

MANAGEMENT PROPOSALS FOR BLUE MOKI 3

Summary and submission

July 2014



Why we care about Blue Moki

Blue moki is a popular table fish taken by shorebased anglers, set netters and spear fishers around the South Island and bottom half of the North. Blue moki has high cultural value to coastal communities. An estimated 36,000 blue moki were taken in 1999 by recreational anglers fishing off the east coast of the South Island.

Set netting has been banned within 4 miles of that coast since 2008. The Ministry for Primary Industries acknowledge that prohibition is likely to have drastically affected recreational catch. MPI are proposing to give more quota to commercial fishers who have exceeded their catch limits since 2010, while local families are now denied reasonable access to a staple food.



Introduction

In May 2014 the Ministry for Primary Industries (MPI) proposed an increase in the Total Allowable Catch (TAC) and Total Allowable Commercial Catch (TACC) for blue moki 3 (MOK 3).

The New Zealand Sport Fishing Council-LegaSea submitted on 25 June 2014. We rejected the proposed TACC increase due to sustainability concerns and the inadequate allowance proposed for non-commercial interests. Blue moki 3 is an important fishery both socially and culturally.

We also objected to the Ministry's inadequate 21 working day consultation timetable. Serious management issues were raised in the submission and solutions were offered to address those concerns.



Headliners

- ❌ MPI propose to increase the quota limit for blue moki 3 because commercial fishers have exceeded their catch limits by 25%.
- ❌ Moki are long lived and are vulnerable to overfishing. There is no measure of abundance so stock status is unknown.
- ❌ MPI are incentivising overcatch, by rewarding commercial fishers who exceed their limits with extra quota.
- ❌ A reasonable recreational allowance would be around 50 tonnes. MPI propose 5 or 10 tonnes, confiscating the recreational allowance and making it available to quota holders.
- ❌ Since the 2008 set net ban local recreational fishers have been denied safe, inshore access to blue moki to feed their family. They now watch as commercial fishers return to shore with boat loads of overcatch.
- ❌ Moki 3 and the blue moki stock along the east coast of the North Island are inseparably co-dependent due to the annual autumn migration of spawning stock. Catch in one area will affect the other. No assessment of these effects has been done.

Submission recommendations

- ✅ That no change to blue moki 3 (MOK 3) catch limits be made at this time as there is no measure of abundance.
- ✅ Prior to any catch limit increase the Ministry for Primary Industries must urgently undertake at-sea catch research to establish a more reliable estimate of blue moki 3 mortality and catch at age.

MPI Proposals

Table 1: Proposed TACs, TACCs and allowances for MOK 3

Option	Allowances				
	TAC (t)	TACC (t)	Customary Māori (t)	Recreational (t)	Other sources of fishing related mortality (t)
Current	-	127	-	-	-
Option 1	146	127	1	5	13
Option 2	187	160	1	10	16

Recreational interests

- Blue moki is a popular table fish, a reasonable recreational allowance would be around 50 tonnes.
- MPI ignore harvest estimates and accept our recreational catch and interests to be trivial. This is unacceptable.
- In 2008 the Supreme Court ruled that qualitative factors form an essential part of what makes up recreational fishing interests, “people providing for their wellbeing, particularly their social wellbeing, is an important element of recreational interests”. The Minister for Primary Industries has an obligation to provide for our recreational interests.

Stock status and mortality

- Blue moki rapidly grow to the Minimum Legal Size (MLS) of 40cm and then growth slows. They live long. Such species are vulnerable to overfishing.
- The 40cm MLS combined with trawl selectivity biased toward small fish, would indicate that blue moki between 25cm and 40cm are routinely caught and discarded.
- There is no information regarding the discard rate for sub-legal moki caught by trawl or set net - the two methods that could be expected to have significant sub-legal catch. Monitoring landed catch without the discard rate data is pointless. Such a large MLS will drive high discard rates unless selectivity is excellent, yet there is no data or commentary on this.
- MPI assert that because landed catch has been mostly stable over the past 14 years that fishing pressure is low; landed catch is not fishing mortality and such assumptions are invalid.
- MPI propose a standard allowance of 10% for fishing related mortality. Whether a 10% allowance for fishing related mortality is reasonable or not depends on the discard rate and the survivorship of discarded fish.
- No data on either parameter is included, making it impossible to set an allowance that is anything more than just as number – it cannot even be categorised as a guess.
- The inability to account for all fishing induced mortality imperils the Total Allowable Catch (TAC). The TAC is the sole tool that ‘ensures sustainability’, a primary purpose of the Fisheries Act.

Overcatch

- Exceeding the lawful catch limits is now the common trigger for MPI to propose increased commercial catch limits. MPI do not apply a similar principle, to reduce under-caught Total Allowable Commercial Catches (TACCs).
- MPI propose a TACC increase while they have failed, during the last 28 years, to monitor this blue moki fishery. This smacks of operational contempt for the quota system and the Fisheries Act that enables it.
- Tarakihi, rig and spiny dogfish are the three main species with significant blue moki bycatch. If TACC increases are granted to generate more catching rights, to enable the catch mix to be balanced, then MPI are on a road to nowhere. Tarakihi 3 is 75% caught with 377 tonnes (t) uncaught. Rig 3 is 77% caught with 138 t uncaught. Spiny dogfish 3 is 27% caught with 3492 t uncaught.
- Providing TACC increases on a whim removes the need for industry to improve selectivity, a common weakness. Generating more catching rights to compensate for poor fishing practice is rejected as a logical or durable response.
- If a TACC is limiting catch then it is serving its primary function as a sustainability measure.
- There have been several increases in commercial quota in the last few years in response to landings in excess of the TACC. MPI need to be careful that they are not providing the wrong incentives to commercial fishers, by rewarding them with extra quota as soon as their catch exceeds the TACC. After all, the setting of Total Allowable Catches is the primary tool that sustains our fisheries for future generations of New Zealanders; TACs are not a tool to be used selectively merely to enrich a select few private quota holding interests.
- If MPI are reluctant to allow the blue moki TACC to constrain the catch of these associated species then the blue moki TACC would need to increase one hundred fold to accommodate these other TACCs that have never been caught, never been assessed, and never been reviewed since their introduction to the QMS in 1986!