

Bob Gutsell
President
NZ Sport Fishing Council
PO Box 54242, The
Marina, Half Moon Bay,
Auckland 2144
secretary@nzsportfishing.org.nz



2022 Sustainability Review
Fisheries Management
Fisheries New Zealand
PO Box 2526
Wellington 6140
New Zealand
FMsubmissions@mpi.govt.nz



22 July 2022

Submission: Review of Sustainability Measures for Rig (SPO 3) for 2022/23

Recommendations

1. **We recommend the Minister of Oceans and Fisheries** retain the current TAC for the SPO 3 fishery.
2. **We recommend** the Government make meaningful changes towards its stated goal of more holistic management of our oceans based on a set of principles, including taking a precautionary approach to achieve the objective of promoting “an ecosystem-based approach to research, monitoring and management.”

The submitters

3. The New Zealand Sport Fishing Council (NZSFC) appreciates the opportunity to submit on the review of sustainability measures for Rig (SPO 3). Fisheries New Zealand (FNZ) advice of consultation was received on 14 June 2022, with submissions due by 22 July 2022.
4. The NZSFC is a recognised national sports organisation of 55 affiliated clubs with over 36,200 members nationwide. The Council has initiated LegaSea to generate

widespread awareness and support for the need to restore abundance in our inshore marine environment. Also, to broaden NZSFC involvement in marine management advocacy, research, education, and alignment on behalf of our members and LegaSea supporters. www.legasea.co.nz.

5. The New Zealand Angling & 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.
6. The New Zealand Underwater Association is comprised of 43 clubs nationally who represent a cohort of approximately 160,000 participants in underwater activities in New Zealand. These activities include diving, snorkelling, freediving, fin swimming, underwater hockey, spearfishing, underwater photography, underwater rugby, ghost diving marine clean up and Experiencing Marine Reserves. Through our membership we are acutely aware that the depletion of inshore fish stocks has impacted on the marine environment and our members' wellbeing.
7. Collectively we are '*the submitters*'. The submitters are committed to ensuring that sustainability measures and environmental management controls are designed and implemented to achieve the Purpose and Principles of the Fisheries Act 1996, including "maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations..." [s8(2)(a) Fisheries Act 1996].
8. Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from these reviews and would like to be kept informed of future developments. Our contact is Helen Pastor, secretary@nzsportfishing.org.nz

Background

9. All rig Quota Management Areas (QMAs) use Catch Per Unit of Effort (CPUE) analyses as the primary form of measuring stock status. In current SPO 3 analyses, instead of using estimated catch weight, only landed catch weight is used. This introduces a lot of gaps in knowledge, and a lot of bias.
10. Rig is the most popular shark species harvested by recreational fishers in New Zealand. The 2017/18 National Panel Survey (NPS) estimates recreational harvest of rig in SPO 3 has increased from 8.1 tonnes in 2011-12 to 9.4 tonnes. The tonnage set

aside to allow for recreational fishing interests was reduced from 60 to 20 tonnes in 2020.

11. The tonnage set aside to allow for Māori customary fishing interests is 20 tonnes. There is only a small amount of customary reporting of rig catch. FNZ suggest this may indicate that tangata whenua use recreational fishing regulations for their harvest.

Proposal

12. [Proposal here](#)
13. Fisheries New Zealand advise, “The deemed value rates for SPO 3 are lower compared to similar rig stocks such as SPO 7 and SPO 2. FNZ is proposing to increase deemed value rates to align with other stocks”.
14. **Table 1** - Fisheries New Zealand (FNZ) propose the following options for the Total Allowable Catch (TAC), the Total Allowable Commercial Catch (TACC) and associated allowances in the SPO 3 fishery.

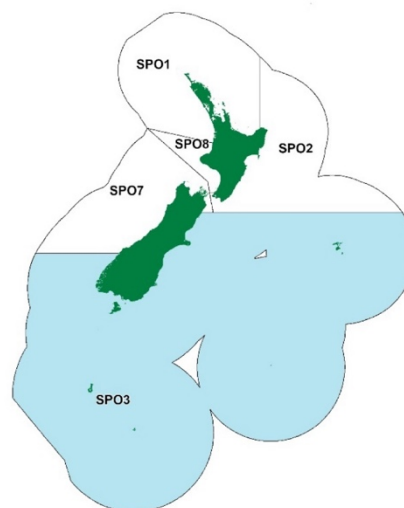


Table 1: Proposed management options (in tonnes) for SPO 3 from 1 October 2022.

Option	TAC	TACC	Allowances		
			Customary Māori	Recreational	All other mortality caused by fishing
Option 1 (<i>Status quo</i>)	766	660	20	20	66
Option 2	802 ↑ (36 t)	693 ↑ (33 t)	20 -	20 -	69 ↑ (3 t)

15. Any changes to the TAC, TACC or allowances will apply from 1 October 2022.

Discussion

16. A May 2022 assessment of the relative abundance of rig concluded that SPO 3 is at or above the Harvest Strategy Standard target of 40% of unfished biomass (B40). The assessment of part of the stock, in the Foveaux Strait, found that overfishing is likely to be occurring in the Strait.
17. FNZ note the estimates are highly uncertain and based on the available information

they advise, “the status quo is an appropriate option for this fishery”. We agree. The Minister must make a precautionary decision to retain the existing settings.

18. We recommend the Minister retains the existing catch settings in SPO 3 as stock projections for SPO 3 are unknown, and overfishing is occurring in some areas such as the Foveaux Strait.
19. SPO 3 commercial catch cannot be increased without also increasing the catch of flatfish, barracouta, red cod, tarakihi, stargazer, elephant fish, and red gurnard also taken by single trawl, or shark catches in set net fisheries. These associated and potentially interdependent species are not in similar states of abundance to each other, especially east coast tarakihi, which has been assessed as below the management soft limit.
20. Moreover, Fisheries New Zealand is only just starting to try and quantify the effects of bottom trawling and we cannot make risky increases when the associated fish stocks have vastly differing stock status.

Impacts of trawling

21. The submitters are deeply concerned about the effects of trawling on inshore biodiversity and productivity. The prospect of increased number of trawl tows and a larger trawl footprint will have an unknown and unmeasured detrimental effect on the benthic environment. There is poor understanding of the impacts of trawling, such as the effect on benthic habitats and resuspension of fine sediments.
22. Historically there have been major issues with discards and dumping in the southern trawl fisheries. The [Heron report](#) (2016) revealed that senior fisheries Ministry officials were aware of widespread dumping and failed to act. Fast forward to 2022 we are now facing the prospect of onboard cameras which we envisage will help to change fishing practices.
23. Commercial fishers report an increase in abundance of rig along the east coast of the South Island, making it difficult for fishers to avoid catching rig. There is some suggestion this increase in abundance is due to greater recruitment success since set netting was banned on the east coast to protect vulnerable dolphins. So now a TACC increase is being proposed to account for increased rig catch. This outcome raises several issues:
 - a. Commercial catches in SPO 3 were excessive in the 1970s and 80s, regularly over 1000 tonnes, and 2667 tonnes in 1980. This is just reported catch. This level of catch has obviously had an impact on the stock. SPO 3 is now most

likely rebuilding from a very low level, although no useful data prior to 1990 is presented in the Discussion Document.

- b. As long as indiscriminate bottom trawling is permitted in mixed species fisheries an increase in abundance of one species will likely impact on fishing success for other, less abundant species.
- c. Innovative, new fishing techniques will need to be developed if we expect to continue to manage single species within a mixed trawl fishery. Increasing the TACC for one species at a time just does not make sense nor does it represent ecosystem based fisheries management.
- d. Banning indiscriminate bulk harvesting fishing methods seems to have positive impacts for some species. The set net ban on the South Island's east coast has probably enabled rig (and maybe other species) to rebuild to more abundant levels. The trawl ban on the west coast of the North Island has contributed to the rebuild of Snapper 8, now estimated to be at B54, that is 54% of unfished biomass. Consequently, the Minister increased the SNA 8 TAC by 72% and increased the TACC by 23% from 1 October 2021.
- e. Schedule 6 of the Fisheries Act (1996) authorises commercial fishers to release rig back to the water if they are likely to survive. Around 10% of annual catch is released under Schedule 6.

24. In a mixed trawl fishery of species with varying characteristics and variable productivity we agree with Fisheries New Zealand that the tonnage set aside to allow for fishing related mortality must be a minimum of 10% of the TACC.