

Mark Connor
President
NZ Sport Fishing Council
PO Box 93
Whangarei 0140
secretary@nzsportfishing.org.nz



Highly Migratory Species Team
Ministry for Primary Industries
PO Box 2526
Wellington 6140
FSubmission@mpi.govt.nz

29 November 2013

NZ Sport Fishing Council submission on management options for the southern bluefin tuna fishery for 2013–14 and 2014-15

NZ Sport Fishing Council

1. The New Zealand Sport Fishing Council appreciates the opportunity to submit to the Ministry for Primary Industries (MPI) on management options for the southern bluefin tuna. MPI released their proposals on 11 November 2013 with submissions due by 29 November 2013.
2. NZSFC 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 Roz Nelson, secretary@nzsportfishing.org.nz
3. The NZ Sport Fishing Council is a national sports organisation with over 32,000 affiliated members from 55 clubs nationwide.
4. The New Zealand Sport Fishing Council has initiated LegaSea, a public outreach organisation, to generate support for the ongoing effort to protect and enhance the public's access to abundant fisheries in a healthy marine environment. www.legasea.co.nz
5. The intention is to broaden NZSFC involvement in marine management advocacy, research, education and working together on behalf of our members and LegaSea supporters.
6. We are committed to ensuring that sustainability measures and 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]

Summary of NZSFC Submission

7. MPI must highlight the need for the Minister to take a precautionary approach when managing the critically low southern bluefin tuna stocks. Increasing catch when the scientific advice shows spawning stock is still critically low, at less than 10% of unfished biomass, is not a precautionary approach.
8. New Zealand must continue to develop a reputation as a responsible fishing nation in the regional fisheries management organisations it is party to, and does not need to follow the lead of Japan, Australia and Taiwan.

9. NZSFC submit that the 69 tonne (t) in-season increase in ACE should not be allowed in the 2013–14 fishing year. We note this was the only option proposed in the Initial Position Paper.
10. NZSFC do not support the TAC increase in 2014–15 to 1000 t. This increase should be held off until there is evidence that the stock has rebuilt to at least 10% of the unfished biomass in accordance with the precautionary approach, which is often mentioned, but seldom followed, in international fisheries management.

Proposals for southern bluefin tuna

Details of TACC and allowances

11. The Ministry for Primary Industries (MPI) proposes that the TAC for 2012–13 be set to the level of New Zealand’s country allocation set by CCSBT for 2014 and 2015 (Table 1 and 2). No other options are considered.
12. MPI propose an in-season increase of 69 t commercial Annual Catch Entitlement for southern bluefin tuna for the 2013–14 fishing year. For the 2014–15 year MPI propose that the TAC for STN1 increase to 1,000 tonnes (the CCSBT allocation for New Zealand for that year), with effect from 1 October 2014.

Table 1: Proposed in-season TAC increase for the 2013-14 fishing year.

Total Allowable Catch (TAC)	Māori Customary Allowance	Recreational Allowance	Other Sources of Fishing-Related Mortality	Total Allowable Commercial Catch	Additional in-season ACE
Current					
830	1	8	4	817	-
Proposed 2013-14 in-season change					
910	1	8	15	817	69

Table 2: Proposed TAC increase for the 2014-15 fishing year.

Total Allowable Catch (TAC)	Māori Customary Allowance	Recreational Allowance	Other Sources of Fishing-Related Mortality	Total Allowable Commercial Catch
Current				
830	1	8	4	817
Proposed for 2014-15				
1000	1	8	20	971

MPI rationale for increasing the TAC

13. MPI rationale for these proposals includes:
 - The international commission has allocated that amount to New Zealand and believes it is consistent with a new rebuild plan.
 - The TAC is usually set at the level of the New Zealand allocation.
 - This would provide maximum benefits to New Zealand quota holders.

Submission for southern bluefin tuna

14. NZSFC have engaged in the management of highly migratory species (HMS) for many years, particularly since the mid 1980s, which saw the introduction of the Billfish Moratorium; this was followed by the Billfish Memorandum of Understanding with commercial fishing interests, and submissions on the uncontrolled increase in swordfish catch in the late 1990s. More recently we have

been actively involved in the Highly Migratory Species Working Group and Highly Migratory Species Fisheries Plan Working Group.

15. NZSFC continues to support the New Zealandisation of our commercial fisheries, preferring catch from our waters to be taken by New Zealand companies rather than under foreign licenses. Many of our members realise that this requires profitable tuna fisheries.
16. New Zealand has a reputation as a responsible fishing nation, although this has been tarnished lately with the reprehensible behaviour of some foreign charter crews in our deep water fisheries.
17. The NZSFC advocate there is no justification for Nathan Guy, the Minister, to increase the TAC by 138% over 5 years for a fish stock that was recently below 5% of its unfished state. The proposals are only justified in the interests of the beneficiary quota holders.
18. The NZSFC acknowledges the good work New Zealand has done in international fisheries commissions, which involve difficult negotiations at the best of times. Progress has been made in a number of compliance, reporting and research areas. However, the Commission for Conservation of Southern Bluefin Tuna has been responsible for the management of STN for over 30 years and a few years ago this fishery was assessed to be in its worst ever state.
19. There is some considerable doubt about the accuracy of reported global catch because of under reporting by some Commission members and catch by non-members. However, using the figures provided by CCSBT, the global catch declined by two thirds in the 1980s and has averaged about 14,000 t since 1990 (Figure 1). The stock assessment shows that the spawning stock biomass continued to decline with catch at that level. The Commission is proposing to rapidly increase the Total Allowable Catch (TAC) to 14,676 t (Figure 1). This is above the average reported catch since 1990.

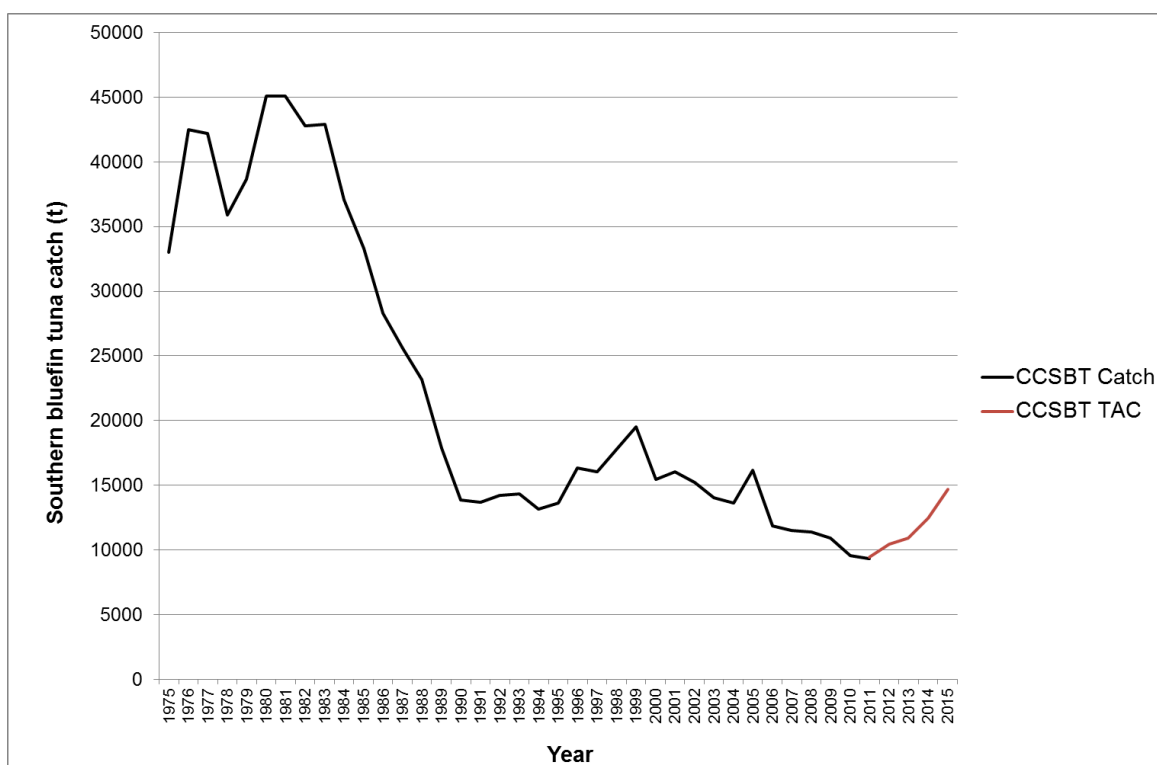


Figure 1: Global catch of southern bluefin tuna (tonnes) by year and the Total Allowable Catch proposed by the international commission (CCSBT) responsible for rebuilding the stock.

20. NZSFC strongly advocate there be no increase in the national and global quota until a stock assessment shows spawning stock biomass is at least 10% of the unfished biomass.

21. NZSFC acknowledge that fisheries and survey data indicate that this stock is rebuilding and the catch rate is improving in the New Zealand fishery. However, NZSFC advocate for the Minister to make a precautionary decision to allow the spawning stock biomass more time to rebuild. Increasing the national and global extraction can only slow the rebuild.
22. CCSBT amended the Rules of Procedure to task the Scientific Committee to incorporate advice consistent with a precautionary approach: Rule 8 Bis (SCIENTIFIC ADVICE)
“1.The Scientific Committee shall incorporate advice consistent with the precautionary approach in its advice to the Commission”.
23. There is no mention in the Ministry’s IPP of caution or the precautionary approach in relation to these proposals. We submit that MPI need to incorporate advice consistent with the precautionary approach in its advice to the Minister. Increasing southern bluefin catch above the long-term average when the scientific advice is that the spawning stock is still critically low is not consistent with the precautionary approach.
24. NZSFC will promote tag and release of southern bluefin caught by recreational fishers.

Background

1. Management of southern bluefin tuna (STN) 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 STN a year in New Zealand waters (1960s to 1980), mostly prior to the establishment of the Exclusive Economic Zone (EEZ). There was a small recreational fishery based out of Fiordland and STN are taken as a by-catch of the Pacific bluefin fishery out of Greymouth and Hokitika.
2. Southern Bluefin had a domestic catch limit of 420 t since early 1990s. On introduction to the 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 have been a series of in-season increases following allocation decision by the CCSBT. In 2012 the Total Allowable Catch (TAC) was set at 830 t, with a TACC of 817 t, a recreational allowance of 8 t, a customary allowance at 1 t and other sources of fishing related mortality at 4 t.
3. The reported catch worldwide was around 14,000 t for a long time. CCSBT agreed to reduce global catches by 20% in 2010 to 2011 (to 9,449t). The Commission has decided over recent years to increase the “global” TAC to 10,449 t in 2012, 10,949 t in 2013, 12,449 t in 2014, and 14,647 t in 2015.
4. Southern bluefin can live to 30 years old and reach maximum size of about 190 cm and 140 kg by 20 years old. (The recreational all tackle world record is 158 kg from BOP). Most STN are mature by 12 years of age.
5. Southern bluefin tuna consist of a single stock primarily distributed between 30° S and 45° S, and spawn in the Indian Ocean south of Java around March. 1999 to 2002 seemed to be particularly bad spawning years with better numbers now showing in NZ from more recent spawning seasons.
6. Current spawning stock size is at or below 5% virgin biomass in the most recent stock assessment (2011), well below the biomass that could produce Maximum Sustainable Yield (MSY).