-fish>

Over three decades of reporting on the marine environment, southern bluefin is the only species for which the prognosis has improved across the production period of a feature. Cooperation between the partners of CCSBT—including New Zealand—has brought the spawning biomass of southern bluefin back from 5% of unfished levels to 20%.

It wasn't an easy road. For the first two decades of the scheme the southern bluefin population continuing to decline, resulting in a 50-year low. Only after a set of science-based rules replaced the negotiated catch limits did the biomass begin to increase, at a remarkable rate of 5% per annum, and reached the 20% goal early, in 2020. This was undeniably a victory for fisheries management informed by scientific modelling rather than economics, and something for which the government should be congratulated.

But rather than bank the advantage of an increasing spawning biomass back into the population, the CCSBT decided to allocate greater catch to member countries in 2018, which has the effect of prolonging the recovery of the stock—perhaps endangering the recovery of the stock—prolonging the period until the stock reaches CCSBT's own target of 30% biomass, and prolonging both maximum yield and highest catch per unit effort. It extends the mortgage to nature at a time of greatest uncertainty around climate change and other externalities that could affect reproduction success and survival of the stock.

This is evidence of short-term thinking. It does not make commercial sense in the long term and is flawed from an ecological perspective.

While the ministry is not solely responsible for this policy, as a partner it undoubtedly has input into the structure of the relationship. From both a commercial and ecological perspective, the best outcome would be that CCSBT did not distribute additional allocation, but left it uncaught until the stock returned to target.

As it currently stands, our understanding of the CCSBT relationship is that New Zealand can elect to allocate catch to one of four categories—commercial, recreational, customary or 'other mortality'. If not allocated, we understand that the uncaught allocation could not be seized or reallocated, but that it may put New Zealand in a weaker negotiating position at the next review, potentially moving the allocation to another member state.

This perhaps forces government to allocate it. If allocated to commercial catch, it will be caught. If allocated to recreational catch (which has exceeded its allocation for four of the past five years,

last year more than doubling the allocation) it would go some way towards correcting the overage, and it may or may not be caught next year. Fisheries scientists we have spoken to agree that this is best considered in combination with a bag limit modification, such as one fish per vessel-day which we understand has been recommended by some clubs and the New Zealand Sport Fishing Council. Legasea has also recommended fishers share their catch.

If allocated to customary catch (not an option forwarded by MPI in this review) it is likely it would not be caught, but rather 'banked' back into the breeding population. Likewise 'other mortality'.

It is worth noting that the southern bluefin tuna is currently listed as Critically Endangered by IUCN, the same category as mountain gorillas or New Zealand's flightless kākāpō, neither of which one would contemplate hunting and eating on weekends with mates. The classification after Critically Endangered is 'Extinct in the Wild'.

While the IUCN are debating changing the designation to 'Endangered' after recent improvements, southern bluefin is patently an iconic and vulnerable species, more vulnerable because of the uncertainty of climate change and the pelagic range of the fish that crosses the territorial boundaries of many countries as well as the High Seas where protections are scant.

These factors together would suggest that the most precautionary approach would be prudent.

It is not within the scope of an independent media outlet to make a recommendation, but the science is plain and the decisions of ministers will be published and publicly examined for engagement with peer-reviewed science, commercial sustainability and the long-term benefit to a vulnerable species with an uncertain future.

Sincerely,



James Frankham  
PUBLISHER



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**Submitter details:**

<b>Name of submitter or contact person:</b>	Manuel Greenland
<b>Organisation (if applicable):</b>	Goodfishing
<b>Email:</b>	
<b>Fish stock(s) this submission refers to:</b>	STN1. Southern Bluefin Tuna
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	Within the current framework, I prefer the additional 14t to be allocated to the recreational allowable catch.  However I raise questions about the framework.

**Official Information Act 1982**

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## Submission:<sup>1</sup>

### Details supporting your views:

Dear Minister,

It's great that we are called upon to discuss the problem of increasing Southern Bluefin Tuna stocks. This is a welcome change from the usual discussion about threatened fish stocks and deteriorating marine ecology.

The Southern Bluefin Tuna is enjoying a recovery because of the countries participating in the CCSBT respecting a set of catch limits designed to build the stock back to 30% of its unfished biomass. The increased catch allocation to New Zealand follows progress under this regime.

#### The Case for an Increased Recreational Catch

Recreational anglers have significantly overfished their allocation between 2016 and 2020. If anecdotal evidence of the season to date is anything to go by, 2021 will see the recreational catch well in excess of allowance again. Given that the success of the Bluefin recovery relies on all parties fishing within their allocated quota, serial over-fishing of quota risks confidence in the agreement, undermines trust, and endangers the recovery. Allocating the additional 14t to recreational anglers would address this issue, at no cost to the commercial industry as they have been under-fishing their allowance. It is a "free option" to correct potentially harmful serial offending.

An allocation to commercial also guarantees the additional 14t of fish will be taken, whereas an allocation to recreational merely makes the recreational allowance more appropriate to current catch rates.

In addition, the establishment and recovery of the Bluefin fishery is contributing to local incomes. Tourist services in the areas from which recreational trailer boats can reach the tuna have enjoyed renewed strong demand. The vehicles, boats and trailers making the trips to these locations are bought from and serviced by local businesses. Providers of recreational fishing equipment for Bluefin tuna report a significant source of new sales revenues as fishos gear up. All of this supports local industry and local jobs. All this in addition to the significant social and cultural benefits which accrue to our society from the joy of fishing itself, and indeed from bringing home a feed.

That said, with a recreational allowance reasonably set, it should also be enforced. The current control measure of "one fish per angler per day" measured after the fact, does not help the majority of fishos who want to help this fishery to improve, and sadly enables a selfish minority to abuse the privilege this fishery offers by taking well more than is justified. We encourage a more customised approach to limit setting as might be variously suggested by boat limits, season limits and the like, and some stronger enforcement mechanisms to ensure compliance.

#### Questioning the framework

We note that New Zealand must accept the increased catch allowance, by allocating it to one of Commercial, Recreational, Customary or Other take, or risk losing it to another country in the CCSBT. This denies us the option to invest in a faster growing healthier fishery in the future by limiting our take now. We question this framework and ask why we cannot make this choice. Why can we not have another allocation called "Savings for the Future" where we accept our allocation and choose not to take it?

We also question that the significant (10t) charter boat take is considered recreational. Charter boats bring commercial grade technology, equipment, skills and knowledge to their fishing effort in the pursuit of profit. Their clients also enjoy far higher catch rates than the average recreational anglers. This is notably akin to Commercial fishing boats. We believe there is a strong case that the charter boat take should be from the commercial allowance, which would free up a further 10t for true recreational anglers as opposed to charter boat clients.

Thank you for the opportunity to engage. We welcome your considered decision.

Best,

Manuel Greenland

Please continue on a separate sheet if required.

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<sup>1</sup> 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:** Tobias Dalton

**Organisation (if applicable):**

**Email:**

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

Southern Bluefin Tuna

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

Extra 14 Tonne Quota to be given to the Recreation  
Fisherman and NOT Commercial

**Official Information Act 1982**

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I strongly support the concept of fishing for the future. I am a recreational fisherman that stays well under my personal quota and many recreational guys I fish with also remain under quota. With that being the case, the increase in quota for southern Bluefin Tuna should be given to recreational fisherman and not commercial. This would give us the opportunity to continue preserving this fishery and increase SBT numbers because with a bit of self control, the recreational fishery will not kill an extra 14t of fish. I know if the 14t increase in quota goes to the commercial fishery, the full quota will be taken giving this species of fish a smaller chance of future survival.



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---

**Submitter details:**

<b>Name of submitter or contact person: Deane Airey</b>	
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fish stock(s) this submission refers to:</b>	STN-1
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	Option 2

**Official Information Act 1982**

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## Submission:<sup>1</sup>

### Details supporting your views:

It has been widely recognised thru out the Rec scene that these tremendous fish deserve respect and preservation, and therefore it has been encouraged throughout our scene and put into practice to take 1 fish per angler max, 2 per boat, and catch and release any further catches.

A practise that will not be shared by the Commercial sector, they will catch and slaughter the extra 14T.

Therefore the Rec increased take is likely to not be fully taken from the stock, and will lead to a stronger replenishment of the species in the future, leading to more consumer based spending targeting the species as sport fishing.

The economic return from recreational fishing in NZ is huge, and the increased opportunity will lead to more digging into their pockets to experience this amazing fishery.

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<sup>1</sup> 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:

<b>Name of submitter or contact person: Peter David Burt</b>	
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fish stock(s) this submission refers to:</b>	SNT 1
<b>Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):</b>	Option 2

### Official Information Act 1982

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I strongly believe the future of the Southern Bluefin Tuna is best served by the additional catch being allocated to recreational sector and recreational fishers limiting their catch.

I fish recreationally and have enjoyed seeing the catch rates of fish increase over recent years. It's awesome to know the the fishery is recovering. But it is only in the early stages of recovery and should be managed with extreme care. I have seen a shift in mentality from recreational fisherman over the passed 20 years to limit catches to strive for sustainability and endeavour to leave the fishery better than the one we inherited it. We do it for love and passion- not money or profit, and it's my dream that my two children will have an even better fishery than the one I have enjoyed. Option 2 is the best option towards acheiving that dream.



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---

**Submitter details:**

**Name of submitter  
or contact person:** David Henry

**Organisation (if applicable):**

**Email:**

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

STN-1

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

Option 2

**Official Information Act 1982**

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## Submission:<sup>1</sup>

### Details supporting your views:

By allocating the additional catch to the recreational sector, and recreational anglers limiting their catch, we will end up with more fish in the sea and the stock rebuilding at a faster rate than if it is given to the commercial sector who will catch and kill the fish.

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---

**Submitter details:****Name of submitter**

or contact person: Conor Pullman

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

Southern Blue Fin Tuna (STN1)

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

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

Option 2, increase TAC to 14 Tonne by adding 14T to recreational take

**Official Information Act 1982**

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**Submission:<sup>1</sup>**

**Details supporting your views:**

I believe that recreational boats should be limited to 2 Southern Bluefin Tuna per boat per day to further help with stock regeneration, once at a higher % of original biomass then the take could be increased.

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---

#### Submitter details:

Name of submitter  
or contact person: Chris O'Neil

Organisation (if applicable): TopCatch Limited

Email:

Fish stock(s) this submission refers to: STN-1

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

Option 2 – Bank quota with Recreational Fisho

#### Official Information Act 1982

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**Submission:<sup>1</sup>**

**Details supporting your views:**

Ridiculous idea to consider handing this over to the commercial sector. The fish stocks are only just recovering and we are finally seeing a decent Winter time fishery for Recreational fisherman. If you hand this over to the Commercial sector it will see millions pulled out of the fishing retail trade, boat manufacturers, fuel sales (of which a huge portion is tax for the government).

Please do the right thing and keep this with the recreational fisherman.

Regards

Chris O'Neil

Please continue on a separate sheet if required.

---

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### Submitter details:

**Name of submitter or contact person:**

Donovan de Bruin

**Organisation (if applicable):**

**Email:** [FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

**Fish stock(s) this submission refers to:**  
2021 Sustainability Review, Fisheries New Zealand.

Southern bluefin tuna

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

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

Recreational

### Official Information Act 1982

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## Submission<sup>1</sup>

### Details supporting your views:

The reason for supporting recreational is that it brings money into the local communities, instead of going to a select few. Tuna numbers have increased from commercial cutting down which is obviously having an impact. I would like to see the numbers keep increasing.

Please continue on a separate sheet if required.

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**Submitter details:**

**Name of submitter  
or contact person:** Clinton Gollop

**Organisation (if applicable):**

**Email:**

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

STN1

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

Option Two

**Official Information Act 1982**

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## Submission:<sup>1</sup>

### Details supporting your views:

The 14 tonne allocation is to go to recreational fishing with tighter management on the rec take to ensure that the rec TAC is not exceeded

The current situation would have the rec guys most likely continuing to exceed the TAC therefore increasing the rec TAC and imposing tighter management (i.e – changing the limit to 1 fish per angler/per season or the like) would help the fishery to continue to recover to a more sustainable bio-mass.

Please continue on a separate sheet if required.

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## Submitter details:

Name of submitter

or contact person: Jacob Burton

Organisation (if applicable):

Email:

Fish stock(s) this submission refers to:

*Southern Bluefin Tuna*

Your preferred option as detailed in the discussion paper

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

To give the additional 14 tonnes of allowance to the recreation sector.

## Official Information Act 1982

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**Fisheries New Zealand**

Tini a Tangaroa

**Submission:<sup>1</sup>**

Details supporting your views: We need to continue to rebuild the stocks – taking the additional 14 tones via commercial quote will ensure that 14 tonnes are killed. Recreational fishos should have a bag limit of 1 fish per angler per season and a max of 2 per boat per trip to ensure that allocated 14 tonnes stays swimming.

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### Submitter details:

**Peter MacGregor**

**Organisation (if applicable):**

**Email:**

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

Bluefin Tuna

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

Limit catch to one per boat for recreational anglers and no commercial fishing for 5 years.

### Official Information Act 1982

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We want healthy fish stocks for the future. Short term pain for long term gain. Ban all foreign boats from our territorial waters.

Please continue on a separate sheet if required.



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---

**Submitter details:**

**Name of submitter or  
contact person:**  
Keegan Oxenham

**Organisation (if applicable):**

**Email:**

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

STN-1

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

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

Option 2, bank the quota with recreational fishers.

**Official Information Act 1982**

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## **Submission:<sup>1</sup>**

### **Details supporting your views:**

As a recreational fisher who has fished in this fishery, it would be logical to me to allocate the extra quota to the recreational fishers, as the past few years has shown the growth of recreational fishing for Bluefin in New Zealand. From the amount of information I have seen it would seem as if the recreational sector needs extra quota to be able to fish within our limits. However if there was a poor recreational season with low numbers of fish caught this would be a benefit to all party's fishing these fish as that would mean more fish in the ocean for all.

---

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---

**Submitter details:**

<b>Name of submitter or contact person:</b> Casey Huband	
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fish stock(s) this submission refers to:</b>	STN-1
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	Option 2, Put 14t quota with recreational fishers

**Official Information Act 1982**

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## Submission:<sup>1</sup>

### Details supporting your views:

I think it would be a smart move to bank extra quota in recreational sector, a good number of recreational sports fishermen are already proactive with tag and release which helps keep these fish in the ocean to increase their biomass if the recreational fishers dont reach their allocation

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---

**Submitter details:**

<b>Name of submitter or contact person:</b> Lachlan Wallace	
<b>Organisation (if applicable):</b>	Recreational
<b>Email:</b>	
<b>Fish stock(s) this submission refers to:</b>	STN-1
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	Option 2 Bank the quota

**Official Information Act 1982**

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I have been fishing and diving for the last 40 years and over that time I have seen not just fish stocks but sea life and health rapidly decline. As a keen fisherman I am worried for the health of our fish stocks and ocean and want there to be the same enjoyment for my kids and future generations. I think we should bank or quota and reduce the commercial quota to get or stocks back to sustainable levels quicker.

Thanks

Lachlan Wallace



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---

**Submitter details:**

<b>Name of submitter or contact person:</b> Cameron DeLacey	
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fish stock(s) this submission refers to:</b>	STN-1 – Southern Bluefin Tuna
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	Option 2 – Bank the quota with recreational fishermen

**Official Information Act 1982**

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## Submission:<sup>1</sup>

### Details supporting your views:

I believe the quota should go towards recreational fishermen in NZ so that kiwis get the benefit of our oceans instead of resources getting caught in our oceans and sold for profit overseas. I support commercial fishing if the result is to provide fish for kiwis who can't get this themselves, however disagree with taking fish from our waters to sell to other countries as a commodity. We want our oceans to remain healthy and abundant and the only way to do this is to limit the catch to become a purely localised food source.

Specifically for the Southern Bluefin, recreational fishermen should get the added quota as this is an additional 70% on top of current, which would make a huge difference for NZers and is only a small drop in the scheme of things for the commercial fleet, of which the majority of this will simply be exported overseas for the profit of a few individuals.

Recreational fisherman should be required to report their catch to the nearest NZSFC club and should be limited to either 1 fish per boat per day landed (including Charter operations) or 1 fish per person per season landed, or a combination of both. This will enable the resource to be fairly spread around to all kiwis who wish to enjoy these fish.

I am a recreational fisherman and have taken mates out to catch Southern Bluefin in the past 2 years, voluntarily abiding by the above suggestions which many others have also done. I believe there will be very little resistance amongst NZ fisherman to apply this as legislation.

Please continue on a separate sheet if required.

---

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---

#### Submitter details:

**Name of submitter** Damien Peters  
**or contact person:**

**Organisation (if applicable):**

**Email:**

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

STN-1

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

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

Option 2

#### Official Information Act 1982

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## **Submission:<sup>1</sup>**

### **Details supporting your views:**

Having the ability to fish this unique species and provide such premium food to family and friends is the ultimate kiwi thing to do... Selling off and decimating our fish stocks to overseas countries who have already ruined their own eco systems is not okay..

By banking the additional allowance in recreational sectors the recreational fisherman can manage and limit their catch. This is the best chance of ending up with more fish in the sea.

Please continue on a separate sheet if required.

---

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---

**Submitter details:**

<b>Name of submitter or contact person:</b> Ross Palmer	
<b>Organisation (if applicable):</b>	N/A
<b>Email:</b>	
<b>Fish stock(s) this submission refers to:</b>	STN-1
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	Option 2

**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.



I support option 2, to apply the new 14T to the recreational fishery.

The reasons for this are four-fold:

- 1) The TAC for recreational fishers, by all estimates, is currently being exceeded. Given that the numbers of recreational fishers targeting Southern Bluefin has and continues to show growth, it makes sense to accommodate this recent growth by increasing the TAC, otherwise Fisheries is in a position of having to restrict and reduce the current estimated catch, possibly by restricting recreational fishers to one fish per season or other measures that would adversely affect the recreational fleet. This doesn't make sense in an increasingly popular recreational fishery.
- 2) The size of the commercial fleet is significantly diminished, so it would seem counter-intuitive to raise their TACC at this time.
- 3) We risk having any leverage with our partners if we don't utilise our allocation, and the recreational fishery is already in a position to help us meet this allocation figure.
- 4) The recreational fishery for Southern Bluefin has and continues to energise the businesses, including retail, charters, associated products, that have already benefitted from the increased interest in recreational game fishing across NZ that I have witnessed and experienced over the past decade.

Option 2, in particular, is appropriate for customary and recreational interests, given the reasons stated above, and the region where many of these fish are caught (Waihou Bay) is heavily populated with Maori fishers.

As long as the latest science indicates a positive trajectory for the species, option 2 is appropriate from an environmental perspective.

Thank you for this opportunity.

Ross Palmer

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**From:**

**Sent:**

**To:**

**Subject:**

Sunday, 18 July 2021 10:27 PM

FMSubmissions

Bluefin quota

Sent from my Galaxy

I support the continued sustainable fishing of these fish.

Bank the extra 14 tons in the rec TAC and increase the coms TAC to 1060 tons.

New limit of 1 tuna per angler per SEASON for rec fishers an unlimited tagging.

No tuna takes below 50 kgs

Cheers

Stu