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Fiordland Review
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Discussion: Review of amendments to amateur fishing regulations in Fiordland Marine Area

Submitters

1. The New Zealand Sport Fishing Council is a recognised national sports organisation with over 38,500 affiliated members from 53 clubs nationwide. The Council has initiated LegaSea to generate widespread awareness and support for the need to restore abundance in our inshore marine environment. Also, to broaden NZSFC involvement in marine management advocacy, research, education and alignment on behalf of our members and LegaSea supporters. www.legasea.co.nz.
2. The New Zealand Angling and Casting Association (NZACA) is the representative body for its 28 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.
3. 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.
4. 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].

5. Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this process. We would like to be kept informed of future developments. Our contact is Helen Pastor secretary@nzsportfishing.org.nz.

Proposals

6. **The Fiordland Marine Guardians propose to significantly reduce bag limits for recreational fishers in the sheltered and semi-sheltered outer area of the Fiords to mostly align with the bag limits in the less productive areas inside the Habitat lines (Internal Waters of Fiordland, IWFs).**
 - a. The demarcation lines of the IWF would be extended to the natural headland seaward entrances of each Fiord, to be renamed as “Fishing lines”.
 - b. No changes are proposed at this stage to commercial fishing such as rock lobster potting, pāua diving and blue cod fishing which would still be allowed in the outer sounds inside the “Fishing Lines”.
 - c. See figure 1 below.

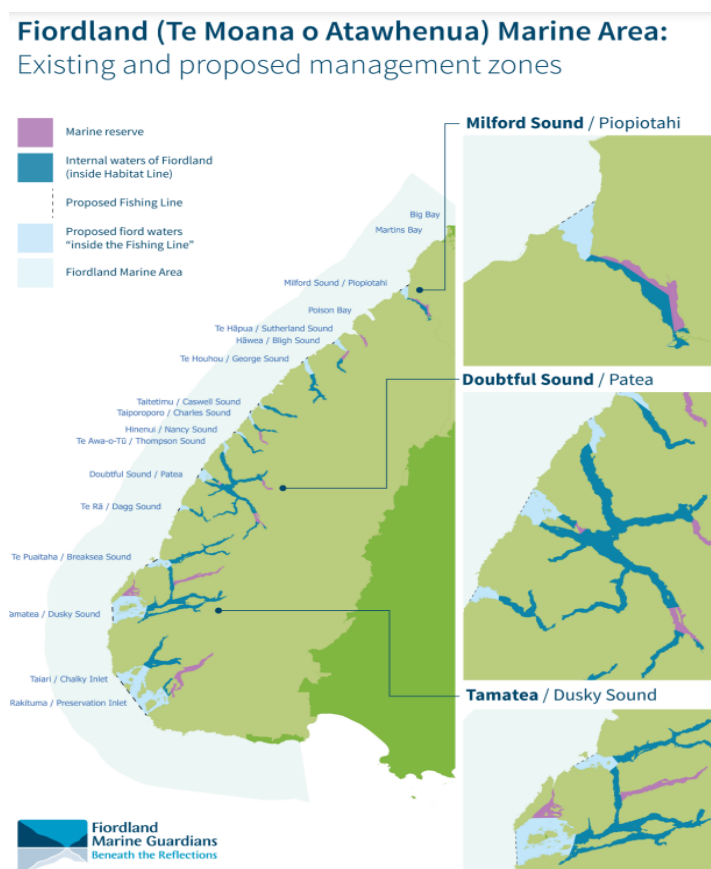


Figure 1. Map of proposed demarcated areas. Fiordland Marine Guardians 2022

7. Fiordland Marine Guardians propose to change amateur finfish and shellfish daily species and bag limits.

- a. Reduce the combined daily finfish bag limit from 30 finfish per person per day to 10 finfish per person. No accumulation beyond the daily species limits and the combined finfish bag limit.
- b. Exclude barracouta from the combined finfish bag limit with its own baitfish species limit of 3 barracouta.
- c. Close hāpuku/bass fishing in the IWF for all Fiords for a period of five years.
- d. Introduce a combined maximum daily bag limit of 150 shellfish per person per day for all shellfish species, except for the shellfish that have individual bag limits.
- e. Ban scallop harvesting in the entire proposed FMA.
- f. Introduce a 2-tiered limit approach for blackfoot pāua. Inside the proposed FMA, introduce a daily bag limit of 1 per person, and outside the FMA introduce a limit of 6 per person. No accumulation limit applies.
- g. See figure 2 below. See figures 3 and 5, on pages 16 and 18.

Current status	Proposal
Combined daily bag limit of 30 finfish per person of any combination of listed species. No accumulation beyond the daily limit.	Reduce the combined daily finfish bag limit to 10 finfish per person. No accumulation beyond the daily species limits and the combined finfish bag limit.
Up until 5 May 2022, only listed finfish species were included in the daily combined finfish bag limit. This excluded albacore tuna, southern bluefin tuna, kingfish, and others.	From 5 May 2022, Fisheries New Zealand has amended the Amateur Fishing Regulations to include <u>all</u> finfish species into the daily combined finfish bag limit as a result of the National Daily Bag Limit review.
As of 5 May 2022, Fisheries New Zealand has amended the Amateur Fishing Regulations to now include a new combined baitfish daily bag limit of 50 baitfish. This applies to the following 7 species: Anchovy, Jack/Horse/Chilean mackerel, Koheru/Scad, Pilchard, Piper/Garfish, Slender/Stout sprat and Yellow-eyed mullet. The baitfish bag limit is in addition to the combined finfish bag limit, with no accumulation applying.	To exclude barracouta from the combined finfish bag limit with its own baitfish species limit of 3 barracouta.
Maximum daily limit per person in the Internal Waters of Fiordland (inside the Habitat Line) is 3 groper (hāpuku)/bass. There is no monitoring of groper (hāpuku)/bass stocks in the FMA.	Close groper (hāpuku)/bass fishing in the Internal Waters of Fiordland (inside the Habitat Line) for all fiords for a period of five years. Fisheries NZ to develop a non-lethal methodology for monitoring groper (hāpuku)/bass abundance, so any decision to re-open the fishery in the future is based on robust information.
Fisheries NZ conduct stock assessments for blue cod using an extractive potting method, which places undue pressure on vulnerable inner-fiord fisheries. A citizen science programme is currently under development by Fisheries NZ that will enable Fiordland's fishers to contribute information regarding fish take, gender etc. in a robust manner that complements other sources of scientific information.	Fisheries NZ to develop a non-lethal methodology for monitoring blue cod/rāwaru abundance, so any decision to re-open closed fisheries (i.e. Milford Sound/Piopiotahi) and review bag limits in the future is based on robust information.

Figure 2. Proposed changes to finfish limits. Fiordland Marine Guardians 2022

- 8. The Fiordland Marine Guardians propose a reduction of the total take of rock lobsters per fisher. Two options are proposed with a key difference on the position of the line that demarcates the limits.**
- a. Option 1 - Introduce a two-tier bag limit for rock lobster, with demarcation based around the Internal Waters of Fiordland (IWF) line. Daily rock lobster (all species) takes, and possession would be no more than 6 in the outer fiord entrances outside the IWF, with a maximum accumulation limit of 10.
 - b. Option 2 - Introduce a two-tier bag limit for rock lobster, with demarcation based around the line that extends across the natural headland seaward entrances of each fiord (new proposed "Fishing Line"). Daily rock lobster (all species) possession in coastal waters outside the proposed Fishing Line would be 6, with a maximum accumulation limit of 10.
 - c. See Figure 4, page 17.

Recommendations

- 9. We do not support establishing the proposed "Fishing lines" across the natural headlands of the Fiords –**
- a. A blanket application of restrictions designed for the low productivity areas inside the Habitat Lines, to the high productivity outer Fiords to address some areas of localised depletion is not an acceptable solution.
 - b. Overall sustainability of stocks for the main target species in the whole Fiordland Marine Area is good and is not threatened by recreational catch which is limited by the remote location, limited access points, and weather conditions.
 - c. There are no proposals by the Guardians to reduce commercial fishing effort in the outer fiords inside the proposed "Fishing Line".
 - d. Introducing regulations that are overly restrictive, lack support from fishers and are largely unenforceable is not good policy and costly to both the Guardians and Fisheries New Zealand in terms of signage, enforcement, education, and reputation.
 - e. If amateur fishers and divers follow the proposed rules, it will put lives at risk due to unpredictable and dangerous sea conditions outside the fiords.
 - f. Recreational fishers are not going to travel significant distance and time to catch a few fish, insufficient for one family meal. These strict catch limits do not apply in waters around large population centers, so, **why is Fiordland affected?**
- 10. We recommend identifying areas where localised depletion is occurring instead. The Fiordland Marine Guardians can then work with Fisheries New Zealand, tangata whenua, and fishers to implement localised spatial management tools which target each individual issue –**

- a. The Fiordland Marine Guardians state their proposals have little to no scientific data to back them, with sparse anecdotal input only. The proposals are biased towards commercial interests.
- b. We do not accept any further restrictions on **recreational fishers while no commercial catch reductions are proposed.**
- c. There is no doubt that the number of private boats and fishing effort has increased over the last 5 years and there are instances of local depletion of some species.
- d. In areas where fishing has significantly depleted some species, we recommend finding solutions to address localised depletion, with all stakeholders involved.

11. We recommend monitoring abundance and total harvest (commercial, customary, and recreational) of key species and ongoing habitat research for biodiversity in the inner Fiords –

- a. There is no available information for commercial fishing effort and catch data inside the inner Fiords, although commercial fishing for multiple species is occurring in these areas where the proposals reduce recreational daily allowances to unprecedented levels inside “Fishing Line”.
- b. The FMA is a large and diverse area. To enable sustainable management more research is needed on fishing effort, total catch, and environmental changes in the Fiords and around the coastal headlands of the Fiords.

12. We support a five-year closure for hāpuku and bass inside the Habitat Lines and prohibiting scallop harvest in the Fiords.

13. We recommend the Minister initiates a consultation process to review the TACC for hāpuku/bass, HPB 5 –

- a. The HPB 5 TACC has not been caught in the past 10 years, with the average catch over 10 years only equating to around 34% of the TACC.

14. We do not support the proposed reduction in the combined finfish daily bag limit of 30 to 10 fish per fisher –

- a. This endangers fishers catching a fish for a feed by pushing fishing effort further out to the coastline.
- b. This will make fishing inaccessible for many fishers who are unable to travel further distances to catch a feed for their family.
- c. This will have a negative impact on the contribution of fishing to the tourist economy of inner Fiords.
- d. Specific limits and codes of practice for multi day charter trips may be needed which are much different to allowances for one day recreational trips.

15. We support most of the species-specific reduced bag limits and accumulation limits proposed for the open coast to apply to the outer fiords –

- a. We acknowledge the role recreational catch can contribute to localised fish depletion and are comfortable supporting fair reductions when better research becomes available.

16. We do not support the pāua proposals –

- a. **We recommend a daily bag limit of 6 per person per day be applied for both pāua species, in both the inner and outer Fiords.**
- b. A consultation by the pāua industry is currently underway with proposals to spread more PAU 5 commercial fishing effort into remote areas in Fiordland.
- c. We acknowledge pāua fisheries can be become easily depleted but do not accept the reduction from 10 to 1 blackfoot pāua per person per day, when pāua catch for PAU 5A from October 2021 to September 2022 was around 106 tonnes total.

17. We do not support all the crayfish proposals –

- a. The rock lobster stock in CRA 8 continues to increase, as does the commercial TACC, almost every year.
- b. Commercial fishers do set pots inside the natural headlands. The proposals seem to recognise this with no significant changes to allowances.
- c. **We support option 1 with 6 rock lobster per day with an accumulation limit of 6 per person for catch inside the fiords and 10 for catch from the open coast.**

18. We do not support bluenose proposals –

- a. Recreational harvest amounts have been steady over the past 10-15 years, and we do not consider this harvest as a major contributor to the bluenose decline.

19. We do not support albacore proposals –

- a. These are highly migratory species part of a South Pacific stock which is at sustainable levels and not subject to local depletion anywhere in New Zealand.

Discussion

Information availability

- 20. There is little information readily available and easily accessible to substantiate the proposals from the Fiordland Marine Guardians. In the absence of substantiating information, it is objectionable the Guardians are proposing such drastic reductions targeting recreational fishers only.

21. The proposals and recommendations are based on anecdotal evidence, which we believe to be gathered from minimal consultation and discussions with select charter vessels only.
22. Some of the anecdotal evidence is agreed by most stakeholders, yes, localised depletion is occurring, but any information around the source of the depletion is unavailable and recreational catch data is sparse.
23. There is no accessible information about commercial catch and fishing effort data around Statistical Areas 30, 31 and 32. It is not acceptable to recreational fishing interests that information that is crucial to informed decision-making is being withheld.

Do not support the proposed 'Fishing line'

24. The proposed 'Fishing Line' is a transfer of the issue, not a solution.
25. The Fiordland Marine Guardians (FMG) are already proposing several strict regulations targeting Amateur Charter Vessels (ACV) and amateur fishers. To push the Internal Waters of Fiordland (IWF) regulations out to the headland, and then impose strict daily bag limits means fishers will be travelling to the coast to fish. It appears that the rules proposed for charter vessels with large groups on multi-day trips are proposed for private boats with few fishers and small boats.
26. The current spatial separation created by the IWF lines works in both commercial and amateur fishers favour by reducing spatial conflict. Pushing the IWF boundaries out to the coastal fringe with strict regulations inside the proposed 'Fishing Line' will result in conflict between amateur and commercial fishers on the open coast, especially around the headland entrances.
27. Any new regulations inside the proposed 'Fishing Lines' must apply equally to commercial and recreational fishers. We object to the biased approach being taken because there are no proposed changes to commercial catch allocation or any consultation anywhere regarding commercial fishing effort of depleted species, except for the current pāua industry management plan, which involves PAU 5A (Fiordland Marine Area).

The proposed 'Fishing Line' endangers fishers and boat safety.

28. The Fiordland Marine Guardians have a duty, when making regulations, to avoid or mitigate any risks to the safety of fishers.
29. Often, coastal fishing around Fiordland is dangerous. Strong winds, short weather windows, and only a few points of access (which are difficult and costly to traverse), pushes the limits of boat safety as people travel out to sea to fish.

30. Unreasonably low amateur bag limits inside the headlands will mean the public will not travel to Fiordland unless the extended weather forecast is very good. Recreational fishers would only be able to fish for a reasonable catch in optimal weather, and with so few multi day weather windows travel and fishing would be much more concentrated than currently seen. This creates its own problems with infrastructure and safety. Too many boats all at once may mean further Council-imposed traffic restrictions in the future.
31. Meanwhile, commercial operators are still able to fish inside the proposed 'Fishing Lines' whenever it suits them. Larger commercial vessels do not rely on good weather windows and are able to fish in most weather.

Enforcement is costly and not possible over such a large, divided area

32. Boats are accessing all the Fjords and on the water inspections in this large and remote area are impractical.
33. Enforcement will be costly and will not be able to be maintained. There are four main access points for the entire Fiordland Marine Area, and travel is time consuming, weather-dependent, and increasingly unaffordable due to fuel costs.
34. The Fiordland Marine Area is a similar size to the Hauraki Gulf Marine Park in the North Island, but with a much larger rocky coastline, far more extreme weather, and far fewer people.
35. If the daily bag limit for some of the species is set at 1 per person per day, there will inevitably be an increase in fish release mortality rates as people try harder to catch the biggest specimen they can find.
36. Widespread acceptance of bag limit changes and why they are needed is the best and may be the only way of achieving compliance. Inspections when people return to the boat ramp or port cannot determine where the fish were caught, even if there is a track of where the boat has been.
37. The Fiordland Marine Guardians states a 'citizen science programme by Fisheries New Zealand' is being implemented to 'contribute information in a robust manner that complements other scientific information'.
38. However, it is human nature to report catch that is within the rules, or not report at all.
39. There is no other scientific information available to the best of our knowledge. We acknowledge there needs to be more research on overall take and fishing effort of all fishery stakeholders. Before Fisheries New Zealand invests funds into establishing a new recreational monitoring programme, they need to acknowledge the existing NPS survey that

measures recreational harvest. Also, recreational catch is currently monitored by fisheries officers. Fishers to Fiordland are already actively fishing accordingly to the 'Fish for a feed' principle outlined by the Fiordland Marine Guardians.

Increased fishing pressure on the Internal Waters of Fiordland

40. Recreational fishers are not the main cause of fish species decline across the Internal Waters and the Fiordland Marine Area.
41. The concept of fishing for a feed differs between stakeholders and individuals, and so fishers must be involved in decision-making around any processes involving catching a feed for their family.
42. The intention of the changes is to align the amateur fishing regulations of the FMA with the philosophy of **Fishing for a Feed** is a very simplistic way of deciding on fishing zones and quantities.
43. Fish stock assessment has not been undertaken on most species and the default mechanism is to revert to deciding on how much a fisher can eat per day.
44. Any decisions need to be based on robust science and research, and the time and effort should be put into the science.
45. The recreational fishing sector does not accept any changes that disadvantage amateur fishers while FNZ have not conducted adequate research into total harvest.

Individual species limits

Pāua –

46. The Fiordland Marine Guardians propose a reduction in blackfoot pāua daily bag limit from 6 to 1 per fisher, inside the Fishing Line, and 10 to 6 per fisher per day in the outer Fiords.
47. However, due to the turbulent coastline around the Headlands we cannot anticipate much pāua diving would occur in these areas, rather than in the inner Fiords where it is sheltered.
48. The commercial fishing industry fishes for pāua inside the proposed "Fishing Line" also.
Where are industry catch reductions?
49. There is currently an industry-led draft Fisheries Plan for PAU5, in circulation.

50. The plan involves the use of catch spreading into abundant QMAs, to reduce risk of serial depletion, as below –

“For PAU 5A, formal catch spreading is desirable in order to ensure that pāua continues to be taken from the less accessible central areas of the Fiordland coast as well as the more accessible northern and southern areas”.

– Strategy 1.3.2, FISHERIES PLAN FOR THE PĀUA FISHERIES PAU 5A, PAU 5B & PAU 5D.

51. Serial depletion can spread as commercial catch is spread, and voluntary ACE shelving is used over TACC reviews.
52. If catch spreading is occurs this will increase total pāua catch inside the proposed ‘Fishing Line’ in many areas.
53. Commercial catch data and catch trends for the area inside the proposed ‘Fishing Line’ needs to be publicly available to make a well-informed decision.
54. As climate change involves consistent rise in water temperatures, any decision on sustainable management of the fishery should involve all stakeholders.

Albacore –

55. The Fiordland Marine Guardians propose a reduction in albacore daily bag limit from 30 to 3 per fisher.
56. This is a pelagic species and not a resident fish, with little data on catch rates of Albacore in New Zealand.
57. There is data from the South Pacific which states that Albacore are not overfished and that the fish stocks are sustainable.
58. Estimated total albacore recreational catch in New Zealand is 7.5% of the total albacore fishery.
59. In Fiordland, total estimated recreational catch is around 2-3 tonnes per annum, which is around 0.8% of total annual albacore catch in New Zealand.
60. The total estimated recreational catch across the fishery is around 260 -263 tonnes per annum.
61. The total estimated catch of the entire albacore fishery is 3500 tonnes per year.
62. This is based on catch data from the Southland Sport Fishing Club, recorded back 22 years

Hāpuku/bass –

63. The TACC for HPB 5 has not been met at all for the past 10 years and is significantly overallocated.
64. 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.
- 65. The current TACC for HPB 5 is 451 tonnes.**
- 66. In 2020/21 commercial catch was 195 tonnes, less than half of the allocated TACC.**
67. Boat ramp survey results from HPB 5 in 2017/18 show 1389 hapuku/bass were caught, weighing 8.3 tonnes.
68. 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.

Blue cod –

69. The FMG state FNZ blue cod potting surveys are having an impact on the blue cod fishery. Potting surveys are undertaken in Dusky Sound. Collecting abundance and growth information is useful. Advice needs to be obtained whether the surveys without collecting age data are worthwhile.

Crayfish species –

70. CRA 8 is a productive rock lobster fishery with by far the highest commercial catch rates in New Zealand. This is a remarkable turnaround for this fishery considering that the spawning stock biomass was below the soft limit for 36 years and probably below the hard limit from 1986 to 2002.
71. The TACC has been increased five times since 2017, most recently from 1192 t to 1251 t (5%) in 2022, and is currently at **1251 tonnes, which is 45% of total rock lobster TACCs in New Zealand.**

72. A new stock assessment for CRA 7 and CRA 8 was completed in 2021. Changes were made to some key model assumptions. In 2021 the CRA 7 and CRA 8 fisheries were combined into a single assessment model with two areas **with a significant increase in the CRA 8 stock over the last 15 years.**
73. **The current TACC in CRA 8 is 1251 tonnes.**
74. The National Panel Survey estimated the recreational harvest in **CRA 8 to be about 16 t (CV 36%), the balance of current allowance of 33 t is made up of 18 t of rock lobster reported from commercial vessels as recreational catch for the crew.**

Figures

Finfish species	Current Amateur Daily Limit per Fisher (as of 5 May 2022)		Proposed Amateur Daily Limit per Fisher	
	Internal waters (inside Habitat Line)	External (outside Habitat Line)	Fiord Waters Inside the Fishing Line	Open Coast Outside the Fishing Line
Albacore tuna	30		3	
Barracouta	30		3 ¹	
Blue cod/rāwaru	3	10	1	10
Blue cod/rāwaru – Doubtful/Thompson/Bradshaw internal waters	1		1	
Blue moki	15		1	2
Blue nose	5		1	
Blue shark	1		0	
Bronze shark	1		0	
Butterfish	15		2	
Eels – Shortfin/ Longfin	6		2	
Elephant fish	5		1	
Flatfish (except Sand flounder)	30		2	
Sand flounder	Included in 30 flatfish limit		2	
Gem fish	30		1	
Grey mullet	30		4	
Groper (Hāpuku)/ Bass	3	5	0 (in the Internal Waters of Fiordland/inside the Habitat Line)	1 (in the fiord entrances and outer coast/outside the Habitat Line)
Hammerhead shark	1		0	
Hoki	30		1	
Kahawai	15		2	
Kingfish	3		2	
Lamprey	30		2	
Ling	30		0	1
Mako shark	1		0	
Marblefish	30		1	
Marlin	1		1	
Porbeagle shark	1		1	
Quinnat salmon	2		1	
Red cod	10		2	
Red gurnard	30		2	
Red moki	15		1	
Rig	5		2	
School shark	5		2	
Sea perch/ Jock Stewart	10		1	10
Seven gilled shark	1		1	
Skate ray	5		1	
Snapper	30		1	
Southern bluefin tuna	1		1	
Spiny dogfish	15		2	
Stargazer	30		2	
Tarakihi	15		1	10
Thresher shark	1		1	
Trevally	30		1	
Trumpeter	15		1	4
Warehou	15		1	
Wrasse	30		4	
All other finfish species not listed	30		4	

Figure 3. Proposed Amateur Daily Limits per fisher. Fiordland Marine Guardians 2022.

Current status	Proposal - Option 1	Proposal – Option 2
No person may take or possess more than 6 rock lobsters (both spiny and packhorse rock lobster species combined) on any one day within the Fiordland (Te Moana o Atawhenua) Marine Area.	Introduce a two-tier bag limit for rock lobster, with demarcation based around the Internal Waters of Fiordland/Habitat Line.	Introduce a two-tier bag limit for rock lobster, with demarcation based around the line that extends across the natural headland seaward entrances of each fiord ("Fishing Line").
	<p>Daily rock lobster take and possession limit for internal waters of Fiordland/inside the Habitat Line (excluding Milford Sound/ Piopiotahi) is 6 (both spiny and packhorse rock lobster species combined).</p> <p>The daily rock lobster <u>take</u> limit for the external fiord waters (outside the Internal Waters of Fiordland/Habitat Line) is 6 rock lobsters (both spiny and packhorse species combined).</p> <p>The daily rock lobster <u>possession</u> limit for the external waters (outside the Internal Waters of Fiordland/Habitat Line) is 6 rock lobsters (both spiny and packhorse species combined); with a maximum <u>accumulation</u> limit of 10 rock lobsters (both species combined).</p>	<p>The daily rock lobster <u>take</u> and <u>possession</u> limit for the fiord waters inside the Fishing Line (excluding Milford Sound/ Piopiotahi), is 6 (both spiny and packhorse species combined).</p> <p>The daily rock lobster <u>possession</u> limit for the open coast waters outside the Fishing Line is 6 (both spiny and packhorse species combined); with a maximum accumulation limit of 10 rock lobsters (both species combined).</p>
No person may take or possess more than 3 rock lobsters on any one-day that are taken from within the Milford Sound/ Piopiotahi internal waters of Fiordland. No accumulation applies.	No change to current daily bag limit of 3 rock lobsters within the Milford Sound/ Piopiotahi internal waters.	No change to current daily bag limit within the Milford Sound/ Piopiotahi internal waters but move the demarcation line from the Habitat Line to the line that extends across the natural headland seaward entrances of each fiord ("Fishing Line").
<p>Within the Fiordland (Te Moana o Atawhenua) Marine Area, a limited defence provision exists to allow possession of accumulated rock lobster taken over 3 or more days in excess of the daily possession limit if:</p> <ul style="list-style-type: none"> o not more than 15 rock lobster are possessed; and o the daily take limit of 6 rock lobster was not exceeded on any day; and o not more than 3 rock lobster were taken from the Milford Sound/ Piopiotahi internal waters of Fiordland; and o in the case of rock lobster held on board or landed from a vessel, including rock lobster removed from any holding pot, the rock lobster are held in labelled containers or bags that contain only rock lobster taken 	<p>Limited defence provision exists to allow possession of accumulated rock lobster taken over 2 or more days in excess of the daily possession limit if:</p> <ul style="list-style-type: none"> o not more than 10 rock lobster are possessed; and o the daily take limit of 6 rock lobster was not exceeded on any day; and o not more than 6 rock lobster were taken from the internal waters of Fiordland/ Habitat Line with the balance taken from outside the Habitat Line/internal waters; and o not more than 3 rock lobster were taken from 	<p>Limited defence provision exists to allow possession of accumulated rock lobster taken over 2 or more days in excess of the daily possession limit if:</p> <ul style="list-style-type: none"> o not more than 10 rock lobster are possessed; and o the daily take limit of 6 rock lobster was not exceeded on any day; and o not more than 6 rock lobster were taken from the fiord waters inside the Fishing Line with the balance taken from the open coast outside the Fishing Line; and

Figure 4. Rock lobster proposals. Fiordland Marine Guardians 2022.

Current status		Proposal	
No daily bag limit for shellfish. Individual species limits apply for nine species; (e.g. 10 blackfoot pāua, 50 kina etc.) along with a mixed shellfish species bag limit of 50 for all other shellfish species that are not listed.		Introduce a daily combined bag limit for shellfish of 150. All shellfish species to be included in this bag, not just those listed. Individual shellfish species limits still apply.	
Scallops: Max. daily limit of 10.		Prohibit scallop take from the entire FMA.	
<p>Amend the individual daily species limits as per below.</p> <ul style="list-style-type: none"> Note that the demarcation line for the two-tiered shellfish species limits shifts from the Internal Waters of Fiordland/Habitat Line (current) to the line that extends across the natural headland seaward entrances of each fiord ("Fishing Line") Note the proposed introduction of two-tiered limits for pāua (both species) with no accumulation applying 			
Shellfish species	Current Amateur Daily Limit Per Fisher	Proposed Amateur Daily Limit Per Fisher	
		Inside Fishing Line	Outside Fishing Line
Cockles	150	20	
Kina	50	20	
Mussels	25	10	
Oysters (Flat/ Dredge oyster)	50	0	
Pāua - Blackfoot	10	1	6
- Yellow-foot	10	2	
Pipi	150	20	
Scallops	10	0	
Tuatua	150	10	
All other shellfish species combined, (whether the same species or different)	50	20	

Figure 5. Shellfish proposals. Fiordland Marine Guardians 2022.