

# **Southern Sportfishing Club Inc**



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## **Review of amendments to amateur fishing regulations in Fiordland Marine Area**

**This is a response of the Southern Sport Fishing Club on the proposed changes to fishing regulations in the Fiordland Marine Area.**

**The Southern Sport Fishing Club and formally the Fiordland Game Fishing Club has been recreationally fishing in Fiordland since 1972 and thus has a wealth of knowledge within its current and past members.**

**Their opinions, experiences and beliefs are represented in the following points.**

**The intention of the changes are to align the amateur fishing regulations of the FMA with the philosophy of “Fishing for a Feed”, which is a very simplistic way of deciding on fishing zones and quantities that can be harvested. Fish stock assessment has not been undertaken on the majority of species, with the default mechanism being based on how much an angler can eat. We don’t understand or agree on how the guardians’ decided on how much a feed was for fisherman. Was it for himself, his family or extended family? Are friends included? Any decisions should be based on robust science and research not on a philosophy. The time and effort of the guardians should be put into the science. The guardian’s state they need to act now and cannot wait for research to make changes. The recreational fishing sector alone should not be disadvantaged because research has not been undertaken by regulatory authorities or interested parties.**

**We do agree that the internal waters of Fiordland have been under pressure in the past and that these areas need to be protected in some form. Moving from Habitat lines to Fishing lines with the lines between headlands is an option. This would stop fishing pressure outside the current habitat lines. The only issue with this, is that your forcing pressure to the coastline, so are you really solving a problem or just transferring a problem that’s already in existence, with increased pressure at a new location.**

**Forcing fisherman to fish on the outer coast will increase the safety risk due to strong winds and short weather windows. The consequence of which poses a serious health and safety factor.**

**The proposed changes within the fishing lines would also have to apply to the commercial sector and any changes to them should be based on the percentage changes to the recreational sector.**

**Our main concerns are regarding fishing in the outer waters to the 12 nautical mile limit.**

The changes to daily limits and reduced individual species is based on anecdotal evidence and we believe they have gone to far, especially when its not based on science.

The changes will have the direct effect of people deciding not to go fishing and therefore not experiencing Fiordland and all it has to offer.

The guardians propose to reduce the combined finfish bag daily limit from 30 to 10. There is no accumulation beyond the daily species limit and the combined finfish bag limit.

Recreational fishers are not going to travel significant distance and time to catch a hand full of fish. It makes no economic or time sense. Fishers will not be able to bring fish out for friends and family. This is discriminating against those that are old or young and those disabled that cannot go fishing. There are individuals that fish to supplement their daily food source. This reduction will affect them in a negative manner. The overall effect will be that recreational fishers will be discouraged to fish. The daily bag limit should stay at 30 per day.

There is very little hope that the current changes would be reversed in the future if fish stocks improve. History shows that a reverse is very unlikely to occur, especially when there is no current data to compare to.

The Guardians state that the number of recreational fishers is increasing and that there are more expected in the future. They state that boats are getting bigger with a greater range that they can travel. They have not provided any statistics on the numbers fishing, the number of boats fishing in the area or on the change in boat size over time. There is no data to back this up and is just anecdotal beliefs and thoughts.

The guardians' state that they are flying blind with the lack of data, so why are recreational fishers being penalized and what restrictions and cuts is the commercial sector taking in the area?

The following comments are on individual species that are listed in the document:

Albacore – the guardian's propose to reduce the albacore catch from 30 to 3 fish per day . This is a pelagic species and not a resident fish. There is no hard data on NZ catch rates of albacore. There is data from the South Pacific which states that albacore are not overfished and that the fish stocks are sustainable. Why the reduction? The estimated recreational catch in NZ is 260 -263 T per year. The total estimated catch of the entire fishery is 3500 T. The recreational catch is 7.5% of total. We believe the Fiordland recreational catch is 2-3 T per year. This is based on the catch numbers I have from our fishing club going back 22 years and the time we have spent fishing in Fiordland. It is also based on the individual boat counts that have been supplied to the Fiordland Recreational and Conservation Trust for boats heading into Milford Sound over the 2021 season. This catch rate is .08% of the total catch in New Zealand. Why is it 3 albacore? We believe it should be at 15 fish.

Members of the Southern Sport Fishing Club fish the NZ Sport Fishing National tournament every year. Those fishing will be severely restricted with only being able to catch 3 fish such as albacore. The points based system means that you fish various line weights and enter fish based on a calculation of fish weight versus line weight. To be competitive more than 3 fish would often have to be caught and weighed. The guardian's proposal would mean our club members would have to fish outside of Fiordland and outside our home waters.

The other issue is we often fish outside the 12 nautical mile limit. How will MPI treat fishers with more than 3 albacore inside the 12 mile limit? How can this be enforced? This is the same issue MPI have in the Canterbury area with boats bringing fish through a traffic light

area below the limit, in which the fish were caught. This problem has not been resolved to date.

**Bluenose** – Proposal to go from 5 to 1. Again, based on no data and our members believe that the numbers caught now are similar to 10-15 years ago. The number should stay at 5 fish.

**Blue-cod** - the fishing in the internal sounds is poor and has been declining for years so the number has to be decreased. It should be at 2 instead of the one proposed. Outside the sounds the limit of 10 is where it should be. Our members have not seen a change in the past 10 years.

**Groper** - these have been decimated over the years and should be at 0 for the internal waters. Outside the sound the groper should be at 2, not 1 as proposed.

**Kahawai and Kingfish** - proposed to reduce to 2 fish inside and outside sound. Kingfish numbers have been increasing and they should stay at 3. Kahawai are not usually targeted by our members but no real data is available. The number should be at 6.

**Mako** - proposed the number should be 0. It's not endangered, and no current data of numbers are available so should remain at 1.

**Trumpeter** - The proposal to reduce it to 1 inside sounds and 4 outside from the current 15. There is no data but we have not seen a decrease in catch numbers. Inside the sound should be at 2 and outside the sounds it should be at 6.

Essentially the inner sounds are under pressure and fish quantities need reducing. Outside the sounds is a different story and many aspects of the document are based on opinion and beliefs. Pelagic fish such as albacore should not be heavily cut as proposed.

These recommendations will have the effect of reducing peoples desire and ability to justify travelling to Fiordland to fish.

A number of our members have fished in Fiordland for over 25 years and fished the national tournament for over 22 consecutive years. These proposals will force out members to fish out of Fiordland and potentially increase fishing pressure to a different area. The guardians are therefore just transferring a problem to another area and not solving anything.

We would implore the guardians to reconsider their proposals and include our recommendations in a revised document.

Ian Carrick  
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