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17 July 2023

Submission: Support FNZ's Option 1 for Trevally 2

Recommendations

1. **The Minister approves FNZ's Option 1 for Trevally 2**, to provide for an increase in the TAC, and to increase the allowance for fishing related mortality to equate to 10% of the TACC.
2. **The Minister does not support Fisheries New Zealand's Options 2 or 3**, as catch alone is not a good indicator of abundance, and over-catch of the TACC is not a valid reason for TACC increases.
3. **The Minister retains the existing non-commercial allowances for Māori customary and recreational fishing interests**, noting the next National Panel Survey estimates will be available in 2024.
4. **The Minister makes a precautionary decision** by approving Option 1, as the present data showing large fluctuations in abundance between years is not possible at a population level for a species that lives in excess of 40 years.

FNZ Proposals

Option	TAC	TACC	Allowances		
			Customary Māori	Recreational	All other mortality caused by fishing
Current settings	349	241	1	100	7
Option 1 (modified <i>status quo</i>)	366 (↑ 17 t)	241	1	100	24 (↑ 17 t)
Option 2	387 (↑ 38 t)	260 (↑ 19 t)	1	100	26 (↑ 19 t)
Option 3	408 (↑ 59 t)	279 (↑ 38 t)	1	100	28 (↑ 21 t)

The Submitters

5. The New Zealand Sport Fishing Council (**NZSFC**) appreciates the opportunity to submit on the review of management measures for Trevally 2 (**TRE 2**) for 2023/24. Fisheries New Zealand (**FNZ**) released their Discussion Paper No: 2023/06 on 7 June 2023, with submissions due by 17 July 2023.
6. The NZ Sport Fishing Council is a recognised national sports organisation of 50 affiliated clubs with over 36,700 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.
7. The New Zealand Angling and Casting Association (**NZACA**) is the representative body for its 24 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.
8. 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].
9. 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, secretary@nzsportfishing.org.nz.

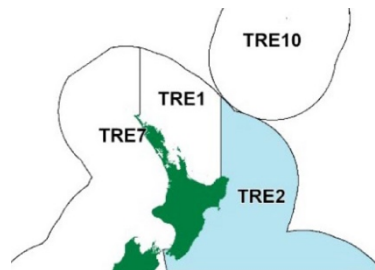
Discussion

10. The submitters are concerned that under-reported catch in the early years tends to underestimate current levels of depletion in trevally and other stocks, when compared to historic abundance.
11. There can be no doubt that trawlers and net fishers were catching trevally before 1950 and much of that catch was discarded or under-reported because there was little market for it, and catch reporting by fishers and monitoring by officials was poor.
12. In Option 1, Fisheries New Zealand (**FNZ**) propose to increase the Total Allowable Catch (**TAC**) so the allowance for other sources of mortality can be increased to equate to 10% of the Total Allowable Commercial Catch (**TACC**) in all options. The submitters support this approach as a minimum, in mixed and bottom trawl fisheries.
13. In Option 2, FNZ propose a 19 tonne (**t**) TACC increase. In Option 3, FNZ propose a 38 t increase to the TACC, to provide for greater utilisation. This is just above the 2022 landed

commercial catch. **The submitters do not support over-catch of the TACC as a valid reason to increase the TACC.**

14. In all FNZ options, no change is proposed for the tonnages set aside to allow for Māori customary and recreational fishing interests. This is supported as a new estimate of recreational harvest from the National Panel Survey (**NPS**) will be available in 2024. The TRE 2 recreational harvest estimate from the 2018 NPS was 17 t. The level of Māori customary harvest is unknown.
15. There was a proposal to increase the TACC and set aside allowances for non-commercial fishing in 2010. The then Minister decided to retain the TACC of 241 t and set aside 100 t for recreational fishing and 1 t for Māori customary fishing interests.
16. Most of the previous TACC increases in Fisheries Management Area 2 (**FMA 2**) have come about after the TACC has been over-caught for a few years. In some cases, it is the entities with the most quota targeting a species so there is insufficient Annual Catch Entitlement (**ACE**) to cover the bycatch caught by other fishers. The Quota Management System (**QMS**) incentivises this behaviour because it achieves two outcomes:
 - a. The major quota holder squeezes the ACE fishers or smaller quota holder out of the fishery; and/or
 - b. It is a deliberate ploy, and a successful strategy in the past, to insist on an increased TACC, in snapper, gurnard and tarakihi. Now it's trevally's turn.

17. Changes in sea temperatures and conditions may, over time, shift some fish further south. An increase in the TAC maybe warranted where there is good supporting data. In the meantime, FNZ acknowledge that Cyclone Gabrielle is expected to have had a significant impact on parts of the TRE 2 marine environment and an unknown impact on stock abundance. These impacts could be felt for several years. To assist us in understanding the effects of the cyclone and subsequent storms, there is a need to monitor the stocks and the ongoing impacts of sediment influx from land run-off on the marine environment. Ministerial precaution must apply given these circumstances.



18. There is no accepted stock assessment for the whole TRE 2 stock. There is an assessment for the Bay of Plenty that shows an increasing trend in trawl catch per unit of effort (**CPUE**) and biomass, and the FNZ Inshore Working Group note that there are similarities with the northern half of TRE 2.
19. Spatial patterns in CPUE and a single year of catch-at-age data indicate that trevally found in the northern portion of TRE 2, including Hawke Bay, are part of the TRE 1 Bay of Plenty sub-stock. A model that included TRE 2 north in the Bay of Plenty stock assessment was attempted, but was not accepted by the FNZ Working Group.

20. The commercial catch in TRE 2 is about one fifth of the landed catch in TRE 1. The TRE 2 TACC has either been fully caught or over-caught in 65% of the fishing years since the introduction of trevally to the QMS in 1986.

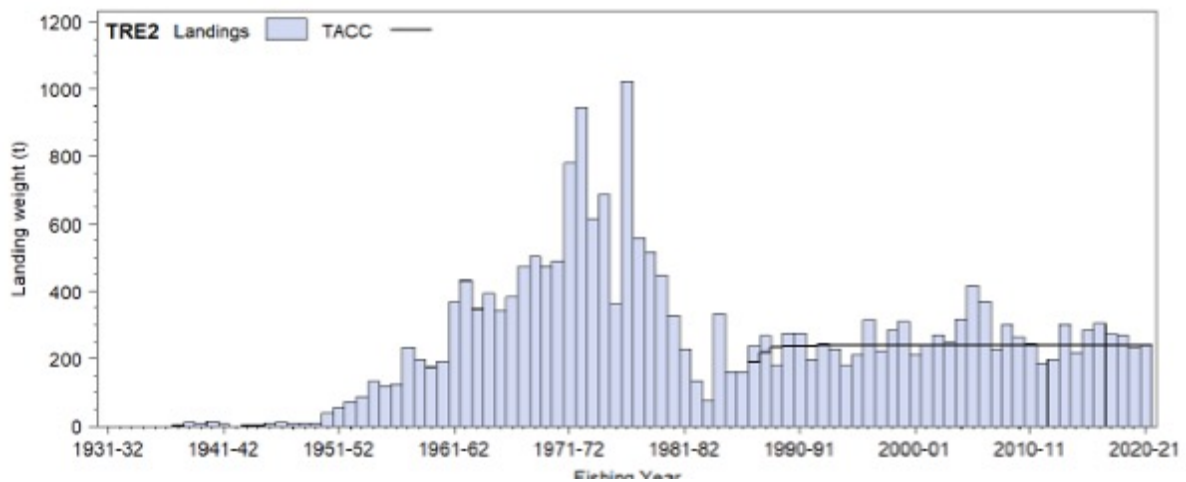


Figure 1: TRE 2 landed and reported commercial catch history since 1931 and the TACC since 1986.

21. Under the QMS, there are many factors that influence what fish are landed. It could be a change in fishing habits, a change in the availability of ACE or the port price. We reiterate our concerns that the Minister cannot rely just on reported catches to increase the TACC.
22. The Minister has a statutory obligation to act in a precautionary manner when information is uncertain, incomplete or unreliable, and we know from experience that **catch on its own is not a reliable indicator of changes in actual fish abundance. And there is no accepted stock assessment for TRE 2. Some time ago the FNZ Inshore Working Group considered “High annual variability in standardised CPUE indices, and narrow confidence intervals led the Northern Inshore Working Group to conclude that trevally in TRE 2 are probably part of the TRE 1 biological stock in the Bay of Plenty, with abundance in TRE 2 fluctuating markedly according to the movement of fish into and out of this QMA.”** (Fisheries Assessment Plenary Report May 2023).
23. We caution the Minister against relying on the TRE 2 standardised CPUE indices as a reliable indicator of abundance, as the large fluctuations in abundance between years are not possible or plausible at a population level for a species that live in excess of 40 years.
24. Trawl survey data provides information on stock abundance that is independent of commercial catch and effort reporting, and it is used to inform management decisions for a number of fish stocks. There is no trawl survey data for FMA 2, but there is recent survey data from the Bay of Plenty. This shows no significant change in trevally abundance since the 1990s.

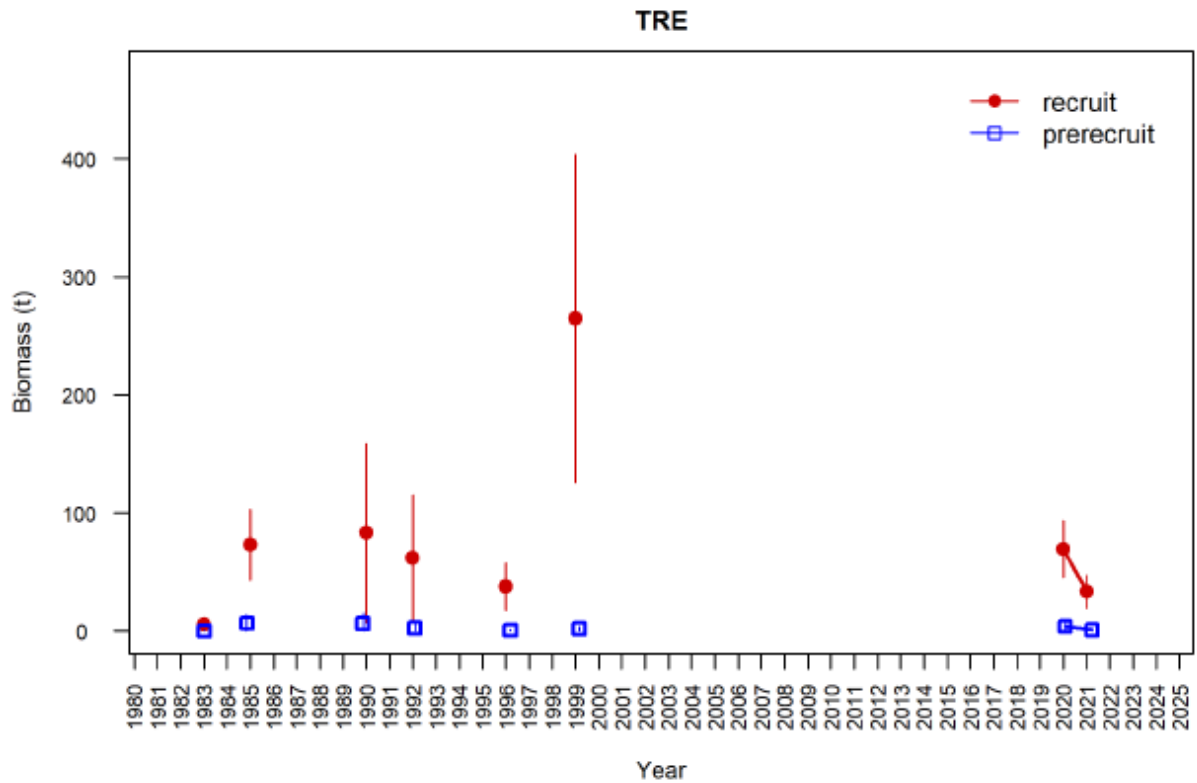


Figure 2: Bay of Plenty trawl survey trevally biomass estimates 1983-84 to 2020-21 (Fisheries Assessment Report 2022/10).

25. **We recommend** the Minister approves FNZ’s Option 1 for Trevally 2, to provide for an increase in the TAC, and to increase the allowance for fishing related mortality to equate to 10% of the TACC.
26. **We recommend** the Minister does not support Fisheries New Zealand’s Options 2 or 3, as over-catch of the TACC is not a valid reason for TACC increases.