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23 July 2025

## Recommendations for Jack mackerel 1 (JMA 1) for 2025/26

1. **The Minister acknowledges his statutory duty** to make a precautionary decision given the uncertain, unreliable, and inadequate information regarding the abundance of JMA 1.
2. **The submitters support** the Minister in making a precautionary decision for Jack mackerel 1 (JMA 1). Our alternative is Option 4, as follows –
  - a. The Total Allowable Catch is set at 4,082 tonnes (t).
  - b. The allowance set aside for Māori customary interests is set at 10 t.
  - c. The allowance set aside for Recreational interests is set at 32 t.
  - d. The allowance set aside for Other Mortality is set at 40 t.
  - e. The Total Allowable Commercial Catch is reduced to 4,000 t.
3. **The submitters insist the Minister direct Fisheries New Zealand** to complete a full assessment of the JMA 1 fishery.
4. **The submitters insist the Minister direct Fisheries New Zealand** to invest resources into forage fish and the effects of fishing and environmental conditions impacting overall abundance.
5. The submitters recommend the Minister directs Fisheries New Zealand to work with industry to find solutions to spread the harvest of Jack mackerels to alleviate concentrated fishing effort occurring in the Bay of Plenty.

## Submitters

6. The New Zealand Sport Fishing Council (**NZSFC**) is a recognised national sports organisation with over 37,000 affiliated members from 50 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. [legasea.co.nz](http://legasea.co.nz).
7. The New Zealand Angling and Casting Association (**NZACA**) is the representative body for its 20 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. The New Zealand Underwater Association (**NZUA**) comprises three distinct user groups including Spearfishing NZ, affiliated scuba clubs throughout the country and Underwater Hockey NZ. Through our membership we are acutely aware that the depletion of inshore fish stocks has impacted on the marine environment and the wellbeing of many of our members.
9. 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].
10. 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).

## Proposals

11. Fisheries New Zealand has released a [Discussion Document](#) proposing to set a Total Allowable Catch (**TAC**) for the first time including proposed changes to the Total Allowable Commercial Catch (**TACC**) and setting allowances for Customary Māori, Recreational and All Other Mortality caused by fishing for Jack mackerel in JMA 1 (**Table 1**).

Table 1. Proposed management options (in tonnes) for JMA 1 from 1 October 2025.

Option	TAC	TACC	Allowances		
			Customary Māori	Recreational	All other mortality caused by fishing
<i>Current settings</i>	-	10,000	-	-	-
Option 1	10,142	10,000 <sup>2</sup>	10	32	100
Option 2	8,122	8,000 (↓ 2,000)	10	32	80
Option 3	7,112	7,000 (↓ 3,000)	10	32	70

## Consultation

12. On 24 June 2025 Fisheries New Zealand released the [Discussion Paper No: 2025/16](#), to review the Total Allowable Catch for Jack mackerel 1 (**JMA 1**). Submissions were due by 23 July 2025.
13. **The submitters** appreciate the opportunity to submit on the proposal, however we object to the unreasonably short timeframe available to respond to this proposal and those for 34 other fish stocks. A letter requesting a deadline extension was sent to the Minister on 11 July. On the afternoon of 23 July FNZ advised a new deadline of 30 July.
14. The 21 working days submission period was inadequate and likely unlawful given the Court of Appeal Wellington Airport judgment determining that, “**Consultation must allow sufficient time**, and a genuine effort must be made. It is a reality not a charade...Implicit in the concept is a requirement that the party consulted will be (or will be made) adequately informed so as to be able to make intelligent and useful responses”<sup>1</sup>. [emphasis added]

## Background

15. New Zealand has three Jack mackerel species that are managed as a complex: two endemic species, *Trachurus novaezelandiae* (common names: Jack mackerel and yellowtail) and *Trachurus declivis* (greenback horse mackerel), and *Trachurus murphyi* (Chilean Jack mackerel) is a Pan-pacific species which was positively identified in New Zealand in 1986.
16. Fisheries New Zealand are proposing a to set the Total Allowable Catch (**TAC**) for Jack mackerel fishery on the east coast of the North Island for the first time (**JMA 1**) (**Figure 1**). The options proposed include reductions to the Total Allowable Commercial Catch (**TACC**) of up to 3,000 tonnes, an allowance set aside for Recreational and Customary Māori interests and an allowance set aside for Other Mortality equating to 1% of the TACC.
17. Jack mackerels were introduced to the Quota Management System (**QMS**) in 1987. The TACC was first set at 5,970 tonnes. The TACC did not constrain harvest and was exceeded across consecutive years. The TACC was increased to 8,000 tonnes in the 1993–94 fishing year and again to 10,000 tonnes in 1994–95. The TACC increases were awarded based on an increased availability of Jack mackerels driven by an

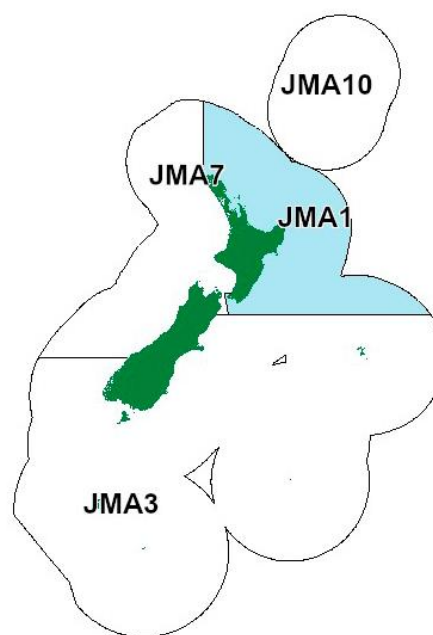


Figure 1. Fisheries Management Areas for Jack mackerel.

<sup>1</sup> Wellington International Airport Limited and others v Air New Zealand [1993] 1 NZLR 671. At [p.675].

influx of *T. murphyi*. *T. murphyi* makes up the smallest proportion of commercial Jack mackerel harvest in JMA 1.

18. Both TACC increases were made under the proviso that they be accounted for by increased catches of *T. murphyi* only with the combined landings of the domestic New Zealand species *T. declivis* and *T. novaezelandiae* in JMA 1 not exceeding the original quota of 5,970 tonnes.
19. Jack mackerels are an important recreational species primarily as bait and some personal consumption. An allowance for recreational fishers has not been set aside however, Jack mackerel are a part of the recreational daily limit of 50 baitfish. The 2023–23 National Panel Survey estimated recreational harvest of Jack mackerels in JMA 1 at 22.1 tonnes (C.V = 0.27), previous surveys estimated recreational harvest as 32.2 tonnes (C.V = 0.21) in 2011–12 and 18.6 tonnes (C.V = 0.24) in 2017–18.
20. Jack mackerels are an important prey species contributing to the crucial link between primary production and higher tropic level species such as marine mammals, seabirds and large predatory fish. Declines in abundance of ‘forage fish’ species such as Jack mackerels can have severe implications for dependent species.
21. FNZ state in their discussion document that “*it is not known whether catches at the level of the current TACCs or recent catch levels are sustainable in the long term*”<sup>2</sup>. The TACC needs to be significantly reduced until more information on sustainable harvest is available.

### **Commercial catch information and management settings**

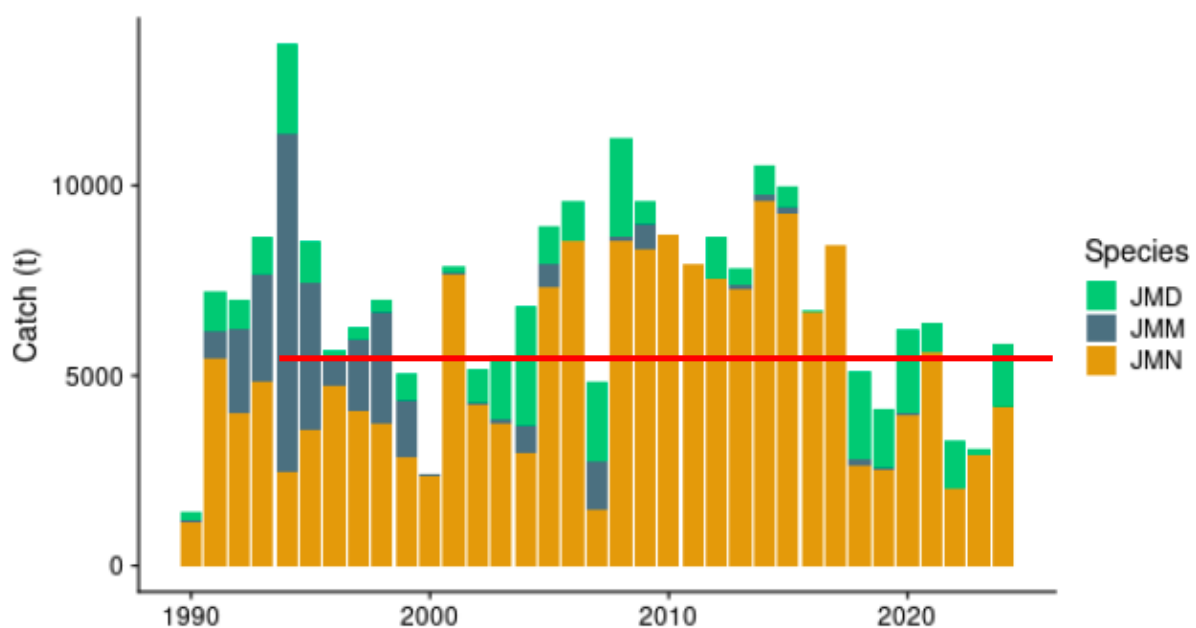
22. Jack mackerels in JMA 1 are primarily taken by the target purse seine fishery operating in the Bay of Plenty, smaller quantities of commercially harvested fish are caught off east Northland and east of the Coromandel Peninsula. Small amounts of Jack mackerel are caught as bycatch of kahawai and blue mackerel purse seine fisheries and trawl fisheries.
23. In response to market requirements, fish are no longer stored in brine on board vessels, this has resulted in shorter trip durations and concentration of commercial fishing effort in the Bay of Plenty near the processing facilities in Tauranga.
24. Since the multi species TACC was increased to 10,000 (1994–95) landings of Jack mackerels have been below the set statutory limits, excluding 4-years. However, this does not consider the provision that the combined landings of *T. declivis* and *T. novaezelandiae* would not exceed the original quota of 5,970 tonnes across the whole of JMA 1 which industry had agreed to. Industry also agreed to introduce monitoring programmes which would provide the necessary catch by species information to meet the provision.<sup>3</sup>

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<sup>2</sup> Review of sustainability measures October 2025: JMA 1. Fisheries NZ. At [149]

<sup>3</sup> Fisheries Assessment Plenary – Jack mackerels. May 2025. Fisheries New Zealand. At [p.697]

25. Species composition information is available for the Bay of Plenty purse seine fleet for the 1989–90 fishing year up to 2023–24. Since 1999–00, *T. murphyi* has made up less than 5% of the reported catch composition, excluding 4-years where it varied between 7% and 26%. This aligns with the estimated reduced abundance of *T. murphyi* and their limited distribution overlapping the Bay of Plenty purse seine fleet.
26. In addition, there is species composition information available for the JMA 1 East Northland and Bay of Plenty purse seine fishery. **Despite industry agreeing to not exceed 5,970 tonnes in JMA 1, reported commercial landings of *T. declivis* and *T. novaezelandiae* have exceeded 5,970 tonnes 17 times over the last 25 years (Figure 2).** This just highlights industry’s inability to adhere to unregulated agreements and the inertia in FNZ to review TACs for low information stocks.
27. **The submitters also have concerns regarding the TACC primarily being used to harvest *T. novaezelandiae*** and the long-term ecosystem effect this may have. The current TACC was allocated for three species not one, we urge FNZ to consider solutions that may resolve these concerns.



**Figure 2.** The time series of annual species catch estimates from the JMA 1 purse seine fishery in East Northland and the Bay of Plenty (JMN, *T. novaezelandiae*; JMD, *T. declivis*; JMM, *T. murphyi*). Red line is approximately 5,900 tonnes.

## Effects of fishing

28. In November 2022 the High Court provided clarification on the Minister’s responsibilities in terms of setting the TAC. Churchman J. described those responsibilities (in part) as follows –
- “When setting or varying [the] TAC **the Minister must take into account any effects**

**of fishing on any stock and the aquatic environment.** ‘Effect’ means the direct or indirect effect of fishing, including any positive, adverse, temporary, permanent, past, present, future, and/or cumulative effect. ‘Fishing’ means the catching, taking, or harvesting of fish, aquatic life, or seaweed.”<sup>4</sup> [emphasis added]

29. This judgment applies to all species in the Quota Management System (**QMS**), their habitats, and species that are dependent on them as prey, not just the fish stocks of value to commercial interests.
30. Despite the High Court judgment, FNZ does not know or does not describe how the proposed options will impact on the aquatic environment, nor how they will effectively address the direct or indirect effects of fishing. This is essential information if the Minister is to make a lawful decision for JMA 1.

### **Sustainability concerns**

31. Jack mackerels also known as forage fish or baitfish hold a key trophic position in the ecosystem between planktons and large fish, marine mammals and seabirds. Effective management must account for the needs of the wider ecosystem.
32. FNZ have merely glossed over the importance of baitfish within the food web but have stated that research has indicated that a loss of abundance of forage fish could reduce the total biomass of marine predators i.e., predatory fish, marine mammals and seabirds. FNZ also state that the response to loss of prey abundance would be dependent on *diet flexibility* (the ability of predators to switch prey). The results from the study on diet flexibility are due to be published in 2026,<sup>5</sup> a precautionary approach is required until more information is available, however, we caution FNZ and the Minister to not use a predators ability to switch prey as an excuse to continue harvesting low knowledge fish stocks.
33. FNZ note in their discussion document that “*an economic trade-off may exist between harvesting forage fish and allowing them to remain in the ocean, where they can provide support for other commercially important species*”<sup>6</sup>.
34. It seems counterintuitive to be removing large quantities of Jack mackerel just to be exported at a low value when there are uncertain high risks to species that are highly valued socially and culturally, by the commercial and non-commercial fishing sectors, environmental groups and tourism interests.
35. There is no trade-off between sustainability and socio-economic factors. Sustainability must be ensured. That includes sustainability of non-target species.
36. Declines in seabird populations on the northeast coast are particularly concerning. Seabirds dependent on forage fish are vulnerable to both capture and starvation due to fishing. There are already reports that seabirds are flying further afield to

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<sup>4</sup> Environmental Law Initiative v Minister for Oceans and Fisheries [2022] NZHC 2969 [11 November 2022]. At 22.

<sup>5</sup> Review of sustainability measures October 2025: Jack mackerel (JMA 1). Fisheries NZ. At [76-77]

<sup>6</sup> At [5]

gather food for their chicks in breeding season, this is impacting on fledgling survival. This can be addressed if we stopped the bulk harvesting of many forage fish e.g., transitioning away from bulk harvesting forage fish species in the Hauraki Gulf Marine Park and near seabird nesting sites.

37. The distribution and abundance of forage fish can be highly dynamic and fluctuate in response to oceanographic and climatic conditions that influence food (plankton) availability. Past research has indicated that mackerels in the North Island are one of several fisheries that are most likely to be at risk of disruption from future temperature anomalies.<sup>7</sup>
38. Scientists from FNZ have already [stated in 2024](#) that climate conditions on the east coast of New Zealand may have led to a decline in food availability for baitfish and therefore contributing to chronic malnutrition in larger fish. If turbulent climate conditions are having an impact on prey availability then we need to manage what we can and leave more fish in the water to maintain resilience in fish populations. Changes in climate and oceanographic conditions are expected to continue.
39. Jack mackerels are also susceptible to overfishing by purse seine even at low biomass due to schooling behaviour.
40. It is currently unknown if the current management settings for JMA 1 allow Jack mackerels to effectively fulfil their ecosystem role as prey and what the effect of extracting 5,000–10,000 t of Jack mackerels from JMA 1 has on the ecosystem.
41. There has been a partial quantitative stock assessment for *T. novaezelandiae* in 2023 which estimated fishing mortality '*likely (>60%) to be at or below*' the target and '*overfishing is unlikely (<40%) to be occurring*'. However, this estimate is only representative of the Bay of Plenty purse seine fishery and does not reflect the entirety of JMA 1.<sup>8</sup> No stock assessment information is available for *T. declivis*, and *T. murphyi* in New Zealand waters is not considered to represent an independent biological stock.<sup>9</sup>
42. FNZ must advise the Minister that these current proposals do not meet the minimum statutory standard, so to be lawful, the Minister is obliged to make a precautionary decision.
43. Our concern is that the current suite of proposals do not meet the statutory test of 'ensuring sustainability', as required by the Fisheries Act and as confirmed by the High Court. The CRA 1 High Court decision in 2022 confirmed that ***the Fisheries Act requires the Minister to act in accordance with New Zealand's international obligation to favour a precautionary approach where information is uncertain, unreliable, or inadequate***<sup>10</sup>.

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<sup>7</sup> At [84]

<sup>8</sup> Fisheries Assessment Plenary – Jack mackerels. May 2025. Fisheries New Zealand. At [p.697]

<sup>9</sup> At [p.719]

<sup>10</sup> Environmental Law Initiative v Minister for Oceans and Fisheries [2022] NZHC 2969 [11 Nov 2022]. At [17 & 44]

44. We cannot control how marine ecosystems react to rising sea surface temperatures and changes in productivity, however, the Minister and FNZ have a responsibility to manage fisher behaviour. What can be controlled is harvesting fewer fish to leave more fish in the water providing stronger resilience against environmental perturbations.

## Environmental bottom line

45. The purpose and principles in sections 8, 9 and 10 of the [Fisheries Act 1996](#) form an environmental bottom line that will **ensure sustainability**. This bottom line applies to all species – none are exempt from the obligation to ensure sustainability.
46. The primary tool used to defend the bottom line is the setting of catch limits pursuant to s13 of the Act, determining the TAC for each stock.
47. The biomass that will provide the maximum sustainability yield ( $B_{MSY}$ ) of any species is only a starting point at determining the environmental bottom line. From this theoretical point the Act's principles must be applied to describe and take into account the uncertainty, information fullness and reliability, international obligations, and to adopt the precautionary principle, as described by Churchman J. of the High Court:
- a. "Accordingly, I accept Mr Salmon's submission that the importance of the requirement relating to the use of the 'best available information' in a fisheries context, is somewhat elevated. Indeed, the purposes of the Act appear to create what could be described as an '**environmental bottom-line**', and are accordingly complemented by a scheme that favours precaution"<sup>11</sup>. [emphasis added]
48. The single species focus has been ruled by the Court as insufficient. In considering the challenge to the Minister's 2021 and 2022 decisions for CRA 1, the Court described how the Minister applies the Fisheries Act 1996, saying "there are two approaches to fisheries management that are identifiable at international law, being an 'ecosystem approach' and a 'precautionary approach':
- a. The ecosystem approach requires decision-makers to incorporate wider ecosystem effects into fisheries management, instead of considering sustainability with a single-species focus; and
  - b. The precautionary approach stipulates that decision-makers are more cautious where information is uncertain, unreliable or inadequate<sup>12</sup>.
49. Full application of the relevant factors is required to ensure the bottom line is at least achieved; **the bottom line is not an aspiration, it is a bottom line not to be breached**.
50. In a situation of imperfect information the environmental bottom line is defended by using precautionary principles. This is where FNZ find themselves with these

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<sup>11</sup> Environmental Law Initiative v Minister for Oceans and Fisheries [2022] NZHC 2969 [11 Nov 2022]. At [108]

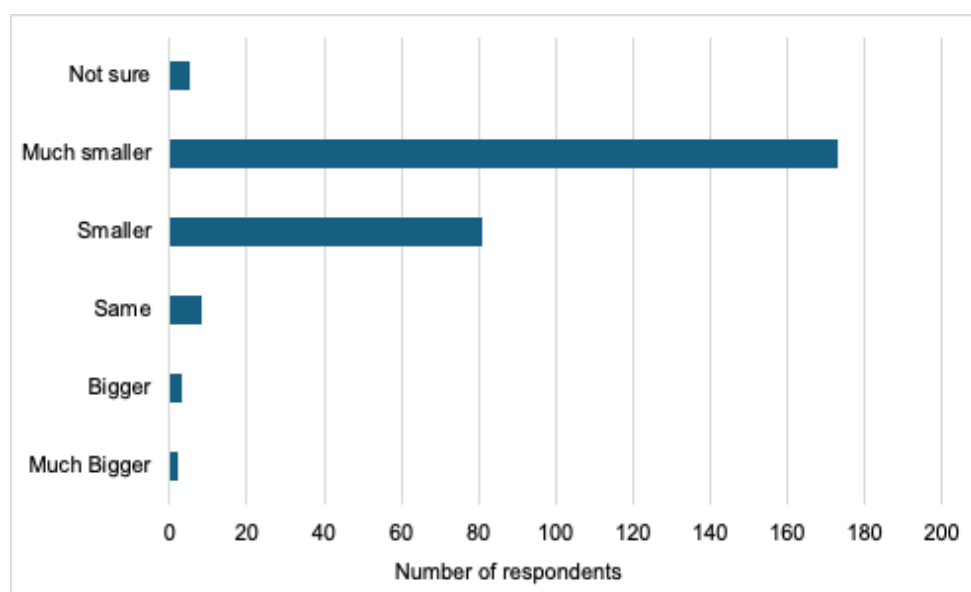
<sup>12</sup> At [16-17]



current proposals. There is declining commercial catch with no reliable estimates of trends in abundance or biomass for JMA 1 and no real understanding of the impacts of harvest on the wider ecosystem. **The Minister must adopt a precautionary approach.**

## Baitfish survey

51. In October 2024, LegaSea distributed a public survey on social media, through fishing clubs, and local news media (e.g., Mahurangi Matters) to gauge the public's perception of baitfish abundance, work ups, and how this may have changed over the time that they have been on the water. The survey focussed on JMA 1. See Appendix 1 for survey results.
52. The survey had 272 valid responses. More than half (53%) of the respondents had 31+ years' experience on the water. Respondents ranged from fishers, boaties, divers, people who work on the water and 'other'.
53. Respondents were asked – *'Over the years have you seen a change in the number of seabirds, mammals or fishing workups in your area?'* All survey respondents completed this question, 257 respondents said they had seen a change in their area.
54. Respondents were also asked – *'The size of a work up is usually described as the number of birds fishing and diving, dolphins and/or whales in the area. Based on your perspective, over the time that you have spent on the water, how would you rate the change in SIZE of work ups now?'* There were 254 responses that indicated that work up size was 'smaller' or 'much smaller' (**Figure 3**).



**Figure 3.** Survey responses to whether the size in work ups has changed over the respondents time on the water (n = 272).

55. Survey respondents were asked – *'JMA 1 is one of the largest inshore fisheries by weight yet there has never been a full assessment to understand if this harvest level*

*is actually sustainable. Do you think this is acceptable?* Most respondents answered this question, 258 (94%) selected 'No', 3 respondents selected 'Not sure', 6 selected 'Yes'.

56. There is a common perception which extends beyond this public survey among the JMA 1 fishing and boating community that there is a declining abundance of baitfish and associated species. Work ups are less frequent and are not lasting as long and/or are smaller in size.
57. Some recreational fishers use work ups to spot fish but they are now becoming harder to find and residents of coastal towns, particularly Whangamatā have also reported seeing less frequent work up activity.
58. The survey asked respondents to leave further comments that they think LegaSea and Fisheries New Zealand should know. These comments are the personal experiences of fishers based on the east coast of the North Island. A subset of comments are attached in the Appendix. If FNZ would like the full dataset of survey responses please contact [secretary@nzsportfishing.org.nz](mailto:secretary@nzsportfishing.org.nz).

## Summary and Recommendations

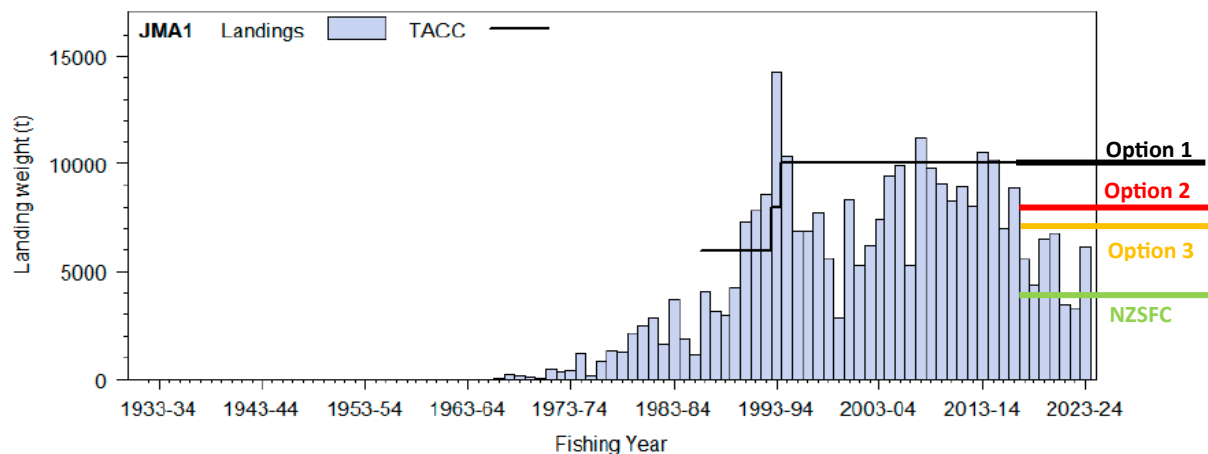
59. The Minister has a statutory duty, not just a policy setting, a legal obligation, *“to maintain the potential of fisheries resources to meet the reasonably foreseeable needs of future generations..”* as per s8 of the Fisheries Act 1996.
60. FNZ state in their discussion document that it is *“uncertain whether catches the level of the current TACC (10,000 t) or recent catch levels are sustainable in the long term”*<sup>13</sup>. This further highlights the Ministers obligation to take a precautionary approach. None of the options proposed will reduce the TACC to a level that will reduce the amount of Jack mackerels coming out of the water. Therefore, an alternative option is required.
61. **The submitters support** the Minister in making a precautionary decision for Jack mackerel 1 (**JMA 1**). Our alternative is Option 4, as follows –
- f. The Total Allowable Catch is set at 4,082 tonnes (t).
  - g. The allowance set aside for Māori customary interests is set at 10 t.
  - h. The allowance set aside for Recreational interests is set at 32 t.
  - i. The allowance set aside for Other Mortality is set at 40 t.
  - j. The Total Allowable Commercial Catch is reduced to 4,000 t.
62. **The submitters insist the Minister direct FNZ** to complete a full assessment of the JMA 1 fishery and invest resources into forage fish, the effects of fishing and environmental conditions impacting overall abundance.

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<sup>13</sup> Review of sustainability measures for October 2025: Jack mackerel (JMA 1). Fisheries NZ. At [72]

63. **The submitters have concerns regarding large quantities of baitfish being harvested from concentrated areas and the effect this may be having on the ecosystem.** We recommend the Minister directs FNZ to work with industry to seek solutions to spread the harvest of Jack mackerels to alleviate the concentrated fishing effort in Bay of Plenty.

64. A TACC reduction to 4,000 tonnes reduces the TACC to the original setting plus further to allow for changing environmental conditions.



**Figure 4.** Commercial landings and total allowable commercial catch (TACC) for Jack mackerel 1 (JMA 1). Black line is the status quo and where the TACC would be if option one is selected (10,000 tonnes). Red line is option 2 (8,000 tonnes), orange line is option 3 (7,000 tonnes). The green line is the NZSFC recommended TACC of 4,000 tonnes.

## Appendices

### Appendix 1

#### Baitfish survey questions. October 2024.

1. **Name**
2. **Email**
3. **Phone**
4. **Are you a boatie or someone who cares about the environment?**
  - a. Boatie
  - b. Fisher
  - c. Diver
  - d. Other
5. **Are you a member of a fishing, oceans or underwater club?**
  - a. Yes
  - b. No
6. **If you selected 'Yes', please select which one.**
7. **If you selected 'Other', please comment which club you belong to.**
8. **How long have you been observing changes to our marine environment**
  - a. Less than 5 years
  - b. 6-20 years
  - c. 21-30 years
  - d. 31+ years

#### **Work ups**

*A work up is a concentrated feeding frenzy above and below water. Predatory fish, usually kahawai and kingfish, seabirds (especially gannets) and marine mammals all come together to feed on schools of baitfish. As predatory fish chase the baitfish to the surface, seabirds can be seen diving. The size (number of birds or marine mammals) feeding can be used as an indicator of the amount of food available. Work ups can also be measured by how long the feeding lasts or how often they occur.*

9. **Over the years have you seen a change in the number of seabirds, mammals or fishing work ups in your area?**
  - a. Yes
  - b. No
  - c. Not sure

10. The size of a work up is usually described as the number of birds fishing and diving, dolphins and/or whales in the area. Based on your perspective, over the time that you have spent on the water, how would you rate the change in SIZE of work ups now?
- a. Much smaller
  - b. Smaller
  - c. Same
  - d. Bigger
  - e. Much bigger
11. When you first started spending time on the water how often would you see work ups? E.g., when I was a kid out fishing with family we would see a work up every time we went out on the water (1-2 times every times).
- a. Infrequently. Less than once every few trips
  - b. Once every few trips
  - c. 1-2 times per every trip
  - d. 3+ times per trip
  - e. Not sure
12. How often do you see work ups now? E.g., I have been out three times this year and have seen one work up (Once every few trips).
- a. Infrequently. Less than once every few trips
  - b. Once every few trips
  - c. 1-2 times per every trip
  - d. 3+ times per trip
  - e. Not sure
13. Is there anything else you would like to add that you think we should know?
- a. Comment

***Baitfish management***

*The Quota Management System (QMS) manages each species of fish independently and relies on knowing. The first step for responsible management is to know how many fish are in the water. Then the Minister can decide how many fish can be taken every year, and how many fish need to stay in the water. In JMA 1 (East Coast North Island and Southern Coast of North Island), commercial fishers can take up to 10 million kilos of Jack mackerel from the area. This is equivalent to more than 12 million fish (commercial max, 800 grams each).*

14. JMA 1 is one of the largest inshore fisheries by weight yet there has not been a full assessment to understand if this harvest level is actually sustainable. Do you think this is acceptable?
- a. Yes
  - b. No

- c. Not sure

**Description**

*Over the past decade, each year in JMA 1, the commercial harvest of Jack mackerel was on average only 67% of their allowable catch. In more recent years, actual harvest has dropped as low as 34%. Declining harvest rates may indicate that there are simply not enough Jack mackerel to fill the catch limit. Or worse, the populations are decreasing.*

15. **Knowing baitfish are vital food sources for many other sea creatures, would you support a review of the catch limits for the JMA 1 Jack mackerel fishery?**
- a. Yes
  - b. No
  - c. Not sure
16. **If there was a review, would you support the Minister reducing the Jack mackerel commercial catch limit to a lower level in the next few years?**
- a. Yes
  - b. No
  - c. Not sure
17. **Please provide any further comments that your think LegaSea or Fisheries New Zealand should know.**
- a. Comment

## Appendix 2

The following comments are a subset of the personal comments received from survey respondents to the Baitfish Survey. For privacy names have been excluded. Respondents have been recorded as how they identified they used the water and the time they have spent on the water has been provided.

1. Fisher, Less than 5 years
  - a. It's crazy that these Jack Mackerel quota's haven't been reviewed in something crazy like 30 years, I would say it's well overdue, well that's and understatement if ever I've heard one. Myself and my friends, actually target Jack Mackerel or Aji as we call them, with ultra-light tackle, they're fun to catch on this UL balanced gear, and bonus they taste great. These archaic 30 year old quota's and the fact no stock assessments have been done is madness, I would hate for the population to crash.
2. Fisher, Less than 5 years
  - a. My fishing session would usually start with catching bait fish, kahawai and snapper. That no longer happens
3. Fisher & Diver, 6-20 years
  - a. The unabated commercial fishing of baitfish is the crux of our whole problem. These are the food source of our target species particularly snapper. That is why we have a flesh problem with our snapper on the east coast Coromandel where I have traditionally fished and dived. One only has to look at the uncontrolled activity in places like Asia to understand the outcome we are staring at. We cannot indiscriminately claim right of passage to catch a feed when we are not managing our resource. I have stopped fishing and I believe everyone else needs to consider what they want for the future. I would suggest that we are already too late, as it takes time to turn a ship around, excuse the pun. We are the ones starving the snapper, they take a long time to grow, our kids are going to certainly give us the message in the future, one that they cannot enjoy a 'fish' in! Act now, Kiwis!
4. Anon, 6-20 years
  - a. The fishing in Doubtless bay has collapsed . Jonhn Dorry used to be washed up on the beach that has not happened in four years . The snapper have been fished out of the bay by long line boats . the King fish are not around like they once were . The Kahawai are still coming into the bay but the fish and the schools are getting smaller . It does not help when certain people are setting gill nets and catching up to fifty Kahawai in one go. Gill nets should be banned like in other countries. All the mussels have been taken of the rocks. Thanks to divers with tanks .The last mussels were fished out three years ago collecting mussels with tanks should also be banned . Now that the fish have been fished out of Doubtless bay the long line boats have moved north . To fish that area out .

5. Fisher & Diver, 6-20 years

- a. Schools of resident baitfish (piper, Jack Mackerel, yellow-eye mullet, Koheru) seem to have disappeared from the inner Hauraki gulf in places such as bays, headlands and reefs. This is my routine observation since 2022 from the top of the Coromandel to Cape Rodney. Transient schools over deeper water in the Gulf are still apparent on sonar. From my scuba diving experience Hauraki Gulf reef environments are largely devoid of sea-weed, kelp, eel-grass that support baitfish. This marine vegetation was far more abundant when I started diving the gulf in the early 1990's.

6. Fisher & Diver, 6-20 years

- a. The areas I have fished and am talking about are kahawai work ups in the eastern bay of plenty inshore eg motu. Anchovy meat balls off whakatane that largely dissappeared in the early 2000's, and Jack mackerel that appear to have declined in the Hauraki gulf in the last 5 years.

7. Fisher & Diver, 21-30 years

- a. The marked reduction in bait fish and Work Ups are noticeable whenever you go out on the water .. The Ocean is not alive like it used to be 25 yrs ago where we moved from one workup to another, fishing underneath them.. I moved to NZ 30 yrs ago because of the fishing and diving.. It is not an Ocean we want to leave for our children, workups are a real visual aspect, great for tourists and kiwis alike.. One of the great reasons people want to live in and visit NZ.

8. Fisher, 21-30 years

- a. Less bait fish around our local wharf at Port Charles and an almost total absence of John dory that were once quite common in this area. A noticeable number of small throwback snapper in the last 2/3 years.

9. Fisher, 21-30 years

- a. I have fished the mercury Bay area and noticed the decline of snapper size and availability. The schools of bait fish has also diminished reducing the quantity of King Fish in the inner Mercury Bay area.

10. Fisher, 21-30 years

- a. 20 years of fishing out of Whangamata we've seen huge decline in not just baitfish but all fish. And now seeing a purse seine vessel working the same patch four days in a row barely 6km from shore is extremely disturbing.

11. Anon, 21-30 years

- a. We used to see work ups inside the Islands in the BOI, now I have seen approximately 2 mild work ups in 2 years. the gannets have moved out. I have seen 0 blue penguins in the last 2 years, but today Jesus birds were a first for me in the Bay.



12. Fisher & Diver, 31+ years

- a. There has been a decline in the Whangarei area of piper due to over fishing by commercial and recreational fishers. A lot of this is sold as bait. Koheru are an important inshore forage species in NE NZ. They can occasionally be seen feeding on the surface but I wouldn't call it a work up.

13. Fisher, 31+ years

- a. I think it is fair to say that the drop in baitfish is probably the reason I don't see as many dolphin pods in either the Hauraki Gulf or Western Bay of Plenty. In the summer months I would normally have seen at least one pod every time I went out, now especially in the WBOP I hardly ever see one.

14. Anon, 31+ years

- a. We are finding mackerel difficult to find where as they used to be everywhere.

15. Anon, 31+ years

- a. There have been very few or no Jack mackerel in the waters from Omaha to Houhora the entire time far. We saw a school today first time in 10 months. They seem to have vanished

16. Fisher & Diver, 31+ years

- a. Bait fish numbers have dropped significantly in the past few years. There used to be decent work ups, bird life and activity out on the water where I fish in the Coromandel. These days it's rare to see any work ups and they are always small. Something has gone wrong with the sea food chain and management of commercial fishing.

17. Fisher & Diver, 31+ years

- a. In the Firth of Thames and Hauraki Gulf Yellow-eyed Mullet are becoming extinct. Once abundant they are now scarce with huge impact on both marine and bird life. Breeding schools of Kahawai are now unseen on the Thames coast where I have lived for over 70yrs, both the bird life and diversity have been devastated.

18. Fisher & Diver, 31+ years

- a. There has been a reduction in workups in the Bream Bay / Hauraki Gulf area over the last few decades. Alongside that, there has been an overall reduction in the health of the ecosystems in the Hauraki Gulf. We can't keep the take, take attitude going. We need to back off and let the ecosystem repair itself.

19. Fisher, 31+ years

- a. My retirement home overlooks Doubtless Bay where I have fished extensively as a child. The numbers and size of work ups have reduced substantially. The numbers of baitfish in estuaries is also dramatically reduced.

20. Anon, 31+ years

- a. Definitely major reductions in baitfish schools in my area, the BoP, over the last 22 years.

21. Fisher, 31+ years

- a. I am a charter skipper in the Bream Bay and Hauraki Gulf (10 years). I have fished the Hauraki Gulf for 50 years. There is way less bait now compared to 7 years ago. I believe that the predators and mammals are now starving chasing small amounts of bait around the Gulf. Cheers [REDACTED]

22. Fisher, 31+ years

- a. The bait in the harbours & everywhere is gone. The schools & numbers of Jack mackerel are way down & reducing every year. It used to be so easy to catch as many for bait as you wanted every morning. most days now we can hardly catch any & plenty of days we have to go without. It is getting severely worse every year. The pilchard schools are also gone. We used to see acres of them on the surface everywhere now it's very rare to even see a small school. The bait is gone & next will be the collapse of all the fisheries as happens in every other country where they take the bait out of the food chain the fisheries collapse. The quota not being caught is a sure sign that the fishery is in serious decline & about to collapse. It won't take long to recover but something needs to be done urgently right now. While you are saving the bait please also save the swordfish. there numbers & size are in decline & the same as the bait the quota is not being caught so it needs to be severely cut to the bycatch level it was originally meant to be. Our snapper fishery is improving every year so don't worry about them. save our bait & swordfish please.

23. Fisher, 31+ years

- a. Lived on Great barrier island for 12 years and had been going to the island since 1978, used to see great birdlife and workups but now hardly any birds around bait fish kahawai very rare. Have found a lot of dead birds on our beach especially penguins, gannets etc. Very pissed off with the governments attitude, speak to anyone on the barrier and they will give you the same answer as I have given.

24. Fisher & Diver, 31+ years

- a. I have navigated from Matiatia to Tryphena, averaging maybe 15-20 return trips a year for 25+ years. That's close to 35,000 nautical miles or 1.5 times around the equator. Each trip takes around 6 hours each way. I have observed the shocking decline in sea life, driven by the almost total absence now of bait fish and 'boill ups' and all the fish, marine mammal and bird life that it generates. It is a disgrace to the respect given to this most beautiful piece of water and commercial fishing practices.

25. Fisher & Diver, 31+ years

- a. The survey doesn't quite get to the extent of the massive reduction of bait fish I observe. Also the decline on the east coromandel coast in the last 10 years has been exponential. The cause is also simple to see with spotter plane purse seine boats seemingly always roaming the area between shoe castle the aldermans and slipper. Watching them catch tens of tons of Jack macs in a single shot is sickening and simply must be stopped. Do we just have to watch the fish version of scallops happen before our eyes?

26. Diver, 31+ years

- a. I have a masters degree in marine science and have spent most of my recreational and professional life as a marine farmer of oysters and mussels in the Hauraki Gulf. Over the last six decades I have seen many changes in the gulf, some natural and many man made. The most clearly detrimental man made change has been the reduction of bait fish caused by the unregulated harvesting of these fish. This must stop, even if only to allow the remaining fish to survive but also to allow the science to catch up.

27. Fisher & Diver, 31+ years

- a. We had large numbers of mackerel in the BOP up to about 10 to 15 years ago now it very rare to see those numbers.

28. Fisher & Diver, 31+ years

- a. Much harder to find baitfish schools, a lot less Snapper, Kingfish, a lot less Trevally and Kahawai and barely any John Dory and Tarakihi, these appear pt be non existant where they previously were abundant.

29. Fisher, 31+ years

- a. Over 65 years fishing so have seen the gulf destroyed by commercial fishing both trawling and seine netting. The vibrant food chain that is kahawai, pilchards, mackrell, trevally has been reduced to near extinction levels . No wonder we are now seeing g unhealthy mushy snapper and large decline in sea bird numbers all due to lack of food obviously.

30. Fisher & Diver, 31+ years

- a. I have regularly seen large workups between Pauanui and the Alderman's targeted by purse seiners. The number of workups has drastically deteriorated as has the overall availability of fish in summer. People are saying it is seasonal but I have been fully aware of major deterioration in fish numbers. The quota system is broken. If you look at historical photos from the 1970s the massive drop in fish stocks is undeniable.