



## **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 4 of 4:** Hapuku/ bass and multi stocks

Individuals and organisations who responded to proposed changes to hapuku/ bass (HPB 7 & 8) and Individuals who responded to proposed changes on multiple stocks.

Hapuku/bass and multi stocks	stocks
Immersion Fishing	HPB 7 & 8
Ngati Toa and Ngati Koata Iwi	HPB 7 & 8
Tierney Partnership Ltd	HPB 7 & 8
New Plymouth Sport fishing and Underwater club	HPB 7 & 8
Raglan Sport Fishing Club	HPB 7 & 8
Westfleet	HBP 7
Fish4Us	HPB 7 & 8
Cape Egmont Boat Club	HPB 8
Luke Williamson	CRA 1, 7 & 8, SCA 1 & CS, HPB 7 & 8
Andrew Caldwell-Smith	CRA 1, 7 & 8, SCA 1 & CS, HPB 7 & 8
Nadia Pavlovich	CRA 1, 7 & 8, SCA 1 & CS, HPB 7 & 8
Vicky Pavlovich	CRA 1, 7 & 8, SCA 1 & CS, HPB 7 & 8
Justin Caldwell-Smith	CRA 1, 7 & 8, SCA 1 & CS, HPB 7 & 8
Dino Pavlovich	CRA 1, 7 & 8, SCA 1 & CS, HPB 7 & 8
Richard Potter	CRA 1, 7 & 8, SCA 1 & CS, HPB 7 & 8, RBT 7, SBW 6B
Karen Wealleans	CRA 1, 7 & 8, SCA 1 & CS, HPB 7 & 8, RBT 7, SBW 6B
Tim Hewitt	HPB 7 & 8
Brendan Tierney	HPB 7 & 8
Pat Adams	HPB 8

# IMERSION FISHING Ltd



P O Box 536 Picton

Ph

E-Mail

Vessel Registration 900727

Quota Registration No 9791515

Imersion Fishing is a shareholder and ace holder of HPB in stat areas 7, 2 and 8

I have caught all of my quota and ace in these areas and more in the last decade and longer

I am a licensed fish receiver that has built a factory to process my catch and a shop to retail direct as quality and affordability are major issues for wet fish in New Zealand

The chosen method of fishing is Dann lines as restricting the amount of hooks deployed reduces by catch to 10% of target species also the most effective way to catch HPB with no risk to sea bird species due to rate of fall during deployment exceeding MPI requirements

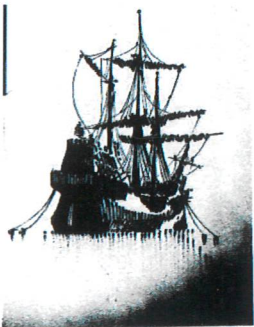
The current government claims that the economic impact of reductions in HPB quota is minimal as tacc levels in many areas are annually uncaught – the proposed reductions for me mean every day I go to work to pay a mortgage on quota that no longer exists a factory that is closed because there is no ace available and a shop that is empty as a result

My vessel has been fully surveyed and audited – insured for the last 18 years at a cost of 1 million dollars there is no offer of compensation for quota repealed or following compliance cost imposed by law in order to operate and I face a life time of financial ruin for recording all of my catch and declaring my income

The Government states that catches on paper have declined in the last decade due to sustainability issues The increase in compliance costs have out stripped any return available and most fisherman have left the industry due to age and too much financial risk given the percentage of investment required to operate

Has the crown identified the uncaught sector of quota and the circumstances surrounding this??

Why should active and involved share holders be punished with such severe reductions when we are catching all of our quota and additional ace ??



The science and data available is poor and does not meet the legal requirements to evoke such severe reductions

The recreational catch is underestimated with absolutely no form of reporting required

HPB 1 and 2 have 70% reductions for commercial yet the amateur sector has no adjustment to daily bag limits which is unethical and predigest so stock sustainability cannot be the issue

It is acceptable to favor caution in relation to tacc levels for natural resources but to ignore available data and effort in innovation undertaken by operations committed to industry long term is extremely frustrating

The level of investment and commitment to follow regulations of industry are not reflected in any way in this country and there are simply too many factors affecting the possibility of making a correct decision in the setting of tacc levels for many stocks due to the lack of serious consultation with invested industry members and this needs urgent address in New Zealand

HPB 3 has an achievable tacc with set nets as the preferred method of fishing - is the message adopt set nets and achieve the tacc for all areas in order to retain our shareholding and available ACE?

Harvest strategies utilizing all three stat areas 2, 7 and 8 in order to spread the effort and manage the annual migration of HPB have been ignored and given no consideration for the innovation and extra cost incurred to operate in this fashion that is focused on sustainability and reducing by-catch.

This government has taken a one hundred year old fishing method and ethical approach to harvesting a natural resource and thrown it in the trash.

Restaurants and retail outlets are complaining about the quality of wet fish in New Zealand resulting in the dumping of many products – availability is random and this is a reflection of the harvest strategies undertaken because of a low port price to fishermen.

Top chefs have chosen to remove fish from the menu rather than run the risk of damaging the reputation they have worked so hard to achieve and maintain.

The low port price results in a reduced or no effort and as a result large amounts of ACE is uncaught by the bigger Entities in the industry annually.

This is what has alerted the Government to a decline in landings of many species on paper.

The consideration of compensation for active fishing operations who meet the criteria by catching their entire quota and ACE annually needs to be addressed. Annual loss of income and assets such as plant and equipment that are now Redundant as a result of the decision rule to reduce HPB quota is a legal matter with merit.

Fisheries Act 50G Compensation for Reduction of Quota Repealed.

Imersion Fishing

“The Puka Store”

FV Lionheart

Troy Smith





# Submission Form

## Review of sustainability measures for 1 April 2022

**Once you have completed this form**

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

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

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

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

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 Hori (George) Turi Elkington  
or contact person:

Organisation (if applicable):

Ngati Toa and Ngati Koata Iwi

Email:

Fishstock(s) this submission refers to:

HPB 7 and HPB 8

Your preferred option as detailed in the  
discussion paper

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

Other

**Official Information Act 1982**

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



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

**Executive Summary:**

This submission presents the following:

1. That the recreational daily bag limit in HPB 2, HPB 7 and HPB 8 be reduced to one HPB per person per day.
2. That the recreational sector report landings for HPB 2, HPB 7 and HPB 8.
3. That Iwi will report Customary landings when recreational landings are reported.
4. That the proposed HPB 7 and HPB 8 ACE (or equivalent) review goes back to Iwi Forums for further consultation.
5. That the methodology of setting HPB 7 and HPB 8 ACE (or equivalent), be reviewed as suggested in this submission.

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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.



## Details supporting your views:

### Introduction:

My name is Hori Turi Elkington

I whakapapa to all of the waka of the migration.

For this submission my Iwi include but is not limited to Ngati Toarangatira, Ngati Koata, Te Atiawa and Ngai Tahu.

For this submission I represent Ngati Toarangatira and Ngati Koata Iwi and I am a representative for Ngati Toarangatira on Te Taihu Iwi Forum and Te Waka a Maui me Ona Toka Iwi Forum.

This submission may represent Te Taihu Forum subject to approval at the next Forum meeting.

I am currently the Deputy Chair for Te Taihu Forum.

I am a Customary Fisheries Kaitiaki for both Ngati Toarangatira and Ngati Koata Iwi.

I hold the commercial fishing qualification "Mate of a Deep Sea Fishing Boat", which lets me skipper a fishing boat up to 200 miles off the Coast of New Zealand and be a Mate anywhere in the world.

I hold the engineer qualification "2<sup>nd</sup> Class Diesel Trawler Engineer" which means that I can fill both roles of skipper and engineer.

### Hapuku Fishing Families at Risk:

1. I support some non-Iwi fishing families who like my family have fished HPB 2, HPB 7 and HPB 8 for generations and they and their mokopuna like myself, are sadly facing exclusion from the industry possibly forever.
2. These families are at risk of extinction/elimination as participants in the industry if policymakers do not consider them and their contribution to be of special value to the fishery.
3. In fact they may well be at more at risk taonga than the species that we are trying to protect.
4. Ngati Toarangatira and Ngati Koata have fished the Hapuku fishery in the areas referred to as HPB 2, HPB 7 and HPB 8 for 200 years.
5. I personally have been fishing areas HPB 2, and HPB 8 for over 40 years and HPB 7 for over 60 years.
6. We own two Vessels, both were registered commercial fishing vessels up until 2021.
7. When these vessels registration expired, I didn't renew them, primarily because I don't want to get caught by recreational fishers working other Iwi grounds and they like previous ones get slaughtered too.
8. For the same reason, I haven't commercially fished Hapuku since 2013, nearly a decade ago.

### Hapuku is a taonga species.

9. Hapuku is a tapu (sacred) species to Maori and traditional protocols (tikanga/kawa) apply when fishing them.
10. We still practice the same respect for these taonga as taught by our old people who have "farmed" these taonga for hundreds and perhaps thousands of years.
11. It has been said that my grandfather John or Ratapu Elkington knew all of the Hapuku grounds from Cape Farewell Spit to Cape Taranaki in waiata form.
12. Grandfather Ratapu and his generation taught my father and uncles the traditional Hapuku fishing grounds and associated tikanga/kawa or how to "farm or preserve" these grounds and our father/uncles taught us.





13. Examples of tikanga/kawa include but are not limited to; never processing Hapuku on the grounds, systematically rotating fishing the grounds, resting the grounds, seasonal fishing and the like.
14. So highly respected is the tikanga/kawa for Hapuku that if Hapuku bled on the ground grandfather Ratapu would leave saying that it will bring predators and the Hapuku will leave the grounds.
15. We still practice these values today by putting Hapuku into watertight bins that do not leak.
16. For us (Maori) brought up this way, it is sad to see recreational fishers process Hapuku on the grounds and the heads, frames and offal discarded on the grounds.

## **Iwi Hapuku Grounds.**

17. For the purpose of this submission I shall refer to both traditional grounds and grounds that I personally have found as iwi Hapuku grounds because we "farmed" these grounds.
18. Over the past 25 years, six iwi Hapuku fishing grounds mainly in HPB 2 and HPB 8 have been cleaned out by recreational fishers.
19. I have counted 26 recreational boats fishing iwi grounds at the same time, with additional boats coming and going.
20. If each of these 26 boats has an average of three fishers and they catch their daily limit, (which is easily done on "farmed" grounds, at least initially), 390 Hapuku are taken each day.
21. This is slaughter, the Hapuku fishery cannot sustain this kind of disrespect.
22. Our charter vessels, which in practice are iwi vessels, have had a self imposed daily bag limit of one Hapuku per person per day for nearly 20 years.
23. This is a type of "farming," our clients respect, appreciate and support us for our values.
24. We are the only iwi charter fishing vessel operating out of Wellington and Porirua.
25. From my experience in the HPB 2, HPB 7 and HPB 8 fisheries, I do not believe that the fishery can sustain a recreational daily bag limit of 2 Hapuku per person.
26. We operate two charter vessels and for the last 5 years we have found that six Hapuku along with a mixed bag of other species, Trevally, Blue Cod, Snapper, Tarakihi, Kahawai, Kingfish and the like, results in a very happy day for 12 or more clients.

## **Daily Recreational Bag Limit.**

27. As a fisher in all four sectors, ie. commercial, recreational, charter, and customary, and a kaitiaki on both sides of Raukawa Moana (Cook Strait), I recommend that the daily bag limit in areas HPB 2, HPB 7 and HPB 8 be reduced to 1 HPB per person until the recreational sector reports landings, and such landings contribute to reputable decisions.
28. For over 20 years, I have been requesting in different iwi/ministry forums that the ministry reduce the HPB daily bag limit and I keep hearing that it's too difficult to do.
29. The ministry deserves applause for the proposed reduction in the daily bag limit, thank you. However, 2 Hapuku per person per day is still too generous, given the stressed state of the HPB fishery.
30. Therefore, I recommend that the ministry follow the Iwi Forum (representing all Iwi in the South Island) advice that for area's HPB 2, HPB 7 and HPB 8 the recreational daily bag limit be reduced to 1 Hapuku per person per day.
31. And that this daily bag limit apply until science, contributed to by the recreational fishery in the form of reporting, verifies that the fishery has recovered to the extent that a daily bag limit of 2 is sustainable.





32. The draft minutes of the Te Waka a Maui me Ona Toka Forum meeting of the 10<sup>th</sup> and 11<sup>th</sup> November under the heading "April 2022 Sustainability Round" bullet point 4 states; " HPB – Recreational take should be seriously reduced – maybe to 1 per day. Forum is very concerned about this stock. Recreational reporting should also be included.
33. As per Clause 59 of the Review of Sustainability Measures for Hapuku and Bass (HPB7 & HPB8) for 2022/23, Fisheries NZ Discussion Paper No: 2021/26; the Forum expressed support for a decrease to the TACC and a recreational daily bag limit of one HPB per fisher.
34. It may be more correct to word the above statement to say "the Forum discussed at length and agreed that the recreational daily bag limit be set at 1 HPB per person per day".
35. I have recommended that the draft minutes be amended to delete the word "maybe".
36. The question is, "why did the ministry consult with Te Tiriti partner representatives and then not only ignore the advice given, but recommend double the daily bag limit advised by their partner".
37. The Crowns partner and only partner says, "set the recreational daily bag limit for HPB 7 and HPB 8 at one Hapuku per day for 2022/23".
38. Accordingly, amend Clauses 76 – 78 and other relevant clauses of the document "Review of Sustainability Measures for Hapuku and Bass (HPB 7 & HPB 8) for 2022/23"; Fisheries NZ Discussion Paper No: 2021/26.

## **Hapuku/Blue Cod Comparison:**

39. Our ringawera (kitchen crew), based on many years of experience, can feed 500 guests with 5 Hapuku or equivalent ratios, and can likewise feed 100 guests with 1 Hapuku.
40. Referring to Clause 73 of "Review of Sustainability Measures for Hapuku and Bass (HPB 7 & HPB 8) for 2022/23" or Fisheries NZ Discussion Paper No: 2021/26, a reason why little information on customary Hapuku reporting is available, is that a customary permit has not been required because the recreational daily bag limit more than adequately provides.
41. Comparatively speaking, we cannot feed 100 guests with 2 Blue Cod, we wouldn't even try to.
42. In most cases, one Hapuku will provide more green weight than 2 Blue Cod will.
43. When the Blue Cod recreational daily bag limit reduced to 2 per day in the Challenger East Area, which includes Marlborough Sounds, Maori and the recreational sector adjusted accordingly.
44. Will we get a different reaction if the daily bag limit for Hapuku reduces to 1 per person per day?
45. Not if consulted and explained properly, including advice that for hui and tangi, kaitiaki may issue a customary permit and all can be treated the same as Maori on such sacred occasions.

## **Te Tiriti:**

46. Race Relations Commissioner Meng Foon wrote to Minister Chris Hipkins, and party leaders in 2021. In the letter Foon made it clear that Te Tiriti responsibilities require the protection of taonga Maori. Most correctly, his letter specifically focussed on te reo as a taonga Maori, which is brilliant.
47. Bouncing off of the vision of Meng Foon, this submission promotes Hapuku as a taonga Maori protected under Te Tiriti.
48. We support Te Tiriti and the Race Relations Commissioners vision and values.
49. My brothers and I have over 200 years accumulated experience of fishing Hapuku and Blue Cod, we agree that both fisheries are under stress but the Hapuku fishery is in a more serious state of decline than the Blue Cod fishery is.





50. We therefore call for the ministry to follow the recommendation of iwi fisheries Forums as the voice of Te Tiriti partner and to reduce the recreational bag limit to 1 Hapuku per day in areas HPB2, HPB 7, and HPB 8 for 2022/23.

## **Recreational Reporting:**

51. As mentioned, I am a representative of Te Waka a Maui me Ona Toka Forum and Te Taihū Forum. These Forums represent all tangatawhenua in the South Island and furthermore, Ngāti Toarangatira traditional rohe included from Wellington to the Whangaehu river in the Central North island.
52. Both Forums recommend reporting of recreation catch, in order to give credibility to fisheries decisions.
53. On the same grounds and for the same purpose Iwi are willing to report customary take when the recreation sector starts reporting.
54. For quality decision making and equality for all fishing sectors, it is time to move forward with all fishery sectors reporting.

## **Decline in commercial landings:**

55. Congratulations to the ministry for the evidence provided in the document "Review of Sustainability Measures for Hapuku and Bass (HPB 7 & HPB 8) for 2022/23". "Fisheries NZ Discussion Paper No: 2021/26" which I shall refer to from now on as the "Discussion Paper"
56. The decline in commercial landings is significantly due to but not limited to the following;
1. A decline in commercial fishers participating in the HPB2, HPB7 and HPB8 fishery.
  2. Port price.
  3. Compliance and regulation.

## **A decline in commercial fishers.**

57. Clause 36 of the "Discussion Paper" states "the downward trend in landings could be driven by decreased effort by commercial fishers targeting hapuku and bass". The clause concludes with, "The number of hooks set in fishing events where hapuku and bass were caught and recorded as the target species has also decreased over the same time period, from approximately 500,000 to 35,000 (figure 4)".
58. The number of hooks reducing from 500,000 to 35,000, be it approximate or otherwise, is significant.
59. Traditional fishers, like myself, have obviously left the industry.

## **Port Price.**

60. Clause 35 of the "Discussion Document" states, "The port price for HPB 7 has fluctuated between \$3.30 and \$4.50 over the past decade. The clause goes on to say... "indicating that the port prices are unlikely to be contributing to the decline in landings. I have a different view and shall comment later.
61. Similarly Clause 39 states "The port price paid for HPB 8 has fluctuated between \$4 and \$6 for the past decade reaching a high of \$6.32 in the 2020/21 fishing year.
62. The above port prices for a prime species such as HPB are criminal when compared with the retail price.
63. No wonder fishers are exiting the fishery. Between the port and the retailer someone is making an incredible margin.





64. In 2013 when I exited the fishery, the port price that I was getting for HPB green (not headed or gutted) was \$8.00/kg, my fish was iced and flown to the Sydney Fish Market and we all made a profit.
65. Contrary to the end of Clause 35 as mentioned above, port price contributes significantly to the decline in landings. I wouldn't bother putting to sea for the port prices quoted in Clause 35 and 39.
66. I refer to the second paragraph in Kevin Tierny's submission as follows:
67. "We bring our daily catch to Wellington where it is sold, often to a niche market. This reflects on the price we receive for our fish, at present \$14.50/kg, nearly 3 times more than other ports where the big-name fish entities control prices".
68. Kevin and his son Brendan are 4<sup>th</sup> and 5<sup>th</sup> generation HPB fishermen, they are the last commercial Set/Dahn line HPB fishermen operating out of Porirua Harbour.
69. They are a rare and endangered species and they could go like all the others, if port price is dictated to them because they have to lease ACE from the big companies and on-sell to them at their prices.
70. I note that in the 4<sup>th</sup> paragraph of Kevins submission he says, "The October 2021 HPB 2 quota reduction of 70% without our knowledge or input reduced our HPB ACE of 2095kg down to 630kg".
71. Unless we review the methodology of ACE settings this fishery will become another Dinosaur.

## **Compliance and Regulation:**

72. In short, regulation is as equally a significant reason for my exit from the HPB fishery.
73. We support wise regulation, we call it tikanga/kawa. Maori tikanga/kawa/regulation, has been tried and tested for hundreds, perhaps thousands of years and we maintained a thriving HPB fishery under our management.
74. We appreciate the progress the ministry is making in the journey to include Te Tiriti partner in management decisions.
75. On this journey, it is noted that as per clause 9 of the "Discussion Paper" that changes to catch settings will come into effect on 1 October 2022.
76. This should allow reasonable time so that Te Tiriti partner can respectfully and equally be further included in decision making on catch settings and that such be set with wisdom, and with consideration for the small independent fisherman.

## **Review the methodology of ACE Settings:**

77. A review of the ACE setting methodology is timely for a number of reasons, including but not limited to the following:
1. When landings fall short of allowable settings we conclude that the fishery is under stress.
  2. When we cut allowable settings we risk penalising those remaining in the fishery.
  3. It's easier to blame the commercial sector for everything that goes wrong.
  4. We manage the fishery with only one measurable (commercial), all other sectors are estimates.

## **When landings fall short of allowable settings we conclude that the fishery is under stress**

78. I refer to clause 36 of the "Discussion Paper", and ask the question, how do we provision for a decrease from 500,000 hooks to 35,000 hooks in the way we calculate landings against allowable settings.



- 79. If there is no provision, we have a flawed methodology.
- 80. If there is a flawed methodology we get exits from the fishery.
- 81. We have exits from the fishery.

**When we cut the allowable settings we risk penalising those remaining in the fishery**

- 82. We use a type of blanket applies to everyone methodology, ie if landings are down, everyone pays.
- 83. This means that those in the fishery, for the illustration of this principle, pay in the form of an ACE cut, equivalent to those who hold ACE but don't catch it. For the time-being I am one of those.
- 84. It may be respectfully better to find a way to measure a species health according to landings from those remaining in the fishery, relative to the ACE they hold and past years landings, especially long term participants, and then make adjustments accordingly.

**It's easier to blame the commercial sector for everything that goes wrong.**

- 85. The commercial sector has it's rogues but the industry unfairly carries the stigma of the behavior of a very small minority.
- 86. The industry has some of the most trustworthy and honest collectives that can be found in any industry or profession.
- 87. At sea we have to rely upon honesty, integrity, dependability and the like, that has never changed and it will never change.
- 88. The industry has intergenerational relationships based on trust, grandfathers, fathers, our generation, and now our son's generation trust each other unquestionably.
- 89. All sectors in the fishery have equal responsibility and accountability for the health of the fishery.

**We manage the fishery with only one measurable (commercial), all other sectors are estimates.**

- 90. This point is addressed elsewhere in this submission.
- 91. Iwi are generally prepared to report when the recreational sector reports, charter boats are reporting some specific landings, HPB is one of them.
- 92. This submission wants HPB landings to be reported by all sectors in the HPB 2, HPB 7 and HPB 8 fishery for starters and other species can follow.

**Summary:**

- 1. The recreational daily bag limit in HPB 2, HPB 7 and HPB 8 be set at 1 per person per day.
- 2. The recreational sector report HPB landings in areas HPB 2, HPB 7, and HPB 8.
- 3. The proposed ACE settings include further consultation and consideration as proposed in this submission and other submissions.





**Fisheries New Zealand**

Tini a Tangaroa



Please continue on a separate sheet if required.

**Name of Submitter:** Kevin Tierney

Kevin Ruston Tierney, Leigh Anne Tierney, Brendon Mark Tierney

(Next Generation Trust) QRN 9792804

Vessel Registration 44452

**Email:**

### **SUBMISSION FORM:**

## **REVIEW OF SUSTAINABILITY MEASURES FOR 1 APRIL 2022 HPB 7 & HPB 8**

### **Intro and Background**

My name is Kevin Tierney, I am a 4<sup>th</sup> generation fisherman and my son Brendan who fishes with me is 5<sup>th</sup> generation. My family have been pioneers in the fishing industry since 1894 when my Great Grandfather and family commercially fished with set lines for hapuka in the Cook Strait waters, which would now be classed as Areas 2,7,8. I myself have fished for 55 years firstly with my father Carol (over 60 years fishing), and later with Brendan (20 years fishing) in QMA areas 2,7,8. The sea is our calling and in our blood. Brendan and I fish setlines/Dahn lines from our 12m boat, Kelly Jean, out of Paremata Harbour.

We bring our daily catches to Wellington where it is sold, often pre sold to a niche market. This reflects on the price we receive for our fish, at present \$14.50 kg, nearly 3 times more than other ports where the big-name fish entities control the prices.

Since my son Brendan has fished with me our focus has been on balancing the conservation of our fish stock purely from our own perspective, without any outside pressure or influence, to cover costs and a small wage. We have decreased the number of hooks used, decreased our days and rotated our fishing spots. Unfortunately, we are just one small cog in the wheel and our efforts show nothing in the big picture of things.

Our entire quota or ACE is for HPB 2,7,8 and SCH 2,7,8. The October 2021 HPB 2 Quota reduction of 70% without any notification, knowledge or input reduced our HPB Ace of 2095kg down to 630kg. With the conversion factor of 1.45 headed and gutted now leaves us with a total of 434.48 kg of fish. To callously say '*a fisher dependent on the revenue from their current catch levels generated by their quota package may need to source new ACE to maintain their current throughput*' shows a total lack of understanding of ACE and the availability to the small independent fisherman.

2.

We consistently catch and have to lease in more quota for Areas 2,7,8 but now that quota for Area 2 is literally as scarce as hen's teeth and prohibitive in price making it totally uneconomical and viable. As a small concern we have expenses of specifically a loan for our new engine, high diesel prices, costs of surveys, boat and equipment failure and replacement and of course levies.

### **In Answer to Your Summary**

There are 48 owners of HPB 7 and the majority is owned by 3 large companies, Sandford Ltd, Tallies Group Management, Westfleet Seafoods Ltd. In HPB 8 there are 39 ACE holders of which Talley and Ngai Tahu own the majority. This quota is generally used for by catch and though never all caught is extremely unlikely to be leased out to small concerns such as ourselves.

There are now only 2 full time independent fishermen reliant on HBP 2,7,8 and one is from Picton and the other being ourselves. Two others who own substantial rock lobster quota fish HPB 2,7 in their off season. The other fishermen who used to fish these waters have either retired or passed away and their quota is snatched up by the large companies when it comes onto the market.

### **Management Background**

The reduction in HPB 1,2 has been passed onto the commercial fisherman but I know that there has been no attempt to follow up lowering total daily catches from 5 down to 2 hapuka for the recreational fisherman. In the last 3 years specifically, we have seen the amount of pleasure crafts increase on the water 10 fold and we now have 6 charter boats alone that are based in Paremata taking anywhere between 5-15 people on any given day. That is potentially 25-75 groper taken from one boat. We forwent weekends on the water due to continual hounding from recreational boats who followed and fished on or on top of our gear, tangling and endangering, sometimes causing loss to our gear due to their total disregard of our fishing vessel. As you say, technological improvements in fishing gear and access to boats in general has allowed recreational fishers to access hapuka and bass in deep waters easily and in fact they target these species.

### **Options For Setting the TACC For HPB 7,8**

**I do not agree with either of these options** but would grudgingly accept the HPB 8 TACC Option 1, reduction from 80.1 T to 65 T. This is a more realistic option. At present we hold 9.5 T.

**I cannot accept either Option for setting the TACC for HPB 7** from 235.5 T down to 152.5 T as it is far too drastic. A 25% reduction would be acceptable to maintain a viable commercial catch, at present we hold 1.1 T.

### **OPPORTUNITY FOR A DIFFERENT PROPOSAL:**

**I would like to propose and see a Cook Strait Fishery for all HPB 2,7,8 that would have a boundary from Cape Palliser to the east of Wellington, across to Cape Campbell in the South Island, north to Stephens Island then east to Kapiti Island. This fishery would combine a HPB Area of 2,7,8 as a SPECIAL Cook Strait HPB QMA and leave it easily accessible to any plans, strategies, conservation, management, biological and environmental studies. The existing boundaries are far too expansive in area. QMA 2 extends from the south end of Mana Island to East Cape – Cape Runaway which is almost half the length of the North Island of NZ.**

These boundaries at present are totally ridiculous and on any given day we could be fishing in all these 3 Areas of 2,7,8.

If these 3 Areas were integrated together under one Area Cook Strait Fishery, the TACC and TAC could be given a reduction enabling a small business such as ourselves, a viable one plus a reduction to the recreational take of 5 groper per person down to 2 groper per person. Why do you not look at the whole picture instead of compartmentalising with 3 different areas when in effect this could be made into a single identity enabling easy, cost-effective workings without crisscrossing between the separate areas.

This is our business and way of life. We feel very strongly about it, and with your proposed reductions in these Areas we effectively lose our whole business and livelihood, owing loans, redundant plant and machinery and no likelihood of finding a similar specialized job on the water working for ourselves and family. As usual it is all about the big companies who can and do write this off while the small businesses, without **compensation** or **thought**, are left lost and dead in the water.

Kevin Tierney





# NEW PLYMOUTH SPORTFISHING & UNDERWATER CLUB (INC.)

P.O. Box 97  
NEW PLYMOUTH 4340  
PH  
Email : \_\_\_\_\_

8<sup>th</sup> February 2022

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

## **Submission: Review of Hāpuku and Bass (HPB 7 & 8) for 2022-23**

Having reviewed the consultation information, the New Plymouth Sportfishing and Underwater Club submits that the Hapuka Bass fishery is a highly valued but little known stock and must be treated accordingly.

We submit that better information be sought including a stock assessment and improved understanding of the fishery including general abundance and catch at age information.

Until that information is available, we propose that a conservative approach be taken. Once the fish stocks are better understood, we would strongly encourage updated controls and allowances – which may include increases, status quo or decreases in allowances, controls and allocations.

Our submission is focused on the long-term future and sustainability of this stock and wish to see this fishery around for generations to come.

Recreationally, we see few Hapuka or Bass caught inshore – our own club data from the weigh station show that fewer than 10 fish per annum is weighed despite numerous fishing competitions, and these are generally small fish (less than 10 kg).

Our Club members do make long range trips to the offshore fishery (including the Mokau and Southern Trenches) – but these trips are rare, expensive and attainable only by few – meaning that a majority of the Hapuka Bass fishery is not readily available to most recreational anglers.

Our detailed information is as follows:

1. **The Minister sets** a Total Allowable Catch (TAC) for HPB 7 & 8 for the first time, reduces the Total Allowable Commercial Catches (TACCs) applying in each area and sets aside sufficient allowances to provide for expected mortality from Māori customary and recreational fishing, and due to other fishing related mortality.
2. **The Minister makes precautionary decisions for HPB 7 & 8** by implementing the following package of measures:
  - a) Setting a TAC to enable hāpuku and bass stocks to rebuild to B50, a level consistent with 50% of the estimated unfished biomass.

- b) Setting a conservative TACC
- c) Removing hāpuku and bass from the combined recreational daily bag limit with kingfish.
- d) Reducing the recreational daily bag limit to 2 per person per day.
- e) Introducing an amateur accumulation limit of 4 per person for multi day trips.

**3. The Minister approve the following settings for HPB 7**

- a) The TAC is set at 129 tonnes.
- b) The TACC is set at 77 tonnes.
- c) The Minister sets aside an allowance for Māori customary fishing interests of 20 tonnes.
- d) The Minister sets aside an allowance for recreational fishing interests of 28 tonnes.
- e) The Minister sets aside an allowance for other fishing related mortality of 4 tonnes.

**4. The Minister approve the following settings for HPB 8**

- a) The TAC is set at 56 tonnes.
- b) The TACC is set at 38 tonnes.
- c) The Minister sets aside an allowance for Māori customary fishing interests of 8 tonnes.
- d) The Minister sets aside an allowance for recreational fishing interests of 8 tonnes.
- e) The Minister sets aside an allowance for other fishing related mortality of 2 tonnes.

**5. The Minister acknowledges** that TACC reductions will not be enough to rebuild depleted hāpuku and bass abundance, and that effort controls and some area closures will be required during the stock rebuilding period.

**6. The Minister prohibits** bottom fishing in the Cook Strait hāpuku spawning ground, an area south of Brothers Islands.

**7. The Minister requires** separate reporting for hāpuku and bass in commercial fisheries and recreational harvest surveys, and ensures this information is made available to all stakeholders in machine readable format, to enable effective stock monitoring in the future.

**8. Fisheries New Zealand develop** a method for monitoring changes in relative abundance and age structure of hāpuku and bass.

**9. The Minister reviews** HPB 7 & 8 within 3 years so management can be better informed by improved commercial catch reporting, abundance and catch at age information.

Thank you for the opportunity to provide a submission on this Fishery.

Regards,



Ian Steele  
New Plymouth Sportfishing and Underwater Club (President)

Bob Gutsell  
President  
NZ Sport Fishing Council  
PO Box 54242, The  
Marina, Half Moon Bay,  
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8 February 2022

## Submission: Review of Hāpuku and Bass (HPB 7 & 8) for 2022-23

### Recommendations

1. **The Minister sets** a Total Allowable Catch (TAC) for HPB 7 & 8 for the first time, reduces the Total Allowable Commercial Catches (TACCs) applying in each area and sets aside sufficient allowances to provide for expected mortality from Māori customary and recreational fishing, and due to other fishing related mortality.
2. **The Minister makes precautionary decisions for HPB 7 & 8** by implementing the following package of measures:
  - a. Setting a TAC to enable hāpuku and bass stocks to rebuild to B50, a level consistent with 50% of the estimated unfished biomass.
  - b. Setting a conservative TACC based on an average of the past 5 year's catches minus 25%.
  - c. Removing hāpuku and bass from the combined recreational daily bag limit with kingfish.
  - d. Reducing the recreational daily bag limit to 2 per person per day.
  - e. Introducing an amateur accumulation limit of 4 per person.
3. **The Minister approve** the following settings for HPB 7 –
  - a. The TAC is set at 129 tonnes.
  - b. The TACC is set at 77 tonnes.
  - c. The Minister sets aside an allowance for Māori customary fishing interests of 20 tonnes.
  - d. The Minister sets aside an allowance for recreational fishing interests of 28 tonnes.
  - e. The Minister sets aside an allowance for other fishing related mortality of 4 tonnes.



4. **The Minister** approve the following settings for HPB 8 –
  - a. The TAC is set at 56 tonnes.
  - b. The TACC is set at 38 tonnes.
  - c. The Minister sets aside an allowance for Māori customary fishing interests of 8 tonnes.
  - d. The Minister sets aside an allowance for recreational fishing interests of 8 tonnes.
  - e. The Minister sets aside an allowance for other fishing related mortality of 2 tonnes.
5. **The Minister acknowledges** that TACC reductions will not be enough to rebuild depleted hāpuku and bass abundance, and that effort controls and some area closures will be required during the stock rebuilding period.
6. **The Minister prohibits bottom fishing in the** Cook Strait hāpuku spawning ground, an area south of Brothers Islands.
7. **The Minister requires** separate reporting for hāpuku and bass in commercial fisheries and recreational harvest surveys, and ensures this information is made available to all stakeholders in machine readable format, to enable effective stock monitoring in the future.
8. **Fisheries New Zealand develop** a method for monitoring changes in relative abundance and age structure of hāpuku and bass.
9. **The Minister reviews** HPB 7 & 8 within 3 years so management can be better informed by improved commercial catch reporting, abundance and catch at age information.

## **The submitters**

10. The New Zealand Sport Fishing Council (NZSFC) appreciates the opportunity to submit on the review of hāpuku and bass (HPB 7 & 8) for 2022-23. Fisheries New Zealand's (FNZ) Discussion paper 2021/26 was received on 14 December 2021, with submissions due by 8 February 2022.
11. The NZ Sport Fishing Council is a recognised national sports organisation of 55 affiliated clubs with over 36,200 members nationwide. The Council has initiated LegaSea to generate widespread awareness and support for the need to restore abundance in our inshore marine environment. Also, to broaden NZSFC involvement in marine management advocacy, research, education and alignment on behalf of our members and LegaSea supporters. [legasea.co.nz](https://legasea.co.nz).
12. The NZSFC acknowledges that some affiliated clubs in the regions affected by this review will be making a separate submission to this collective effort.
13. The New Zealand Angling and Casting Association (NZACA) is the representative body for its 35 member clubs throughout the country. The Association promotes recreational fishing and the camaraderie of enjoying the activity with fellow fishers. The NZACA is committed to protecting fish stocks and representing its members' right to fish.
14. The New Zealand Underwater Association comprises three distinct user groups including Spearfishing NZ, affiliated scuba clubs throughout the country and Underwater Hockey NZ. Through our membership we are acutely aware that the depletion of inshore fish stocks has impacted on the marine environment and the wellbeing of many of our members.

15. Collectively we are '*the submitters*'. The joint submitters are committed to ensuring that sustainability measures and environmental management controls are designed and implemented to achieve the Purpose and Principles of the Fisheries Act 1996, including "maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations..." [s8(2)(a) Fisheries Act 1996].
16. Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this review and would like to be kept informed of future developments. Our contact is Helen Pastor,

## Background

17. There have been concerns about the depleted state of hāpuku stocks for many years. Significant changes were observed in the hāpuku fishery as commercial fishing activity grew in the early 1930s. Issues of concern even in those early days of fishery development were the diminishing numbers of groper in most accessible inshore areas and a decline in their average size (Graham 1953). From the 1930s to 70s total catches of hāpuku and bass from New Zealand waters ranged from 1000 and up to 2000 tonnes per annum (Plenary 2021).
18. Management and reporting of both species are combined as HPB. Hāpuku and bass were introduced into the Quota Management System (QMS) in 1986. The review of HPB 1 & 2 in 2021 was the first and only review of any HPB stock since 1986.
19. Despite the heavy commercial exploitation of hāpuku and bass stocks since the early 1930s, there is poor scientific evidence to support ongoing management. Fisheries New Zealand (FNZ) classify HPB as low knowledge stocks with no reliable estimates of biomass or yield. There is no evidence of any plans to increase the knowledge on these species, except for updated recreational harvest estimates in 2024.
20. FNZ held stakeholder meetings during 2021 to discuss peoples' views of the fishery and their suggestions for future management. FNZ report there was general concern about depletion in HPB 7 and localised depletion in HPB 8, with few hāpuku found inshore.
21. In 2020 the New Zealand Sport Fishing Council (NZSFC) ratified a policy supporting the restoration of hāpuku and bass stocks in New Zealand waters. A strategy was developed to rebuild stocks in eastern waters, in anticipation of the review of HPB 1 & 2 in 2021. Following the 2021 review the Minister reduced the TACs, TACCs and allowances in HPB 1 & 2.
22. The NZSFC's policy's objectives supports the Minister rebuilding population levels so ecosystem function can be restored, and so hāpuku and bass can be managed as a high value niche fishery providing for commercial, Māori customary and recreational fishing interests.

## FNZ proposals

23. Currently only a Total Allowable Commercial Catch (TACC) has been set in HPB 7 & 8. As part of this review the Minister is obliged to set for the first time a Total Allowable Catch (TAC) and set aside a tonnage of fish to allow for non-commercial fishing interests, both Māori customary and recreational, and other mortality caused by fishing, before varying the TACC.

24. The current 235.5 t TACC in HPB 7 has not been reached since 2004-05. The 80.1 t TACC in HPB 8 has not been reached since 2010-11. FNZ advise the status quo is not an option and a reduction to the under-caught TACCs is warranted.
25. FNZ also note that HPB 7 & 8 share a border with HPB 2. They propose to disincentivise misreporting of commercial catch between areas by increasing the deemed value rates in HPB 7 & 8 to align with the rates applying in HPB 2.

**Table 1:** Proposed changes to the Total Allowable Catch (TAC), Total Allowable Commercial Catch (TACC) and allowances for HPB 7 and HPB 8, in tonnes. Source: Fisheries New Zealand.

HPB 7							
Option	TAC	TACC	Allowances			Recreational Measures	
			Customary Māori	Other mortality	Recreational	Daily Limits	Additional regulations
Current settings	N/A	235.5	N/A	N/A	N/A	5 per person	Included in the combined daily limit of 5 with kingfish with a maximum of 3 kingfish
Option 1	164	110 ↓ (125.5 t)	20	6	28	2 per person	Remove from the combined daily limit of 5 with kingfish and:
Option 2	136	83 ↓ (152.5 t)	20	5	28		-Introduce daily limit of 2 hāpuku/bass -Introduce accumulation limit of 3
HPB 8							
Option	TAC	TACC	Allowances			Recreational Measures	
			Customary Māori	Other mortality	Recreational	Daily Limits	Additional regulations
Current settings	N/A	80.1	N/A	N/A	N/A	5 per person	Included in the combined daily limit of 5 with kingfish with a maximum of 3 kingfish
Option 1	87	65 ↓ (15.1 t)	10	4	8	2 per person	Remove from the combined daily limit of 5 with kingfish and:
Option 2	76	55 ↓ (25.1 t)	10	3	8		-Introduce daily limit of 2 hāpuku/bass -Introduce accumulation limit of 3

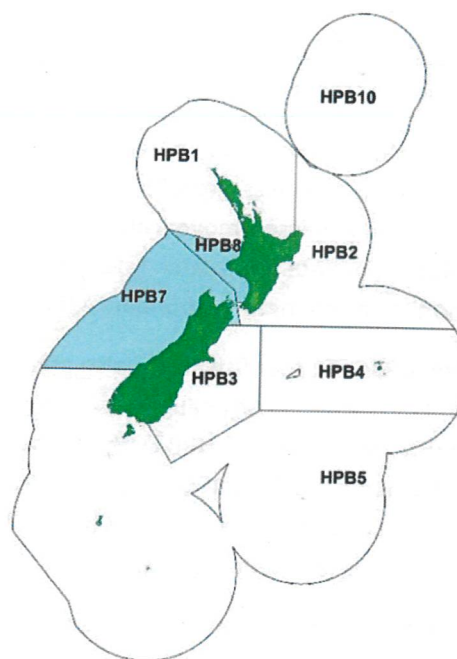
26. FNZ also propose to reduce recreational daily bag limits. The 2017–18 National Panel Survey (NPS) estimated the recreational harvest of hāpuku/bass was 35.4 t (CV = 0.35) in HPB 7 and 6.2 t (CV = 0.49) in HPB 8. (The 2011-12 NPS survey estimate for HPB 8 was higher, 25.6 t). Approximately 90% of daily bag sizes in HPB 7 were three or fewer hāpuku/bass, and around 90% of daily bag sizes in HPB 8 were two or fewer hāpuku/bass. Most of the catch came from the Cook Strait area, Marlborough Sounds and across to Cape Campbell. Fewer bass are caught from the South Island.



## Discussion

### Commercial catches

27. Hāpuku and bass are caught as bycatch in commercial longline fisheries targeting school shark and bluenose (HPB 7 & 8), ling (HPB 7) and trawl fisheries targeting tarakihi (HPB 8).
28. In the last 3 fishing years commercial fishing effort in HPB 7 & 8 has changed from bottom longlines to Dahn line. This change could be due to the requirement to use streamer (tori) lines on longlines that pose a danger to seabirds.
29. Commercial catch and fishing effort have been declining in HPB 7 & 8 over the last 8 years. Despite increases in port price, some commercial fishers report they have switched their attention to other species.
30. In 2019-20 and 2020-21 catches may have been affected by Covid-related issues. In 2019-20 catch in HPB 7 was 79 t and 78 t in 2020-21. In HPB 8 catch in 2019-20 was 33 t and 43 t in 2020-21.
31. The TACCs proposed by FNZ in Options 1 & 2 are not sufficient to enable a rebuild in either HPB 7 or 8. The Minister has a statutory obligation to ensure sustainability (Supreme Court 2009). To meet this obligation the submitters have recommended the Minister apply new TACCs to rebuild HPB 7 & 8. Our recommended TACCs are based on the average of the last 5 years of commercial catch minus 25%.
32. For HPB 7, FNZ propose in Option 1 a 110 t TACC on the basis that it is consistent with current commercial landings. Reduced catches in the past two years maybe Covid-related however, the average annual catch in HPB 7 over the past 5 years is 102.6 t.
33. FNZ's Option 2 for HPB 7 is 83 t, based on a 25% decrease to current commercial landings. In our view, a 25% reduction to the 5 year average is a more precautionary approach. As such, we have recommended the Minister reduce the HPB 7 TACC from 236 t to 77 t.
34. For HPB 8, FNZ propose in Option 1 a 65 t TACC on the basis that it is consistent with long-term average commercial landings. Commercial catches have reduced over the last two years however, the average annual catch in HPB 8 over the past 5 years is 50.6 t.
35. FNZ's Option 2 for HPB 8 is 55 t, based on current commercial landings. The last time that level was reached was in 2017-18, when 61 t were landed. We submit that a 25% reduction to the 5 year average is a more precautionary approach. We recommend the Minister rebuild HPB 8 by reducing the TACC from 80.1 t to 38 t.



## **Stock depletion**

36. Hāpuku and bass have been fished down over the last 70 years, depletion is not a novel issue for these stocks.
37. Large Quota Management Areas (QMAs) and increased efficiency due to the advent of high resolution sounders and GPS has enabled catches of HPB to be maintained despite obvious overfishing. Vessels move from one fishing ground to another causing serial depletion. Shifting effort to maintain the catch rate makes catch per unit of effort (CPUE) unreliable as a way of monitoring changes in abundance (Paul 2005).
38. Depletion of other fish stocks also affects the management of HPB. In the early 2000s hāpuku and bass were mostly caught as bycatch in trawl fisheries targeting hoki and barracouta in HPB 7, and tarakihi in HPB 8. The proportion of targeted catch in HPB 8 has increased from 30% in the early 2010s to 45% in 2020-21. This change could be attributed in part to the depletion of tarakihi and reduction of TACCs in TAR 2 & TAR 7 from 2018 onwards, and several years of reductions in bluenose TACCs.
39. Fisheries New Zealand and its predecessors have made little effort to improve data collection of the status of hāpuku and bass. FNZ seems to be resigned to accepting that HPB is classed as a 'low knowledge' stock therefore not warranting any further efforts to gather real-time data.
40. The review of HPB 7 & 8 highlights the need for separate species reporting and management of hāpuku and bass, and more localised management. Until this new data is available the submitters recommend the Minister makes a precautionary decision for both HPB 7 & 8.
41. We submit the Minister sets a TAC in HPB 7 & 8 to enable hāpuku and bass stocks to rebuild to B50, a level consistent with 50% of the estimated unfished biomass.

## **Enabling holistic management**

42. TACC reductions will not be enough to rebuild depleted hāpuku and bass abundance. Effort controls and some area closures will be required during the stock rebuilding period. Having closed areas for comparison could help in assessing changes in the fishery, if compliance is high. A mix of extractive and non-extractive sampling could be used.
43. Reports suggest that the Cook Strait is a hotspot for spawning hāpuku (Paul 2005). Although the exact location is unknown, the hotspot is thought to be south of Brothers Islands (Johnston 1983). To assist in the rebuild, the Minister must close the spawning ground to bottom fishing.
44. Hāpuku caught in depth over 60 metres suffer from barotrauma and may not survive catch and release. Small hāpuku caught in shallower waters may be released using a descender rig, however this takes some practice to successfully release fish.
45. We submit that the review of the Fisheries Act 1996 must include provisions for removing vulnerable species from the QMS. The review must also enable the introduction of alternative management controls that limit fishing effort to levels appropriate for the fishery. These new provisions will enable hāpuku and bass to be treated as a high value niche commercial, Māori customary and recreational fishery that maintains stock levels and ecosystem function.

## Non-commercial harvest - HPB 7

46. The 2017–18 National Panel Survey (NPS) of HPB 7 estimated the recreational harvest of hāpuku/bass was 35.4 t (CV = 0.35). Approximately 90% of daily bag sizes in HPB 7 were three or fewer hāpuku/bass. Most of the catch came from the Cook Strait area, Marlborough Sounds and across to Cape Campbell. Fewer bass are caught from South Island waters.
47. **FNZ propose** in HPB 7 Option 2 the Minister sets the TAC at 136 t and then sets aside:
  - a. 20 t to allow for Māori customary fishing interests;
  - b. 28 t to allow for recreational fishing interests;
  - c. 4 t to allow for other, fishing related mortality;
  - d. With the remaining 83 t to be allocated as the TACC.
48. **We submit** in HPB 7 the Minister sets the TAC at 129 t and then sets aside:
  - a. 20 t to allow for Māori customary fishing interests;
  - b. 28 t to allow for recreational fishing interests;
  - c. 4 t to allow for other, fishing related mortality;
  - d. With the remaining 77 t to be allocated as the TACC.
49. FNZ also propose to reduce the daily bag limit so the total annual recreational catch fits, on average, within the 28 t allowed for within the TAC.
50. The submitters support the non-commercial allowances proposed for HPB 7 on the basis that the TAC is reduced to 129 t, as described above, and that management of HPB 7 is aimed at achieving B50, so there are more fish in the water in the future.
51. Currently the recreational daily bag limit is 5 per person, included in the combined daily limit of 5 with kingfish, with a maximum limit of 3 kingfish. FNZ propose the Minister:
  - a. removes hāpuku and bass from the combined limit (5);
  - b. introduces a daily limit of 2 hāpuku or bass; and
  - c. introduces an accumulation maximum limit of 3 hāpuku or bass.
  - d. **We submit** in support of a & b with **an accumulation maximum of 4 per person.**
52. An accumulation limit of 4 recognises that, in general, the fish caught in the southern areas are smaller than those taken in HPB 1 & 2. It also recognises that fishing in these areas is not for the faint hearted. These offshore trips are well planned, expensive and rare, so a take home catch of 4 after an overnight or multi-day trip is a reasonable outcome.
53. Ministerial support for a 4-max accumulation limit also fulfils the Minister's duty to manage fish stocks in a manner that enables people to provide for their social, economic and cultural wellbeing from fishing.
54. When HPB 1 & 2 were reviewed in 2021 FNZ proposed a recreational daily bag limit of 2 and an accumulation limit of 3. The submitters supported those proposals on the basis that:
  - a. the fish stocks were managed to achieve B50;
  - b. the fishery was bycatch for all fishers; and

- c. some areas were closed to fishing for 10 years.
55. We received some pushback from recreational interests following the Minister's September 2021 decisions for HPB 1 & 2. The adverse reaction was in response to David Parker's decision to cut the daily bag limit and impose an accumulation limit, while failing to ensure the fishery would be managed as a bycatch fishery with area closures to protect the remaining fish from exploitation.
  56. So, while we consider the 2-daily bag limit and 4-max accumulation limit is a reasonable response to enable recreational fishers to contribute to the rebuild of HPB 7, we also acknowledge that recreational fishers are bearing the brunt of the rebuild. This contribution to conservation and rebuilding the stock needs to be taken into account in future management decisions. We therefore submit cautious support for these reductions.
  57. FNZ propose the Minister sets aside 20 t to allow for Māori customary fishing interests. There poor information to guide the Minister's decision. The 20 t allowance has been proposed by FNZ after discussions with Te Waka a Māui me Ōna Toka Iwi Forum.
  58. We support the Minister setting aside 20 t to allow for Māori customary fishing interests in HPB 7 while also acknowledging that some customary harvest is taken under the amateur fishing regulations.

#### **Non-commercial harvest - HPB 8**

59. The 2017–18 National Panel Survey (NPS) estimated the recreational harvest of hāpuku/bass was 6.2 t (CV = 0.49) in HPB 8. The 2011-12 NPS survey estimate for HPB 8 was higher, at 25.6 t. Around 90% of daily bag sizes in HPB 8 were two or fewer hāpuku/bass. Most of the catch came from the Cook Strait area.
60. The high CV of 0.49 associated with the estimated 6.2 t of recreational harvest means there is a lot of uncertainty around the estimate. This uncertainty requires the Minister to make a precautionary decision when setting the TAC, allowances and TACC in HPB 8.
61. **FNZ propose** in HPB 8 Option 2 the Minister sets the TAC at 76 t and then sets aside:
  - a. 10 t to allow for Māori customary fishing interests;
  - b. 8 t to allow for recreational fishing interests;
  - c. 3 t to allow for other, fishing related mortality;
  - d. With the remaining 55 t to be allocated as the TACC.
62. Given the statutory duty on the Minister to ensure sustainability, **we submit the Minister** sets the TAC at 56 t and then sets aside:
  - a. 8 t to allow for Māori customary fishing interests;
  - b. 8 t to allow for recreational fishing interests;
  - c. 2 t to allow for other, fishing related mortality;
  - d. With the remaining 38 t to be allocated as the TACC.

63. The submitters support the alternative non-commercial allowances proposed above (in 62) on the basis that the TAC is reduced to 56 t, as described above, and that management of HPB 8 is aimed at achieving B50, so there are more fish in the water in the future.
64. FNZ also propose to reduce the daily bag limit so the total annual recreational catch fits, on average, within the 8 t allowed for within the TAC.
65. Currently the recreational daily bag limit is 5 per person, included in the combined daily limit of 5 with kingfish, with a maximum limit of 3 kingfish. In HPB 8 FNZ proposes the Minister:
  - a. removes hāpuku and bass from the combined limit (5);
  - b. introduces a daily limit of 2 hāpuku or bass; and
  - c. introduces an accumulation maximum limit of 3 hāpuku or bass.
66. The same daily bag and catch limits were proposed when HPB 1 & 2 were reviewed in 2021. The submitters supported those proposals on the basis that:
  - a. the fish stocks were managed to achieve B50;
  - b. the fishery was bycatch for all fishers; and
  - c. some areas were closed to fishing for 10 years.
67. We received some pushback from recreational interests following the Minister's September 2021 decision. The adverse reaction was in response to David Parker's decision to cut the daily bag limit and impose an accumulation limit, while failing to ensure the fishery would be managed as a bycatch fishery with area closures to protect the remaining fish from exploitation.
68. **We submit** in support of hāpuku and bass being removed from the combined daily bag limit with kingfish, a daily bag limit reduction from 5 to 2 per person, and **an accumulation maximum of 4 per person.**
69. An accumulation limit of 4 recognises that in general the fish caught further south are smaller than those taken in HPB 1 & 2. It also recognises that fishing in these areas is not for the faint hearted. These offshore trips are well planned, expensive and rare, so a take home catch of 4 after an overnight or multi-day trip is a reasonable outcome.
70. We consider the 2-daily bag limit and 4-max accumulation limit is a reasonable response to enable recreational fishers to contribute to the rebuild of HPB 8. We also acknowledge that recreational fishers are bearing the brunt of the rebuild. This contribution to conservation and rebuilding the stock needs to be taken into account in future management decisions. We therefore submit cautious support for these reductions.
71. FNZ propose the Minister sets aside 10 t to allow for Māori customary fishing interests. There is poor information to guide the Minister's decision.
72. We submit in support of the Minister setting aside an 8 t allowance to provide for Māori customary fishing interests, as some customary harvest is taken under the amateur fishing regulations and this contributes to setting a conservative TAC for the first time. A conservative TAC will help guide future management of this much valued fishery for the benefit of future generations.





# Submission Form

## Review of sustainability measures for 1 April 2022

**Once you have completed this form**

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

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

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

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

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: Colin Smith****Organisation (if applicable):**

Westfleet Fishing

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

HPB7

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

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

Option 1 would be our preferred one

**Official Information Act 1982**

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



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

**Details supporting your views:**

Westfleet is one of the biggest quota holders of HPB7, and we have two long line vessels that operate in this area all year, mainly targeting LIN. In the past they use to get 1000kg HPB every trip as a by-catch within the LIN fishery, now they only get a few fish as a by-catch .

We don't send the vessel targeting HPB as it's a risk due to the lack of continuous good catches of HPB and the by-catch of BNS that they sometimes catch, means we move them out before they even get started.

In the past five years we have only caught around 30% of our quota which is 91tons.

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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

Please continue on a separate sheet if required.



**From:** [fish4us](#)  
**To:** [FMSubmissions](#)  
**Subject:** Hapuku/Bass-HPB7 & HPB8  
**Date:** Tuesday, 8 February 2022 1:40:19 PM  
**Attachments:** [20220208\\_133405.jpg](#)  
[20220208\\_133346.jpg](#)

**Submission Form**  
Review of sustainability measures for 1 April 2022

Once you have completed this form  
Email to: [fmsubmissions@fish.govt.nz](mailto:fmsubmissions@fish.govt.nz)  
While we prefer email, you can also post your submission to:  
2022 Sustainability Review, Fisheries Management, Fisheries New Zealand, PO Box 2527, Wellington 6140,  
New Zealand

Submissions must be received no later than 5pm on Tuesday 8 February 2022.  
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 enter your own or prepare your own but if preparing your  
own please use the above headings as used in this form.

**Submitter details:**  
Name of submitter or contact person: Shirley Hydes  
Organisation (if applicable):  
Email: fish4us@xero.co.nz  
Fishstock(s) this submission refers to: Hapuku/Bass - HPB 7 and HPB 8  
Your preferred option as detailed in the discussion paper:  
(write "other" if you do not agree with any of the options presented): Other

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

**Submission Form**  
Review of sustainability measures for 1 April 2022

Details supporting your views:

I have been frustrated with the fishing industry for some  
time.  
Instead of cutting the quota, "Shirley" is like you're done in other  
words in the past.  
If you cut the quota like you did to HPB2  
then the quota should be compensating the quota owner  
the fish.  
The commercial fishermen have bought their quota and  
by reducing the quota it is reducing their income substantially.  
It is "fish".

Please continue on a separate sheet if required.

\* 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.

P  
**SUBMISSION FORM:**

**REVIEW OF SUSTAINABILITY MEASURES FOR 1 APRIL 2022 HPB 8**

Submission, our club ,Cape Egmont Boat Club supports the proposed reduction of option two in HPB8, submission sent by NZSFC, as a club we have had a voluntary hapuka limit of one per angler per day for approximately 15 years, fish stock is in a poor state. We identified this problem years ago, our club is on the west coast , 35km south of NewPlymouth, anything to keep this fishery alive and sustainable must be a good thing for now and the future. Thankyou, kindest regards Richard van der Fits, commodore, CEBC,



# Submission Form

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---

**Submitter details:**

<b>Name of submitter or contact person:</b> Luke Williamson	
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	Rock Lobster Sustainability Measures for 2022/23
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	CRA 1: Option 1.4; Decrease TAC by 12% CRA 7: Option 7.1; Status quo CRA 8: Option 8.1; Status quo

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

**Details supporting your views:**

It is clear Northland needs to decrease the TAC but I don't feel 12% goes far enough. I think it should be at least 10-20% until there is a clear increase in stock. I also support the idea of increasing the minimum size of crayfish.

I strongly disagree with increasing the TAC in CRA 7 and 8. There is clear anecdotal evidence of recreational fishers struggling to catch any crayfish due to commercial catch pressure. This increase smacks of commercial interests having too strong an influence over the decision. Of the options proposed, status quo is least bad, but a 10% decrease would be much more sensible for the long term sustainability of the fishery.

It is irresponsible to always be running the populations so close to the edge of survival.

Please continue on a separate sheet if required.

---

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**Submitter details:**

**Name of submitter**

or contact person: Andrew Caldwell-Smith

**Organisation (if applicable):**

**Email:**

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

Scallops – SCA 1 and SCA CS

CRA 1, 7 & 8

HPB 7 & 8

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

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

Scallops SCA1 & SCACS: Option 1

CRA 1: Option 1.4

CRA 7: Option 7.1

CRA 8: Option 8.1

HPB 7: Option 2

HPB 8: Option 2





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

#### Details supporting your views:

After reading all documents and witnessing the decline in our fisheries this is my vote.

In particular I have watched the huge decline in the scallop beds

The best time to do something is now and I hope that we do that today

---

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Please continue on a separate sheet if required.



# Submission Form

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**Submitter details:**

**Name of submitter  
or contact person:** Nadia Pavlovich

**Organisation (if applicable):**

**Email:**

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

Scallops – SCA 1 and SCA CS

CRA 1, 7 & 8

HPB 7 & 8

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

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

Scallops SCA1 & SCACS: Option 1

CRA 1: Option 1.4

CRA 7: Option 7.1

CRA 8: Option 8.1

HPB 7: Option 2

HPB 8: Option 2





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

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**Fisheries New Zealand**

Tini a Tangaroa

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---

**Submitter details:**

<b>Name of submitter or contact person:</b> Vicky Pavlovich	
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	Scallops – SCA 1 and SCA CS  CRA 1, 7 & 8  HPB 7 & 8
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	Scallops SCA1 & SCACS: Option 1 CRA 1: Option 1.4 CRA 7: Option 7.1 CRA 8: Option 8.1 HPB 7: Option 2 HPB 8: Option 2





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

#### Details supporting your views:

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In particular I have watched the huge decline in the scallop beds

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**Submitter details:**

**Name of submitter  
or contact person:** Justin Caldwell-Smith

**Organisation (if applicable):**

**Email:**

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

Scallops – SCA 1 and SCA CS

CRA 1, 7 & 8

HPB 7 & 8

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

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

Scallops SCA1 & SCACS: Option 1

CRA 1: Option 1.4

CRA 7: Option 7.1

CRA 8: Option 8.1

HPB 7: Option 2

HPB 8: Option 2





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

#### Details supporting your views:

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In particular I have watched the huge decline in the scallop beds

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**Fisheries New Zealand**

Tini a Tangaroa

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**Submitter details:**

<b>Name of submitter or contact person:</b>	Dino Pavlovich
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	Scallops – SCA 1 and SCA CS  CRA 1, 7 & 8  HPB 7 & 8
<b>Your preferred option as detailed in the discussion paper</b> (write "other" if you do not agree with any of the options presented):	Scallops SCA1 & SCACS: Option 1 CRA 1: Option 1.4 CRA 7: Option 7.1 CRA 8: Option 8.1 HPB 7: Option 2 HPB 8: Option 2





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#### Details supporting your views:

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In particular I have watched the huge decline in the scallop beds

The best time to do something is now and I hope that we do that today

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*[Faint, illegible text and lines, likely a continuation of a form or document.]*

Please continue on a separate sheet if required.

**From:** [Richard Potter Visit Waiheke](#)  
**To:** [FMSubmissions](#)  
**Subject:** Review of sustainability measures – 2022 April round  
**Date:** Wednesday, 15 December 2021 3:39:28 PM

---

We would love to see a ban across New Zealand on fishing species, when they are spawning.

Kind regards,  
Richard  
Visit Waiheke

**P.** +64 9 276 1111

**M.** 09 276 1111

**E.** [info@visitwaiheke.co.nz](mailto:info@visitwaiheke.co.nz)

**W.** [www.visitwaiheke.co.nz](http://www.visitwaiheke.co.nz)

*For regular updates about Waiheke and our properties "Like" our Facebook page:  
<http://www.facebook.com/VisitWaiheke>*





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---

**Submitter details:**

<b>Name of submitter or contact person:</b> Karen Wealleans	
<b>Organisation (if applicable):</b>	
<b>Email:</b>	
<b>Fishstock(s) this submission refers to:</b>	all
<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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**Fisheries New Zealand**

Tini a Tangaroa

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

**Details supporting your views:**

---

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The overwhelming emphasis on the management of fish stocks seems to be the economic /export benefits etc. Meanwhile, the marine environment remains largely unprotected, with bottom trawling still allowed (banned in many other countries) e.g MPI has conceded that since 2013 the bottom trawl footprint in the area proposed for the orange roughy catch had already increased by more than 800 km<sup>2</sup>. In addition, no new marine reserves have been recently gazetted. Only 0.48% of NZ's oceans are fully protected. 30% protection is what is required for a healthy marine environment.

I propose the following re reviewing catch limits.

CRA 7 and 8 -No increase to rock lobster catch -better to decrease and allow stocks to regenerate further.

SCA 1and SCA CS -Total closure of these beds until stock has regenerated.

HPB 7 and HPB8 -Reduce the quota. More research required.

RBT 7 - Reduce the quota. More research required.

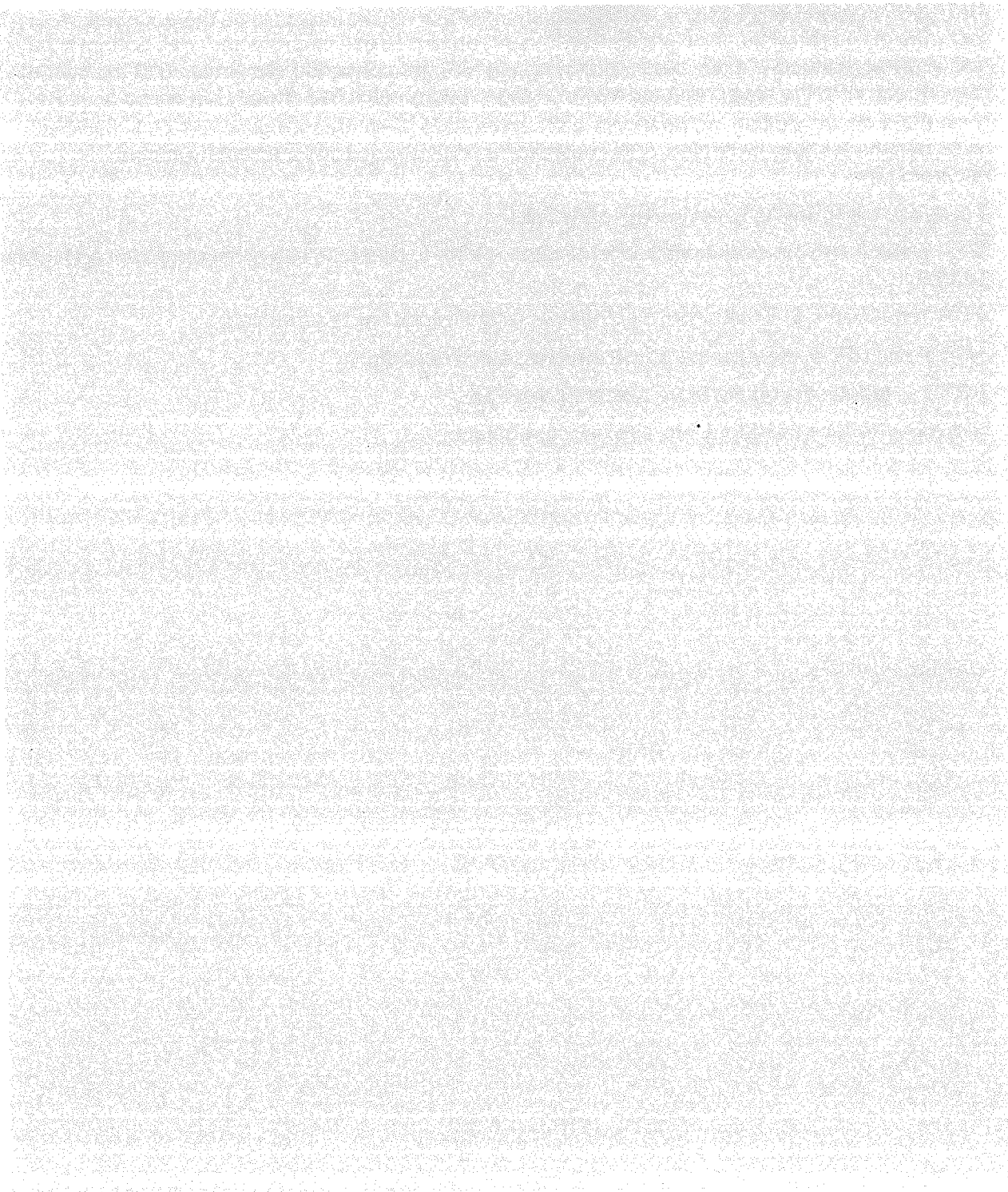
SBW6B - Reduce the quota. More research required.





**Fisheries New Zealand**

Tini a Tangaroa



Please continue on a separate sheet if required.

**From:** [timhewittfarm@gmail.com](mailto:timhewittfarm@gmail.com)  
**To:** [FMSubmissions](#)  
**Subject:** Review of sustainability measures - 2022 April round  
**Date:** Wednesday, 2 February 2022 1:20:16 PM

---

Dear Sir

Re submissions on any groper grounds in this country, the facts are the Ministry of Fisheries have now almost annihilated our groper stocks.

Ask any really good amateur fisherman with a good boat and very good depth finding equipment, he will tell you it's now very difficult to catch a groper in Cook Strait. As for the Wairarapa Coast, where I fish, all the groper have been taken out in the last ten years. There is virtually now nothing left. It doesn't matter what area you are fishing in New Zealand, the problem is the same.

Your articles state reasons for poor catches are decreased targeting of groper or very difficult to calculate numbers etc etc. This BS has got to stop.

Get real. Act now and save the species.

Yours faithfully  
Tim Hewitt

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For more info visit [www.bullguard.com](http://www.bullguard.com)

## Submission for the proposed changes to the TAC of HPB 7 & HPB 8

Brendan Tierney  
Tierney Partnership LTD  
5<sup>th</sup> Generation Commercial Fisher  
Paremata

I am opposed to any changes to the TAC of HPB FMA 7 & 8

### WHY:

A large percentage of the HPB7 ACE is owned by the large companies: Talley's, Westfleet and Sanfords, this is used as bycatch for the lucrative export Ling fishery. These companies offer low port prices for HPB making it unfeasible to catch and unless you sell your catch to these companies, they will not lease out any of their available ACE. Then the remaining ACE is owned by a multitude of individuals, many who no longer fish this ACE and instead try and lease it out.

HPB8 is similar, a large % of the ACE is used as bycatch for the SCH fishery. Since the SCH has been harder to catch in the past years, these fishers have not caught their HPB ACE. Talleys own over 24t, Ngai Tahu 15t, how much Catch effort is there on this ACE alone?

FNZ has all the data available to see what each fisher catches, leases in and out and their catch effort. FNZ can see where and when the catch effort takes place and in the following few years will have even more data (from electronic reporting)  
Has FNZ reviewed every individual fisher and their catch efforts? Can they provide all the data to back up their proposed TAC changes?

A 70% cut to HPB2 was an extreme injustice, if cuts are going to be made to HPB7 & 8 there needs to be precise data that shows the catch effort is relative to the TAC not being caught. Over the last 10-15 years it has been easy to lease ACE and it has been at an affordable price, this is because the ACE is not being fished rather than being fished and there not being sufficient fish stocks.

Another major factor is Cook Strait, this has 3 FMA's : HPB2, 7 & 8 in its vicinity. Weather and tides in Cook Strait make it very hard to catch HPB, these factors become conservation by themselves along with our own conservative fishing practices – we look after our resource, we value it. the tides are only suitable for a couple days every two weeks due to the moon phases and if the weather is not suitable during those days then a lot of the time no fishing takes place.

All of our annual catch (12-17t) is consumed locally. By reducing the TAC of HPB 7 & 8 it will effectively shut down the remaining small owner/operators who supply fresh daily fish to the Wellington & Marlborough markets (3-4 fishers). It will simply be unfeasible to fish. This will be detrimental to Wellington as groper could disappear from its markets.

Reducing the TAC will drive up the value of HPB but will the public pay \$60-\$80 per kg? Fishers will not be able to just source more ACE if the TAC has been reduced so dramatically (70% HPB2, proposed 50-70% HPB7, proposed 15-30% HPB8) it will simply not be available.

We now face losses of up to \$80,000 per year and there being extremely very limited ACE available to lease. These losses are catastrophic for a small business and simply not feasible.

No compensation will be given, instead we will be forced to give up commercial fishing and the general Wellington/Marlborough public will not be able to purchase fresh locally caught HPB.

#### Recreational Sector

The recreational sector has grown exponentially while the commercial sector has dwindled. I find it highly unfair that they are still entitled to a bag limit of 5 HPB per person per day in FMA 2- where the commercial catch has been reduced – The Minister has signed off saying a bag limit of 2 fish, yet this has not yet been implemented by FNZ? How does this help the sustainability of the fishery? The reduced bag limits must be implemented across all the FMA's as soon as possible. Any one person at the moment can catch 1825 hapuku per year that's around 14,500kg, that's absurd!

#### FMA's

The FMA's seem to be far too big, they stretch for 1000's of square miles. Saying that there are sustainability issues in one small area does not justify a 70% cut to the entire FMA.

#### Solution

Why can't the FMA's be reviewed? Cook Strait should be its own FMA, not have 3 separate FMA's within it. Even some fishing grounds border the 3 area's depending on the tides, which can make reporting very difficult.

It is crazy that an area can stretch from Mana Island all the way up to Cape Runaway, or from Clarence all the way up to Egmont and down to Haast.

Give Cook Strait its own area and quota: Cape Palliser across to Cape Campbell, up to Stephens Island, across to Kapiti Island. This is a more realistic FMA.





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---

**Submitter details:**

**Name of submitter  
or contact person:** Pat Adams

**Organisation (if applicable):**

**Email:**

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

Area 7 & 8 HPB

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

Other

**Official Information Act 1982**

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

**Details supporting your views:**

Set a Area 8 TAC of 100t with a TACC of 70t

Reduction in recreational catch is required with the increase in average size of boat, Better weather forecasting, better/more affordable electronics and electric fishing reels,

I also think Recreational catch is under estimated, 10 x boats with 4 people catching 5 x HPB each at an average of 10kgs per fish = 200Kgs per Boat x 10 = 2 ton per day when the sea conditions allow, This is not including other species eg. Blue nose.

At any given time when the conditions allow there can be more than 10 Recreational boats on the shelf in area eight, posting on social media how much fish they are catching, Not sure what they do with so much fish???

Agree with introduction limit of 2 HPB/BASS Daily limit for recreational with a total accumulation of 3 Per angler, Still a lot of fish.

Document does not talk about Commercial catch effort in any format, Without catch effort data all of us are guesing what is out there. As a lot of fishers who used to fish for HPB in area 8 have retired from Commercial fishing, there is less effort, so less information. This was discussed in the web based discussion. If No one is targeting HPB how can we assess the stock is declining.

When Targetting HPB/BASS we appear to be catching acceptable numbers as our Data shows and our knowledge grows

We are only just starting our commercial fishing enterprise on the shelf in area 8 with very few commercially viable species in area 8 for non Quota owners, as Snapper is so prevalent and ACE for SNA is hard to procure and very costly,

Reducing the TACC for HPB for area 8 limits our ability to grow our business. We are only fishing currently intermittently, but planning on upping time on the water in the next 2 years

Reducing Commercial catch effective October 1 2022 without reducing Recreational catch is unacceptable in my opinion, If commercial fishers take a cut, the so called Recreational fisher (with 200kgs on board) should be reduced at the same time.

As I don't fish in area 7 I can't comment on the sustainability of the stock levels

Thanks for taking the time to read my submission.

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.



**From:** [Ben Pritchard](#)  
**To:** [FMSubmissions](#)  
**Cc:**  
**Subject:** Review of sustainability measures for hapuku/bass CRA 7/8  
**Date:** Friday, 4 February 2022 9:03:25 AM

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The 2 options presented do not go far enough to adequately protect the fishing stocks. The catch data provided in MPI's assessment of the stock shows a dramatic decline in fish populations. Anecdotal speculation is presented in MPI's assessment stating that this is the result of reduced fishing pressure. No evidence is presented to support these statements. This position should be reviewed by MPI as it is farcical and non-evidence based, decisions should only be made based on credible and factual data. The data shows fishing stock collapse occurring.

The recreational catch is overestimated. The recreational fishing effort in CRA 7/8 is very low. A review of the factual data supporting the estimate should be completed.

MPI should reconsider the options presented and include and approve a more significant option that further reduces the allowable catch from the 2 options presented in order to protect the fishing stock.