



11 July 2025

By Email: S.Jones@ministers.govt.nz

Hon Shane Jones
Minister for Oceans and Fisheries
The Beehive
Pipitea
Wellington 6011

Dear Minister for Oceans and Fisheries,

REQUEST FOR EXTENSION OF SUBMISSION DEADLINE

We are writing to you concerning the inadequate time provided for consultation on the October fisheries management proposals and request a 10-day extension to the current deadline of 23 July 2025.

On 24 June 2025, Fisheries New Zealand (**FNZ**) publicly released [consultation documents](#) proposing changes to catch limits for more than 29 fish stocks across New Zealand. The deadline for stakeholders, iwi, hapū and the public to have their say is 23 July 2025. These people often work on a voluntary basis to provide important input to inform sustainability decisions.

This deadline gives the public 21 working days to analyse, understand, and make an informed submission on 29 different fish stocks. This is an unreasonably short timeframe and totally inadequate for volunteer organisations working on behalf of the public's interests in fisheries and the marine environment.

At the same time FNZ is consulting on the review of [deemed value rates](#) for 8 fish stocks and the [proposed changes to catch limits](#) for orange roughy (ORH 3B) and blue mackerel (EMA 1) released on 2 July 2025 with public submissions due 28 July 2025. In addition, NZSFC have committed a significant amount of resource into pre-consultation advice on rock lobster management options for East Northland, management targets for CRA 2 and CRA 4 and draft section 11A Fisheries Plans through the National Rock Lobster Advisory Group.

We understand there are many fish stocks within our fisheries that require management changes, but sufficient time must be allocated to ensure adequate, informed consultation. As the Court of Appeal held in its landmark *Wellington Airport* judgment:¹

“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” . [emphasis added]

Consultation is about giving the public the opportunity to have their voice heard and make an informed submission on important shared fisheries. The information which can be gained through this process is expected by the scheme of the Fisheries Act 1996 and can be critical to achieving the sustainable utilisation. This requires a reasonable time frame.

The New Zealand Sport Fishing Council believes that, in the context of simultaneous proposals for the review of 29 fish stocks and 8 sets of deemed value rates, a 21-working day submission period is insufficient time and likely unlawful in light of the Court of Appeal’s judgment.

We urge you to grant a 10-working day extension to the current deadline of 23 July 2025. **The new deadline would be 6 August 2025.** This should not prevent timely decisions being made for the October round and will likely improve the quality of information available.

We are available to discuss this in further detail, if required. Our contact is Helen Pastor secretary@nzsportfishing.org.nz

Sincerely,



Scott Macindoe

President

New Zealand Sport Fishing Council

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