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12 September 2022

Submission on the request for a temporary closure at Taranaki, to the take of all shellfish, other fish species and seaweeds.

Submission: New Zealand Sport Fishing Council – LegaSea support the proposal, in part.

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. Together we are '*the submitters*'.
2. The submitters have supported previous s186A fishing closures where there has been a clear purpose to restore abundance and productivity of the marine environment.
3. In developing this submission the submitters have worked closely with the NZSFC Zone 6 clubs to help members better understand the reasons why we have previously supported s186A applications, and the benefits of sharing thoughts and dialogue with mana whenua and the wider community.
4. 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.

Discussion

5. The submitters acknowledge Taranaki iwi for highlighting issues around depletion and the overharvest of shellfish and organisms from local reefs near many public access points. These issues are common knowledge and have not been addressed adequately in the past by officials. Compliance with existing regulations is often patchy given the lack of resources available to the two local MPI officers. It is clearly time for Taranaki iwi and the community to find their own solutions, and for Fisheries New Zealand to support their efforts.

6. The submitters are pleased to support the [application by Taranaki Iwi for a 2-year fishing closure](#) of the Taranaki coast to the take of all shellfish, seaweeds, anemones and conger eels, excluding beach cast seaweed and rock lobster, out to two nautical miles from the coast.
7. The submitters cannot support the 2-year temporary closure preventing the harvest of rock lobster out to two nautical miles from the coast because locals have mixed views on the need for the closure to apply out to 2nm, and due to concerns about the displacement of fishing effort into neighbouring areas.
8. Current discussions amongst local members reveal [support for an area closure](#). If the closure extends to 2nm from the coast it will mean most, if not all, crayfish harvest within the QMS Statistical Area 935 will not be permitted. A closure out to 1nm means the nearshore reefs will be closed to extraction but the outer reefs will still be available to some non-commercial fishers and existing commercial fishers.
9. A closure out to 1nm for the next two years is supported on the basis that there is strong interest from locals and Taranaki iwi to explore the [Ahu Moana co-management concept](#).

Displacement of fishing effort

10. The proposed closure area sits within the rock lobster management area defined as CRA 9, and within the Stat Area 935. CRA 9 is large, extending from north of the Kaipara Harbour on the North Island west coast down to Westland, South Island. Much of the North Island rocky reef habitat is in Area 935. In 2014 the Total Allowable Commercial Catch (TACC) in CRA 9 was increased from 47 tonnes to 60.8 tonnes. That is 60,800 kilos per annum. In 2020 41% of total commercial catch was taken from Stat Area 935. That catch was harvested from a reported 177,000 potlifts in 2020.
11. If a 2nm closure was in place much of this fishing effort would move onto the limited rocky reef areas north or south of the closure boundaries. Crayfish in these outer areas are obviously not as prolific as they are in areas already targeted so we can anticipate greater effort i.e. more potlifts in areas that are not currently targeted, or lightly targeted.
12. The environmental and social impacts of displacing such a significant level of fishing effort from currently targeted areas to areas north and south have not been discussed in any Fisheries New Zealand documents we have seen.
13. We also note with caution that Catch Per Unit of Effort (CPUE) for rock lobster in CRA 9 has decreased markedly since commercial catch limits were increased in 2014. In 2013 Fisheries New Zealand estimated CPUE in CRA 9 to be around 2.89, that is 2.89 kilos harvested per potlift. In 2020 CPUE had dropped to 1.55 kg/potlift, and in Stat Area 935 CPUE was estimated in 2020 to be around 1.22 kgs per potlift.
14. These CPUE estimates are not encouraging for those people who may be affected by any displacement of fishing effort due to a 2nm closure.
15. We also note that one of our member clubs tried for 12 years to get a voluntary agreement from local commercial rock lobster fishers for a 1.5nm exclusion zone around their boat ramp. Eventually two operators agreed, one refused. Club members have no effective response because under the Quota Management System quota owners can choose where and when they fish their allocation, within the bounds of statutory closures and

management controls, and there are no effort controls. That means commercial fishers can keep dropping and lifting pots until they meet their catch target.

16. At the release of this application it would have been helpful for all parties if Fisheries New Zealand had provided an evaluation of catches from varying water depths and areas along the coastline. In the absence of adequate information many locals are not willing to accept a 2-year temporary closure to rock lobster harvest out to 2nm.

Ahu Moana – co-management concept

17. Management of local fisheries and shellfish at the Quota Management Area level is failing. Management of these taonga, treasured species, is clearly not delivering sufficient abundance to provide for the social and cultural wellbeing of the Taranaki iwi and community. A more fine-scale solution is required.
18. The submitters have been encouraged by the feedback from meetings between local members and Taranaki iwi. It seems all parties are keen to explore how they can work together for the long-term benefit of the fisheries, the community and future generations.
19. Early discussions with Taranaki iwi regarding Ahu Moana have been positive and need further discussion. The Ahu Moana concept is based on –
 - a. Co-management of areas covering the coastline to provide for joint mana whenua and community co-management of local marine areas; and
 - b. Caring for marine areas through co-management by mana whenua and local communities.
20. The concept of Ahu Moana is one outcome of the Hauraki Gulf Revitalising the Gulf discussions, a collaboration between Ngāti Hei and communities from around the Gulf. It has potential to provide benefits for Taranaki iwi and local communities because it's clear intent is to restore local abundance of fisheries, revitalise the mauri (lifeforce) of the near shore zone and enable special rules to manage fishing activity and methods.
21. Ahu Moana is only possible if all parties collaborate. A 2-year temporary closure out to 1nm can address immediate concerns about overfishing of the intertidal zone and near shore reefs, and allow for Taranaki iwi and community to talk with each other and find a common, workable and enforceable solution to the current depletion.
22. The New Zealand Sport Fishing Council acknowledges the New Plymouth Sportfishing & Underwater Club and Taranaki iwi leadership for their efforts to initiate conversations to better understand the current issues and how the community can get involved and be part of a long-term solution.
23. Restoration of the intertidal zone and near shore reefs will not only benefit the marine environment, it will also contribute to enhancing the social and cultural wellbeing of Taranaki iwi and communities for now and future generations.

