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2 February 2024

**Submission:** We support Option 1 to increase to the STN 1 TAC and the allowance for recreational fishing interests

## Recommendations

1. The Minister supports the proposed increase in the STN 1 Total Allowable Catch of 186 tonnes.
2. The Minister and Fisheries New Zealand recognise that a significant recreational fishery has developed for southern bluefin tuna in New Zealand.
3. The Minister acknowledges that setting a reasonable allowance for a new recreational fishery is critical to avoiding allocation disputes in the future.
4. The Minister supports the proposed increase of 35 tonnes to the recreational allowance, to allow for the expected catch and recreational fishing interests.
5. The Minister and Fisheries New Zealand note that NZSFC and LegaSea will continue to promote the current bag limit and responsible fishing practices in the tuna fishery.

## The submitters

6. The New Zealand Sport Fishing Council (NZSFC) appreciates the opportunity to submit on the proposals for the future management of southern bluefin tuna (STN 1). Fisheries New Zealand (FNZ) advice of consultation was received on 13 December 2023, with submissions due by 2 February 2024.
7. The New Zealand 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. [www.legasea.co.nz](http://www.legasea.co.nz). Together we are *'the submitters'*.

8. 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]
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](mailto:secretary@nzsportfishing.org.nz).

## Background

10. Management of southern bluefin tuna (**SBT**) throughout its range is the responsibility of the Commission for Conservation of Southern Bluefin Tuna (**CCSBT**) of which New Zealand is a founding member. Japanese longliners were catching 1000s of tonnes of SBT a year in New Zealand waters (1960s to 1980), mostly prior to the establishment of the Exclusive Economic Zone (EEZ). NZSFC supported the “New Zealandisation” of our tuna fishers in the 1980s and early 1990s.
11. There has been a recreational fishery out of Fiordland since the 1970s and SBT were taken when the Pacific bluefin tuna fishery, 60 miles off Greymouth and Hokitika, developed in the early 2000's. In 2017 a new, more accessible recreational fishery off Cape Runaway was developed. Good catch rates and favourable weather that year attracted hundreds of anglers to the eastern Bay of Plenty at short notice.
12. Since the early 1990s southern bluefin had a domestic catch limit of 420 tonnes (**t**). On introduction to the Quota Management System (**QMS**) in 2004 the Total Allowable Commercial Catch (**TACC**) was set at 413 t, with a recreational allowance of 4 t, a customary allowance at 1 t and other sources of fishing related mortality at 2 t. There has been a series of in-season increases following allocation decisions by the CCSBT.
13. In 2018 the Total Allowable Catch (**TAC**) was set at 1088 t, with a TACC of 1046 t, a recreational allowance of 20 t, a customary allowance at 2 t and other sources of fishing related mortality at 20 t (Figure 1). In 2021 the recreational allowance was increased from 20 to 34 tonnes.
14. The reported catch worldwide was around 14,000 t for a long time. CCSBT agreed to reduce global catches by 20% in 2010, to 9,449t in 2011. The Commission has determined that the spawning stock biomass of SBT is on track to meet the international management target of 30% of the unfished spawning stock biomass (or proxy) by 2035 at current catch levels.

15. At its latest meeting in October 2023, the CCSBT agreed to increase the Global TAC for the next three years (to 2026), by 3,000 tonnes to a total of 20,647 tonnes, in accordance with recommendations from its scientific committee. As a result of this, New Zealand’s national allocation has increased by 186 tonnes. There is now a utilisation opportunity to reflect this international decision within New Zealand’s domestic catch settings for southern bluefin tuna.

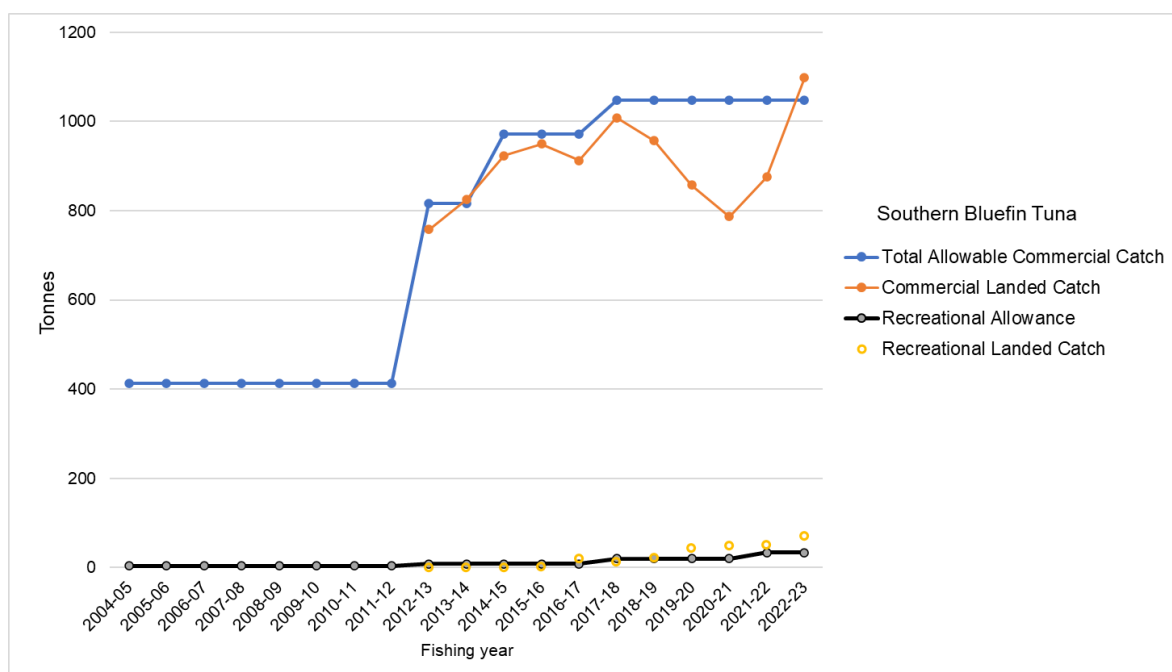
## Proposals for southern bluefin tuna

16. Fisheries NZ’s [Discussion Paper No: 2023/28](#) proposes one option. Increase the commercial TAC by 186 tonnes and the allowance for recreational interests by 35 tonnes (Table 1).

**Table 1: Current and proposed catch settings for STN 1. Figures in tonnes.**

Option	TAC	TACC	Allowances		
			Customary Māori	Recreational	All other mortality caused by fishing
Current settings	1,102	1,046	2	34	20
Option 1	1,288 (↑ 186)	1,197 (↑ 151)	2	69 (↑ 35)	20

17. There have been significant increases in the TACC since the introduction of southern bluefin tuna into the QMS in 2004, and limited change to the recreational allowance. The New Zealand TAC has been regularly under caught in recent years but was close to fully caught in 2022-23 as commercial fishers are allowed to carry over some of their uncaught ACE from the previous year (Figure 1). The addition of 35 t to the allowance for recreational fishing will take it from 3.0% to 5.4% of the revised TAC.



**Figure 1: The allowances for commercial and recreational fishers for southern bluefin tuna made under the Quota Management System. Commercial fishers are allowed to carry over some of their uncaught ACE from the previous year.**

## Discussion

### Recreational catch

18. The fast development of the recreational fishery for southern bluefin tuna off Cape Runaway in 2017 caught many people by surprise. Information from tuna longline fishers and a social media storm saw hundreds of anglers gamefishing in July. Thanks largely to the hard work by members of the Waihou Bay Sport Fishing Club and the patience of returning anglers, we have weigh station data for a high proportion of landed catch. This is useful for management purposes, describing the fishery, and estimating total recreational harvest.
19. In 2017 NZSFC clubs recorded 266 landed southern bluefin from the east coast recreational fishery, most of which were over 60 kg and the average weight was 72 kg. Worldwide it is rare to find so many large southern bluefin tuna reasonably close to the coast.
20. Fisheries New Zealand contracts a project to survey fishers at the Waihou Bay boat ramp to compile weigh station records from fishing clubs, Amateur Charter Vessels records, and recreational catch taken on commercial vessels (s111) from around New Zealand. The combined recreational harvest estimate from the North and South Island fisheries in 2022-23 was 69.3 tonnes. This estimate includes an additional 22.5% over the recorded catch to allow for unaccounted recreational catch.
21. A recommendation from the Waihou Bay Sport Fishing Club in 2018 asked fishers to limit their landed catch to one SBT per boat, per day. This voluntary measure was promoted by other NZSFC clubs that year and included in the LegaSea FishCare guide prior to the regulation change to one southern bluefin tuna per angler, per day.
22. The [FishCare Southern Bluefin Tuna Guide](#) includes information on best practice methods for handling SBT prior to their release and the importance of looking after fish that are kept, to maintain quality and avoid waste of these valuable fish.
23. The submitters support the proposed 35 t increase in the STN 1 recreational allowance. As the Supreme Court in the Kahawai case has previously highlighted, the Minister has discretion however the allowance must be reasonable, and “***The allowance is simply the Minister’s best estimate of what they will catch during the year***, they being subject to the controls which the Minister decides to impose upon them e.g. bag limits and minimum lawful sizes”<sup>1</sup>. [emphasis added]
24. The increased allowance from 34 t to 69 t represents just 0.0033% of the 2024 Global TAC, and even if this allowance was fully caught, this catch rate would have no effect on the spawning stock biomass which is currently rebuilding.

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<sup>1</sup> New Zealand Recreational Fishing Council Inc And Anor V Sanford Limited And Ors SC 40/2008 [28 May 2009]. At [55]