

Dr James Morrison

[REDACTED]  
[REDACTED]

Auckland 1061

11<sup>th</sup> August 2013

Fisheries Management – Inshore Fisheries  
Ministry for Primary Industries  
PO Box 2526  
Wellington 6140

Email: FMSubmission@mpi.govt.nz

Copy to: Nathan Guy, Minister for Primary Industries & Peseta Sam Lotu-Liga, MP for Maungakiekie, Outdoor Boating Club

## **Individual submission for the review of the sustainability and other management controls for snapper 1 (SNA1)**

To whom it concerns,

I strongly disagree with all of the proposals (options) to cut the recreational bag limits and/or increase the minimum legal size for snapper in area 1. These proposals are ineffective, counterproductive and inequitable. I object personally, and on behalf of the general public of New Zealand including more than 600,000 recreational fishermen and women.

My objections are on the following basis:

1. The proposals are inequitable and unfair
2. The proposals have high economic costs for the Auckland Region
3. The proposals ignore fishing as an important cultural activity for non-Maori as well as Maori
4. The proposals are a poorly disguised commercial initiative masquerading as a sustainability initiative, and have no justification on that basis
5. The proposals are ineffective and counterproductive

I also object strongly to the Ministry of Primary Industries withholding relevant information, particularly with respect to details of the recreational catch, and their disgraceful treatment of recreational fishers in poorly organised public meetings.

### **The proposals are inequitable and unfair**

The proposals as they currently stand will severely disadvantage children and families. Surveys of the recreational catch<sup>1</sup> in the Hauraki Gulf clearly demonstrate that approximately half of all people catch three or less fish per trip, and that the average landed fish is around 30cm long. What they should also show is that children

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<sup>1</sup> The most recent 2012 survey information is currently held by MPI, not officially released to the public.

and families, who are restricted by time, weather, intolerance for long trips, and many other factors, catch fewer fish and smaller fish than the average.

This is in direct contrast to the die-hard fishermen who target large snapper and devote early mornings, late nights, and often greater expense to achieve their goal. The impact of the proposals to increase the minimum size will affect families and young people far more than they will affect other fishermen.

This is quite at odds with such worthy programs as “take a kid fishing” (TAKF). A 2012 study of TAKF<sup>2</sup> found that the two reasons people attended were:

- Because it was something the family could do together (72%)
- Because the children wanted to go fishing (55%)

I challenge the authors of these proposals to find a young person who will be excited about fishing when it involves releasing even more of the catch as ‘undersize’ and often coming home empty-handed. To add insult to injury, commercial fishing is allowed to take 25cm fish. It is unjust for recreational fishermen to be able to buy ‘undersize’ fish when they are not permitted to keep the same from their own efforts.

It is equally unfair that the commercial catch is to be unchanged at 4,500 MT per annum, while the targeted recreational catch is being reduced. The objective when recreational limits were set in 1997 was to rebuild the depleted stock and enhance recreational fishing. In the course of achieving that goal, recreational fishing has accepted both reduced bag limits and increased minimum sizes. Commercial fishing has been relatively unchanged, despite being a major beneficiary of improvements in the fishery (and the main cause of its earlier collapse).

### **The proposals will have high economic costs for the greater Auckland region**

Recreational fishing is an important economic activity in the greater Auckland region:

- In 2006, 17% of Auckland households owned a boat<sup>3</sup>
- In 2008, approximately 20% of New Zealanders reported participating in fishing, representing more than 250,000 Aucklanders
- In 2009, approximately 44,500 international visitors to New Zealand also participated in fishing activities<sup>4</sup>
- The recreational marine sector contributed \$399 million to Auckland’s gross regional product (GRP) in 2006.
- The sale of new trailer power boats (mainly associated with recreational fishing) alone contributed \$37 million in turnover for Auckland in 2008 (i.e. 30% of the total Auckland boat market not including superyachts, launches and sailing boats).
- The supply of equipment and services to trailer power boats in Auckland is estimated at an additional \$126 million per annum
- There is also a substantial export component in this sector
- While recreational boating and fishing is a significant economic activity in its own right, it is also closely linked to other marine sectors

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<sup>2</sup> Family orientated, non-competitive outdoor recreation events and on-going participation, Zink Research (for Sport NZ), April 2012

<sup>3</sup> Industry snapshot for the Auckland region: The Marine Sector, ARC, October 2009

<sup>4</sup> The Economic and Social Value of Sport and Recreation to New Zealand, Paul Dalziel, September 2011

Using the deemed value of \$26 per kilogram for snapper in table 3.3 of the MPI report, every thousand tonnes of snapper is worth \$26 million. This seems a great deal, but in context it represents less than 0.2% of New Zealand's dairy exports in 2012. It is only 0.03% of Mighty River Power's market capitalisation. It is a trivial economic amount, substantially less than the annual value of new trailer power boat sales (\$37 million) and equipment and servicing of these (\$ 126 million) in Auckland, and yet taking this away from recreational fishers will have a huge social cost.

All of the proposed reductions in the recreational catch will reduce the enjoyment and attractiveness of recreational fishing. This in turn will reduce participation, either through boat ownership or through charter fishing activities. It will affect the dozens of boat yards, service providers, and various recreational fishing supply companies. Owners of these businesses rightly fear a downturn that will severely damage their viability.

We are aware of the government's business growth agenda to "double the value of food exports by 2025". Reducing the recreational catch will not aid in achieving this goal. Indeed, the best pathway to achieve this goal for commercial fishing would be to retain a higher proportion of value-added versus exporting unprocessed fish to Asian-based factories. Until such time as the greater part of the catch value is retained in New Zealand, and the many wasteful practices in commercial fishing are addressed, there is no economic justification for favouring the commercial sector.

### **The proposals ignore fishing as an important cultural activity for non-Maori as well as Maori**

Fishing is a significant cultural activity for many New Zealanders. Approximately 20% of New Zealanders identify themselves as recreational fishers. This is more than running, golf or any team-based sports. Only cycling (22%) and swimming (34%) are more ubiquitous.

Pre-European Maori depended on the sea for sustenance, and Maori today continue to identify strongly with this heritage. The first Europeans to arrive in New Zealand were expert mariners and they were followed by enterprising Europeans who made their living from the sea as whalers and sealers. Farming only came later. Many other immigrants from the Pacific Islands, Asian nations, and further afield also have a strong heritage of fishing. It is an activity at the core of our national identity, and one which provides a common interest across cultural boundaries.

While New Zealand is secular, its dominant cultural heritage lies in Christianity. Many of the Apostles, including Saint Peter, were fishermen. Fishing is a common theme in the Christian bible, and the fish is a symbol of the early Christian church.

New Zealand prides itself as an egalitarian society. Within this egalitarian view, recreational fishing is seen as a fundamental right, not a privilege or commodity to be purchased. Nonetheless, New Zealanders also recognise the importance of sustainability and so recreational fishers compromised their interests in order to

secure fish stocks for future generations. It would be unwise to confuse this position with surrender of rights to commercial interests.

**The proposals are a poorly disguised commercial initiative masquerading as a sustainability initiative, and have no justification on that basis**

The scientific evidence presented with the proposals<sup>5</sup> shows that snapper numbers (i.e. section 4.2. Status of the SNA 1 Stock) declined significantly over the period 1960 to 1988. East Northland stocks fell to just fewer than 20% of their 1900 biomass. Hauraki Gulf–Bay of Plenty stocks fell to only 10% of their 1900 biomass. Both are now roughly stable at around 24% and 19% respectively of their 1900 biomass levels.

The actual document erroneously suggests that there has been a decline in the Hauraki Gulf–Bay of Plenty stock since 2010. As the 95% confidence interval is plus or minus 6%, any apparent increase or decline within these limits is not significant. It is more accurate to say that stocks are now relatively stable. The report acknowledges there is zero probability that stocks lie below the hard limit of 10% of 1900 levels, but some likelihood that that the Hauraki Gulf–Bay of Plenty stocks are below 20%. The report also notes a concern that over-fishing may be occurring. However, the important conclusion on page 33 is that “the spawning biomass [is] projected to increase slowly over the next five years (between 1% and 4%) for both sub-stocks”. A slow decline is then forecast to occur after 2030.

The actual ‘problem’ is that neither stock is likely to reach the interim target of 40% of the 1900 biomass. Achieving this goal would indeed be good for fishing overall, as the greater biomass would allow a greater sustainable harvest. However, this is only a common good if it is shared. The proposals provide no comfort that recreational fishers will ever share in that good – in fact they set a precedent for sacrifice of entitlement by recreational interests in favour of commercial fishing. This is simply not acceptable.

Logic dictates that a problem is best solved by finding the point of greatest leverage and focussing efforts there. In this case, any over-fishing should be attributed to those who take the most fish, those who fish indiscriminately (including taking smaller fish) and those methods involve a high rate of mortality for fish that are not ‘landed’ (and the illegal practice of dumping). This logic clearly points to commercial fishing activity as the main contributor to over-fishing. It is immensely frustrating to recreational fishing that the commercial fishing sector continues to take a lowest-cost approach, and has not been proactive in implementing changes to achieve more sustainable management of the fishery.

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<sup>5</sup> Review of sustainability and other management controls for snapper 1 (SNA 1), MPI Discussion Paper No: 2013/31

## **The proposals are ineffective and counterproductive**

Following from the previous point, it is perverse for all three proposals to focus on the recreational sector, with lower bag limits and raising the minimum size. Most recreational fishers already struggle to catch more than 3 fish per trip, and already return a high proportion of fish as undersize (although still above the commercial fishing minimum size). Hence the proposals will likely have two effects:

- Lowering bag limits will incentivise high grading, where fishers keep smaller fish until they catch a larger one in order to maximise the total weight taken
- Raising the minimum legal size will increase the mortality of snapper, as recreational fishers will still inadvertently catch the smaller fish

In order to make any substantial impact on the recreational catch, it is necessary to introduce severe limits that will promote these counter-productive effects and yet achieve relatively little under even the best scenarios (i.e. less than 500 tonnes per annum). Yet it will cause considerable social and economic damage. It would also require more policing of recreational fishing to enforce.

It would simply be far more effective to either require more sustainable fishing practices from the commercial sector, or to reduce the quota available to commercial fishing.

Finally, it cannot be overstated that it is time for the government to address the (non)performance of the commercial fishing sector, particularly its woeful track record as (non)conservationists. It is entirely inappropriate for the commercial sector to be allowed to retain its status quo, yet stand as a long-term beneficiary of the proposed changes. At the very least, new proposals from MPI are required which:

- Address the mortality associated with bulk harvesting methods by banning trawling and Danish seining from significant nursery and fragile benthic areas.
- Measure, monitor and report all discards/waste caused by commercial fishing.
- Incentivise better practices by having discards/waste caused by commercial fishing counted as catch and deducted from quota.

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Finally, I wish to raise an objection over your handling of the so-called public meetings. A 'public meeting' suggests some form of formal presentation, and an opportunity for dialogue. What has occurred is more in the nature of a trade-show with information kiosks manned by staff. To add insult to injury, the ministry is in possession of recreational fishing survey data that it has delayed publication of despite holding the final 'draft' reports for some time. This is a travesty, of which MPI should be ashamed. An apology is in order.

Thank you for your time and consideration,

Yours Sincerely,

Dr James Morrison