



## **Public Submissions Received for the 2022 April Sustainability Round**

Part 1 of 4: Large representative bodies and organisations.

Part 2 of 4: Rock lobster and scallop stocks

Part 3 of 4: Scallop stocks only

Part 4 of 4: Hapuku/bass and multi stocks

**February 2022**

## List of Submissions & Responses for the 2022 April sustainability round

### **Part 2 of 4:** Rock lobster and scallop stocks

(not including large representative bodies)

Individual or organisation	Stocks
CRA 1 Rock Lobster Industry Association	CRA 1, 7 & 8
CRA 2 Rock Lobster Management Co Ltd	CRA 1, 7 & 8
CRA 4 Rock Lobster Industry Association Inc	CRA 1, 7 & 8
CRAMAC 6	CRA 1, 7 & 8
CRAMAC 8	CRA 1, 7 & 8
Environment and Conservation Organisations of NZ (ECO)	CRA 1, 7 & 8
Gisborne Fisheries	CRA 1, 7 & 8
NZ RLIC	CRA 1, 7 & 8
Tairāwhiti Rock Lobster Industry Association Inc	CRA 1, 7 & 8
Environmental Law Initiative	CRA 1
KPF Investments Limited	CRA 7
CRA 8 Fishing industry	CRA 8
New Zealand Red Holdings Ltd	CRA 1
Ngāpuhi Asset Holding Company Limited	CRA 1
WAKAMINENGA KI WAITANGI KOMITI MAORI	CRA 1, SCA 1
Ngātiwai Marae Committee and Moana Futures Ltd	CRA 1, SCA 1
Te Runanga o Whaingaroa	CRA 1, SCA 1
on behalf of Matawai-Pokapu Komiti Maori	CRA 1, SCA 1
Lee Fish limited	CRA 1
Leigh Lobster and Associates	CRA 1
Mountains to Sea Conservation Trust	CRA 1
Allison Fishing	CRA 7
Anderson Family Trust Partnership	CRA 7
Otago Rock Lobster Industry Association Incorporated	CRA 7
Fiordland Marine Guardians	CRA 8
Loyal fishing	CRA 8
Southern Ocean Lobster Ltd	CRA 8
Ben Pritchard	CRA 7 & 8
Bob Lovell	CRA 1
Richard Ridler	CRA 1
Bruce Sanderson	CRA 1
Jeffrey Clarke	CRA 1
Geoff Creighton	CRA 1
Philippa La Rosa	CRA 1
Vincent La Rosa	CRA 1
Lucy Cheighton	CRA 1
Emma Cheighton	CRA 1
Sophie Boberg	CRA 1

James Cheighton	CRA 1
Glen Coulston	CRA 1
David and Denise Anderson	CRA 7
Chris Cooper	CRA 7
Joe & Fiona King	CRA 8
Brad Olsen	CRA 8
fiona King	CRA 8
Gordon Wardrop	CRA 8
Terence Brocx	CRA 1, SCA 1
Jack Worthington	CRA 1, SCA 1
Tom Webb	CRA 1, SCA 1
Kim Jones	CRA 1, SCA 1
Blair Jones	CRA 1, SCA 1
Ross Scobie	CRA 1, SCA 1
Shaun Lee	CRA 1, SCA 1 & CS
Andrew Dean	CRA 1, SCA 1 & CS
Dyne Hemara	CRA 1, SCA 1 & CS
Nat Davey	CRA 1, SCA 1 & CS



## **CRA 1 ROCK LOBSTER INDUSTRY ASSOCIATION INC. (CRAMAC 1)**

Private Bag 24-901  
Wellington, 6142

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### **REVIEW OF ROCK LOBSTER SUSTAINABILITY MEASURES FOR 01 APRIL 2022**

#### **SUBMISSION - CRAMAC 1**

This submission is made by the CRA 1 Rock Lobster Industry Association Inc. The organisation is a fully constituted and incorporated society that is recognised as the commercial stakeholder organisation representing the interests of the commercial rock lobster industry in the Northland region extending from the Kaipara Harbour on the west coast to Te Arai Point, south of Whangarei on the East Coast.

This submission focuses on the proposed sustainability measures for CRA 1.

The consultation document presents four management options for CRA1.

- Option 1.1, proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t;
- Option 1.2 , proposes to reduce the TACC to 105 tonnes. This represents a decrease of 5 tonnes or 5%. The allowances for recreational catch will be reduced to 27 tonnes with the allowance for customary catch and other mortality remaining unchanged at 20t and 41t respectively. The TAC will be decreased to 193 tonnes.
- Option 1.3 , proposes to reduce the TACC to 99 tonnes. This represents a decrease of 11 tonnes or 10%. The allowances for recreational catch will be reduced to 25 tonnes with the allowance for customary catch and other mortality remaining unchanged at 20t and 41t respectively. The TAC will be decreased to 185 tonnes.
- Option 1.4 , proposes to reduce the TACC to 94 tonnes. This represents a decrease of 16 tonnes or 15%. The allowances for recreational catch will be reduced to 24 tonnes with the allowance for customary catch and other mortality remaining unchanged at 20t and 41t respectively. The TAC will be decreased to 179 tonnes.

#### **CRAMAC 1 POSITION**

**Based on the results from the latest 2021 CRA 1 Rapid Stock Assessment Update, CRAMAC 1 support Option 1.1: Status Quo and strongly object to Options 1.2, 1.3 or 1.4.**

CRAMAC 1 are supportive of the stock assessment science process and of the Rock Lobster Stock Assessment Working Group that advises on the quality and therefore the suitability of the science results to be used to inform effective management decisions in the CRA 1 fishery.



CRAMAC 1 have always chosen to maintain a conservative approach to managing the CRA 1 fishery and they believe from the results of the 2021 rapid stock assessment update, that the current TACC of 110t is the best approach to maintaining the growth of a healthy and sustainable fishery into the future.

### **RATIONALE FOR OPTION 1.1**

The most recent stock assessment for CRA 1 was undertaken in October 2019. The results from this assessment suggested, as at 1 April 2020, a reduction in the TACC was required in order to manage the future catch in CRA 1 in a responsible sustainable manner. CRAMAC 1 supported the 21t (16%) TACC reduction as a necessary measure to ensure the future sustainability and health of the resource that underpins the economic and social wellbeing of the businesses and people whose livelihoods are dependent on the CRA 1 fishery.

The results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery. The National Rock Lobster Management Group agreed that this  $B_{MSY}$  reference level was a reliable interim management target. This management target is a level of vulnerable biomass at, or above, which the fishery should be managed in order to maintain a healthy sustainable fishery for all stakeholders, for now and into the future. The CRA 1 fishery is above this management target

The CRA 1 spawning stock biomass is also estimated to be well above the internationally accepted soft and hard limits and the 2021 assessment update predicts that, at the current levels of catch, both the vulnerable and spawning stock biomass are expected to increase over the next 5 years.

The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.

To further help achieve this goal is the new process of completing a rapid stock assessment update for CRA 1 on an annual basis. This will allow the status of the CRA 1 stocks to be monitored each year and will allow timely annual adjustments to be made to the TAC, if required.

### **IMPACTS OF THE PROPOSED TACC REDUCTION**

The 1 April 2020 TACC reduction resulted in an estimated \$1.8 million loss in annual revenue to the CRA 1 fishing industry alone. This was a significant loss in income to a commercial fishery, of which a good proportion is just small family businesses. Along with the financial repercussions that have impacted directly on the rock lobster industry in CRA 1 is the loss in revenue being felt by other fishery associated businesses.

The TACC reductions proposed in options 1.2, 1.3 & 1.4 will result in an additional loss of annual revenue to the CRA 1 commercial sector alone of up to \$1.09 million. CRAMAC 1 believe the 21t TACC reduction taken in April 2020 was a sensible decision that balanced financial loss to the commercial sector with achieving our goals of a sustainable fishery but, they believe any further reduction in the TACC will result in unwarranted financial loss to the businesses, families, staff and associated communities (many of which are small coastal

communities) whose livelihoods rely on this industry to support their annual income and believe this loss would be unjustified and irresponsible to consider.

### **CRAMAC 1 FUNDED RESEARCH**

CRAMAC 1 are fully committed to maintaining a healthy, sustainable fishery, and indeed at our own expense, the commercial fishery take responsibility for collecting a large percentage of the data that supports the stock assessment science.

This research includes:

- A voluntary log book programme, which throughout each year consistently collects length frequency and other data across the fishery.
- A catch sampling research programme
- A tag recapture research programme which collects invaluable growth data.

Without this data, any feasible sustainable management of CRA 1, for the benefit of all stakeholders within the fishery, would be severely compromised. Even with the increasing financial, social and political challenges that the commercial fishery is facing, our commitment to financing and undertaking this work remains strong.

### **MANAGEMENT OF RECREATIONAL & ILLEGAL CATCH**

CRAMAC 1 are aware that any intended management outcome can only be achieved if aggregate catch is managed to the allowances set within the TAC.

We are fully committed to maintaining a healthy, sustainable CRA 1 fishery for the benefit of all sectors and therefore there is a high level of frustration over the lack of commitment from Fisheries New Zealand to implement and enforce better estimation and management of recreational catch. Allowances for recreational catch should change in the same direction, at the same time and to the same extent as the TACC, with all changes based on good stock assessment science.

There is currently a high degree of uncertainty in the level of recreational catch, this not only creates uncertainty in the stock assessment model outputs but, until this uncertainty is adequately reduced this catch cannot be effectively managed to the allowance set in the TAC. Bag limits should also reflect abundance in the fishery and should be adjusted in line with TACC adjustments.

The Victorian rock lobster fishery in Australia have achieved a highly successful tagging programme for monitoring recreational catch. It is now mandatory for all recreational fishers to tag rock lobster they catch and keep. The data collected from this programme has immensely improved estimates of recreational catch and provided data on the profile of the catch and the catching sector. New Zealand must improve how recreational catch is monitored and managed and we strongly emphasise the need for FNZ to adopt a very similar type of programme as being used in the Victorian fishery.

The current estimate of illegal take in CRA 1 is also highly uncertain. The lack of supporting evidence for the actual amount of illegal take from the fishery are of serious concern to industry and should be to all legitimate extractive users. CRAMAC 1 support MPI/FNZ taking steps to address the uncertainty in this figure and to reduce any level of illegal take.

### **CRA 7 & CRA 8**

Both of these fisheries are above the  $B_{MSY}$  reference levels that are the agreed interim management targets for those fisheries and the vulnerable biomasses are projected to continue to increase. As such CRAMAC 1 supports Option 8.3 for CRA 8 and Option 7.2 for CRA 7.

## **SUMMARY**

- CRAMAC 1 support Option 1.1
- Option 1.1 would retain the current TACC of 110t and is predicted by the rapid assessment update to allow for a rebuild in biomass over the next 5 years. The assessment also shows CRA 1 to be above the reference level biomass at which the CRA 1 fishery is sustainable for now and into the future.
- CRAMAC 1 object to Options 1.2, 1.3 & 1.4
- CRAMAC 1 stress the need for FNZ to take action in regard to implementing and enforcing better estimation of recreational catch and illegal take. We also highlight the need for MPI to take steps to reduce any level of illegal take.
- CRAMAC 1 note the financial stress that the 21 t reduction to the TACC in 2020 has caused the industry and noted that any further reductions in TACC would be unacceptable especially in light of the rapid assessment update results.
- CRAMAC 1 remains committed to the industry-funded data collection/research programmes and the support for stock monitoring contracted by MPI.
- CRAMAC 1 supports Option 8.3 for CRA 8 and Option 7.2 for CRA 7.

Yours sincerely

*Geoff Creighton*

Chairman

CRA 1 Rock Lobster Industry Association Inc

# **CRA 2 ROCK LOBSTER MANAGEMENT COMPANY LTD**



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## **REVIEW OF ROCK LOBSTER SUSTAINABILITY MEASURES FOR 01 APRIL 2022**

### **SUBMISSION - CRAMAC 2**

This submission is made by the CRA 2 Rock Lobster Management Co Ltd (CRAMAC 2). CRAMAC 2 is recognised as the commercial stakeholder organisation that represents the interests of the commercial rock lobster industry, in the region from Te Arai Point just south of Whangarei all the way to East Cape.

This submission focuses on the proposed sustainability measures for CRA 1, CRA 7 & CRA 8.

### **CRAMAC 2 POSITION**

- 1. Based on the results from the latest 2021 CRA 1 Rapid Stock Assessment Update, CRAMAC 2 support Option 1.1: Status Quo.**
- 2. Based on the results from the 2021 CRA 7 Stock Assessment, CRAMAC 2 support Option 7.2: Increase the TAC by 16% which includes a TACC increase of 5%.**
- 3. Based on the results from the 2021 CRA 8 Stock Assessment, CRAMAC 2 support Option 8.3: Increase the TAC by 11% which includes a TACC increase of 5%**

### **RATIONALE FOR CRA 1 OPTION 1.1**

The most recent stock assessment for CRA 1 was undertaken in October 2019. The results from this assessment suggested, as at 1 April 2020, a reduction in the TACC was required in order to manage the future catch in CRA 1 in a responsible sustainable manner. CRAMAC 2 agree that the 21t (16%) TACC reduction was a necessary measure to ensure the future sustainability and health of the resource that underpins the economic and social wellbeing of the businesses and people whose livelihoods are dependent on the CRA 1 fishery.

The results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery. The National Rock Lobster Management Group agreed that this  $B_{MSY}$  reference level was a reliable interim management target. This management target is a level of vulnerable biomass at, or above, which the fishery should be managed in

order to maintain a healthy sustainable fishery for all stakeholders, for now and into the future. The CRA 1 fishery is above this management target

The CRA 1 spawning stock biomass is also estimated to be well above the internationally accepted soft and hard limits and the 2021 assessment update predicts that, at the current levels of catch, both the vulnerable and spawning stock biomass are expected to increase over the next 5 years.

The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.

To further help achieve this goal is the new process of completing a rapid stock assessment update for CRA 1 on an annual basis. This will allow the status of the CRA 1 stocks to be monitored each year and will allow timely annual adjustments to be made to the TAC, if required.

### **IMPACTS OF THE PROPOSED TACC REDUCTION ON THE CRA 1 COMMERCIAL FISHERY**

The 1 April 2020 TACC reduction resulted in an estimated \$1.8 million loss in annual revenue to the CRA 1 fishing industry alone. This was a significant loss in income to a commercial fishery, of which a good proportion is just small family businesses. Along with the financial repercussions that have impacted directly on the rock lobster industry in CRA 1 is the loss in revenue being felt by other fishery associated businesses.

The TACC reductions proposed in options 1.2, 1.3 & 1.4 will result in an additional loss of annual revenue to the CRA 1 commercial sector alone of up to \$1.09 million. CRAMAC 1 believe the 21t TACC reduction taken in April 2020 was a sensible decision that balanced financial loss to the commercial sector with achieving their goals of a sustainable fishery but, they believe any further reduction in the TACC will result in unwarranted financial loss to the businesses, families, staff and associated communities (many of which are small coastal communities) whose livelihoods rely on this industry. CRAMAC 2 agree that any further TACC reductions are unwarranted in the CRA 1 fishery and that the current TACC of 110t should be maintained.

### **RATIONALE FOR CRA 7 OPTION 7.2 & CRA 8 OPTION 8.3**

The results from the 2021 stock assessment showed the vulnerable biomass across the entire CRA 7 & CRA 8 quota management areas combined to be above the reference level biomass for this entire region. This management target is a level of vulnerable biomass at, or above, which the fishery should be managed in order to maintain a healthy sustainable fishery for all stakeholders, for now and into the future. Both the CRA 7 & CRA 8 fisheries are above this management target.

Both areas are also estimated to be well above the internationally accepted soft and hard limits and at current levels of catch in CRA 7 (TACC of 106.2 t) and CRA 8 (TACC of 1191.7 t), both vulnerable and spawning stock biomass across the entire CRA 7 & CRA 8 region is projected to increase over the next five years.

To further help achieve this goal is the new process of completing a rapid stock assessment update for all rock lobster stocks on an annual basis. This will allow the status of these stocks to be monitored each year and will allow timely annual adjustments to be made to the TAC, if required.

CRAMAC 2 therefore believe option 7.2 for CRA 7 (5% TACC increase) and Option 8.3 for CRA 8 (5% TACC increase) will allow an opportunity of increased utilisation for the commercial sector in both these quota management areas, while maintaining healthy sustainable fisheries across this entire region.

## **MANAGEMENT OF RECREATIONAL & ILLEGAL CATCH**

CRAMAC 2 are aware that any intended management outcome in any fishery can only be achieved if aggregate catch is managed to the allowances set within the TAC. Therefore CRAMAC 2 is continually frustrated over the lack of commitment from Fisheries New Zealand to implement and enforce better estimation and management of recreational catch. Allowances for recreational catch should change in the same direction, at the same time and to the same extent as the TACC, with all changes based on good stock assessment science.

There is currently a high degree of uncertainty in the level of recreational catch, this not only creates uncertainty in the stock assessment model outputs but, until this uncertainty is adequately reduced this catch cannot be effectively managed to the allowance set in the TAC. Bag limits should also reflect abundance in the fishery and should be adjusted in line with TACC adjustments.

The Victorian rock lobster fishery in Australia have achieved a highly successful tagging programme for monitoring recreational catch. It is now mandatory for all recreational fishers to tag rock lobster they catch and keep. The data collected from this programme has immensely improved estimates of recreational catch and provided data on the profile of the catch and the catching sector. New Zealand must improve how recreational catch is monitored and managed and we strongly emphasise the need for FNZ to adopt a very similar type of programme as being used in the Victorian fishery.

The current estimate of illegal take in all rock lobster fisheries is also highly uncertain. The lack of supporting evidence for the actual amount of illegal take is of serious concern to industry and should be to all legitimate extractive users. CRAMAC 2 support MPI/FNZ taking steps to address the uncertainty in this figure and to reduce any level of illegal take.

## **SUMMARY**

- CRAMAC 2 support Option 1.1 for CRA 1
- Option 1.1 would retain the current CRA 1 TACC of 110t and is predicted by the rapid assessment update to allow for a rebuild in biomass over the next 5 years. The assessment also shows CRA 1 to be above the reference level biomass at which the CRA 1 fishery is sustainable for now and into the future.
- CRAMAC 2 stress the need for FNZ to take action in regard to implementing and enforcing better estimation of recreational catch and illegal take. We also highlight the need for MPI to take steps to reduce any level of illegal take.



- CRAMAC 2 note the financial stress that the 21 t reduction to the TACC in 2020 has caused the industry and noted that any further reductions in TACC would be unacceptable especially in light of the rapid assessment update results.
- CRAMAC 2 supports Option 8.3 for CRA 8 and Option 7.2 for CRA 7.

Yours sincerely

*Dan McRae*

Chairman

CRA 2 Rock Lobster Management Company Ltd



## **REVIEW OF ROCK LOBSTER SUSTAINABILITY MEASURES FOR 01 APRIL 2022**

### **SUBMISSION - CRAMAC 4**

This submission is made by the CRA 4 Rock Lobster Industry Association Inc (CRAMAC 4). CRAMAC 4 is a fully constituted and incorporated society and represents the interests of CRA 4 quota share and ACE owners in the fisheries waters bounded by the Wairoa River and Manawatu River, taking in the Hawkes Bay, Wairarapa and Wellington coasts.

This submission focuses on the proposed sustainability measures for CRA 1, CRA 7 & CRA 8.

### **CRAMAC 4 POSITION**

- 1. Based on the results from the latest 2021 CRA 1 Rapid Stock Assessment Update, CRAMAC 4 support Option 1.1: Status Quo.**
- 2. Based on the results from the 2021 CRA 7 Stock Assessment, CRAMAC 4 support Option 7.2: Increase the TAC by 16% which includes a TACC increase of 5%.**
- 3. Based on the results from the 2021 CRA 8 Stock Assessment, CRAMAC 4 support Option 8.3: Increase the TAC by 11% which includes a TACC increase of 5%**

### **RATIONALE FOR CRA 1 OPTION 1.1**

The most recent stock assessment for CRA 1 was undertaken in October 2019. The results from this assessment suggested, as at 1 April 2020, a reduction in the TACC was required in order to manage the future catch in CRA 1 in a responsible sustainable manner. CRAMAC 4 agree that the 21t (16%) TACC reduction was a necessary measure to ensure the future sustainability and health of the resource that underpins the economic and social wellbeing of the businesses and people whose livelihoods are dependent on the CRA 1 fishery.

The results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery. The National Rock Lobster Management Group agreed that this  $B_{MSY}$  reference level was a reliable interim management target. This management target is a level of vulnerable biomass at, or above, which the fishery should be managed in order to maintain a healthy sustainable fishery for all stakeholders, for now and into the future. The CRA 1 fishery is above this management target

The CRA 1 spawning stock biomass is also estimated to be well above the internationally accepted soft and hard limits and the 2021 assessment update predicts that, at the current levels of catch, both the vulnerable and spawning stock biomass are expected to increase over the next 5 years.

The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.

To further help achieve this goal is the new process of completing a rapid stock assessment update for CRA 1 on an annual basis. This will allow the status of the CRA 1 stocks to be monitored each year and will allow timely annual adjustments to be made to the TAC, if required.

### **IMPACTS OF THE PROPOSED TACC REDUCTION ON THE CRA 1 COMMERCIAL FISHERY**

The 1 April 2020 TACC reduction resulted in an estimated \$1.8 million loss in annual revenue to the CRA 1 fishing industry alone. This was a significant loss in income to a commercial fishery, of which a good proportion is just small family businesses. Along with the financial repercussions that have impacted directly on the rock lobster industry in CRA 1 is the loss in revenue being felt by other fishery associated businesses.

The TACC reductions proposed in options 1.2, 1.3 & 1.4 will result in an additional loss of annual revenue to the CRA 1 commercial sector alone of up to \$1.09 million. CRAMAC 1 believe the 21t TACC reduction taken in April 2020 was a sensible decision that balanced financial loss to the commercial sector with achieving their goals of a sustainable fishery but, they believe any further reduction in the TACC will result in unwarranted financial loss to the businesses, families, staff and associated communities (many of which are small coastal communities) whose livelihoods rely on this industry. CRAMAC 4 agree that any further TACC reductions are unwarranted in the CRA 1 fishery and that the current TACC of 110t should be maintained.

### **RATIONALE FOR CRA 7 OPTION 7.2 & CRA 8 OPTION 8.3**

The results from the 2021 stock assessment showed the vulnerable biomass across the entire CRA 7 & CRA 8 quota management areas combined to be above the reference level biomass for this entire region. This management target is a level of vulnerable biomass at, or above, which the fishery should be managed in order to maintain a healthy sustainable fishery for all stakeholders, for now and into the future. Both the CRA 7 & CRA 8 fisheries are above this management target.

Both areas are also estimated to be well above the internationally accepted soft and hard limits and at current levels of catch in CRA 7 (TACC of 106.2 t) and CRA 8 (TACC of 1191.7 t), both vulnerable and spawning stock biomass across the entire CRA 7 & CRA 8 region is projected to increase over the next five years.

To further help achieve this goal is the new process of completing a rapid stock assessment update for all rock lobster stocks on an annual basis. This will allow the status of these stocks

to be monitored each year and will allow timely annual adjustments to be made to the TAC, if required.

CRAMAC 4 therefore believe option 7.2 for CRA 7 (5% TACC increase) and Option 8.3 for CRA 8 (5% TACC increase) will allow an opportunity of increased utilisation for the commercial sector in both these quota management areas, while maintaining healthy sustainable fisheries across this entire region.

## **MANAGEMENT OF RECREATIONAL & ILLEGAL CATCH**

CRAMAC 4 are aware that any intended management outcome in any fishery can only be achieved if aggregate catch is managed to the allowances set within the TAC. Therefore CRAMAC 4 is continually frustrated over the lack of commitment from Fisheries New Zealand to implement and enforce better estimation and management of recreational catch. Allowances for recreational catch should change in the same direction, at the same time and to the same extent as the TACC, with all changes based on good stock assessment science.

There is currently a high degree of uncertainty in the level of recreational catch, this not only creates uncertainty in the stock assessment model outputs but, until this uncertainty is adequately reduced this catch cannot be effectively managed to the allowance set in the TAC. Bag limits should also reflect abundance in the fishery and should be adjusted in line with TACC adjustments.

The Victorian rock lobster fishery in Australia have achieved a highly successful tagging programme for monitoring recreational catch. It is now mandatory for all recreational fishers to tag rock lobster they catch and keep. The data collected from this programme has immensely improved estimates of recreational catch and provided data on the profile of the catch and the catching sector. New Zealand must improve how recreational catch is monitored and managed and we strongly emphasise the need for FNZ to adopt a very similar type of programme as being used in the Victorian fishery.

The current estimate of illegal take in all rock lobster fisheries is also highly uncertain. The lack of supporting evidence for the actual amount of illegal take is of serious concern to industry and should be to all legitimate extractive users. CRAMAC 2 support MPI/FNZ taking steps to address the uncertainty in this figure and to reduce any level of illegal take.

## **SUMMARY**

- CRAMAC 4 support Option 1.1 for CRA 1
- Option 1.1 would retain the current CRA 1 TACC of 110t and is predicted by the rapid assessment update to allow for a rebuild in biomass over the next 5 years. The assessment also shows CRA 1 to be above the reference level biomass at which the CRA 1 fishery is sustainable for now and into the future.
- CRAMAC 4 stress the need for FNZ to take action in regard to implementing and enforcing better estimation of recreational catch and illegal take. We also highlight the need for MPI to take steps to reduce any level of illegal take.
- CRAMAC 4 note the financial stress that the 21 t reduction to the TACC in 2020 has caused the industry and noted that any further reductions in TACC would be unacceptable especially in light of the rapid assessment update results.

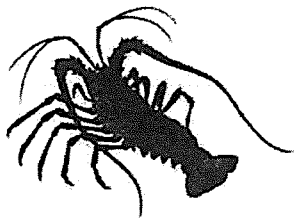
- CRAMAC 4 supports Option 8.3 for CRA 8 and Option 7.2 for CRA 7.

Yours sincerely

*Mark Peychers*

Chairman

CRA 4 Rock Lobster Industry Association Inc



**CRA 6 ROCK LOBSTER INDUSTRY ASSOCIATION INC.**  
**CRAMAC 6**

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**REVIEW OF ROCK LOBSTER SUSTAINABILITY MEASURES FOR 01 APRIL 2022**

**SUBMISSION - CRAMAC 6**

This submission is made by the CRA 6 Rock Lobster Industry Association Inc (CRAMAC 6). CRAMAC 6 is a fully constituted and incorporated society and represents the interests of CRA 6 quota share and ACE owners in the fisheries waters of the Chatham Islands, including the two main islands (Chathams and Pitt) and most of the marine environment shallower than 200m.

This submission focuses on the proposed sustainability measures for CRA 1, CRA 7 & CRA 8.

The consultation document presents:

- four management options for CRA 1
- two management options for CRA 7
- three management options for CRA 8

**CRAMAC 6 POSITION**

- 1. Based on the results from the latest 2021 CRA 1 Rapid Stock Assessment Update, CRAMAC 6 support Option 1.1: Status Quo.**
- 2. Based on the results from the 2021 CRA 7 Stock Assessment, CRAMAC 6 support Option 7.2: Increase the TAC by 16% which includes a TACC increase of 5%.**
- 3. Based on the results from the 2021 CRA 8 Stock Assessment, CRAMAC 6 support Option 8.3: Increase the TAC by 11% which includes a TACC increase of 5%**

**RATIONALE FOR OPTION 1.1**

The most recent stock assessment for CRA 1 was undertaken in October 2019. The results from this assessment suggested, as at 1 April 2020, a reduction in the TACC was required in order to manage the future catch in CRA 1 in a responsible sustainable manner. CRAMAC 4 agree that the 21t (16%) TACC reduction was a necessary measure to ensure the future sustainability and health of the resource that underpins the economic and social wellbeing of the businesses and people whose livelihoods are dependent on the CRA 1 fishery.



The results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery. The National Rock Lobster Management Group agreed that this  $B_{MSY}$  reference level was a reliable interim management target. This management target is a level of vulnerable biomass at, or above, which the fishery should be managed in order to maintain a healthy sustainable fishery for all stakeholders, for now and into the future. The CRA 1 fishery is above this management target

The CRA 1 spawning stock biomass is also estimated to be well above the internationally accepted soft and hard limits and the 2021 assessment update predicts that, at the current levels of catch, both the vulnerable and spawning stock biomass are expected to increase over the next 5 years.

The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.

### **RATIONALE FOR OPTION 7.2 & OPTION 8.3**

The results from the 2021 stock assessment showed the vulnerable biomass across the entire CRA 7 & CRA 8 quota management areas combined to be above the reference level biomass for this entire region. This management target is a level of vulnerable biomass at, or above, which the fishery should be managed in order to maintain a healthy sustainable fishery for all stakeholders, for now and into the future. Both the CRA 7 & CRA 8 fisheries are above this management target.

Both areas are also estimated to be well above the internationally accepted soft and hard limits and at current levels of catch in CRA 7 (TACC of 106.2 t) and CRA 8 (TACC of 1191.7 t), both vulnerable and spawning stock biomass across the entire CRA 7 & CRA 8 region is projected to increase over the next five years.

To further help achieve this goal is the new process of completing a rapid stock assessment update for all rock lobster stocks on an annual basis. This will allow the status of these stocks to be monitored each year and will allow timely annual adjustments to be made to the TAC, if required.

CRAMAC 6 therefore believe option 7.2 for CRA 7 (5% TACC increase) and Option 8.3 for CRA 8 (5% TACC increase) will allow an opportunity of increased utilisation for the commercial sector in both these quota management areas, while maintaining healthy sustainable fisheries across this entire region.

### **MANAGEMENT OF RECREATIONAL & ILLEGAL CATCH**

CRAMAC 6 are aware that any intended management outcome in any fishery can only be achieved if aggregate catch is managed to the allowances set within the TAC. Therefore CRAMAC 6 is continually frustrated over the lack of commitment from Fisheries New Zealand to implement and enforce better estimation and management of recreational catch. Allowances for recreational catch should change in the same direction, at the same time and to the same extent as the TACC, with all changes based on good stock assessment science.

There is currently a high degree of uncertainty in the level of recreational catch, this not only creates uncertainty in the stock assessment model outputs but, until this uncertainty is adequately reduced this catch cannot be effectively managed to the allowance set in the TAC. Bag limits should also reflect abundance in the fishery and should be adjusted in line with TACC adjustments.

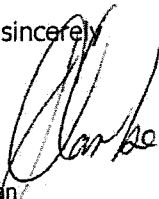
The Victorian rock lobster fishery in Australia have achieved a highly successful tagging programme for monitoring recreational catch. It is now mandatory for all recreational fishers to tag rock lobster they catch and keep. The data collected from this programme has immensely improved estimates of recreational catch and provided data on the profile of the catch and the catching sector. New Zealand must improve how recreational catch is monitored and managed and we strongly emphasise the need for FNZ to adopt a very similar type of programme as being used in the Victorian fishery.

The current estimate of illegal take in all rock lobster fisheries is also highly uncertain. The lack of supporting evidence for the actual amount of illegal take is of serious concern to industry and should be to all legitimate extractive users. CRAMAC 6 support MPI/FNZ taking steps to address the uncertainty in this figure and to reduce any level of illegal take.

### **SUMMARY**

- CRAMAC 6 support Option 1.1 for CRA 1, Option 7.2 for CRA 7 & Option 8.3 for CRA 8.
- The 2021 assessments for all these stocks shows CRA 1, CRA 7 and CRA 8 to be above the reference level biomass at which these stocks are sustainable for now and into the future.
- CRAMAC 6 stress the need for FNZ to take action in regard to implementing and enforcing better estimation of recreational catch and illegal take. We also highlight the need for MPI to take steps to reduce any level of illegal take.

Yours sincerely



Chairman  
Jeffrey Clarke  
CRA 6 Rock Lobster Industry Association Inc



30 January 2022

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

BY EMAIL

### **SUBMISSION**

Review of Sustainability Measures for Rock Lobster (CRA8) April 2022/23

This submission is made by the CRA8 Rock Lobster Industry Association Inc. ("the Association"). This organisation is a fully constituted and incorporated society that is recognised as the commercial stakeholder organisation representing the interests of the commercial rock lobster industry in the southern South Island including South Westland, Fiordland, Stewart Island, Foveaux Strait and adjacent islands.

### **CRA8**

The consultation document presents three management options for CRA8:

- Option 8.1 proposes the status quo for the Total Allowable Catch (TAC), accordingly the Total Allowable Commercial Catch (TACC) and allowances would be unchanged;
- Option 8.2 proposes to increase the TAC by 9% to 1394.5 tonnes. This represents an increase to the TACC of 23.8 tonnes or 2% to 1,215.5 tonnes and an increase to the Other Sources of Mortality Allowance of 88 tonnes.
- Option 8.3 proposes to increase the TAC by 11% to 1,430 tonnes. This represents an increase to the TACC of 59.3 tonnes or 5% to 1,251 tonnes and an increase to the Other Sources of Mortality Allowance of 88 tonnes.

Previously management procedures have been used to guide management decisions however as has been well documented the change to electronic reporting has made the previous time series of CPUE data that drove management procedures incompatible. Instead, the options are based on the 2021 stock assessment for CRA7&8. While the stock assessment was divided into two regions the large percentage of catch in Region 1 and all of Region 2 are within

CRA8. Accordingly, it is the totals within the stock assessment that are of most relevance to any consideration. This submission also assumes a change of 5% to the CRA7 TACC.

Since 2015 the Association has supported a Maximum Economic Yield (MEY) philosophy. It is recognised within the CRA8 industry the best economic result is not necessarily achieved through maximum exploitation of the vulnerable biomass. The ability to target fishing effort to certain times of the year and certain grades when market prices are at their most favourable is a much more desirable outcome and is achieved by maintaining a consistently high biomass.

While most of the assessment results are based on the Autumn Winter vulnerable biomass – essentially male lobsters and a small cohort of immature female lobsters - this is by no means the biomass available to the industry on an annual basis as the spawning stock biomass (mature females that are in berry during AW) are available for catch during Spring Summer months.

The assessment provides projections for five scenarios:

- Current catch continued
- Current catch + 10%
- Current catch + 20%
- Current catch – 10%
- Current catch – 20%

In all but the last scenario the AW vulnerable biomass is projected to increase. Spawning stock biomass is also projected to increase: Current + 10% has a 98% probability.

The National Rock Lobster Management Group has agreed that  $B_{MSY}$  reference levels should be used as interim management targets to guide decisions. The stock assessment shows the vulnerable biomass to be 1.46 times the  $B_{MSY}$  reference level and is projected to continue to increase (to 1.69 times) under current catch levels. It is also projected to increase under a 10% increase to catch levels (to 1.57 times). Given that Option 8.3 provides for an increase of only 5% to the TACC the increase will be around 1.62 times.

The increase in the TACC will result in an estimated economic return to the CRA8 fishermen of approximately \$5.3 million. Export earnings will be higher again. A large portion of these increased earnings will be spent within the southern regional economies. This aligns with the government aim of encouraging regional economic development. It is unlikely that this increase will result in the addition of further vessels to the catching fleet. Instead, the existing vessels become more financially efficient and profitable.

In respect to the increase in the Sources of Other Mortality Allowance, it is logical to use the figures from the stock assessment to inform the allowance. The Association does have concerns that the totals used are simply guesses with no data or empirical evidence to support them. It is highly unlikely that handling mortality is anything like the 83 tonnes or the illegal estimate of 34 tonnes is close to reality but accepts them for this purpose in the absence of any other data. In some fisheries figures like these could result in overestimation of the productivity of the fishery but this is not likely to occur in CRA8. The Association supports research to establish totals that have some credibility.

Many fishermen of many years' experience are reporting catches over the last year as being the best they have ever seen. This has resulted in less effort being expended through fewer pots and fewer days fishing. It is their belief that CPUE has continued to increase since the last TACC increase in 2020. This is borne out by the continuing increase in the number of legal lobsters caught and reported per pot in the logbook programme. To put the 59.3 tonnes increase into perspective, this represents an increase of approximately 850 kgs per vessel in the CRA8 fishery. At current catch rates this is 1 – 2 days fishing at any time of year.

In summary, there is no reason that the proposed increase should not be approved.

There are no sustainability concerns in the CRA8 fishery or predicted by the 2021 CRA7&8 stock assessment. All projections of stock size under Option 8.3 are for the stock to continue to increase. The TACC increase in Option 8.3 is more conservative than the scenario of Current Catch + 10% but the Association is willing to take this approach even if this provides an economic risk of under-utilising the fishery.

The Association submits that the current situation regarding the lack of effective management of the recreational sector cannot continue. Management requires accurate and timely data from all sectors to allow the Minister to discharge his responsibilities. It is an indictment on MPI/Fisheries NZ that nothing meaningful is done to constrain the recreational sector to the allowance or to put in place a reporting mechanism. The Association does not agree that the recreational take on average is within the allowance. The CRA8 fishery continues to grow and with that it is reasonable to assume that fishing participation and success increases. In addition, the number of amateur charter vessels operating within CRA8 continues to increase. This reflects the popularity of fishing, particularly in Fiordland but now also more prevalent around Stewart Island. Based on this the recreational catch will continue to increase and will continue to exceed the allowance if steps are not taken to constrain catch.

The Association could agree with an increase to the current amateur allowance that is similar to recent TACC increases and that proposed in Option 8.3. As stated above, measures to manage and constrain catch to the allowance are expected.

The Association expects the Minister to make comments in his decision regarding directing his Ministry to address this situation immediately for all rock lobster stocks.

### **CRA1 And CRA7**

Both of these fisheries are above the  $B_{MSY}$  reference levels that are the agreed interim management targets for those fisheries and the vulnerable biomasses are projected to continue to increase. As such the Association supports Option 1.1 for CRA1 and Option 7.2 for CRA7.

## Summary

The Association supports Option 8.3 that proposes:

- The increase in the TAC to 1,430 tonnes;
- The increase in the TACC to 1,251 tonnes;

The Association also:

- Supports Option 1.1 for CRA1;
- Supports Option 7.2 for CRA7;
- Agrees to an increase to the recreational allowance on the basis that it expects the Minister to make definitive comments regarding the meaningful management of recreational rock lobster fisheries in respect of constraining catch to the given allowance and the collection of accurate catch data; and
- Supports research to establish credible data to guide stock assessments and the setting of the Other Sources of Mortality allowance.

A handwritten signature in black ink, reading "Malcolm Lawson". The signature is written in a cursive, flowing style.

Malcolm Lawson  
Chief Executive Officer





31st January 2022

#### **SUBMISSION ON THE REVIEW OF ROCK LOBSTER SUSTAINABILITY MEASURES FOR 01 APRIL 2022**

1. Gisborne Fisheries is a family-owned seafood company based on the East Coast of New Zealand in Gisborne. The company has been operating on the East Coast for more than 70 years and is involved in quota ownership, harvesting, processing, and wholesaling of quality seafood around New Zealand and internationally.
2. This submission relates to the review of **ROCK LOBSTER SUSTAINABILITY MEASURES FOR 01 APRIL 2022**
3. Gisborne Fisheries **preferred option is**  
**Option 1.1:** which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t
4. The results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery and the spawning stock biomass is well above the soft and hard limits.
5. The 2021 assessment update also predicts that at the current levels of catch both the vulnerable and spawning stock biomass are expected to increase over the next 5 years.
6. The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with the biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.
7. As a long standing processing company handling substantial volumes of commercially caught lobster and finfish, a healthy sustainable fishery is of paramount importance us. We were fully supportive of the CRA1 1 April 2020 TAC/TACC reduction. We saw this as a necessary measure to ensure the future sustainability and health of the resource that underpins our

business and underpins the future economic and social wellbeing and security of our business and our staff.

8. We believe the 21t TACC reduction taken in April 2020 was a sensible decision that balanced financial loss to the commercial sector with achieving our goals of a sustainable fishery. We believe any further reduction in the TACC will result in unwarranted financial and mental stress to the commercial sector and to the many associated businesses that rely on the commercial fishing sector in CRA 1 to support their annual income.
9. We are also increasingly frustrated with the lack of commitment from Fisheries New Zealand to implement and enforce better estimation and management of recreational catch of rock lobster in CRA 1. While the commercial sector is intensely scrutinised and monitored and have also been expected to cope with the financial and mental stress of a TACC reduction, there are no such requirements made of the recreational sector. There has been and still is no adequate monitoring of recreational catch and the recreational sector have not been required to make any changes to their catch limits.
10. Any reductions in catch, that are required to ensure the sustainability of the CRA 1 fishery, need to be shared equally by both the recreational and commercial sectors. Recreational fishing bag limits need to be decreased at the same time as any catch reductions are imposed on the commercial sector and levels of recreational catch need to be adequately monitored as we move into the future.
11. We strongly urge the need for FNZ to take steps to address this issue and to create better equity in management of this shared fishery.

**12. CRA 7 & CRA 8**

Both of these fisheries are above the BMSY reference levels that are the agreed interim management targets for those fisheries and the vulnerable biomasses are projected to continue to increase.

As such Gisborne Fisheries supports **Option 8.3 for CRA 8 and Option 7.2 for CRA 7.**

Yours sincerely



**Salvatore Zame**  
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# NZ ROCK LOBSTER INDUSTRY COUNCIL LTD

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8 February, 2022

## REVIEW OF ROCK LOBSTER SUSTAINABILITY MEASURES FOR 1 APRIL 2022

A submission on behalf of the New Zealand rock lobster industry.

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## **INTRODUCTION**

1. The New Zealand Rock Lobster Industry Council (NZ RLIC) welcomes the opportunity to participate in the statutory consultation process for the TAC/TACC decisions that will come into effect on 1 April 2022.
2. The NZ RLIC is the umbrella organisation for the nine regional organisations known as CRAMACs, which operate in each of the rock lobster (CRA) management areas of New Zealand. CRAMAC membership comprises CRA quota owners, processors, exporters, and fishermen (quota share owner-operators and Annual Catch Entitlement (ACE) owners) in each region. All nine CRAMACs hold a significant majority mandate of rock lobster quota shares owned in the regions. CRAMACs are the shareholders in NZ RLIC, and appoint the Board of Directors.
3. NZ RLIC represents about 610 quota share owners and 320 ACE owners in the nine CRA stocks nationally and the PHC stock. They collectively landed around 2,800 tonnes of rock lobster with an annual export (FOB) value of around \$370 million in calendar year 2021. The industry deploys around 250 vessels, employs 2,400 people directly and indirectly, lands lobster at around 100 landing points with that product going to about 37 processing and export facilities. The industry supports an extensive network of transport, engineering, electronics and provedoring businesses.

## **SUBMISSION**

4. NZRLIC has considered the information contained in the statutory consultation document (Discussion Paper No: 2021/27), the most recent assessment documents compiled by the Rock Lobster Fishery Assessment Working Group and the views and information from engagement with the CRAMACs and rock lobster quota share owners and ACE holders.
5. For the stocks under review leading up to 1 April 2022, NZ RLIC recommends the following decisions:

### **CRA 1**

- i) The TAC and TACC were reduced in 2020 and the 2021 rapid assessment suggests vulnerable and total biomass will increase over next 5 years and spawning biomass will be stable at levels well above the soft limit. The biomass is also estimated to be above the MSY reference level and increasing. The NRLMG will undertake work to identify a management target in 2022 and develop a management procedure to inform whether further management actions are required. Further reductions to the TAC and TACC would be an unnecessary impact on the regional economy and the incomes of fishing families at this time when the stock is assessed to be on a positive rebuild trajectory. NZ RLIC endorses option 1.1.
- ii) With the assessment suggesting an increase in vulnerable biomass, recreational catch is likely to increase. Recreational controls (principally bag limits) should be adjusted by 1 October 2022 to

provide a level of certainty the recreational catch will be constrained to the allowance as the stock biomass increases.

#### CRA 7

- iii) Projections undertaken as part of the 2021 stock assessment suggest that vulnerable biomass and spawning stock biomass would continue to increase and the stock would remain more than 150% of the  $B_{MSY}$  reference level under Option 7.2 in the NRLMG IPP (a 16% TAC increase to 146.5 tonnes). NZ RLIC's supports this option; the TAC increase is relatively conservative, maintains the stock above the level which can produce MSY, recognises the high current abundance, and allows for a modest increase in utilisation.

#### CRA 8

- iv) NZ RLIC's view is that the Option 8.3 TAC increase to 1431 tonnes is relatively conservative, recognises the high current abundance, and allows for a modest increase in utilisation. Vulnerable biomass, spawning stock and total biomass for CRA 7 & 8 are all projected to continue to increase with this catch level over the next four years (with very high probabilities), and the stock would remain more than 150% of the  $B_{MSY}$  reference level.
- v) A rapid assessment update will be conducted for CRA 7 and CRA 8 in 2022 and will provide an opportunity to consider a review of the catch settings and management controls for April 2023.

#### Other relevant matters

- vi) The Marine Amateur Fishery Assessment Working Group must evaluate new approaches that can be used to produce timely and cost effective estimates of recreational catch and information that can be used to calibrate adjustment of recreational controls to maintain catch within the allowances.
- vii) New research needs to be commissioned to provide annual estimates of recreational catch for each rock lobster stock with sufficient precision to inform stock assessments and management decisions.
- viii) A legislative adjustment should be promulgated to allow regulatory controls to be implemented through a gazette notice to align catch settings and regulatory changes and allow more timely and responsive management interventions.
- ix) The NRLMG should develop a set of allocation principles that can be used to ensure consistency with the Fisheries Act and a uniform approach to setting and adjusting the recreational allowance in relation to the TACC.
- x) Reporting obligations on recreational charter vessels need to be enforced and the NRLMG should develop advice on incorporating catch from these vessels into the overall recreational allowance.



- xi) Improved methods to estimate illegal take, including information metrics to inform analysis, must be developed and implemented by MPI as a matter of priority.
- xii) Telson clipping, and accumulation limits and the associated 'bag and tag' conditions, should be regulated to apply nationally, for all rock lobster fishery management areas.
- xiii) The NRLMG should confirm stock management targets during 2022 so they can be applied to the results of the annual assessments and inform the development of management procedures for TACs in all QMAs.

## **REVIEW OF THE CRA 1 (NORTHLAND) ROCK LOBSTER FISHERY**

### ***CRA 1 STOCK STATUS***

6. The full stock assessment conducted for CRA 1 in 2019 was used to undertake a rapid assessment update in 2021. This updated assessment suggests that in 2021 CRA 1 vulnerable biomass was 15% of the unfished level. Spawning biomass in 2021 was 36% of the unfished level, well above the soft limit of 20% where it is Fisheries New Zealand policy to implement a rebuilding plan.
7. Over the next five years, with 2021 catch levels and recent recruitment, vulnerable biomass is projected to increase to 17% of the unfished level, total biomass will increase by 5%, and spawning biomass is projected to remain constant at levels well above the soft limit.
8. The Rock Lobster Fishery Assessment Working Group has calculated the  $B_{MSY}$  reference level for the vulnerable biomass. Vulnerable biomass was above the reference level in 2021 (104%) and is projected to increase further above the  $B_{MSY}$  reference level by 2025 (to 115% of the  $B_{MSY}$  reference level).

### ***TAC***

9. On the basis of the 2019 stock assessment the CRA 1 TAC was reduced from 1 April 2020 by 16%, the allowances for the recreational sector and other sources of mortality were reduced to reflect best available information on current levels, and the TACC was reduced by 16% from 131 to 110 tonnes.
10. The 2021 rapid assessment suggests vulnerable biomass levels will increase at current levels of removals over the next 5 years. Spawning biomass will remain well above (nearly double) the soft limit of 20% over the next five years.
11. The Rock Lobster Fishery Assessment Working Group has undertaken the work to calculate an interim target biomass level for CRA 1. This is an MSY compatible reference point designed to meet the requirements of section 13 of the Fisheries Act to manage stocks at or above a level that will produce the MSY. This reference point is a relatively conservative assessment of the biomass that would produce MSY because the calculation averages fixed and fixed fishing mortality projections (e.g. the biomass is higher than one focussed only on yield maximisation) and the biomass can only fall below 20%  $SSB_0$  in 5% of simulations. In addition the simulations were further constrained by the requirement that at least 99% of the expected catch had to be available to be taken for at least 95% of years and simulation replicates over the final 20 years. The 2021 rapid assessment suggests vulnerable biomass is above the level of this interim target and increasing. A further decrease in the TAC is not necessary to continue the rebuild of the stock above this level.
12. Work will also be undertaken in the NRLMG during 2022 on the identification of an agreed management target. This will be followed by development of a revised approach to management procedures using

the rapid assessment results. A management procedure would provide guidance on how to use annual assessment results to adjust the TAC and TACC to achieve the management target set. The industry have strong reservations about implementing TACC reductions where there is no management procedure in place to guide decisions on the fishery to achieve a defined management objective and provide clarity about the circumstances when re-instatement of the TACC will occur.

13. Environmental NGOs and groups representing recreational fishers have suggested that the TAC should be further reduced to create greater certainty the vulnerable biomass will increase. The Consultation Paper provides three options for reductions to the TAC. Given the stock is on a positive rebuilding trajectory with a reasonable probability (65%), NZ RLICs view is that further management action needs to be informed by identification of a management target and the development of a management procedure, rather than ad hoc further adjustment to the TAC.

### ***CUSTOMARY CATCH***

14. Information on CRA 1 customary catches is available under the Fisheries (Kaimoana) Regulations 1998, and regulation 50 of the Fisheries (Amateur Fishing) Regulations 2013. The information available from reporting is considered incomplete, in part because customary take of rock lobster that occurs under the Amateur Regulations for the purposes of hui and tangi is not required to be reported.
15. NZ RLIC supports initiatives by tangata whenua and Te Ohu Kaimoana to improve reporting of customary take so that the best estimate of catch is used to inform the assessment.
16. An estimate of 10 tonnes has been used in each of the recent (2019, 2020, 2021) stock assessment models to represent customary catches. We do not recommend any change to the current allowance of 20 tonnes for customary fishing.

### ***RECREATIONAL CATCH***

17. Recreational fishers are not required to report the quantities of rock lobsters they catch, other than the incomplete reporting that occurs from recreational charter vessels. NZ RLIC provides some commentary on the generally poor estimates of recreational take and suggestions for improving the situation in the section on page 18.
18. As for other recent assessments, the 2021 rapid update assessment used estimates from those recreational surveys thought to provide useable results to construct a recreational catch trajectory (5 surveys with very uncertain estimates over the last 27 years). The trajectory was developed by assuming that recreational catch was proportional to the CRA 1 spring-summer commercial CPUE from statistical areas 903 and 904 where the majority of recreational fishing is thought to occur. The 2021 rapid update stock assessment model input was 28 tonnes. This is lower than the level of the allowance at 32 tonnes, but substantially higher than the most recent estimate of recreational catch from the 2017/18 National Panel Survey (NPS) of 15.9 tonnes.

19. In our submissions over the last two reviews, including prior to the April 2020 TAC reduction, NZ RLIC noted that the adjustment in the recreational allowance did not actually reduce recreational catch in parallel to the TACC reduction. Those submissions signalled to the need to reduce recreational catch. Because of the significant uncertainty in the estimates, the decision maker needs to try and assess whether to use the most recent NPS estimate or the extrapolated figure the Working Group developed in the absence of a credible survey estimate.
20. No adjustments to management controls for recreational fishing have been implemented for a long period and there is no certainty that recreational catch will be constrained to the allowance set in April 2020. With the assessment suggesting an increase in vulnerable biomass, there is potential for an increase in recreational catch.
21. Irrespective of the TAC decision, recreational controls (principally bag limits) should be adjusted by 1 October 2022 to provide a level of certainty the recreational catch will be constrained to the allowance as the stock rebuilds and abundance and catch rate increases.
22. This approach reflects the shared nature of this fishery and that the recreational sector needs to play a role in contributing to the rebuild sought for the CRA 1 stock. To date commercial catch has been constrained by 16% but no steps have been taken to actually restrain or reduce recreational catch. Informing future management decisions will also require more regular assessment of recreational catch that provides estimates with adequate precision.
23. Although we do not support further TAC reductions for the reasons outlined above, if a reduction is implemented, the recreational allowance should be reduced to reflect a proportionally equivalent adjustment to the reduction in the TACC. The three TACC options proposed represent reductions of 20%, 24% and 28% on the TACC that applied prior to April 2020. The options proposed in the Consultation Paper would only reduce the recreational allowance from the most recent estimate of take by the % of reduction implemented to the current TACC.
24. To have any actual beneficial impact on the stock rebuild these would need to be accompanied by adjustment of bag limits by regulation to constrain catch to the allowances set. Without such adjustments, changes to the allowance have no practical effect.

#### ***OTHER SOURCES OF MORTALITY***

25. As a result of the 1 April 2020 review of CRA 1, the allowance for other sources of fishing-related mortality (i.e. illegal catch and handling mortality) was reduced to 41 tonnes, to reflect the model estimates used in the 2019 stock assessment.
26. NZ RLIC does not support further adjustment of the TAC for 1 April 2022, but if it is adjusted, the allowance for other sources of fishing-related mortality should be adjusted to reflect the model

estimates used in the 2021 rapid update stock assessment (35.4 tonnes illegal catch plus 1.8 tonnes for handling mortality = 37.2 tonnes).

27. Unfortunately, there has been little focus on improving estimates of illegal catch and the estimates are highly unreliable. The Rock Lobster Fisheries Assessment Working Group has been forced to use a fixed percentage of 20% of the total commercial catch each year from 1981 to 2020, and export discrepancies (the difference between reported catch totals and total exported weight) prior to this. The Working Group also scaled the catch proportionately to commercial CPUE for each year over the 1981-2020 period, to suggest illegal take could vary with available abundance.
28. NZ RLIC is very concerned that these estimates of illegal take are excessive, particularly in the last two decades. There is considerable risk of overestimation of productivity by using an inflated figure. It is not credible to assume that the equivalent of around 3 additional full time commercial vessels are operating in the CRA 1<sup>1</sup> (there are 14 commercial vessels in the fleet) or nearly 6,000 illegal dives per year (assuming each diver takes the maximum of 6 lobsters per dive and an average weight of 1 kg). Such a level of illegal vessel activity would be apparent to commercial vessels and would presumably be detected by MPI Compliance, or at least they would be aware that this scale of activity was occurring, much less this massive level of illegal product circulating.

## **TACC**

29. For the reasons outlined above, NZ RLIC does not believe it is necessary or appropriate to make a further adjustment to the TAC or TACC at this time. Under Options 1.2-1.4 in the statutory consultation document, the CRA 1 TACC would be decreased to between 105 - 94 tonnes (5-16 tonnes) from 1 April 2022. The proposed further reduction in the level of commercial harvest by these amounts would result in an additional loss of annual revenue to the catching sector alone of approximately \$350,000 - 1.1 million (based on 2021/22 MPI levy model port price of \$68.23)<sup>2</sup>. Where the ACE is sold by a quota owner there is an additional annual loss of revenue. This would compound the loss in revenue and capital asset associated with the 21 tonne reduction effected from 1 April 2020. That reduction removed around \$21 million from balance sheets of quota owners including Iwi. A further reduction of TACC will significantly impact on the 14 vessels involved, particularly those ACE purchase dependent vessels. Many of the 14 vessels represent the incomes for long term Northland fishing families. These economic costs would combine with the serious COVID related financial impacts visited on the industry during 2020 and the ongoing higher freight costs and transport logistics difficulties. The reduced revenue and availability of ACE may lead to ACE dependent vessels on the margin becoming uneconomic, or the remaining ACE being insufficient to support all vessels.

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<sup>1</sup> The most recent standardised CPUE (2018/19) is 1.5kg/pot lift. 35 tonnes represents over 23,300 pot lifts (the average vessel would lift 100 pots 80 days a year). This assumes poachers are as efficient as commercial vessels - this is very unlikely.

<sup>2</sup> This port price reflects the COVID market issues associated with the first three months of 2020 particularly. Beach and port price are currently likely near previous levels of ~\$80/kg +

30. The reductions in revenue and activity by fishing and receiving businesses may have flow on impacts in reduced economic activity for a number of associated servicing and support businesses such as transport, storage, provedoring, engineering, boatyards, marine electronics, and bait suppliers.
31. In Northland these fishing and support businesses are in smaller regional towns and communities along the coastline. In some of these communities rock lobster fishing is an important proportion of economic activity. Most rock lobster fishing operations are wholly reliant on rock lobster and don't fish other species or use other methods. They therefore don't have alternatives to maintain or substitute income. These additional economic impacts in a regional economy still dealing with the adverse impacts of COVID-19 are unnecessary.
32. In recent years CRAMAC 1 quota share owners have adopted a conservative approach to managing the fishery. This is demonstrated by choosing not to take TACC increases in the past, and their commitment to a shelving arrangement prior to the April 2020 TACC decrease. CRAMAC 1 remain fully committed to the voluntary and industry funded data collection program that supports the stock assessment. The voluntary log book programme collects data across the fishery all year round, and over recent years more than half of the fleet has participated voluntarily. The industry also funds observer catch sampling and a tag recapture research programme.
33. In addition CRAMAC 1 quota owners have invested in additional data collection for PHC lobsters, funded a PHC stock assessment and implemented at their own cost a horn tag program for PHC distributed domestically to support addressing illegal take for sale of this species.
34. This voluntary investment in research, in addition to their levy contributions to rock lobster assessments and stock monitoring, demonstrate their commitment to ensuring the best data possible is available to support management decisions for the fishery that is so important to them.

## REVIEW OF THE CRA 7 (OTAGO) ROCK LOBSTER FISHERY

### CRA 7 STOCK STATUS

35. A new stock assessment was conducted for CRA 7 & 8 in 2021. The stock assessment modelled CRA 7 & 8 as one biological stock with two regions:
- i) **Region 1 (Otago/Southland):** CRA 7 and statistical areas 922, 923, 924 and 925; and
  - ii) **Region 2 (Fiordland):** Statistical areas 926, 927 and 928.
36. For the combined CRA 7 & 8 fishery, 2021 vulnerable biomass was 21% of the unfished level, and total biomass was 38% of the unfished level. Spawning biomass in 2021 was 48% of the unfished level, well above the soft limit of 20% where it is FNZ policy to implement a formal, time-constrained rebuilding plan.
37. Over the next four years, with 2021 catch levels and recent recruitment, vulnerable biomass, total biomass, and spawning biomass for the entire CRA 7 & 8 area are all projected to increase in comparison to current levels. Vulnerable biomass is projected to increase to 25% (or 0.25) of unfished levels by 2025.
38. Total biomass is projected to increase to 42% of unfished levels by 2025, and spawning biomass is projected to increase to 54% of unfished levels by 2025. There is currently about 89% probability that the overall combined CRA 7 & 8 vulnerable biomass will increase by 2025 and a 100% probability that spawning stock biomass will increase.
39. The Rock Lobster Fishery Assessment Working Group has calculated the  $B_{MSY}$  reference level for the vulnerable biomass. This is an MSY compatible reference point designed to meet the requirements of section 13 of the Fisheries Act to manage stocks at or above a level that will produce the MSY. This reference point is a relatively conservative assessment of the biomass that would produce MSY. The vulnerable biomass was above the reference level in 2021 (1.46 times the  $B_{MSY}$  reference level), and is projected to increase further above the  $B_{MSY}$  reference level (1.69 times the  $B_{MSY}$  reference level) under current catch levels by 2025.

### TAC

40. The best available information suggests the combined CRA 7 & 8 stock biomass is well above the  $B_{MSY}$  reference level and projected to increase over the next four years under current catches. Under Option 7.2 in the NRLMG IPP (a 16% TAC increase), the CRA 7 TAC would be increased to 146.5 tonnes. Vulnerable biomass and spawning stock biomass are projected to continue to increase with this catch level over the next four years, and the stock would remain more than 150% of the  $B_{MSY}$  reference level. This option would enable increased utilisation and maintain the stock above the level which can produce MSY, having regard to the interdependence of stocks.

41. A rapid assessment update will be conducted for CRA 7 and CRA 8 in 2022 and will provide an opportunity to consider a review of the catch settings and management controls for April 2023.
42. NZ RLIC's view is that the TAC increase to 146.5 tonnes being considered is relatively conservative, recognises the high current abundance, and allows for a modest increase in utilisation.

### ***CUSTOMARY CATCH***

43. Information on CRA 7 customary catches is provided under the Fisheries (Kaimoana) Regulations 1998 and an estimate of 1 tonne was used in the 2021 CRA 7 stock assessment model to represent customary catches in CRA 7. We do not recommend any change to the current allowance of 10 tonnes for customary fishing.

### ***RECREATIONAL CATCH***

44. Recreational fishers are not required to report the quantities of rock lobsters they catch, other than the incomplete reporting that occurs from recreational charter vessels.
45. There are no reliable recreational catch survey estimates for CRA 7. In the absence of any reliable information, recreational catch estimates for CRA 7 in the 2021 CRA 7 & 8 stock assessment were assumed to be at 1 tonne in 1945 and were increased to 5 tonnes in 1979. A constant estimate of 5 tonnes was assumed from 1979 to 2020 for CRA 7 recreational catch. In addition, 1.7 tonnes of rock lobster were allowed for the catch reported in CRA 7 by commercial fishers for non-commercial purposes under section 111 of the Act. The National Panel Survey estimate for CRA 7 is unusable given the low number of fishers and events covered in the survey and the high variance. NZ RLIC provides some commentary on the generally poor estimates of recreational take and suggestions for improving the situation in the section on page 18.
46. In principle, NZ RLIC would be prepared to consider an increase to the recreational allowance of 5 tonnes in parallel to the proposed increase in the TACC. However, we acknowledge the position outlined by Ngai Tahu and their strong preference to see better measurement and control of recreational take. There is considerable uncertainty in the current estimate of recreational take, and the recreational representatives have indicated a preference to maintain the current allowance until there is better information. We support the position in the NRLMG consultation document to make no change to the allowance at this time.

### ***OTHER SOURCES OF MORTALITY***

47. As with other QMAs the estimates of illegal catch are highly unreliable. The Rock Lobster Fisheries Assessment Working Group has been forced to use percentages of the commercial catch and scale the catch proportionately to commercial CPUE for each year. NZ RLIC accepts the 2% estimate used since 1990 is not unreasonable.



48. In the 2021 CRA 7 & 8 stock assessment, the Rock Lobster Working Group assumed illegal catch in CRA 7 was 10% of the total commercial catch before 1990, and 2% of the summed commercial catch beginning in 1990, with illegal catch scaled proportionately to CPUE where possible. For the 2020/21 fishing year, the illegal catch estimate assumed in Region 1 for the model (which includes all of CRA 7 and the Southland part of CRA 8) was approximately 8.4 tonnes. An estimate of handling mortality was generated of approximately 16.4 tonnes for Region 1 (which includes part of CRA 8).
49. CRA 7 currently makes up 52% of commercial catch in Region 1. This suggests an allowance of 4.4 tonnes for illegal catch, and 8.5 tonnes for handling mortality for CRA 7. This suggests a 12.9 tonne allowance for other sources of fishing-related mortality, based on the new illegal take estimate and estimate of handling-related mortality from the 2021 CRA 7 & 8 stock assessment.

### **TACC**

50. The proposed TACC increase by 5.3 tonnes (5%) to 111.5 tonnes is modest given the healthy stock status and will provide some utilisation benefits to the commercial sector. Vulnerable biomass and spawning stock biomass are projected to continue to increase with this catch level over the next four years, and the stock would remain more than 150% of the  $B_{MSY}$  reference level.
51. This option would maintain the stock well above the level which can produce MSY and provide an increase of annual revenue to the catching sector which would assist in defraying some of the additional costs incurred in the COVID environment (higher freight costs and transport logistics difficulties) and assist to a modest extent in downstream benefits to associated businesses and regional communities.
52. The Otago Rock Lobster Industry Association Incorporated, on behalf of CRA 7 quota share owners remain committed to the voluntary and industry funded data collection program that supports the stock assessment. They fund around 15 days of technician catch sampling across the small fleet on an annual basis and a tag recapture research programme.

## REVIEW OF THE CRA 8 (SOUTHERN) ROCK LOBSTER FISHERY

### CRA 8 STOCK STATUS

53. A new stock quantitative assessment was conducted for CRA 7 & 8 in 2021. The stock assessment modelled CRA 7 & 8 as one biological stock with two regions:
- i) **Region 1 (Otago/Southland):** CRA 7 and statistical areas 922, 923, 924 and 925; and
  - ii) **Region 2 (Fiordland):** Statistical areas 926, 927 and 928.
54. For the combined CRA 7 & 8 fishery, 2021 vulnerable biomass was 21% of the unfished level, and total biomass was 38% of the unfished level. Spawning biomass in 2021 was 48% of the unfished level, well above the soft limit of 20% where it is FNZ policy to implement a formal, time-constrained rebuilding plan.
55. Over the next four years, with 2021 catch levels and recent recruitment, vulnerable biomass, total biomass, and spawning biomass for the entire CRA 7 & 8 area are all projected to increase in comparison to current levels. Vulnerable biomass is projected to increase to 25% (or 0.25) of unfished levels by 2025.
56. Total biomass is projected to increase to 42% of unfished levels by 2025, and spawning biomass is projected to increase to 54% of unfished levels by 2025. There is currently about 89% probability that the overall combined CRA 7 & 8 vulnerable biomass will increase by 2025 and a 100% probability that spawning stock biomass will increase.
57. The Rock Lobster Fishery Assessment Working Group has calculated the  $B_{MSY}$  reference level for the vulnerable biomass. This is an MSY compatible reference point designed to meet the requirements of section 13 of the Fisheries Act to manage stocks at or above a level that will produce the MSY. This reference point is a relatively conservative assessment of the biomass that would produce MSY. The vulnerable biomass was above the reference level in 2021 (1.46 times the  $B_{MSY}$  reference level), and is projected to increase further above the  $B_{MSY}$  reference level (1.69 times the  $B_{MSY}$  reference level) under current catch levels by 2025.

### TAC

58. The best available information suggests the combined CRA 7 & 8 stock biomass is well above the  $B_{MSY}$  reference level and projected to increase over the next four years under current catches. The NRLMG IPP considers two options for a TAC increase (Option 8.2 (9%) and Option 8.3 (11%)). Under both options vulnerable biomass (71% probability for a 10% increase) and spawning stock biomass are projected to continue to increase over the next four years, and the stock would remain more than 150% of the  $B_{MSY}$  reference level. These options would enable increased utilisation and maintain the stock above the level which can produce MSY, having regard to the interdependence of stocks.

59. A rapid assessment update will be conducted for CRA 7 and CRA 8 in 2022 and will provide an opportunity to consider a review of the catch settings and management controls for April 2023.
60. NZ RLIC's view is that the Option 8.3 TAC increase to 1431 tonnes is relatively conservative, recognises the high current abundance, and allows for a modest increase in utilisation.

### ***CUSTOMARY CATCH***

61. Information on CRA 8 customary catches is provided under the Fisheries (Kaimoana) Regulations 1998 and an estimate of 15 tonnes was used in the 2021 stock assessment model to represent customary catches in CRA 8. We do not recommend any change to the current allowance of 30 tonnes for customary fishing.

### ***RECREATIONAL CATCH***

62. Recreational fishers are not required to report the quantities of rock lobsters they catch, other than the incomplete reporting that occurs from recreational charter vessels.
63. Information on recreational catch is very poor for CRA 8. The National Panel Survey estimate for CRA 8 of 16.7 tonnes is highly uncertain due to the low number of fishers that participated in the survey. In the absence of any reliable information, various assumptions were made by the Working Group about catch over different periods with catch assumed to be a constant 20 tonnes since 1979. In addition, 18.8 tonnes was allowed for the catch reported in CRA 8 by commercial fishers for non-commercial purposes under section 111 of the Act. The National Panel Survey estimate for CRA 7 is unusable given the low number of fishers and events covered in the survey and the high variance.
64. The CRA 8 fishery has a number of areas. In Fiordland, the inner fiords are closed to commercial rock lobster fishing. These closures were established in 2005 by the Fiordland Marine Guardians.
65. The Fiordland Marine Guardians for some time have been expressing concerns about increased recreational fishing effort in Fiordland, particularly from amateur charter-fishing vessels (ACVs). They are proposing changes to the rules for recreational fishing to reduce the level of catch because of widespread concern among all stakeholders about depletion of local abundance particularly in the areas closed to commercial fishing, which provide non-commercial fishers with exclusive access to rock lobsters. The issues associated with ACVs are very evident in Fiordland, but exist in other areas also. NZ RLIC provides some commentary on the generally poor estimates of recreational take and suggestions for improving the situation, including in respect to addressing the serious issues evident with the management of ACV vessels in the section on pages 18 and 23.
66. In principle, NZ RLIC would be prepared to consider an increase to the recreational allowance of 33 tonnes in parallel to the proposed increase in the TACC. However, we acknowledge the position

outlined by Ngai Tahu and their strong preference to see better measurement and control of recreational take. There is considerable uncertainty in the current estimate of recreational take, and the recreational representatives have indicated a preference to maintain the current allowance until there is better information. We support the position in the NRLMG consultation document to make no change to the allowance at this time.

## **OTHER SOURCES OF MORTALITY**

67. As with other QMAs the estimates of illegal catch are highly unreliable. The Rock Lobster Fisheries Assessment Working Group has been forced to use percentages of the commercial catch and scale the catch proportionately to commercial CPUE for each year. NZ RLIC accepts the 2% estimate used since 1990 is not unreasonable.
68. In the 2021 CRA 7 & 8 stock assessment, the Rock Lobster Working Group assumed illegal catch in CRA 8 was 10% of the total commercial catch before 1990, and 2% of the summed commercial catch beginning in 1990, with illegal catch scaled proportionately to CPUE where possible. For the 2020/21 fishing year, the illegal catch estimate assumed in Region 1 for the model (which includes all of CRA 7 and the Southland part of CRA 8) was approximately 8.4 tonnes. CRA 8 currently makes up 48% of commercial catch in Region 1. This suggests an allowance of 4 tonnes for illegal catch in Region 1 of CRA 8. The illegal catch estimate assumed in Region 2 (the Fiordland part of CRA 8) for the model was approximately 38.8 tonnes. This suggests a total allowance for illegal catch of 42.4 tonnes in CRA 8.
69. An estimate of handling mortality was generated of approximately 16.4 tonnes for Region 1 (which includes part of CRA 8). Based on the commercial catch proportion of 48%, CRA 8 handling mortality in Region 1 is about 7.9 tonnes. The estimate of handling mortality in Region 2 is 81.4 tonnes. This suggests a total allowance for handling mortality of 89.3 tonnes for CRA 8.
70. Adding these two components suggests a 131.7 tonne allowance for other sources of fishing-related mortality in CRA 8.

## **TACC**

71. The proposed TACC increase by 59 tonnes (5%) to 1251 tonnes is modest given the healthy stock status and will provide some utilisation benefits to the commercial sector. Operators in the two regions are continuing to report an increase in catch rates and fishing success and a reduction in the effort needed to take their ACE. The number of potlifts needed to take the TAC has been steadily decreasing over the last 5 years. Logbook data through to 2020/21 shows a steady increase in catch rate of legal state lobsters (CPUE from logbook data is not affected by the change to reporting by ER). This information supports the experience of operators.
72. Vulnerable biomass, spawning stock and total biomass for CRA 7 & 8 are all projected to continue to increase with this catch level over the next four years (with very high probabilities), and the stock would

remain more than 150% of the  $B_{MSY}$  reference level. Although some projections for Region 2 are slightly less optimistic, the Working Group and the Plenary agreed it was better to consider CRA 7 & 8 as one stock for reasons including the extent of movement between CRA 7 & 8 in Region 1 and issues with the sources of catch historically. This approach was supported by the conclusion to combine the two regional  $B_R$  estimates. The status of the stocks section in the Plenary is set out combining the conclusions for the CRA 7 & 8 QMAs.

73. The 5% increase option would maintain the stock well above the level which can produce MSY and provide an increase of annual revenue to the catching sector which would assist in defraying some of the additional costs incurred in the COVID environment (higher freight costs and transport logistics difficulties) and assist in downstream benefits to associated businesses in southern regional communities. The areas have been heavily impacted by loss of tourism associated with COVID and the revenue that will be spent in those regions will have benefits.
74. The CRA 8 Rock Lobster Industry Association committed to the voluntary and industry funded data collection program that supports the stock assessment. They will maintain the required level of log books across the CRA 8 fleet and work to ensure the coverage is representative across the large geographic region that is CRA 8. They also maintain their commitment to periodic funding of the tag recapture research programme.

## INTERDEPENDENCE OF STOCKS

75. Regard to the interdependence of stocks is required when setting a TAC for any stock. In New Zealand, rock lobster fisheries extend from the Three Kings Islands in the north to the Auckland Islands in the south, and east to the Chatham Islands. The long larval phase and long-distance movements of adults in some areas suggest a single rock lobster stock around the mainland.
76. The interdependence of stocks also involves the consideration of the effects of fishing on associated stocks affected by fishing for the target stock. In terms of trophic relationships, rock lobsters feed on a wide range of small shellfish, crabs, sea stars and kina, depending on local availability. Predation on rock lobsters is known from octopus, blue cod, groper, southern dogfish, rig, and seals.
77. In the scientific literature for both New Zealand and overseas, an hypothesis is stated: fishing of predators, especially snapper and rock lobsters in New Zealand, reduced their effect on sea urchins. Sea urchins, released from predation pressure, become more abundant and can overgraze algae, creating barrens, which are much less diverse and productive than algal beds. In New Zealand, sea urchin barrens are common in the north and less common in more southern areas. Very sheltered and highly exposed locations do not have barrens, and barrens are limited to a depth range that varies between locations. Barrens are often interspersed among algal beds, and the dynamic nature of barrens and algae has not been properly studied.
78. Evidence for the hypothesis in New Zealand comes mainly from two marine reserves, where sea urchin barrens declined after the reserves were closed to fishing. Evidence for the hypothesis is otherwise scarce, and in no other New Zealand marine reserve has a decrease in barrens been documented. The roles of lobsters and snapper, if any, are poorly supported by direct evidence. The literature suggests that the hypothesis, as stated above, is too simple. If it applies, the effect is limited, mainly to northern New Zealand. Other factors, including sediment, sea urchin and kelp disease, varying recruitments of all the relevant species, temperature, wave action and other environmental variables, are all complicating factors.
79. The hypothesis remains hypothetical. The long lag between reserve protection and barrens decline is a problem for the hypothesis, as is the co-existence of barrens and kelp in the same locations. In some overseas environments, the hypothesis has been clearly shown to be an over-simplification of more complex ecology. In Nova Scotia, barrens have appeared and then disappeared when disease struck the sea urchins, reappearing when favourable conditions produced high sea urchin recruitment. In southern California, fishing was just one of several critical factors for kelp beds: nutrients, ENSO events, storms and pollution were all factors.

## **OTHER RELEVANT MATTERS**

80. The review of rock lobster stocks has again identified a number of generic issues that impede the sustainable and effective management of all of New Zealand's rock lobster fisheries. Little or no progress has been made in resolving or improving these systemic issues for rock lobster management.

### ***POOR ESTIMATES OF RECREATIONAL TAKE***

81. The legislative construct for managing fisheries in New Zealand is based on controlling all sources of removals to sustainable levels. This requires good information on fishing related mortality and illegal catch. In 2019 the results of the 2017/18 NPS surveys were available providing new estimates of recreational take. Unfortunately, many of these surveys had high CVs and standard errors and therefore provide very uncertain results to inform stock assessments and for use in management. The next NPS survey results will not be available until mid 2024.
82. Clearly the ability to undertake stock assessments that provide an accurate and timely assessment of stock state on which to base management action is compromised by this poor and infrequent information. The outcome is that we take unnecessary risks with stock status and the utilisation interests of all sectors can be adversely affected. In CRA 2, the acknowledged historical overestimates of non-commercial take resulted in overestimating productivity of the stock, and was a contributing factor, in combination with poor recruitment, to management settings not being adequate to arrest the depletion of the stock earlier.
83. The stock assessment and management strategy evaluation for CRA 2, for example, demonstrated the impact that unmanaged increases in recreational catch have on delaying the stock rebuild. Government has a responsibility, since it undertakes these surveys on behalf of recreational fishers, and to meet statutory obligations, to implement more frequent surveys designed to provide estimates with usable precision.
84. Through the Marine Amateur Fishery Assessment Working Group all stakeholders need to encourage examination of methods that could be used to produce timely and cost effective estimates of recreational catch. Lobster fisheries pose particular issues because of the relatively low participation rate and the large proportion of removals by diving, including from many shore based access points. These features pose particular issues for the methods historically used in New Zealand which rely on trying to survey to obtain a representative sample of the population, and calibrate this with measurements, particularly of the average size of animals, from boat ramps.
85. The Working Group needs to undertake more analysis of methods, taking into account cost and precision, that may be different to historical approaches taken, such as the tagging used in Victoria, Australia, since 2017, or registration of recreational fishers, as a low cost way to address the serious problem of trying to obtain a representative sample of recreational fishers for surveying. The tagging approach would appear to have major advantages in cost-effectiveness for rock lobster fisheries and

steps around the issue of trying to extrapolate from a (inevitably small) sample by providing a means to have all take reported. In Victoria, in 2021, they transitioned to a reporting app, retaining regulatory requirement to report catch, with a mandatory prior requirement to register intent to target rock lobster.

86. The approaches used in recent years through the NPS surveys have proven to be expensive and unreliable with results that are often inadequate to support management. A key issue with any survey methodology is identifying a properly representative sample of recreational fishers. This could be achieved much more effectively and with less expense if there were a register of recreational fisher. New approaches such as this need to be actively explored.
87. Poor information on recreational take, including the proportion of fishers that take the bag limit and changes in participation and effort, mean that subsequent management action is ill informed or simply does not occur. The focus of management action remains on commercial catch only. In his decision for 1 April 2018, the Minister confirmed that all sectors must contribute to the rebuilding of stocks.
88. In many cases over recent years reductions to TACCs have occurred with no changes to recreational allowances. In some cases TACC increases have occurred with no change to recreational allowances. However, the recreational sector has gained through increased catch rates and an ability to increase participation. This is in stark contrast to the commercial sector where catch is strictly controlled with reporting at the level of each fishing event, and balancing with catch entitlements to the kilogram necessary on a monthly, or the payment of an interim deemed value of \$99/kg is necessary. In many recent circumstances the commercial sector has contributed disproportionately to rebuilding depleted stocks as no changes have been made to recreational allowances, or if they have been, no subsequent changes have been made to recreational controls to actually constrain take. For CRA 2, recreational controls, of unknown effectiveness, came into effect more than 2 years after that TACC was cut by 60%.
89. Attention needs to be directed to the effective management of recreational take. Poor information on recreational take contributes, but there has also been little attention paid to managing recreational take to allowances set by amending management controls. This means that in some cases stock rebuild is compromised, and in effect re-allocation to the recreation sector occurs with uncontrolled recreational catch expansion.
90. After the CRA 2 allowance was adjusted to contribute to the stock rebuild, in 2018 the Rock Lobster Fishery Assessment Working Group advised that the information available to adjust recreational controls, bag limits in that case, was completely inadequate. That matter was referred to the Marine Amateur Fishing Working Group, but no useful additional research has been undertaken. This issue exists across all rock lobster stocks and it is important that key information is available to inform decisions on adjustments to management controls.
91. An additional outcome of inadequate measurement and management of recreational take is that the industry faces uncertainty about receiving benefits from catch reductions and the impacts of the



associated adverse economic impacts. Industry incentives to continue voluntary management initiatives and invest in stock monitoring (log books and catch sampling) are undermined if there is no clarity that stock rebuild will result in re-instatement of TACC reductions or that the industry share of a stock is eroded by the absence of management of the recreational sector.

92. Victoria, South Australia and Tasmania all take the same species as in the New Zealand fishery (*Jasus edwardsii*). All three jurisdictions have had quota management regimes in place to closely manage catch from their commercial fisheries for a considerable period, and as pressure from recreational fishing has increased, have progressively moved to introduce more effective measures to measure and manage recreational take (bag limit reductions and closed seasons). In New Zealand improved arrangements to manage recreational fishing are lagging and compromise the outcomes sought from fisheries management.
93. Industry is happy to share the benefits of good stock status, and in many stocks supports stock levels that bring benefits to the non-commercial sector, but it has for a very long period expressed dissatisfaction about the poor information and lack of management of the recreational sector. Meaningful steps to address this situation are long overdue.

#### **DELAY IN REGULATORY CHANGE**

94. Changes to catch settings (TACs, allowances and TACCs) and regulatory measures (such as bag limits, MLS measures, and seasonal closures) are made under different legislative mechanisms, and as a result regulatory changes are often significantly delayed. For CRA 2, recreational controls of unknown effectiveness, came into effect more than 2 ½ years after that TACC was cut by 60%. In CRA 5 the recreational allowance was adjusted for 1 April 2016. Complementary measures outlined in the Minister's decision letter, to introduce telson clipping and accumulation limits were finally implemented nearly 4 ½ years later.
95. In July 2018 NZ RLIC provided a submission to the Ministry setting out a mechanism to resolve this issue by effecting these changes as sustainability measures using a gazette notice. MPI included that proposal in a set of policies released in February 2019. This measure is now part of the Fisheries Amendment Bill currently under development.
96. Having this ability to implement timely changes to controls remains important to align catch settings and regulatory changes, so that the implementation of management measures for all sectors of a fishery can be co-ordinated and come into effect in similar timeframes and more responsive management is implemented.

## **ALLOCATION POLICY**

97. NZ RLIC has been advocating for substantial improvement in the measurement and management of recreational catches. We have been concerned that the Ministry and stakeholder focus has been on management measures directed at the commercial fishery only. In shared fisheries, where there are material levels of recreational catch, that catch should be better estimated and constrained so that the recreational sector plays its part in the outcomes sought for the stocks.
98. In advice reviewing rock lobster stocks it is important that a consistent position is taken on review of recreational allowances and management controls.
99. The Ministers' decision letter for 1 April 2018 set out some relevant statements;
- "...all stakeholders should take measures to ensure rebuild in the same way I expect all stakeholders to benefit once the status of the fishery improves."
  - "...the (recreational ) allowance must carry some relationship to removals over time.."
  - (in the circumstances of a stressed stock) "it is reasonable to reduce the recreational allowance to reflect the best available information on recreational catch..."
  - "I am aware of my obligations to manage the level of recreational catch (on average) to the level of the allowance I have set"
100. The following paragraphs outline a set of principles that can be used to try and ensure that consistency<sup>3</sup>;
- i) If, based on the science and management requirements, the TAC/TACC is being adjusted, the recreational allowance should also be reviewed.
  - ii) Some recreational allowances set in the past are high because they have been set based on poor information (in some cases now recognised to be overestimates) and/or do not bear much relationship to current levels of removals. If the TAC is being reduced, the recreational allowance should be adjusted to reflect the most recent credible estimate of removals.
  - iii) If further TAC/TACC reductions are necessary, the recreational allowance should be reduced in the same proportion as the reduction to the TACC.
101. It is clear from jurisprudence that there is a responsibility for the Ministry to, on average, manage recreational catch to the allowance set. When reductions are made to the recreational allowance, there is a need to consider whether it is likely that recreational catch will exceed the allowance. This can occur, for example, if a TAC has been set to provide for a stock rebuild. As abundance and catch rate increases, unless steps are taken to constrain catch it is likely that recreational catch and participation

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<sup>3</sup> NZ RLIC acknowledge the position that Te Ohu Kaimoana has set out on allocation and the need for Government to consider the implications of allocation decisions on Settlement rights.

will increase. Where it is likely that recreational catch will exceed the allowance, steps should be taken to adjust recreational controls (principally bag limits) to provide a level of certainty the recreational catch will be constrained to that allowance on average.

102. If a TAC/TACC increase is implemented, the recreational allowance should be increased in the same proportion as the reduction to the TACC. Consideration should also be given to whether a change in recreational controls is appropriate. If the current controls are likely to allow the allowance to be taken, no changes would be necessary. If the current controls are likely to constrain recreational catch below the allowance, recreational controls should be relaxed to allow the allowance to be taken.
103. Applying these principles will involve further work to refine them in practise;
  - i) What does managing the recreational catch to the allowance “on average” mean? Recreational catch is variable because it is influenced by factors including prevailing weather that affects harvest more than the commercial sector, and catch rate. There is a need for some “rule of thumb” in this area.
  - ii) You can’t effectively manage “on average” with a catch estimate every 5 years. Clearly we need to work toward having annual estimates, or at least some relative measure of annual change in recreational catch that is adequate to provide a basis for management changes.
  - iii) What is the threshold for change in recreational controls? Given the process involved in regulation change, there is a need for an agreed threshold to be applied in circumstances where it is material.
104. NZ RLIC recommends that the NRLMG be tasked with developing a set of allocation principles that can be used to ensure consistency with the Fisheries Act and a uniform approach to setting and adjusting the recreational allowance. NZ RLIC provided a draft policy to the NRLMG to support these discussions in early 2021.

#### ***RECREATIONAL CHARTER VESSEL INDUSTRY***

105. The other component of recreational catch that needs serious attention is take by the recreational charter vessel industry. Since 2010 these charter vessels have had a statutory responsibility to report their catch of rock lobster. From the records MPI holds it is quite apparent that administration and enforcement of this obligation has been overlooked to an unacceptable extent. The same leeway is not tolerated for the commercial fleet.
106. For most areas the amateur charter vessel data shows a substantial reduction in numbers of lobsters caught in recent years and low numbers of vessels reporting. This data is not credible and suggests charter vessel operators are in breach of their statutory obligations. Despite these clear issues, it is not

apparent MPI has attempted to consistently enforce these obligations, or issue fines or take prosecutions. Such a level of misreporting would have visited timely and serious consequences on commercial sector operators.

107. This issue needs attention and consideration of steps to better manage recreational charter fishing overall and its expansion and the consequent increase in take. NZ RLIC recommends the NRLMG must have a focus on providing advice to the Minister during 2022 to better manage the recreational charter sector, including how recreational charter catch is considered as part of the recreational allowance. Reporting obligations were introduced in 2010, over a decade ago, but the information is clearly deficient, and no meaningful steps have been taken to manage the sector.

### **ILLEGAL TAKE**

108. Historical estimates of illegal take existed for some QMAs. MPI Compliance have acknowledged those estimates are very dated and not credible. They are now being replaced by estimates made by the Rock Lobster Fishery Assessment Group, which is forced to make ad hoc provision for illegal take and its trends in the assessments, based on proportions of commercial catch. These estimates are ill informed and contentious and inadequate to support assessments and coherent management. The subsequent allowance made in TAC setting represents a potential loss of catch to the legitimate sectors.
109. These poor estimates of illegal unreported removals compromise assessments of stock status when TACs are set. It is now evident that overestimates of non-commercial and illegal removals led to overestimating productivity of the CRA 2 stock, and contributed to the decline in the stock despite the management procedure and shelving by the commercial sector.
110. In his 1 April 2018 decision, the Minister directed MPI to look closely at methods to estimate illegal take, so that better information is available to support his decisions. The NRLMG has been informed of some internal work in MPI, but we believe only limited progress has been made on the collection of new information collection, or a revised approach being undertaken, despite this direction from the Minister. Estimating illegal take is not straightforward but other jurisdictions have done it through the collection and analysis of the right metrics. Other than reducing impact on the legitimate sectors, and providing better information for assessments to mitigate risks to sustainability, such information is important to guide tasking and deployment of compliance resources.
111. The NRLMG needs to put effort into working with the Ministry to address this situation. The absence of work on estimating illegal catch for more than two decades in some cases is a real shortcoming of current management by MPI and Fisheries New Zealand.

## **RECREATIONAL ACCUMULATION LIMITS**

112. For most QMAs, at present there is no effective limit on the amount of rock lobster people can have in their possession at any one time. The availability of the defence provision in regulation 29(3) of the Amateur Regulations (where a person can be in possession of more than the daily bag limit if they can satisfy the court that the fish were taken over a number of fishing days) is currently exploited by illegal operators.
113. As in 2019, NZ RLIC recommended that the work program for the NRLMG should include the provision of advice to the Minister on the application in all QMAs of an accumulation limit and the associated 'bag and tag' conditions that limit the ability to store and transport large quantities of rock lobster where people deliberately exceed the daily bag limit or where the bag limit is consistently taken for sale or barter. This measure would complement the other measures in place to address illegal take nationally.

## **TELSON CLIPPING**

114. The intent of telson clipping is to impede the illegal sales of rock lobsters, and therefore the landing of lobsters for such unlawful purposes. The measure is now in place in CRA 2 and CRA 5. Poaching and black-market activity (i.e., taking rock lobsters for sale or barter outside of commercial entitlements) is a significant issue in a number of lobster fisheries.
115. Illegal removals slow or prevent the rebuild of fisheries, can contribute to localised depletion, and deprive legitimate users of the catch they are entitled to, and depress the catch rate they could otherwise expect.
116. The assumed prevalence and scale of illegal activity in some rock lobster fisheries is significant and impacts on stock sustainability. The allowance made in TAC setting for illegal unreported removals can reduce the TACCs that might otherwise be set, and therefore represent a direct and quantifiable economic loss to New Zealand.
117. Telson clipping provides Fishery Officers with an additional 'tool in the toolbox' to address illegal take for sale in rock lobster fisheries by:
  - a) Opportunistic non-commercial fishers who sell or barter their catch for financial gain; or
  - b) Dedicated fish thieves who conceal their activity under legitimate non-commercial fishing.
118. Compulsory telson clipping for recreational fishers and voluntary specification of telson clipping on customary permits/authorisations could complement enforcement activities carried out by the Ministry and can be relatively easily enforced in the course of normal inspections of amateur fishers. Based on the Kaikoura experience, the measure should help address the potential for illegally taken lobsters to end up being sold and displacing legally taken product in the restaurants, retail and hospitality trade. MPI Compliance personnel have confirmed that the implementation of telson clipping in the Kaikōura

Marine Management Area in 2014 has successfully reduced the supply of recreationally caught rock lobsters being illegally sold to commercial premises.

119. NZ RLIC recommends that the NRLMG should advise the Minister to amend regulations to implement telson clipping for all QMAs for recreationally caught lobsters.

### **STOCK MANAGEMENT TARGETS**

120. Work on the calculation of new reference points for rock lobster fisheries progressed in 2020 and were confirmed for most stocks in 2021. The NRLMG was to undertake work in 2021 to confirm management targets for each red rock lobster stock, but delays occurred and this work has not yet commenced. Stocks can be managed to avoid sustainability risks but commercial and non-commercial stakeholders may prefer higher biomass levels with benefits including higher catch rates and lower catching costs.
121. The Minister has discretion to do this under the Act with jurisprudence suggesting he can do this in consultation with stakeholders taking into account relevant social and economic considerations. Stakeholders will want to consider a number of relevant matters including;
- if we manage at a higher biomass – what is the tradeoff between yield and catch rate
  - what is the catch restraint needed, and for how long, to build to that higher biomass (and how will that be applied across the commercial and recreational sectors)
  - at a higher biomass and catch rate – recreational participation and catch will increase. What steps will be taken to measure and manage recreational catch to the allowance ?
122. There is a need to formulate an approach that will be used to allocate access under section 21 of the Act (the recreational allowance and TACC) in this process. Currently there is no certainty around how recreational catch estimates and controls will be altered relative to TACC changes. Understandably, this makes the industry reticent to accept the cost and foregone catch needed to rebuild stocks when the outcome, if recreational catch is not managed, may be to transfer catch to the recreational sector. This is an important factor in industry supporting catch reductions, such as those suggested for stocks under review in this paper. With the loss of management procedure, industry has no certainty about re-instatement of TACCs as stock rebuild.
123. There is an urgent need for a constructive discussion on these matters. The current situation where ad-hoc and unpredictable decisions are made about relative access by the commercial and recreational sectors leads to uncertainty and incentives to advocate for short term sectoral interests which are not in the interests of good management outcomes for the stocks or the sectors.

124. The Minister's decision letter in April 2018 set out "I reiterate the fact that in shared fisheries I am keen for all users to bear the cost of rebuild and share in the benefits of an increase". Very little progress has yet been made to put this intent into effect.
125. In order for sectors to be able to focus on collaboratively managing stocks, including determining new management targets, the matters above need to be addressed. We need to understand how the commercial and recreational sectors will share in the benefits of higher stock abundance and contribute to stock rebuild where that is necessary.

## **DIGITAL MONITORING**


126. The transition to electronic reporting could have improved the quality and reduced the cost of data collected from the commercial fishery. However, there are issues still to be resolved with excessive detail of information being required and duplication with information collected already in the stock monitoring programme through the log books and observer catch sampling. These matters have not been resolved despite efforts since 2017 and remain issues with the new ER regime, contributing materially both to the commercial operators misunderstanding of the requirements and the complexity of the reporting conditions.
127. Current ER reporting rules risk compromising the collection of data from fishermen at sea on legal state retained animals and destination X animals (lobster of legal state returned to the sea). This data forms the core of the CPUE relative abundance index.
128. NZ RLIC commissioned work to identify the reporting issues with ER and cooperated with MPI Compliance is a series of workshops in each QMA during 2021 to address misunderstandings and improve reporting. We intend to repeat the analysis after this work and identify the nature of remaining reporting issues and take additional steps to address those.
129. The current settings in the regulations and circulars also create an illogical situation and very poor reporting incentives for predated fish and theft from commercial holding pots. Commercial fishers cannot legally land moribund or dead animals as is required in regard to predated lobsters. A requirement to report theft from holding pots and have that amount of fish covered by ACE is both inequitable and can be clearly seen to create poor incentives to report, and therefore have information and resources directed at addressing the theft.
130. The requirement, at least until the review of landings and returns policy, to retain all live QMS finfish species taken in pots creates a significant problem. Rock lobster fishers have generally never retained, and therefore reported the catch of QMS finfish. Those fish have been returned alive to the sea to the benefit of the stocks and for use by other sectors. A requirement to retain those fish will create a very difficult issue for commercial lobster fishermen who will not be able to obtain ACE as the TACCs have never taken into account this catch. The recent deployment of observers in the CRA 1 fishery surfaced this problem. This issue was discussed, and the practical solution was for operators to continue their

reporting practises, that in many cases returned live QMS finfish taken, and observers recorded the numbers and species.

.....

Supplementary inquiries on this submission can be directed to the signatory below. Note that CRAMAC 1, ORLIA and CRA 8 RLIA have also made submissions.

**NZ Rock Lobster Industry Council**



Chief Executive Officer



Kia ora koutou,

Thank you for the opportunity to make a submission on the consultation for the Total Allowable Catch (TAC) for CRA 1 for 22-23 fishing year. As Fisheries New Zealand is aware, the Environmental Law Initiative (ELI) is one of the applicants in a judicial review against the Minister for Oceans and Fisheries' previous TAC decision for CRA 1 from April 2021. While ELI notes and welcomes the changed scoping of this consultation and altered framing of the issues, we do not consider that these address the issues we have raised in the judicial review.

Ngā mihi,

Ingrid O'Sullivan  
Oceans and coasts  
Environmental Law Initiative

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---

#### Submitter details:

Name of submitter

or contact person: Andre Kotzikas

Organisation (if applicable):

KPF Investments Limited

Email:

Fishstock(s) this submission refers to:

CRA 7

Your preferred option as detailed in the discussion paper

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

Option 7.2: which proposes a 5% increase of the Total Allowable Commercial Catch from 106.2 tonnes to 111.5 tonnes

#### Official Information Act 1982

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

The results from the 2021 stock assessment show that the vulnerable biomass in the CRA 7 fishery is above the reference level biomass for this fishery. The science shows the fishery is in good health. This is consistent with what CRA 7 fishers have been seeing out on the water.

As a quota share owner/ACE holder/ fisher/licensed processor with interests in CRA 7, a healthy sustainable fishery is extremely important to me. While there could be a higher TACC increase, I support the 5% increase as a responsible and reasonable measure to ensure the future sustainability and health of the resource that underpins my business/annual income and underpins the future economic and social wellbeing and security of my business, my family, and my staff. This has suffered over the last two years due to the challenging condition of the market and government imposed restrictions relating to the Covid pandemic. I will greatly appreciate the opportunity for more lobster to be caught and sold from CRA 7.

I believe that not increasing the TACC will result in unwarranted financial and mental stress to the industry and to the many associated businesses that rely on the commercial fishing sector in CRA 7 to support their annual income. The proposed TACC increase is of such a conservative size, and the abundance in the fishery is so strong, that the increase will not take away from what the customary and recreational fishers are entitled to catch in CRA 7.

I also believe that it is safe to grant the proposed TACC increase because its impact can be checked when a rapid assessment update is carried out for CRA 7 later in 2022 with any necessary adjustments made for the 2023 fishing year. I welcome the accuracy and up to date information the rapid assessments will be able to deliver. They will ensure the continued responsible and sustainable management of the CRA7 fishery into the future.

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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 **Tania Belworthy**  
or contact person:

Organisation (if applicable): **CRA8 Fishing Industry**

Email:

Fishstock(s) this submission refers to: **CRA8**

### Your preferred option as detailed in the discussion paper:

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

### Official Information Act 1982

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**Submission:**

**In support of the Governments decision to increase the CRA8 quota by 5% for the 2022 year.**

**Details supporting your views:**

**5th Generation family ownership of CRA8, supporting the sustainability of managing our fish stocks for following generations.**

Please continue on a separate sheet if required.





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**Submitter details:**

<b>Name of submitter or contact person:</b>	Geoff Creighton
<b>Organisation (if applicable):</b>	New Zealand Red Holdings Ltd
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 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 1.1: which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t

**Official Information Act 1982**

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

### Details supporting your views:

The results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery and the spawning stock biomass is well above the soft and hard limits.

The 2021 assessment update also predicts that at the current levels of catch both the vulnerable and spawning stock biomass are expected to increase over the next 5 years.

The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with the biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.

As a substantial quota share owner in CRA 1, a healthy sustainable fishery is of paramount importance us. We were fully supportive of the 1 April 2020 TAC/TACC reduction. We saw this as a necessary measure to ensure the future sustainability and health of the resource that underpins our business and underpins the future economic and social wellbeing and security of our business and our staff.

The 1 April 2020 TACC reduction did, over the last 2 years, cause financial stress for our business and mental and emotional stress for our staff. So it was encouraging to see from the results from the 2021 rapid assessment, that this financial sacrifice and associated stress had not been without merit and we have achieved the goal of a biomass in CRA 1 that is tracking upwards into the future.

We believe the 21t TACC reduction taken in April 2020 was a sensible decision that balanced financial loss to the commercial sector with achieving our goals of a sustainable fishery. We believe any further reduction in the TACC will result in unwarranted financial and mental stress to the commercial sector and to the many associated businesses that rely on the commercial fishing sector in CRA 1 to support their annual income.

We are also increasingly frustrated about the lack of commitment from Fisheries New Zealand to implement and enforce better estimation and management of recreational catch of rock lobster in CRA 1. While the commercial sector is intensely scrutinised and monitored and have also been expected to cope with the financial and mental stress of a TACC reduction, there are no such requirements made of the recreational sector. There has been and still is no adequate monitoring of recreational catch and the recreational sector have not been required to make any changes to their catch limits.

Any reductions in catch, that are required to ensure the sustainability of the CRA 1 fishery, need to be shared equally by both the recreational and commercial sectors. Recreational fishing bag limits need to be decreased at the same time as any catch reductions are imposed on the commercial sector and levels of recreational catch need to be adequately monitored as we move into the future.

We strongly urge the need for FNZ to take steps to address this issue and to create better equity in management of this shared fishery.

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:**

<b>Name of submitter or contact person:</b>	Paul Knight
<b>Organisation (if applicable):</b>	Ngapuhi Asset Holding Company Limited
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 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 1.1: which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t

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

### Details supporting your views:

As a iwi quota holder and active member of CRAMAC I can attest that the commercial fishers of CRA1 are well organised and operate in the best interests of the fishery. Which is evidenced by their willingness to support TAC reductions in the past.

The 2021 rapid assessment update shows vulnerable biomass above the reference level biomass for the CRA1 and the spawning stock biomass is above the soft and hard limits.

The 2021 assessment update also predicts that at the current levels of catch both the vulnerable and spawning stock biomass are expected to increase over the next 5 years.

The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with the biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.

Please continue on a separate sheet if required.

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**Submitter details:**

<b>Name of submitter or contact person:</b>	MEREHORA TAURUA
<b>Organisation (if applicable):</b>	WAKAMINENGA KI WAITANGI KOMITI MAORI
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 1 & SCA 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

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





**Details supporting your views:**

**CRA 1 :**

Option 1.1 is preferred for commercial and customary take purposes.

We recommend that the power of gazetted manamoana hapu tangata kaitiaki ki Tangaroa be extended to enable more effective monitoring of stock take by customary and recreational fishers and in this regard, we recommend the recreational take be reduced to the level of Maori customary take, i.e. 20 tonnes.

**SCA 1 :**

Option 2 is the preferred change.

Merehora Taurua  
Project Manager  
Waitangi Komiti Maori [1962 MCD Act]

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:** Jury Greenland

**Organisation (if applicable):** Ngatiwai Marae Committee and Moana Futures Ltd

**Email:**

**Fishstock(s) this submission refers to:** Cra1, Sca1

**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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**Fisheries New Zealand**

Tini a Tangaroa

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

**Details supporting your views:**

---

<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.





We have been continuing to monitor our coastal grounds for changes of environmental impacts and Commercial impacts as we continue to collect kai for customary purposes.

It is evident that with natural barriers of collecting for customary purposes such as, utilizing safe sea conditions for trailer boats, visibility impacted from rain and swell, run off, and tidal changes to name a few, we believe that the the comparison of these challenges faced by commercial are significantly different.

We do not support an increase of any commercial harvesting that is purely based on monetary gains. This is a pre-historic mind set and has played a significant part in our demise of the moana.



**Fisheries New Zealand**

Tini a Tangaroa

Please continue on a separate sheet if required.





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---

**Submitter details:**

<b>Name of submitter or contact person:</b> Stephen Rush	
<b>Organisation (if applicable):</b>	Te Runanga o Whaingaroa
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 1, SCA 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):	SCA 1 Option 1 A full closure with the exception of customary take. CRA 1 Other

**Official Information Act 1982**

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**Fisheries New Zealand**

Tini a Tangaroa

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

**Details supporting your views:**

---

<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.



SCA 1 (OPTION 1) Full closure of the fishery except for customary take.

The scallop fishery across SCA 1 is at a critical state and a closure will provide much needed respite to allow the fishery to recover. Dredging has demolished the sea floor in many areas and the scallop fishery is under serious threat and, in some places, recovery is very unlikely or will take many years to do so.

In Whangaroa we have placed a rahui over the taking of scallops and 12 months on we are encouraged by the support of commercial and recreational fishers who see the sense in applying some relief to the scallop fishery lest it be lost forever.

CRA 1 (OPTION 1.4) Reduction, 179t TAC, 94t TACC, 20t Customary, 24t Recreational, 41t other mortality

We support a reduction to the above levels to allow the crayfish stocks to build to healthy and sustainable stocks. We disagree that the status quo should be maintain and is sustainable at the current levels and rather than wait until the monitoring systems show that, we believe that measures should be put in place now to protect the CRA 1 fishery. We believe that Option 1.4 will sustain the commercial, customary and recreational interests in the fishery.

Please continue on a separate sheet if required.





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**Submitter details:**

<b>Name of submitter or contact person:</b>	Mere Mangu
<b>Organisation (if applicable):</b>	Matawai Pokapu Komiti Maori
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA1 & SCA1
<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:**



**Details supporting your views:**

**CRA 1 :**

Option 1.1 is preferred for commercial and customary take purposes.

We recommend that the power of gazetted manamoana hapu tangata kaitiaki ki Tangaroa be extended to enable more effective monitoring of stock take by customary and recreational fishers and in this regard, we recommend the recreational take be reduced to the level of Maori customary take, i.e. 20 tonnes.

**SCA 1 :**

Option 2 is the preferred change.

Merehora

Mere Mangu  
Member on behalf of  
Matawaia Pokapu Komiti Maori  
Maori Community Development Act 1962.

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.



# Submission Form

## Review of sustainability measures for 1 April 2022

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

### Submitter details:

Name of submitter  
or contact person: Tom Searle

Organisation (if applicable): Lee Fish Limited

Email:

Fishstock(s) this submission refers to: CRA 1

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

Option 1.1: which proposes the status quo of 110 tonnes for  
the Total Allowable Commercial Catch (TACC), no change to  
the Allowances and accordingly no change to the TAC of  
203t

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**Submission:**

**Details supporting your views:**

The results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery and the spawning stock biomass is well above the soft and hard limits.

The 2021 assessment update also predicts that at the current levels of catch both the vulnerable and spawning stock biomass are expected to increase over the next 5 years.

The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with the biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.

As a quota share owner in CRA 1, a healthy sustainable fishery is of paramount importance to me. I was fully supportive of the 1 April 2020 TAC/TACC reduction. I saw this as a necessary measure to ensure the future sustainability and health of the resource that underpins the business underpins the future economic and social wellbeing and security of the business and staff.

The 1 April 2020 TACC reduction has, over that last 2 years, had a significant financial impact on this business. So, it was encouraging to see from the results from the 2021 rapid assessment, that this financial sacrifice has not been without merit and we have achieved the goal of a biomass in CRA 1 that is tracking upwards into the future.

I believe the 21t TACC reduction taken in April 2020 was a sensible decision that balanced financial loss to the commercial sector with achieving our goals of a sustainable fishery. I believe any further reduction in the TACC will result in unwarranted financial and mental stress to the commercial sector and to the many associated businesses that rely on the commercial fishing sector in CRA 1 to support their annual income.

I am also increasingly frustrated about the lack of commitment from Fisheries New Zealand to implement and enforce better estimation and management of recreational catch of rock lobster in CRA 1. While the commercial sector is intensely scrutinised and monitored and have also been expected to cope with the financial and mental stress of a TACC reduction, there are no such requirements made of the recreational sector. There has been and still is no adequate monitoring of recreational catch and the recreational sector have not been required to make any changes to their catch limits.

Any reductions in catch, that are required to ensure the sustainability of the CRA 1 fishery, need to be shared equally by both the recreational and commercial sectors. Recreational fishing bag limits need to be decreased at the same time as any catch reductions are imposed on the commercial sector and levels of recreational catch need to be adequately monitored as we move into the future.

I strongly urge the need for FNZ to take steps to address this issue and to create better equity in management of this shared fishery.



The results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery and the spawning stock biomass is well above the soft and hard limits.

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The 1 April 2020 TACC reduction has, over that last 2 years, had a significant financial impact on this business. So, it was encouraging to see from the results from the 2021 rapid assessment, that this financial sacrifice has not been without merit and we have achieved the goal of a biomass in CRA 1 that is tracking upwards into the future.

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I strongly urge the need for FNZ to take steps to address this issue and to create better equity in management of this shared fishery.





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### Submitter details:

<b>Name of submitter or contact person:</b> Elia Iosua	
<b>Organisation (if applicable):</b>	Leigh Lobster & Associates Ltd
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 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 1.1: which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t

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

### Details supporting your views:

The results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery and the spawning stock biomass is well above the soft and hard limits.

The 2021 assessment update also predicts that at the current levels of catch both the vulnerable and spawning stock biomass are expected to increase over the next 5 years.

The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with the biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.

As a specialised live lobster processing company handling substantial volumes of commercially caught CRA 1, a healthy sustainable fishery is of paramount importance us. We were fully supportive of the 1 April 2020 TAC/TACC reduction. We saw this as a necessary measure to ensure the future sustainability and health of the resource that underpins our business and underpins the future economic and social wellbeing and security of our business and our staff.

The 1 April 2020 TACC reduction did, over the last 2 years, cause financial stress for our business and mental and emotional stress for our staff. So it was encouraging to see from the results from the 2021 rapid assessment, that this financial sacrifice and associated stress had not been without merit and we have achieved the goal of a biomass in CRA 1 that is tracking upwards into the future.

We believe the 21t TACC reduction taken in April 2020 was a sensible decision that balanced financial loss to the commercial sector with achieving our goals of a sustainable fishery. We believe any further reduction in the TACC will result in unwarranted financial and mental stress to the commercial sector and to the many associated businesses that rely on the commercial fishing sector in CRA 1 to support their annual income.

We are also increasingly frustrated about the lack of commitment from Fisheries New Zealand to implement and enforce better estimation and management of recreational catch of rock lobster in CRA 1. While the commercial sector is intensely scrutinised and monitored and have also been expected to cope with the financial and mental stress of a TACC reduction, there are no such requirements made of the recreational sector. There has been and still is no adequate monitoring of recreational catch and the recreational sector have not been required to make any changes to their catch limits.

Any reductions in catch, that are required to ensure the sustainability of the CRA 1 fishery, need to be shared equally by both the recreational and commercial sectors. Recreational fishing bag limits need to be decreased at the same time as any catch reductions are imposed on the commercial sector and levels of recreational catch need to be adequately monitored as we move into the future.

We strongly urge the need for FNZ to take steps to address this issue and to create better equity in management of this shared fishery.

Please continue on a separate sheet if required.

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Mountains to Sea Conservation Trust (MTSCT)  
Experiencing Marine Reserves (EMR)  
F d

4 February 2022

**Attention FMSubmissions@mpi.govt.nz**

Submission on the Review of Rock Lobster Sustainability Measures for 2022/23.

The Mountains to Sea Conservation Trust (MTSCT) mission is to 'inspire kaitiakitanga for our rivers and coasts, from the mountains to the sea'. We do this primarily through our unique freshwater and marine inquiry-based, outdoor education programmes and a multitude community events that encourage participation in communities. The trust has been operating for over 20 years taking students into the oceans to experience marine ecosystems throughout CRA 1 (Northland) region. MTSCT is extremely concerned about the ecological impacts caused by reductions in rock lobster populations around New Zealand from overfishing.

The rock lobster CRA 1 stock covers all of Northland (both east and west coast). The latest stock assessment carried out in 2019 estimates the CRA 1 vulnerable biomass to be ~16% of the unfished level and estimates the total biomass has been fished down to 26% of the unfished biomass. The latest information, the 2021 rapid update estimates the vulnerable biomass is at 15% of the unfished level. In other words, the latest rapid stock update shows that CRA 1 has not improved. The stock is not at a healthy and sustainable level, and this reinforces the stock has been severely overfished for many years. Fisheries New Zealand modelling shows if no management action is taken, the stock will potentially increase (65% probability) but only to 17% of the unfished level - this is far too low and will impact the ecological role of rock lobster in Northland.

**info@emr.org.nz | www.emr.org.nz | facebook.com/emr.mtsct | instagram emr\_nz**



#### Consultation options:

Fisheries New Zealand is proposing 4 options - status quo (which, will not rebuild the stock appropriately) and three options to decrease the TAC (totally allowable catch) by different levels. Based on the knowledge of the MTSCT, option 1.4 to decrease the TAC by 12% is the most appropriate option to help rebuild CRA1 rock lobster stock. The MTSCT does not support any other options. Option 1.4 is most likely (higher probability) to result in a faster rebuild of the stock and partially takes into account the ecological value and benefit of rebuilding rock lobster compared to the other options.

Rock lobsters are ecologically important. Not only in terms of their biomass size (densities) but also the size structure. Having a range of sizes, including large older rock lobsters is ecologically important. A kina (sea urchin) barren is an example of a food chain disruption caused by the removal of predators, such as large rock lobsters. The favourite food of the kina is kelp, if there are no predators to control them, they can chow through an entire kelp forest! The kina compete for food and space and are usually not good eating

*"We now know they (kina barrens) are an artefact of overfishing. Kina Barrens have all but disappeared at Goat Island and Tawharanui Marine Reserves... " - Dr Roger Grace*

Our north eastern marine reserves have an abundance of marine life. In protected areas, the large predators, like snapper and rock lobster return and kelp forests can be restored. Marine reserves provide a safe environment for the predator species to recover in order for the food chain to become balanced again, and reverse the effects of the trophic cascade.

At the Leigh and Tawharanui marine reserves there are noticeably higher numbers of snapper and rock lobster and lower numbers of kina, as opposed to adjacent waters which are not marine protected areas. The ecosystem is more balanced and there is a healthy environment for predators to replenish, kelp forests are abundant and can act as nurseries for a variety of marine species.





In North-eastern marine reserves, through our Experiencing Marine Reserves EMR – Te Kura Moana programme, students are able to observe the benefits of experiencing a healthy functioning marine ecosystems which would have large rock lobster and healthy kelp forests. Our EMR programme has allowed the Trust to observe changes in rock lobster stocks. Over the last 10 years in Northern waters (like those within CRA 1 FMA) we seldom spot a rock lobster anywhere outside of a marine reserve. Rock lobster numbers in Northland have declined significantly which has altered reef habitats. We must rebuild the stock to help restore healthy functioning coastal marine ecosystems.

The MTSET also has public engagement and education events where we take kids and communities snorkeling at their local beaches. Since the Trust was established, we have snorkeled with 147,905 people throughout NZ and had 123 public events in Northland. We would love for our Northland communities to see rock lobsters. If CRA 1 is rebuilt to a much higher level than it is currently then it is possible for Northlanders to experience what has been lost.

The EMR programme and MTSET supports Option 1.4 (the largest TAC decrease). This options best aligns with the Trust's vision of restoring our marine environment and having healthy functioning marine ecosystems for everyone to enjoy.

Kind Regards

**Samara Nicholas, MNZM** - Poutokomanawa/Co-director - Marine Lead

**C/O Mountains to Sea Conservation Trust**

**Experiencing Marine Reserves (EMR) - Te Kura Moana**

*Te Tohu Matua-Supreme Award Winner 2021 at Northland Regional Council's annual 'Whakamānawa ā Taiao - Environmental Awards.*



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---

**Submitter details:**

<b>Name of submitter or contact person:</b>	Trevor Allison
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 7
<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 7.2: which proposes a 5% increase of the Total Allowable Commercial Catch from 106.2 tonnes to 111.5 tonnes

**Official Information Act 1982**

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

The results from the 2021 stock assessment show that the vulnerable biomass in the CRA 7 fishery is above the reference level biomass for this fishery. The science shows the fishery is in good health. This is consistent with what CRA 7 fishers have been seeing out on the water.

As a quota share owner/ACE holder interests in CRA 7, a healthy sustainable fishery is extremely important to me. While there could be a higher TACC increase, I support the 5% increase as a responsible and reasonable measure to ensure the future sustainability and health of the resource that underpins my business/annual income and underpins the future economic and social wellbeing and security of my business, my family, and my staff. This has suffered over the last two years due to the challenging condition of the market and government imposed restrictions relating to the Covid pandemic. I will greatly appreciate the opportunity for more lobster to be caught and sold from CRA 7.

I believe that not increasing the TACC will result in unwarranted financial and mental stress to the industry and to the many associated businesses that rely on the commercial fishing sector in CRA 7 to support their annual income. The proposed TACC increase is of such a conservative size, and the abundance in the fishery is so strong, that the increase will not take away from what the customary and recreational fishers are entitled to catch in CRA 7.

I also believe that it is safe to grant the proposed TACC increase because its impact can be checked when a rapid assessment update is carried out for CRA 7 later in 2022 with any necessary adjustments made for the 2023 fishing year. I welcome the accuracy and up to date information the rapid assessments will be able to deliver. They will ensure the continued responsible and sustainable management of the CRA7 fishery into the future.

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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.



**Fisheries New Zealand**

Tini a Tangaroa

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Please continue on a separate sheet if required.





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**Submitter details:****Name of submitter****or contact person:** Ken Anderson**Organisation (if applicable):**

Anderson Family Trust Partnership

**Email:****Fishstock(s) this submission refers to:**

CRA 7

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

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

Option 7.2: which proposes a 5% increase of the Total Allowable Commercial Catch from 106.2 tonnes to 111.5 tonnes

**Official Information Act 1982**

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

The results from the 2021 stock assessment show that the vulnerable biomass in the CRA 7 fishery is above the reference level biomass for this fishery. The science shows the fishery is in good health. This is consistent with what CRA 7 fishers have been seeing out on the water.

As a quota share owner with interests in CRA 7, a healthy sustainable fishery is extremely important to me. While there could be a higher TACC increase, I support the 5% increase as a responsible and reasonable measure to ensure the future sustainability and health of the resource that underpins the future economic and social wellbeing and security of the fishery. This has suffered over the last two years due to the challenging condition of the market and government-imposed restrictions relating to the Covid pandemic. I will greatly appreciate the opportunity for more lobster to be caught and sold from CRA 7.

I believe that not increasing the TACC will result in unwarranted financial and mental stress to the industry and to the many associated businesses that rely on the commercial fishing sector in CRA 7 to support their annual income. The proposed TACC increase is of such a conservative size, and the abundance in the fishery is so strong, that the increase will not take away from what the customary and recreational fishers are entitled to catch in CRA 7.

I also believe that it is safe to grant the proposed TACC increase because its impact can be checked when a rapid assessment update is carried out for CRA 7 later in 2022 with any necessary adjustments made for the 2023 fishing year. I welcome the accuracy and up to date information the rapid assessments will be able to deliver. They will ensure the continued responsible and sustainable management of the CRA7 fishery into the future.

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Please continue on a separate sheet if required.



**The Otago Rock Lobster Industry Assoc.Inc.**

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3 February 2022

Sustainability Review April 2022  
Fisheries Management  
Fisheries New Zealand  
PO Box 2526  
Wellington 6140

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

## **REVIEW OF ROCK LOBSTER SUSTAINABILITY MEASURES 2022/2023**

### **SUBMISSION ON BEHALF OF OTAGO ROCK LOBSTER INDUSTRY ASSOCIATION INC**

#### *Background*

This submission is made by Otago Rock Lobster Industry Association Incorporated ("ORLIA"). ORLIA is a fully constituted and incorporated society which is recognised as the commercial stakeholder organisation representing the interests of commercial rock lobster industry on the Otago Coast, the CRA7 fishery. Our members are a broad group including quota share owners, ACE fishers and processors and their families.

This submission focuses on the proposed sustainability measures for CRA7. Fisheries New Zealand Discussion Paper No: 2021/27 presents two management options for CRA7:

- Option 7.1 proposes the status quo for the Total Allowable Commercial Catch ("TACC") would stay at its current level of 106.2 tonnes; or
- Option 7.2 proposes to increase the TACC by 5.3 tonnes to 111.5 tonnes. This represents an increase of 5%.

#### *Submission*

**ORLIA supports Option 7.2** and agrees with the comments made at paragraphs 96 and 102 of the Fisheries New Zealand Discussion Paper. Option 7.2 will allow our members to realise an increase in utilisation at a responsible level, without compromising the current utilisation benefits for recreational and customary fishers, or the health of the fishery.

We note the findings of the stock assessment as summarised at paragraph 90 of the Discussion Paper. The results suggest that vulnerable biomass was well above the reference level in 2021 (1.46 times the BMSY reference level).





**The Otago Rock Lobster Industry Assoc.Inc.**

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Although at paragraph 95 it is noted that maintaining the status quo *could* lead to a higher CPUE (inter alia), **we object to Option 7.1**. We believe allowing our fishers a reasonable opportunity for increased utilisation appropriately reflects the nature of a shared fishery. Given the tough economic conditions commercial fishers and those who support them have been facing during the Covid pandemic (including fisher whanau and businesses they support outside the industry), it is important for the social and economic well being of Otago that they can benefit from increased utilisation now. Also many of our members are connected to local iwi (for example, Ngai Tahu interests directly hold nearly 30% of the CRA7 quota shares).

Option 7.2 also allows for more accurate data by taking into account the updated estimate of handling mortality. We remain committed to supporting the stock monitoring contracted by MPI and the ongoing sustainable management of the CRA7 fishery, which will be enabled by the new rapid assessment updates. A rapid assessment update will be conducted for CRA 7 in 2022, giving a real time review of the catch settings and management controls for April 2023.

#### *Conclusion*

We support **Option 7.2** because it will provide an increase that reflects the healthy state of the CRA7 stock and provides the potential for more utilisation at a responsible rate, which will be reviewed by a rapid assessment update before April 2023. It strikes a balance to ensure the ongoing sustainability of CRA7, with a well-considered management approach to our shared fishery.

#### *Additional Comments*

Both the CRA1 and CRA8 fisheries are above the BMSY reference levels that are their agreed interim management targets. The vulnerable biomasses in those fisheries are projected to continue to increase. As such, we support Option 1.1 for CRA1 and Option 8.3 for CRA8.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'K Hesson'.

**Kate Hesson,  
Executive Officer  
Otago Rock Lobster Industry Association Inc  
Dunedin  
Email:  
Tel:**



Sustainability Review 2022  
Fisheries Management  
Fisheries New Zealand  
P O Box 2526  
Wellington 6140

FMSubmissions@mpi.govt.nz

8<sup>th</sup> February, 2022

To whom it may concern,

### **Review of Sustainability Measures for Rock Lobster in Southern FMA (CRA 8) for 2022/23**

Thank you for inviting the Fiordland Marine Guardian's ("the Guardians") comments and feedback on Discussion Document No 2021/27.

#### Scope of comments and advice

The Guardians were formally recognised as a governance group for the Fiordland Marine Area (FMA) with the establishment of the Fiordland Marine Management Act ("the Act") in 2005. Our vision is that the quality of Fiordland's marine environment and fisheries be maintained or improved for future generations to use and enjoy. Given the scope of our interest, this submission will focus solely on the Southern Fisheries Management Area (FMA 8).

#### CRA8

The Guardians have reviewed the document and are satisfied that a systematic and standardised process has been followed to assess the performance of CRA8. We agree that the options posed are appropriate, but **do not wish to state a preference for any of the three options.**

We have received consistent and regular feedback from the community (recreational and commercial fishers, divers etc.) that rock lobster are abundant throughout the FMA at present and appear to have been increasing in abundance for some years now. We acknowledge the mahi and conservative management approach that the CRA8 Industry Association has applied to this important fishery. It is clear that their stewardship is resulting in rock lobster stocks being in increasingly good health.

As noted in the discussion paper, the Fiordland Marine Guardians have proposed a series of changes to amateur fishing rules in the FMA. These include a two-tier daily bag limit being introduced for rock lobster, with higher bag limits for fishing in more productive areas. We are considering whether to shift the demarcation lines for these different bag limits for rock lobster. The demarcation lines are currently based on the habitat lines, which is causing a concentration of fishing effort inside the entrances to many fiords. A shift in the demarcation line seawards (across the entrance headlands of each fiord) would mitigate the concentration of catch to a degree. Regardless of where this demarcation line ends up, we have

recommended a reduction in the daily bag limits for rock lobster, and the introduction of a no-accumulation rule, meaning fishers will only be able to leave the Fiordland Marine Area with one day's bag limit.

We are conscious of the fact that proposing more restrictive fishing limits on recreational fishers at a time when increases to the TACC are being considered will likely cause confusion and frustration from recreational fishers. We have been clear that the changes we are proposing to recreational fishers are not due to concerns about rock lobster abundance, but rather due to a mindset shift we are trying to spear-head around the concept of fishing for a feed.


We intend to engage in discussions with the commercial fishing sector, including the CRA8 Industry Association, about further initiatives that could be considered in these shared fisheries. This could potentially include consideration of key recreational fishing areas in the fine scale spatial management of commercial fishing, and the possibility of industry research being used to monitor changes in the fishery in response to management changes, for example.

In terms of recreational fishing data we have a few comments to make. First, the discussion paper refers to a lack of knowledge about recreational catch in CRA 8, with the sole source of data appearing to be the National Panel Surveys. We question why the catch returns filed by Amateur Charter Vessels (ACV) are not used here. Rock lobster taken by recreational fishers aboard ACVs likely comprise a significant proportion of the recreational take of this species in Fiordland. ACV returns have the potential to provide a source of recreational fishing data in areas where data are currently sparse. We are encouraged by the Ministry's support for our recommendation to move ACV reporting to an electronic system (with a pilot of the technology in Fiordland), as this will improve accuracy, precision and compliance whilst also providing information on which to base fisheries management decisions in a timely manner.

Second, we are very supportive of the work that Fish Mainland has been leading to develop a recreational fishing reporting app. We are assisting Fish Mainland with testing the app and will encourage its uptake by fishers in Fiordland once it is fully developed. We see huge potential with the app for building a data set on which to base future management decisions and, in combination with our 2-tiered recreational bag limits, for encouraging recreational fishing effort to be moved to more productive areas of the Fiordland Marine Area.

Please feel free to contact me if you would like further information.

Yours sincerely,



Rebecca McLeod  
Chair, Fiordland Marine Guardians  
P





**Fisheries New Zealand**

Tini a Tangaroa

# Submission Form

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#### Submitter details:

Fisherman - quota owner

Name of submitter  
or contact person:

Robert Joseph White

Organisation (if applicable):

LOYAL Fishing.

Email:

Fishstock(s) this submission refers to:

CRA 8

Your preferred option as detailed in the  
discussion paper

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

8.3

### Official Information Act 1982

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

**Details supporting your views:**

Being a fisherman for 38 years I have seen the lows and now the highs catches of the industry and the management procedures put in place to better the fishery. I believe the 5% commercial increase to be very conservative based on our own personal fishing catch rates having increased significantly over the last 10 years. Also MPI scientists have said that it could sustain a 15% increase.

yours faithfully  
Bll

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.



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**Submitter details:**

<b>Name of submitter or contact person:</b>	M Vergeer
<b>Organisation (if applicable):</b>	Southern Ocean Lobster Ltd
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA8
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	Increase TAAC by 5%, not the proposed 15%

**Official Information Act 1982**

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

**Details supporting your views:**

See page 3

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CRA8 is the best managed Rock lobster fishery resource in New Zealand. History shows the measured and conservative approach CRA8 have taken to date has placed the fishery in the favourable and strong position it is in today. The CRA8 committee have made a continued investment over many years in research to gain the best possible information so the interests of all stakeholders (including the fishery itself) are protected in the long term sustainability of a most valuable resource. The CRA8 committee, to their credit have managed CRA 8 exceptionally well. Their results speak for themselves.

We support the increase of the TACC to be increased, but by **5 per cent, not the proposed 15 per cent**. This is to further continue to protect the valuable resource into the future.

Reasons:

The increase in recreational fishers, and sale of recreational fishing boats since the Covid pandemic has made Rock lobster fishing more accessible to the general population than ever before. National televised recreational fishing programmes have further highlighted and showcased the stunning scenery of Fiordland as a prime tourist location, placing pressure on the fishery that was previously absent, and under the radar. The recreational catch as a whole is not measured or accounted for in any given period of time, as the commercial catch is. However, the total fishery is measured only by commercial means, not as a whole. With increasing recreational fishers taking more daily catch than the past, it would be prudent to measure the exact quantity of recreational catch so an informed decision can be made. The risk of increasing the TACC by 15 per cent makes no allowances for the counting of increased recreational activity into the equation.

It would be detrimental to commercial fishers to have to decrease the TACC in the future because of increasing the margin by too much now.

Current stock counts confirm that a 5 per cent increase in TACC will be easily absorbed, and the size of the CRA8 fish stock will continue with this measured approach into the future. Long term value of our CRA8 fish stocks has placed this resource in a strong position. Short term gains created from increasing TACC by 15 per cent must be only part of the equation. The long term value of this resource must not be compromised or threatened by short sighted and potentially short lived gains at the expense of future longevity and success.

To Whom it may concern

I have been a recreational scuba diver throughout the Hauraki Gulf for around 50 years and have harvested rock lobster (crayfish) for many of those years.

It is apparent to me that, particularly, in the areas from the Ahas to Kawau Island but also as far ranging as Cape Colville, Great Barrier and The Hen and Chicks Island there has been a very noticeable decline in the species particularly since the early 2000's.

Prior to 2000 it was relatively easy to harvest 3-4 crayfish in 1 or 2 dives but since then it has become more and more difficult to collect a meal and over the past 5 to 10 years has become almost impossible around the inner Islands and difficult around the more outlying Islands of both Barriers and the Hen and Chicks.

In the earlier days such harvesting could often be achieved at depths around 25 to 40 feet depending on the time of year – from the early 2000's depths of up to 50 to 70 feet were needed and then 1 or 2 crayfish are more likely than 3 or 4. Since about 2010 it has been almost impossible to harvest a meal.

Whilst recognising that my comments below are anecdotal I believe they are relevant and I would like you to consider my comments seriously as it is very obvious to me that the fish stock of crayfish has deteriorated significantly particularly since the turn of the century.

Yours sincerely,

Richard Ridler, BAgSci

Business Broker & Business Valuations, LINK Auckland, Ellerslie

E.

W. [linkbusiness.co.nz](http://linkbusiness.co.nz)



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### Submitter details:

Name of submitter

or contact person: **Bruce James Sanderson**

Organisation (if applicable):

Email:

Fishstock(s) this submission refers to:

CRA 1

Your preferred option as detailed in the discussion paper

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

Option 1.1: which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t

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**Fisheries New Zealand**

Tini a Tangaroa

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### Submitter details:

Name of submitter

or contact person: **Bob Lovell**

Email:

Fishstock(s) this submission refers to:

**CRA 1**

Your preferred option as detailed in the discussion paper

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

**Option 1.1: which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t**

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

#### Details supporting your views:

**As a quota holder I strongly object to any further reductions as it has only been 12 months to see if the last reduction is working. Option 1.1 should remain in place for at least another 12 to 24 months to get a better indication of the state of the fishery. As a fisherman we all want to see sustainable stock levels but feel that the recent cut hasn't been given a long enough period. I also wonder why the commercial fishermen are always the ones that are targeted while it appears there is no reduction or accountability for customary groups.**

**Bob Lovell (Quota No: 8411448)**

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

**Details supporting your views:**

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The results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery and the spawning stock biomass is well above the soft and hard limits.

The 2021 assessment update also predicts that at the current levels of catch both the vulnerable and spawning stock biomass are expected to increase over the next 5 years.

The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with the biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.

As a **ace holder/fisher** in CRA 1, a healthy sustainable fishery is of paramount importance to me. I was fully supportive of the 1 April 2020 TAC/TACC reduction. I saw this as a necessary measure to ensure the future sustainability and health of the resource that underpins my **crayfishing business and income** and underpins the future economic and social wellbeing and security of **my business, the future of my family and my staff**.

The 1 April 2020 TACC reduction has, over that last 2 years, caused financial stress **for me and my family business** and as such has caused mental and emotional stress for myself, my family, **and my staff**. So, it was encouraging to see from the results from the 2021 rapid assessment, that this financial sacrifice and associated stress has not been without merit and we have achieved the goal of a biomass in CRA 1 that is tracking upwards into the future.

I believe the 21t TACC reduction taken in April 2020 was a sensible decision that balanced financial loss to the commercial sector with achieving our goals of a sustainable fishery. I believe any further reduction in the TACC will result in unwarranted financial and mental stress to the commercial sector and to the many associated businesses that rely on the commercial fishing sector in CRA 1 to support their annual income.

I am also increasingly frustrated about the lack of commitment from Fisheries New Zealand to implement and enforce better estimation and management of recreational catch of rock lobster in CRA 1. While the commercial sector is intensely scrutinised and monitored and have also been expected to cope with the financial and mental stress of a TACC reduction, there are no such requirements made of the recreational sector. There has been and still is no adequate monitoring of recreational catch and the recreational sector have not been required to make any changes to their catch limits.

Any reductions in catch, that are required to ensure the sustainability of the CRA 1 fishery, need to be shared equally by both the recreational and commercial sectors. Recreational fishing bag limits need to be decreased at the same time as any catch reductions are imposed on the commercial sector and levels of recreational catch need to be adequately monitored as we move into the future.

I strongly urge the need for FNZ to take steps to address this issue and to create better equity in management of this shared fishery.



**Fisheries New Zealand**

Tini a Tangaroa

Please continue on a separate sheet if required.





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**Submitter details:**

<b>Name of submitter or contact person:</b>	Jeffrey Clarke
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 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 1.1: which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t

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

### Details supporting your views:

I am an NZ citizen who cares deeply about the health of our fisheries and have had an association with crayfish fishermen and other participants within the commercial rock lobster industry for many years. Over these years I have been very impressed by the science and management effort the fishing industry put into managing a healthy and sustainable rock lobster fishery for the benefit of all New Zealanders.

On reading the review of the CRA 1 fishery in the Fisheries New Zealand consultation document (Review of Rock Lobster Sustainability Measures for 2022/23) I noted that the results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery and the spawning stock biomass is well above the soft and hard limits.

The 2021 assessment update also predicts that at the current levels of catch both the vulnerable and spawning stock biomass are expected to increase over the next 5 years. The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with the biomass increasing over the next 5 years at the current TACC of 110t.

The science that I see in the consultation document clearly says the CRA 1 fishery is rebuilding, and I see no need for further TACC cuts, which can only have further negative impacts on the New Zealand economy and on the livelihoods of the everyday kiwi people who earn a living from this fishery.

---

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**Submitter details:**

<b>Name of submitter or contact person:</b>	Geoff Creighton
<b>Organisation (if applicable):</b>	New Zealand Red Holdings Ltd
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 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 1.1: which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t

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

### Details supporting your views:

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The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with the biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.

As a substantial quota share owner in CRA 1, a healthy sustainable fishery is of paramount importance to us. We were fully supportive of the 1 April 2020 TAC/TACC reduction. We saw this as a necessary measure to ensure the future sustainability and health of the resource that underpins our business and underpins the future economic and social wellbeing and security of our business and our staff.

The 1 April 2020 TACC reduction did, over the last 2 years, cause financial stress for our business and mental and emotional stress for our staff. So it was encouraging to see from the results from the 2021 rapid assessment, that this financial sacrifice and associated stress had not been without merit and we have achieved the goal of a biomass in CRA 1 that is tracking upwards into the future.

We believe the 21t TACC reduction taken in April 2020 was a sensible decision that balanced financial loss to the commercial sector with achieving our goals of a sustainable fishery. We believe any further reduction in the TACC will result in unwarranted financial and mental stress to the commercial sector and to the many associated businesses that rely on the commercial fishing sector in CRA 1 to support their annual income.

We are also increasingly frustrated about the lack of commitment from Fisheries New Zealand to implement and enforce better estimation and management of recreational catch of rock lobster in CRA 1. While the commercial sector is intensely scrutinised and monitored and have also been expected to cope with the financial and mental stress of a TACC reduction, there are no such requirements made of the recreational sector. There has been and still is no adequate monitoring of recreational catch and the recreational sector have not been required to make any changes to their catch limits.

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We strongly urge the need for FNZ to take steps to address this issue and to create better equity in management of this shared fishery.

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**Submitter details:**

<b>Name of submitter or contact person:</b>	Philippa La Rosa
<b>Organisation (if applicable):</b>	NZ Red Limited
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 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 1.1: which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t

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

**Details supporting your views:**

I am an NZ citizen who cares deeply about the health of our fisheries and have had an association with crayfish fishermen and other participants within the commercial rock lobster industry for many years. Over these years I have been very impressed by the science and management effort the fishing industry put into managing a healthy and sustainable rock lobster fishery for the benefit of all New Zealanders.

On reading the review of the CRA 1 fishery in the Fisheries New Zealand consultation document (Review of Rock Lobster Sustainability Measures for 2022/23) I noted that the results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery and the spawning stock biomass is well above the soft and hard limits.

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### Submitter details:

Name of submitter  
or contact person:

Vincent La Rosa

Organisation (if applicable):

Email:

Fishstock(s) this submission refers to:

CRA 1

Your preferred option as detailed in the  
discussion paper

(write "other" if you do not agree with  
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### Submission:





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Fisheries New Zealand

Tini a Tangaroa

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### Review of sustainability measures for 1 April 2022

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

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

2022 Sustainability Review, Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

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#### Submitter details:

Name of submitter  
or contact person:

LUCY CREIGHTON

Organisation (if applicable):

Email:

Fishstock(s) this submission refers  
to:

CRA 1

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

Option 1.1: which proposes the status quo of 110  
tonnes for the Total Allowable Commercial Catch  
(TACC), no change to the Allowances and  
accordingly no change to the TAC of 203t

#### Official Information Act 1982

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#### Submission:

##### Details supporting your views:

I am an NZ citizen who cares deeply about the health of our fisheries and have had an association with crayfish fishermen and other participants within the commercial rock



lobster industry for many years. Over these years I have been very impressed by the science and management effort the fishing industry put into managing a healthy and sustainable rock lobster fishery for the benefit of all New Zealanders.

On reading the review of the CRA 1 fishery in the Fisheries New Zealand consultation document (Review of Rock Lobster Sustainability Measures for 2022/23) I noted that the results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery and the spawning stock biomass is well above the soft and hard limits.

The 2021 assessment update also predicts that at the current levels of catch both the vulnerable and spawning stock biomass are expected to increase over the next 5 years. The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with the biomass increasing over the next 5 years at the current TACC of 110t.

The science that I see in the consultation document clearly says the CRA 1 fishery is rebuilding, and I see no need for further TACC cuts, which can only have further negative impacts on the New Zealand economy and on the livelihoods of the everyday kiwi people who earn a living from this fishery.

Please continue on a separate sheet if required.





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---

**Submitter details:**

<b>Name of submitter or contact person:</b>	Emma Creighton
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 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 1.1: which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t

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

**Details supporting your views:**

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**Submitter details:**

<b>Name of submitter or contact person:</b>	Sophie Boberg
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 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 1.1: which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t

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

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**Name of submitter  
or contact person:**

**Organisation (if applicable):**

**Email:**

**Fishstock(s) this submission refers to:**

CRA 1

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

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any of the options presented):

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

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---

**Submitter details:**

<b>Name of submitter or contact person:</b>	Glen Coulston
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	CRA 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 1.1: which proposes the status quo of 110 tonnes for the Total Allowable Commercial Catch (TACC), no change to the Allowances and accordingly no change to the TAC of 203t

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

**Details supporting your views:**

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The results from the 2021 rapid assessment update showed that, at the current levels of catch (TAC 203t, TACC 110t), the vulnerable biomass in the CRA 1 fishery is above the reference level biomass for this fishery and the spawning stock biomass is well above the soft and hard limits.

The 2021 assessment update also predicts that at the current levels of catch both the vulnerable and spawning stock biomass are expected to increase over the next 5 years.

The goal of the 21t TACC reduction that was taken on 1 April 2020 was to reverse the slight decline in stock biomass that the 2019 stock assessment predicted to be occurring, and to maintain a sustainable CRA 1 fishery. The 2021 rapid assessment update has predicted that this goal is being achieved with the biomass increasing over the next 5 years at the current TACC of 110t, meaning any further reduction in the TACC is unwarranted.

As a quota share owner/ace holder, a recreational fisher, a conservationist, and, a supporter of marine reserves in CRA 1, a healthy sustainable fishery is of paramount importance to me. I was fully supportive of the 1 April 2020 TAC/TACC reduction. I saw this as a necessary measure to ensure the future sustainability and health of the resource that underpins the future economic and social wellbeing and security of everyone in Northland, and nationally for sustaining economy, environmental, social, cultural outcomes.

At a personal level the 1 April 2020 TACC reduction has caused financial stress for my business, and as such has caused mental and emotional stress for myself, family, and staff. The overlay of Covid 19 also exacerbating this. In the face of such adversities, it would be nice that economic impacts are softened by the government agencies decision making and not accelerated. While this has been the case, it has also been encouraging to see from the results from the 2021 rapid assessment, and, personal observation from time in the water and the ease of catch, that this financial sacrifice and associated stress has not been without merit and we have achieved the goal of a biomass in CRA 1 that is tracking upwards into the future.

I urge one to also consider what impact the coinciding lockdowns and border restrictions prevented Aucklanders and Northlanders from fishing in the north, significantly reducing recreational and cultural harvesting over this past 2 years, and, how this reflects where the real pressure on the fishery exists, and where by, when Covid becomes endemic the take will again accelerate.

I believe the 21t TACC reduction taken in April 2020 was a sensible decision that balanced financial loss to the commercial sector with achieving our goals of a sustainable fishery. I believe any further reduction in the TACC will result in unwarranted financial and mental stress to the commercial sector and to the many associated businesses that rely on the commercial fishing sector in CRA 1 to support their annual income. I also believe it is a band aid approach that is deferring addressing the greater issue at cost to the country.

Fundamentally, the pressure on the Northern rocklobster fisheries is now a social one and not commercial, as it once was. The Commercial aspect is so well measured and monitored we know much more accurately what gets taken by this sector while the physical biomass being impacted by the other allowances is immeasurable. It does not take a rocket scientist to understand a growing population means growing consumption of resources locally.

I am increasingly frustrated there is not great enough commitment from Fisheries New Zealand to implement and enforce better estimation and management of recreational catch of rock lobster in CRA 1. While the commercial sector is intensely scrutinised and monitored and have been expected to cope with the financial and mental stress of a TACC reduction, there are no such requirements made of the recreational sector. There has been and still is no adequate monitoring



of recreational catch, and, the recreational sector have not been required to make any changes to their catch limits.

The exercise in CRA2 to reduce rocklobster recreational allocations, to a mixed 6 crayfish bag including no more than 3 rock lobster, was a brilliant move to soften the growing take of a declining rock lobster population, while encouraging fishers to harvest more of the burgeoning pack horse population. No one missed out on food on the table, or, recreational experience by making this subtle shift. CRA 2 TACC cuts while significantly also helping, I would challenge was a drop in the bottle to the shift in the recreational volume occurring.

I do not believe, given the growth in CRA1 biomass, that any cuts are necessary at this point in time, but, if there is desire to accelerate that growth then the balance to achieving this is in reduction of recreational take limits and developing greater understanding of what this equates to.

In future should drastic reductions be required, Recreational fishing bag limits need to be decreased at the same time as any catch reductions are imposed on the commercial sector and levels of recreational catch need to be adequately monitored as we move into the future.

I strongly urge the need for FNZ to take steps to address this issue and to create better equity in management of this shared fishery.

Kind regards, Naku na noa

Glen Coulston

To whom it may concern.

Having been involved in the cra7 fishery for most of my life and seen the trends in the fishery it is of my opinion having liased with other fishers and stakeholders that cra7 could easily sustain a 5 percent increase in the TACC.

Yours Sincerely  
David Anderson

To Whom It May Concern:

I am a commercial Fisher from Otago and a Quota owner, I have been harvesting crayfish for over 20 years along the Otago coast, Otago crayfish stocks are in very good health and I agree with a minimum TACC increase of 5%. CRA7 is well managed and is a standout example of how great our quota system and fisherman operate here in the south.

Kind Regards  
Chris Cooper



I am in favour of the increase of the cra8 of 5% to the TACC and support this decision of then

Sent from my iPhone



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---

**Submitter details:****Name of submitter****or contact person:** Brad Olsen**Organisation (if applicable):**

You Complete

**Email:****Fishstock(s) this submission refers to:**

CRA 7

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

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

Option 7.2: which proposes a 5% increase of the Total Allowable Commercial Catch from 106.2 tonnes to 111.5 tonnes

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

The results from the 2021 stock assessment show that the vulnerable biomass in the CRA 7 fishery is above the reference level biomass for this fishery. The science shows the fishery is in good health. This is consistent with what CRA 7 fishers have been seeing out on the water.

As a **quota share owner / fisher/** with interests in CRA 7, a healthy sustainable fishery is extremely important to me. While there could be a higher TACC increase, I support the 5% increase as a responsible and reasonable measure to ensure the future sustainability and health of the resource that underpins my **business/annual income** and underpins the future economic and social wellbeing and security of **my business, my family, and my staff**. This has suffered over the last two years due to the challenging condition of the market and government imposed restrictions relating to the Covid pandemic. I will greatly appreciate the opportunity for more lobster to be caught and sold from CRA 7.

I believe that not increasing the TACC will result in unwarranted financial and mental stress to the industry and to the many associated businesses that rely on the commercial fishing sector in CRA 7 to support their annual income. The proposed TACC increase is of such a conservative size, and the abundance in the fishery is so strong, that the increase will not take away from what the customary and recreational fishers are entitled to catch in CRA 7.

I also believe that it is safe to grant the proposed TACC increase because its impact can be checked when a rapid assessment update is carried out for CRA 7 later in 2022 with any necessary adjustments made for the 2023 fishing year. I welcome the accuracy and up to date information the rapid assessments will be able to deliver. They will ensure the continued responsible and sustainable management of the CRA7 fishery into the future.

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A large, empty rectangular area with a light blue background, intended for a drawing or response.

Please continue on a separate sheet if required.



**From:** [Fiona King](#)  
**To:** [FMSubmissions](#)  
**Subject:** Review of sustainability measures – 2022 April round  
**Date:** Friday, 28 January 2022 9:14:19 AM

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I am in favour of the increase of the cra8 of 5% to the TACC and support this decision of then

Sent from my iPhone

**From:** [Gordon Wardrop](#)  
**To:** [FMSubmissions](#)  
**Subject:** Review of sustainability measures – 2022 April round

Submission Form for April 2018 Sustainability Measures (mailto://stefan9640crauthvsystemy%2Eenv%2Egovt.nz)

Mail 4G 6:44 PM  
AA mpi.govt.nz

**Fisheries New Zealand**  
Tei a Tangaroa

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### Review of sustainability measures for 1 April 2022

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**Submitter details:**

Name of submitter or contact person: GORDON + SHARON WARDROP  
Organisation (if applicable): GT + SM WARDROP LTD. PIKO TRUST  
Email: [REDACTED]  
Fishstock(s) this submission refers to: CRA 8  
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with): OTHER

2/02/2022, 9:03

Submission Form for April 2018 Sustainability Measures (mailto://stefan9640crauthvsystemy%2Eenv%2Egovt.nz)

Mail 4G 6:44 PM  
A mpi.govt.nz

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**Submission:**

Details supporting your views:

Agree with MPI / Science 15% increase possible  
We believe therefore 11% very possible  
No evidence of increase in illegal or mortality due to fishing so 11% increase to TACC the sector that suffered the pain of quota cuts.

Yours Sincerely  
Gordon & Sharon Wardrop

2/02/2022, 9:03 pm





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### Submitter details:

**Name of submitter  
or contact person:** Terence Brocx

**Organisation (if applicable):** Northland  
Resident

**Email:**

**Fishstock(s) this submission refers to:**  
*Rock Lobster CRA 1*

**Your preferred option as detailed in the  
discussion paper 1.3**  
(write "other" if you do not agree with  
any of the options presented):

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

**Details supporting your views:**

Firstly thank you for allowing submissions.

I support 1.3 to reinstate bio mass. - CRA1

Of note is the estimated Commercial illegal catch of 35t vs allowable recreational catch of 32 t. This needs to be addressed through better enforcement.

I do not support current or proposed Maori allowances. These should be equal to all.

I think the social and economic benefit of recreational fishing is underestimated and should be revisited.

I agree with Maori Forums in Te Hiku and Mid North.

I note the extra abundance of crayfish post covid due to the commercial boat not working as much.

Commercial fishers should replenish the fishery as they are profiting from a National resource.

I would like to see some improvements made to the options.

Packhorse Crayfish

The limit should be set at two/person. I say this as North Cape is an area that has spectacular diving and population of Pack horse crayfish. Yet I hear regular stories of boats coming back with 6/person. This is pure greed.

Daily Limit

This should be shifted to a weekly limit. Fishers should register their catch via an APP before returning to shore. This would be easy to enforce.

I hear stories of Local fishers catching their daily limit every day. Six Packhorse Crayfish every day continually is not acceptable. These are clearly being sold.

I would like to discuss my submission verbally. Particularly my point about registering daily catches via an APP.

Thank you for your time and my children depend on the decisions that you make.

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Hello. My name is Jack Worthington, I'm a local fisherman/free-diver in the Bay of Islands area, based in Russell. I have been fishing the area for over 10 years and witnessed first hand the decline of certain species, namely the species in question; crayfish, scallops and wreckfish. I, along with many other local anglers agree that the stocks of these species are getting lower and lower each year.

Legal crayfish have all but vanished from the inner bay, scallops are in even worse shape. I believe it's imperative for the commercial and recreational take for crayfish to be lowered in this area. Scallops should be under a total ban for a few years, and dredging must be banned as it is proven to do long term damage to the beds.

Hapuku, Bass and Bluenose no longer populate the reefs they thrived at 10 and even 5 years ago. Their numbers have dramatically reduced, one must travel much further to find them now. This could be due to an increase in recreational pressure and improvements in trailer boats over the years.

I believe take for wreck-fish should be reduced, maybe with a temporary total ban on deep-dropping within a small zone along the outskirts of the bay, just to allow these fish to recover where they used to thrive. Reducing commercial take in the area would also be beneficial.

Let me know what you think of these proposals.

Thanks,  
Jack.



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## Review of sustainability measures for 1 April 2022

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

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

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### Submissions must be received no later than 5pm on Tuesday 8 February 2022.

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### Submitter details:

**Name of submitter  
or contact person:** Tom Webb

**Organisation (if applicable):**

**Email:**

**Fishstock(s) this submission refers to:**

Rock lobster CRA-1

Scallops SCA-1

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

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

Rock Lobster CRA-1 – I support **OPTION 1.4**

Scallops – SCA-1 – I support **OPTION 2** but with the  
**implementation of a mataitai reserve under Kaimoana  
Regulations rather than using a Section 11 closure.**

### Official Information Act 1982

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

**Details supporting your views:**

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**Submitter details:****Name of submitter****or contact person:** Kim Jones**Organisation (if applicable):****Email:****Fishstock(s) this submission refers to:**

Review of Sustainability Measures for New Zealand scallops (SCA 1 & SCA CS) for 2022/23 Fisheries NZ Discussion Paper No: 2021/30 ISBN No: 978-1-99-101997-4 (online) ISSN No: 2624-0165 (online)

Review of Rock Lobster Sustainability Measures for 2022/23 Proposal to Alter Total Allowable Catches, Allowances, and Total Allowable Commercial Catches Fisheries New Zealand Discussion Paper No: 2021/27

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

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

**Option One** (Review of Sustainability Measures for New Zealand scallops (SCA 1 & SCA CS) for 2022/23 Fisheries NZ Discussion Paper No: 2021/30 ISBN No: 978-1-99-101997-4 (online) ISSN No: 2624-0165 (online))

**Option 1.4** (Review of Rock Lobster Sustainability Measures for 2022/23 Proposal to Alter Total Allowable Catches, Allowances, and Total Allowable Commercial Catches Fisheries New Zealand Discussion Paper No: 2021/27





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

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

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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.



## **In relation to the Scallop (SCA 1) fishery:**

I was born and bred in Northland. As a keen diver and Ecologist that lives and work in Northland (and enjoys eating Scallops!) I have physically seen the decline in this fishery within the Whangarei Harbour, Bream Bay, Smugglers Cove, Great Barrier Island, Bay of Islands, Cavalli Islands, Whangaroa Harbour and Little Barrier Island/Hauturu. After seeing this dramatic decline through my own eyes I believe that a full closure, including banning of both commercial and recreational dredging, is required to let the fishery recover. We cannot go on destroying the habitat and taking from a fishery that is under so much pressure. The scientific evidence presented through the discussion document backs this up. I am more than happy to sacrifice eating Scallops today to ensure that future generations have the chance to do so sustainably and know that we did our job as guardians of the resource.

## **In relation to the Rock Lobster fishery:**

I was born and bred in Northland. As a keen diver and Ecologist that lives and work in Northland (and enjoys eating Crayfish!) and past coordinator of the Experiencing Marine Reserves (EMR) programme, I have physically seen the decline in this fishery around New Zealand. After seeing this dramatic decline through my own eyes, and understanding the importance of this species and all of the factors affecting their decline, including the fact that they have become functionally extinct in the Hauraki Gulf, I believe that Option 1.4 would allow for the best chance for this species to recover to a level that would allow sustainable take. We cannot go on taking so much from a fishery that is under so much pressure. The scientific evidence presented through the discussion document backs this up. I am more than happy to sacrifice eating Rock Lobster today to ensure that future generations have the chance to do so sustainably and know that we did our job as guardians of the resource.



**Fisheries New Zealand**

Tini a Tangaroa

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Please continue on a separate sheet if required.





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### Submitter details:

**Name of submitter**

**or contact person:** Blair Jones

**Organisation (if applicable):**

**Email:**

**Fishstock(s) this submission refers to:**

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**Option 1.4** (Review of Rock Lobster Sustainability Measures for 2022/23 Proposal to Alter Total Allowable Catches, Allowances, and Total Allowable Commercial Catches Fisheries New Zealand Discussion Paper No: 2021/27)





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

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

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## **In relation to the Scallop (SCA 1) fishery:**

As a keen diver that lives and work in Northland (and enjoys eating Scallops!) I have physically seen the decline in this fishery within the Whangarei Harbour, Bream Bay, Smugglers Cove, Great Barrier Island, Bay of Islands, Cavalli Islands, Whangaroa Harbour, Little Barrier Island/Hauturu. After seeing the dramatic decline I believe that a full closure, including banning of both commercial and recreational dredging, is required to let the fishery recover. We cannot go on destroying the habitat and taking from a fishery that is under so much pressure. The scientific evidence presented through the discussion document backs this up. I am more than happy to sacrifice eating Scallops today to ensure that future generations have the chance to do so sustainably and know that we did our job as guardians of the resource.

## **In relation to the Rock Lobster fishery:**

As a keen diver that lives and works in Northland (and enjoys eating Crayfish!), I have physically seen the decline in this fishery around New Zealand. After seeing this dramatic decline through my own eyes, and understanding the importance of this species and all of the factors affecting their decline, including the fact that they have become functionally extinct in the Hauraki Gulf, I believe that Option 1.4 would allow for the best chance for this species to recover to a level that would allow sustainable take. We cannot go on taking so much from a fishery that is under so much pressure. The scientific evidence presented through the discussion document backs this up. I am more than happy to sacrifice eating Rock Lobster today to ensure that future generations have the chance to do so sustainably and know that we did our job as guardians of the resource.



**Fisheries New Zealand**

Tini a Tangaroa

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Please continue on a separate sheet if required.





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**Submitter details:**

<b>Name of submitter or contact person:</b>	Ross Scobie
<b>Organisation (if applicable):</b>	n/a
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	Rosk Lobster CRA 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 1.4

**Official Information Act 1982**

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

### Details supporting your views:

I have been diving throughout the northland area for almost 40 years. I this time I have seen the esae of finding crayfish significantly decline. Our family has enjoyed access to the resource over the years but I believe we have the responsibility to ensure that this resource is available for future generations. Consequently I support Option 1.4 which give the greatest probability of sustainability of the fishery.

For the recreational fishery I support a reduction in the maximum daily catch for crayfish. Over the last 40 years I have seen a large increase in boating and diving in the more remote areas of Northland largely due to more pleasure boats and more powerful boats. With more people taking crayfish it is reasonable that the amount each can take is reduced to ensure the resource is maintained for future generations

Please continue on a separate sheet if required.

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This submission specifically addresses the proposals for the Northland rock lobster fishery (CRA 1), as set out in Fisheries New Zealand Discussion Paper for Rock Lobster.

I am alarmed at the depleted biomass levels of CRA 1. Available information suggests Koura have been removed from most shallow reefs in Northland, and the implications for the stock and rocky reef ecosystems are significant. An urgent and careful management approach is required to support the recovery of the stock.

Please remove Option 1.1 from ministerial consideration because it is not sufficiently cautious to protect the stock from further decline in the context of considerable scientific uncertainty.

I support the need to reduce the current catch limits and allowances in CRA 1 (as is generally proposed by Options 1.2 to 1.4), but consider the proposals do not go far enough to protect the stock from further decline; to restore the stock to sustainable levels; or to address the cumulative effects of Koura harvest on the marine environment.

Please:

1. Create permanent restrictions on the maximum size of male and female Koura that can be harvested in CRA 1;
2. Prohibit the commercial and recreational harvest of Koura within the 15-metre depth limit in CRA 1 ("the urchin barrens zone");
3. Development an ecosystem-based management target for CRA 1 that includes consideration of the distinct context and vulnerability of rocky reef ecosystems in Northland to fishing-induced trophic cascades;
4. Develop an ecosystem-based monitoring plan to enable the status of kelp forest habitat to be tracked through time;

Cheers

Shaun



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**Submitter details:**

**Name of submitter  
or contact person:** Andrew Dean

**Organisation (if applicable):**

**Email:**

**Fishstock(s) this submission refers to:**

Rock lobster – CRA 1  
Northland and Wellington/Hawke's Bay

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

Option 1.4

**Official Information Act 1982**

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

**Details supporting your views:**

My diving experience indicates significant decline in abundance of rock lobster around the Bay of Islands and Whangaruru coastlines over the past 5-10 years. These are the same reefs and areas my family members have been diving for 40 years.

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**Fisheries New Zealand**

Tini a Tangaroa

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**Submitter details:**

**Name of submitter or contact person:** Dyne Hemara

**Organisation (if applicable):**

**Email:**

**Fishstock(s) this submission refers to:**

CRA 1, SCA 1, SCAC

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

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

CRA 1 - Option 1

SCA 1 - Option 1

SCAC - Option 1

**Official Information Act 1982**

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

**Details supporting your views:**

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... I support option 1.1 Status quo. Cra1 has only just had a TACC reduction as of the 2020 season. But the recreational sector didn't. The fish that have been left in the water by commercial fishers in CRA1 are now being taken by the recreational sector so the fishery isn't making the rebuild that it might have if the cut was even between both sectors. The main take by recreational fishers is on the east coast of CRA1 which is now hardly fished by commercial. The areas from the Three Kings to the Hokianga on the west coast have a very abundant fishery and its growing each year since the cut in 2020. It shows how a fishery can grow and prosper when there is a lack of recreational pressure, as does CRA8 year after year.

So again the CRA1 TACC should stay as Status Quo. Option 1.1 Nat Davey