

**From:** iain storrie  
**Sent:** Tuesday, 4 February 2014 2:52 p.m.  
**To:** FMSubmissions  
**Subject:** rock lobster and shellfish quotas

Dear sir/madam,

I think you are doing a great job and I think the quotas are probably adequate but I think the policing of the quotas should be increased and the penalties should be higher and enforced.

Regards, Iain.

**From:** Jean Lim  
**Sent:** Wednesday, 29 January 2014 8:51 p.m.  
**To:** FMSubmissions  
**Subject:** submission in support of CRA2\_01

As a recreational diver I support option CRA2\_01, I believe that the current commercial take is excessive and impacts on our recreational fishery.

Nick Herd

-----Original Message-----

From: stuart arnold

Sent: Saturday, 8 February 2014 1:35 p.m.

To: FMSubmissions

Subject: Rock Lobster reduction in Commercial quota for Bay of Plenty

It is imperative that the commercial take of Rock lobster ( crayfish) in our region is implemented as soon as possible due to the drastically reduced stocks of Crayfish in this area. As regular recreational divers in the Bay of Plenty region, we and fellow members of our dive club have seen a definite decline in sightings of crayfish in areas around Mayor Island and Motiti Island especially over the last 3-4 years. On nearly every dive 4 years ago we would see reasonable numbers of Rock Lobster in both shallow and deeper waters around these locations, mostly of juvenile and undersize crayfish. Recently however since 2012, all of the dive sites where you would also see plenty of Crays, these sites are now completely barren with not a single Rock Lobster to be seen anywhere.

Considering that Mayor Island has a designated marine reserve where Rock Lobster can at least have some chance of survival and breeding, which one would think would have some sort of sustainability, it is not happening and the Lobster are almost non-existent in most areas due to the massive commercial take and pressure on the stocks and the high prices they achieve for the asian market. I therefore submit that there should be a quota reduction to the maximum level possible to help ensure that the stocks can have even a small chance of recovery for the future.

I had also heard that the local Tauranga based Commercial Crayfisherman had only achieved less than 50% of his quota from these areas by January this year, when normally the quota would be fulfilled by December, so this indicates a huge decline in the stocks which must be managed properly and sustainably or there will be nothing left in our oceans at all.

I fully support a reduction of the commercial quota of Rock Lobster of minimum 36 tons for the Bay of Plenty area.

Yours sincerely

Stuart Arnold

SUBMISSION ON THE PROPOSED TACs AND ALLOWANCES FOR CRA3 FOR THE  
2014/15 FISHING YEAR AS OUTLINED IN THE NRLMG DISCUSSION PAPER 2014/06

18<sup>th</sup> February 2014

To: Shellfish Submissions

Fisheries Management, Inshore Fisheries

Ministry of Primary Industries.

Organisation making this submission:

**TAIRAWHITI ROCK LOBSTER INDUSTRY ASSOCIATION INC**

P O Box 24 Tokomaru Bay.

The Tairawhiti Rock Lobster Industry Association (TRLIA) represents the interests of quota share owners, ACE owners, fishermen and processors in the CRA3 commercial fishery. The mandate of the TRLIA is renewed annually to a high level ( above 66% ) through the confirmation of support for the rock lobster commodity levy by quota share owners.

The TRLIA supports OPTION 1 from the NRLMG discussion paper. That is, that the Minister is guided by the current CRA3 management procedure and increases the CRA3 TAC and TACC.

The CRA3 management procedure was developed in consultation with the customary, recreational and commercial sectors at considerable cost in time and resources. The outcomes of this management procedure are particularly conservative and "safe". The design of the management procedure ensures that the commercial harvest is adjusted to maintain recreational and customary harvest opportunities at a healthy level.

The TRLIA notes that the stock abundance target of the management procedure, which was equivalent to an Autumn/Winter CPUE of 1.4 kg/pot lift, has been exceeded in the past two years by twice that level.

The TRLIA is mindful of the volatile history of rock lobster stock abundance in CRA3. We look forward to the review of the management procedure for CRA3, scheduled for this year, with a view to developing a maintenance type of management procedure.

Yours sincerely

Gordon Halley

Chairman TRLIA



# **The Otago Rock Lobster Industry Assoc.Inc.**

23 ERIN STREET DUNEDIN 9010

**19<sup>th</sup> February 2014**

## **Fisheries Management-Inshore Fisheries**

Ministry for Primary Industries  
P.O.Box 2526  
Wellington 6140

## **OTAGO ROCK LOBSTER INDUSTRY ASSOCIATION [ORLIA]**

### **Submission on**

### **REVIEW OF ROCK LOBSTER SUSTAINABILITY MEASURES FOR 1<sup>ST</sup> APRIL 2014**

### **The ORLIA Supports**

### ***Options CRA7\_01 – Be guided by the CRA 7 management procedure and increase the TAC***

The Otago Rock lobster Industry Associations members hold 95% of quota shares and are 80% of CRA7 fishers. The association welcomes the opportunity to present this submission on the review of Rock lobster Sustainability Measures for 1<sup>st</sup> April 2013.

The CRA7 fishery is unique among New Zealand lobster fisheries in having a significantly smaller MLS. This regional difference being in recognition of the predominantly recruitment habitat of the Otago Coast, and the regular southern migration of 4 to 6 year old lobster.

### **BACKGROUND**

The CRA7 fishery has always been a cyclical fishery. The combination of predominantly recruitment habitat, regular migration and only periodic settlement creates a fishery with peaks of abundance 4 to 5 years after each period of recruitment. 2007 was the start of the most recent peak, from a period of settlement in 2002/2003. Regular migration combined with a mass migration in 2009 resulted in the 2012 season being at the bottom of the stock abundance cycle. Strong showings of *Pureulus* in 2009/2010/2011/2012/2013 at Moeraki, combined with a high abundance of legal sized lobster in this seasons catch, gives us confidence for the future.

The TACC for 2013 was landed in under 4 months, with high grading being a feature of the fishers' response to high abundance. Up to 10kg per pot, of legal sized lobster, being returned to sea at the end of fishing in October.

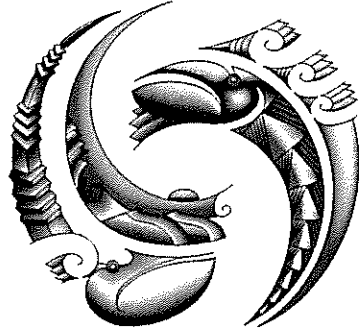
## **THE ORLIA VIEW**

The ORLIA supports 'Rule 39' Management Procedure, which responds quickly to both increase and decrease in abundance. This to be tempered by a maximum 50% increase in the TACC in any one year. We believe this represents a conservative approach to the management of the CRA7 fishery. By lowering the commercial catch during periods of rising abundance more fish will be available to recreational and customary fishers and provide greater stability of catch in periods of low recruitment. We have recorded five seasons of elevated recruitment and expect to see another lift in CPUE in the 2014 season.

We are surprised at the catch level attributed to the Recreational sector. Since 2009 there has been a very low abundance of national sized fish on the Otago coast. In 2009 a mass migration south of all lobster sizes occurred. The fishery has been on a rebuild since, with good recruitment. Historically most Otago recreational fishers have caught their lobster in CRA8, with a significant recreational fleet travelling to Jacksons Bay on the West Coast. With the high abundance of large lobster in the CRA8 fishery we would expect this pattern of recreational fishing to continue.

The future in Otago requires the re-establishment of lost lobster habitat, particularly Kelp forest, and development of techniques to create consistent settlement. The industry standard of growing abundance to increase sustainable catch levels has never worked in CRA7. The migratory nature of the Otago fishery will always have to be at the fore front when considering management options. We have a significant increase in abundance which we can responsibly harvest.

**Simon Gilmour**  
Executive Officer



# Ngati Porou Seafoods Ltd

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## SUBMISSION

Review of Rock Lobster Sustainability Measures for 1 April 2014  
Discussion Paper No: 2014/06

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Submission Compiled by: Ken Houkamau (Quota and Resource controller – NPSL)  
Date Completed: 21/02/2014

## Foreword

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This submission is presented on behalf of Ngati Porou Seafoods Limited, the commercial asset holding company established under the Maori Fisheries Act settlement process to receive and manage the quota assets allocated to Ngati Porou.

Ngati Porou Seafoods Limited reaffirms our commitment to effective fisheries management and sustainability which has been an intergenerational part of our core values and culture.

We are descendants of Tangaroa (God of the sea). The relationship is recorded in our history and in our lifestyles. From fishing in the Pacific, trapping crayfish in whanau allotted pools, travelling the Tasman trading goods gathered in Ngati Porou, to enforcing rahui for the conservation of our kapata kai by sheer force of mana. We are part of the sea and other fisheries, and they are part of us.

This philosophy is further embodied in our company vision statement and purpose for its existence;

**Me tieki i te moana me ona rawa, ka taea te whakahiato nga kai moana tokomaha rawa atu ma Ngati Porou me ona hapu mo ake tonu atu.**

*'To manage, protect and enhance Ngati Porou's seafood resources and environment in a profitable and sustainable manner for the future'*

The onset of colonial contact brought the Treaty of Waitangi and its guarantee of our rangatiratanga and other tikanga. They form the basis of the rights now metamorphosized into a bundle of assets allocated under the Maori Fisheries Act to Ngati Porou on agreement with the Crown.

In making this submission Ngati Porou Seafoods Limited, which (through our ultimate parent, Te Runanganui o Ngati Porou) represents more than 70,000 registered members as well Nga Hapu o Ngati Porou, indicates its strong desire to ensure our resources are managed in a responsible manner and agreements with the Crown as well as our tikanga are maintained and honoured.

We agree with the Minister of Fisheries statements pertaining to the importance of fisheries to New Zealand's economy, heritage, culture and national identity.

We also bring to the attention that Ngati Porou Seafoods Limited is a member of the Iwi Collective Partnership which is a collective of fourteen iwi across the North Island that have pooled their annual catch entitlement together, including Rock Lobster, to improve management decisions, returns, and opportunities within the fisheries sector.



## Executive Summary

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This submission is in response to the National Rock Lobster Management Group's Review of Rock Lobster Sustainability Measures for 1 April 2014. It is presented on behalf of Ngati Porou Seafoods Limited (NPSL), the commercial asset holding company established under the Maori Fisheries Act settlement process to receive and manage the quota assets allocated to Ngati Porou.

NPSL have interests in the CRA2, CRA3 and CRA4 Rock Lobster Fisheries and support the following options:

- **Support option CRA2\_B** - Be guided by the new *Rule 6* CRA 2 management procedure to guide TAC setting in CRA2.
- **Support option CRA2\_02** - Be guided by the new *Rule 6* CRA 2 management procedure and decrease the TACC by 26.083 tonnes to 210 tonnes.
- **Support option CRA3\_01** - Be guided by the CRA 3 Management Procedure and increase the TAC to 389.95 tonnes, increasing the TACC to 260.95 tonnes and retaining the customary, recreational and other mortalities at current levels.
- **Support option CRA4\_01** - Be guided by the CRA4 Management Procedure and decrease TAC to 662 tonnes, decreasing the TACC to 467 tonnes and retaining the customary, recreational and other mortalities at current levels.

These options are supported because NPSL believes present management procedures deliver better outcomes in regard to stock sustainability and utilisation than the traditional stock assessment approach.

Throughout this document NPSL makes a number of comments regarding the management of lobster fisheries. These include introducing commercial voluntary measures, improving non-commercial catch reporting and our belief that the views of outside organisations or individuals that are not directly involved with the fishery should not be considered when determining these local level issues.

## Introduction

1. Ngati Porou Seafoods Limited (NPSL) welcomes the opportunity to write in response to the National Rock Lobster Management Group's (NRLMG) Review of Rock Lobster Sustainability Measures for 1 April 2014.
2. The discussion document provides NRLMG's initial considerations on proposals to:
  - a) Use new management procedures to guide TAC setting in CRA2 and CRA9.
  - b) Set TAC, TACC and allowances for:
    - i) CRA3, CRA4 and CRA7.
    - ii) CRA2 and CRA9 using new management procedures.
3. NPSL have interests in the CRA2, CRA3 and CRA4 Rock Lobster Fisheries and will focus our submission on the following proposals:

### Proposal to use new CRA 2 management procedures to guide TAC setting

Stock	Option	Description
CRA2	CRA2_A	Agree to use the new <i>Rule 4</i> CRA 2 management procedure to guide TAC setting in CRA 2
	CRA2_B	Agree to use the new <i>Rule 6</i> CRA 2 management procedure to guide TAC setting in CRA 2
	CRA2_C	Continue to use periodic stock assessments to guide TAC setting in CRA 2 ( <i>status quo</i> )

### Proposed TACs, allowances and TACCs for CRA 2, CRA 3 and CRA 4

Stock	Option	TAC (tonnes)	TACC (tonnes)	Customary Allowance (tonnes)	Recreational Allowance (tonnes)	Other Mortality (tonnes)
CRA2	CRA2_01: Be guided by the new <i>Rule 4</i> CRA 2 management procedure and decrease the TAC and TACC	416.5	200	16.5	140	60
	CRA2_02: Be guided by the new <i>Rule 6</i> CRA 2 management procedure and decrease the TAC and TACC	426.5	210	16.5	140	60
	CRA2_03: Retain the current CRA 2 TAC, allowances and TACC	452.583	236.083	16.5	140	60
CRA3	CRA3_01: Be guided by the CRA 3 Management Procedure and increase the TAC and TACC	389.95	260.95	20	20	89
	CRA3_02: Retain the current CRA 3 TAC and allowances	354.5	225.5	20	20	89
CRA4	CRA4_01: Be guided by the CRA 4 Management Procedure and decrease the TAC and TACC	662	467	35	85	75
	CRA4_02: Retain the current CRA 4 TAC and allowances	694.7	499.7	35	85	75

## Proposal to use new CRA2 management procedure to guide TAC setting

4. NPSL participated in the CRA2 multi-stakeholder meeting in May 2013. We believe the aspirations of higher abundance, improved stability, improved CPUE and improved information on non-commercial catches and recruitment dynamics identified in the meeting are better managed under a management procedure.
5. As stated in previous submissions, NPSL believes management procedures deliver better outcomes in regard to stock sustainability and utilisation than the traditional stock assessment approach.
6. We do not believe that continued use of periodic stock assessments to guide TAC setting in CRA 2 (option CRA2\_C) is the best option for the fishery and either options CRA2\_A (new rule 4) or CRA2\_B (new rule 6) provide better outcomes.
7. As witnessed first-hand in the CRA3 fishery, we have seen the benefits of using a management procedure to set lobster TAC limits. Add the fact CRA2 stock assessments have been so infrequent we believe introducing a new management procedure to the fishery is the logical next step.

### **NPSL Position**

8. Both *Rules 4* and *6* have been tested and both will result in the desired outcome of maintaining stock abundance above the statutory reference level *B<sub>msy</sub>* and increase CPUE/stock abundance. However, given that *Rule 6* will have less economic impact and the concern that increased lobster abundance created by cuts will simply be taken through the recreational catch, NPSL:
9. **Support option CRA2\_B** - Be guided by the new *Rule 6* CRA 2 management procedure to guide TAC setting in CRA2.

## Proposed TACs, allowances and TACCs for CRA 2

### **NPSL Position**

10. **NPSL Support option CRA2\_02** - Be guided by the new *Rule 6* CRA 2 management procedure and decrease the TACC by 26.083 tonnes to 210 tonnes.
11. As stated in the previous section, we believe management procedures are more effective in managing the fishery than the traditional stock assessment approach. We also prefer *rule 6* as it will have less economic impact and because of concern that increased Lobster abundance created by cuts will simply be taken through the recreational catch.
12. NPSL also makes note that the management procedure enables future TACC adjustments if we find this year more cuts were needed.

## Proposed TACs, allowances and TACCs for CRA 3

### The CRA3 management procedure

13. In reviewing these fishery management options NPSL feel it is important to convey some background underlying goals and principals of the CRA3 management plan which directly relate to this matter at hand.
14. A CRA3 fishery management plan was developed by the multi-stakeholder group, which included participation by the then Ministry of Fisheries. This plan highlighted the need for better management tools to be implemented and identified key goals to achieve this.

High-level Goals	
1	A Sustainable CRA 3 Fishery
2	Quality Information for Decision-Making
3	A Healthy CRA 3 Fisheries Environment
4	A Fishery for All Sectors

15. Included in its key goals was the establishment of a management procedure to better manage stock abundance, growth, and annual TAC / TACC changes to provide more certainty to all users.
16. Part of this process included workshops with other stakeholders, MOF, and scientists to provide key data for various models which culminated in Rule 2(a) being adopted.
17. Key elements of Rule 2(a) were;

- Conditional upon a 3yr fixed TAC, set at 293 tonnes, unless off-set year CPUE falls below 0.75 kg/pot lift or rises above 1.08 kg/pot lift.
- The management procedure will be evaluated every year.
- The relation between CPUE and provisional TAC (before minimum and maximum changes limits operate and ignoring the initial fixed TAC) is illustrated in figure A.

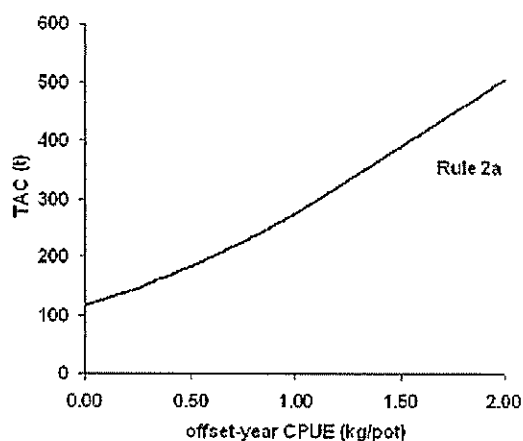


Figure A: The "Rule 2a" CRA 3 Management Procedure

18. Rule 2(a) also indicated that should the CPUE move up or down beyond the parameters agreed then the TAC could be adjusted in various ways, namely;
  - After the initial fixed TAC expires, if the procedure result in a TAC that does change by more than 5%, no change will be made.

- After the initial fixed TAC expires, if the procedure results in a TAC that changes by more than 10%, the TAC will be changed by 10% only.

#### **CRA3 management procedure review**

19. NPSL make note that a review of the CRA3 management procedure is upcoming. The success of the current procedure has been fantastic, the current high stock abundance should be aimed at being maintained or better yet improved.
20. NPSL look forward to contributing to future discussions, development and implementation of the renewed regime.

#### **2013/2014 CRA3 fishing year**

21. Under the CRA3 management procedure it proposes a TAC of 293 tonnes for 3 years (2010–11, 2011–12 and 2012–13) unless offset-year CPUE falls below 0.75 kg/pot lift or increases above 1.08 kg/pot lift. If the CPUE falls outside these limits, as it did this current fishing year, then the harvest control rule equations will lead to a TAC recommendation.
22. Since this management procedure has been in place we have had steady improvements of CPUE. The 1.08 kg/pot lift upper CPUE threshold was well exceeded in the 2013/2014 fishing year. The 2013 autumn-winter standardised CPUE of 2.35 kg/potlift supports the assumption that stock abundance is improving, the CRA3 management procedure is working, and that we should continue to use it to guide our decision making processes.
23. Proposed is a 10% increase in TAC to 389.95 tonnes. This increase is conservative. The TACC increase to 260.95 tonnes represents an estimated \$2.4 million to commercial sector earnings which is significant.

#### **Comments**

24. NPSL have always participated in the CRA3 multi-stakeholder group since its inception and supports these local area management initiatives and developing a long term sustainable fishery through improved information collection.
25. A principal concern to all sectors is the sustainability of the stock, though NPSL is fully behind the principals and procedures of the CRA3 management plan and strives to attain its goals; we have concerns that another TACC increase is going to add additional strain on stakeholder relationships and are cognizant of the volatile history of rock lobster stock abundance in CRA3.
26. We would like to think as responsible fisheries managers the commercial sector would be able to sit down, show leadership and introduce voluntary measures that can be adjusted to best suit the current environment, i.e. level of take (leave fish in the water), closed seasons and MLS (shelve/park). We are advocates of this voluntary approach.

#### **NPSL Position**

27. NPSL stand by the comments above but still believe the management procedure is the best current tool to guide CRA3 catch limits. The current information and performance of the fishery suggests that the increase in TAC/TACC poses little risk to the current sustainability of the CRA3 stock. Therefore NPSL would like to formally;

28. **Support option CRA3\_01** - Be guided by the CRA 3 management procedure and increase the TAC to 389.95 tonnes, increasing the TACC to 260.95 tonnes and retaining the customary, recreational and other mortalities at current levels.

### **Proposed TACs, allowances and TACCs for CRA 4**

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#### **CRA4 management procedure**

29. The CRA 4 management procedure is based on a generalised 'step' rule. Below a CPUE of 0.5 kg/potlift, the TACC is zero; between a CPUE of 0.5 and 0.9 kg/potlift, the TACC increases linearly with CPUE to a plateau of 467 tonnes, which extends to a CPUE of 1.3 kg/potlift. As CPUE increases above 1.3 kg/potlift, TACC increases in steps with a width of 0.1 kg/potlift and a height of 7% of the preceding TACC<sup>1</sup>.

#### **2013/2014 CRA4 fishing year**

30. Standardised CPUE is used as a reliable indicator of stock abundance. In 2013 we saw a decrease in offset year CPUE to 1.293 kg/potlift, therefore indicating a possible decrease in stock abundance. As a result the CRA4 management procedure recommends a TAC decrease to 662 tonnes.

#### **NPSL Position**

31. First and foremost stock sustainability should be the main priority. To ensure stock sustainability NPSL believe fisheries management decisions should be based on the best information available.
32. NPSL is supportive of the CRA4 management procedure. Considering the procedure is likely to meet MPI harvest strategy requirements and maintain stock above *Bref*, we see no reason not to follow its recommendations, therefore:
33. **NPSL support option CRA4\_01** - Be guided by the CRA4 management procedure and decrease TAC to 662 tonnes, decreasing the TACC to 467 tonnes and retaining the customary, recreational and other mortalities at current levels.

#### **Additional Comments**

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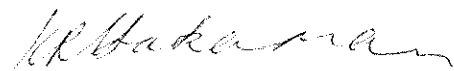
34. NPSL would like to again highlight the uncertainty surrounding non-commercial lobster catch volumes. We think this is an area that needs improvement throughout all lobster fisheries and support initiatives that aim to do this. Improved information from these sectors will improve our ability to manage the stock abundance, growth, and annual TAC/TACC changes, meaning better certainty to all users.
35. Furthermore, introduction of management procedures has been done at a local level with multi-stakeholder participation. NPSL believes the views of those stakeholders directly involved in the fishery i.e. quota owners, commercial and recreational fisherman, LFR's, SRE's, local iwi and

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<sup>1</sup> National Rock Lobster Management (2014). Review of Rock Lobster Sustainability Measures for 1 April 2014. Pg 39.

hapu should be the ones considered when making management decisions. The views of outside organisations or individuals that are not directly involved with the fishery should not be considered when determining these local level issues.

Noho ora mai koe



**Kenneth Houkamau**  
**Ngati Porou Seafoods Ltd**  
**Quota and Resources**

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T: 06 868 1644 F: 06 868 1639 M: 027 2566436 E: [KHoukamau@npsl.co.nz](mailto:KHoukamau@npsl.co.nz)

19<sup>th</sup> February 2014

Shellfish Submissions  
Fisheries Management - Inshore Fisheries  
Ministry for Primary Industries  
PO Box 2526  
Wellington 6140



New Zealand Underwater Association Inc  
Mike Percy (NZUA Environmental Section)  
PO Box 875  
Auckland

**Submission: on behalf of the New Zealand Underwater Association (NZUA).**

Whilst representing many thousands of recreational scuba divers and being closely associated to other organisations such as Spearfishing New Zealand, the NZUA is a stakeholder in matters of the marine environment that consider the health and wellbeing of all its form, with special consideration given to the health of the waters surrounding New Zealand and protection of its biodiversity. On matters that relate to Fisheries target species and their management, the NZUA has particular interest in sustainability and effects on the marine environment in general.

**Review of Rock Lobster Sustainability Measures for 1 April 2014**

Rock Lobster is the prime target species for recreational divers. It is also synonymous with restaurant diners both in New Zealand and around the world. Rock Lobster is New Zealand's third largest seafood earner and therefore, its sustainability is important to the economy. Also the species is considered a taonga to many hapu. This indicates significant cultural importance of its sustainability which plays a significant role of protecting this treasured species. One of the main problems in managing rock lobster fisheries is meeting the requirements of all stakeholders. One can appreciate the importance of keeping the rock lobster fisheries sustainable - we have to learn from our mistakes.

The NZUA recognises the management effort to manage all of New Zealand's rock lobster fishery areas (CRA). As with any fishery, there is always concern of Total Allowable Catch (TAC) and Total Allowable Commercial Catch (TACC) levels being set too high. It must be recognised that rock lobster populations are known to fluctuate with changes in their environment. These changes can have a marked effect on (CRA) an area's sustainability from being sustainable one year but not in the following year. Management of rock lobster must focus on sustainability and must not be influenced by the pressure of opening new markets overseas. Our ocean resources have never been at such a critical level of sustainability and threaten the whole marine ecosystem. The NZUA takes the cautionary approach to any recommendation to the suggestion of any increase in TAC/TACC.

The rock lobster fisheries are monitored using a number of tools - tagging and larval settlement programmes, industry and observer catch sampling programmes and catch/effort forms submitted by the commercial sector. The NZUA also recognises the need to act quickly to outcomes of stock levers caused by the forces of nature.



Agree to support the following -

- **CRA 2** - CRA2 01 be guided by the new rule 4 CRA 2 management procedures and decrease the TAC and TACC.
- **CRA 3** - CRA3 02 retain the current CRA 3 TAC, TACC and allowances.
- **CRA 4** - CRA4 01 be guided by the CRA 4 management procedures and decrease the TAC and TACC.
- **CRA 7** - CRA7 02 retain the current CRA 7 TAC, allowances and TACC.
- **CRA 9** - CRA9 05 retain the current CRA 9 TACC (no TAC or allowance have been previously set for CRA 9)

Regards



Mike Percy (NZUA Environmental Section)



## N Z RECREATIONAL FISHING COUNCIL

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21 February 2014

# NEW ZEALAND RECREATIONAL FISHING COUNCIL

## Submission on

## Review of Rock Lobster Sustainability Measures For April 2014

Inshore Fisheries Management  
Ministry for Primary Industries  
P O Box 2526  
Wellington 6011  
[FMsubmissions@mpi.govt.nz](mailto:FMsubmissions@mpi.govt.nz)

### **The Council and its Representation**

**1:** The national organisations represented by this body are N.Z. Angling & Casting Association, N.Z. Trailer Boat Federation, N.Z. Marine Transport Association, N.Z. Sports Industry Association and N.Z. Underwater Association. We also support the Ministry led and funded recreational forums of which many of these regional members are now members as individuals.

**2:** The Council maintains close contact with a number of Iwi representatives. While every effort has been made to consult we do not suggest that this submission is representative of their views.

**3:** This Council represents over 76,000 recreational and sustenance amateur fishers. In addition by default we represent the public interest in the fishery and those amateur fishers who are non-members. We say by default because we are the only constituted representative body that has been recognised by Government and the Courts of doing so.

4: Over one million people or by recent Ministry of Fisheries figures 20% of New Zealanders fish for sport or sustenance. This does not include those elderly or infirmed amateur fishers who can no longer actively participate in catching seafood for the table. The 1996 research to provide estimates of Recreational and Sustenance Harvest Estimates found that there are approx 1.35 million and increasing recreational and sustenance amateur fishers in New Zealand and therefore we effectively, through our associated member groups, and lack of any other democratically elected or statutory recognised group represent this number also.

5: The Council has been recognised in three court cases as representing the recreational and amateur fishers of New Zealand. The Council was attached to two of these cases without its prior knowledge and the court papers show it was ordered, "To represent the recreational fishing public of New Zealand". The first of these was the order of attachment to the High Court Action on the Manukau, Taiapure application. The second relates to the SNA1 challenge of the Minister's decision that was heard by the High Court. The Council also holds "Approved Party Status" for consultations with the Ministry of Fisheries and is recognised by them and the Minister of Fisheries as a stakeholder group. In the third case this Council along with the NZ Big Game Fishing Council were the applicants in the recent Kahawai case.

6: The Council has a Board of democratically elected officers and members. The Council consults with its members and the public using various means. These include newsletters, both written and electronic, its web site and various press releases. In addition it consults through the various fishing media and meetings it holds and receives input through those forums.

7: This submission has been prepared and presented after consultation via email and our web site to our members and board members.

8: As previously stated, we are aware that many of our National Affiliates and Regional Members are submitting their own submissions and in most cases we have seen and support these submissions where they are not in direct conflict with this submissions intent or requested outcome.

9: In the submission we talk of both recreational and amateur fishers as these two descriptions are so intertwined. For sake of some clarity recreational fishers referred to are generally those who have an interest in supporting recreational fishing interests while amateur refers to all fishers who exercise their rights to fish under the amateur fishing regulations.

10: The NZRFC participates as fully as possible for a voluntary organisation in the annual management rounds and in addition we have made submissions on many of the recent Bills before Parliament relating to our marine systems.

11: NZRFC Submission on the Review of Rock Lobster Sustainability Measures for April 2014

### **Management Procedures (MP's)**

The NZRFC has supported the use of MP's in the past and believes if they are applied in a fair and equitable manner good outcomes can be achieved. We are concerned about how they

are now being used to lock in increased TACC's while at the same time reducing or limiting noncommercial allowances.

**12:** In CRA5 when it was proposed to tie the noncommercial allowance to CPUE the method was changed. In CRA3 and CRA7 other regulations are being fiddled to enhance commercial take while noncommercial take is strongly regulated.

**13:** The move to bring a MP into CRA2 is going to do the same thing with the MP doing its best to hold the TACC in spite of it being obvious noncommercial catch has been suffering for years because the TACC is too high.

**14:** No doubt we will also see a significant TACC increase in CRA9 once the MP is in place and noncommercial catches will decline as a result.

**15:** In general the principle of having better abundance is good, but where there is serious competition for catch from noncommercial, MP's are set to favor commercial.

### **16: New MPS.**

The new MP in CRA2 has been designed to protect the commercial TACC at the expense of noncommercial. We will be surprised if abundance increases to allow noncommercial to catch the allowance within the TAC. This hasn't happened for years because abundance has been low because of a too high TACC. We know commercial interests struggle to accept the most recent noncommercial catch estimates and will ensure their TACC is protected. Rec representatives at the NRLMG table will simply be out voted at any time commercial want as the Customary reps seem to be more interested in protecting their commercial interests rather than those Customary fishers seeking a feed.

**17:** In CRA9 the new "allowances" set will favor commercial and with large numbers of large fish sitting in the water, CPUE will be driven through the roof resulting in vastly increased TACC's within a few years. Rec fishers will be negatively impacted upon when that happens. The rec allowance in CRA3 should be set at 50 tonnes otherwise the TACC will be allowed to increase too fast.

### **18: Proposed allowances in all fisheries.**

It will make not one jot of difference what we write here as MPI has failed to collect decent data on rec fishing for years, has allowed excessive TACC's to persist, and neither them or their minister have paid any regard to past submissions on improving public access to or fisheries. Instead they support the retention of concessions for commercial when they can fish all day with hundreds of pots against the draconian rules rec fishers have to put up with. Once again rec fishers at the NRLMG are ganged up on and virtually all proposals are quashed.

**19:** The MPs will generate what they generate and if noncommercial are lucky there will be a reasonable level of abundance in some fisheries.

**20:** CRA3 is showing increases in abundance because of the 10% rule. That will be reviewed this year and there is little doubt commercial will want it gone so they can take more. This of course while they still retain the concession enabling them to effectively remove the competition from some parts of the fishery.

**21:** CRA7 can only be described as a sick joke where most public fishers don't even bother. There has been more bullshit put about by commercial interests in this fishery than virtually any other. It is disgusting that a once 600 tonne per year fishery now musters about 50 tonne. Shame on you all.

**22:** The idea of a NRLMG is good but the whole process is flawed with MPI so easily being able to over-rule any recommendations that don't suit their commercial goals. There is also a total lack of balance between the opportunities of the various stakeholders to represent their respective groups. Commercial have the backing of a 400 million dollar industry and recreational have less than 50 thousand dollars to represent their interests in all fisheries combined, including finfish and shellfish. Successive versions of MPI and various Governments have done nothing to remedy this so it is no wonder groups like "Legasea" are being spawned.

**23:** In most instances rec fishers would be better to go fishing for the day rather than take part in such a lop-sided show.

**24:** The NZRFC submits that in all CRA fisheries the most conservative MP's are implemented and that when agreed abundance level is reached decent public allowances are set.

**25:** The public fishers of New Zealand care about the way the fisheries are managed. They want to see equity of allocation guiding management decisions MPI need to look at the way they engage the fishing public of this country. This needs to change from the present. The allocation discussion needs to take place. Then and only then can we look forward to a world leading sustainable fisheries management system.

**26:** We look forward to our concerns being addressed, especially those around consultation and allocation. We would like to be kept informed of any future developments. The NZRFC is always available to discuss this submission and fisheries management in general in more detail if needed.

Yours faithfully,  
NEW ZEALAND RECREATIONAL FISHING COUNCIL

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21 February 2014

## NZ Sport Fishing Council submission on the review of Rock Lobster sustainability measures for 1 April 2014

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## 1. INTRODUCTION

The New Zealand Sport Fishing Council and supporters of our LegaSea outreach (the submitters) are seriously concerned that Nathan Guy, the Minister for Primary Industries, is again being exposed to a highly public backlash arising from shallow commercial advantage being disguised as balanced advice from the National Rock Lobster Management Group. The Group's latest advice is within the *Discussion Document No: 2014/06 Review of Rock Lobster Sustainability Measures for 1 April 2014*. Flaws in the National Rock Lobster Management Group's process and advice have been identified in many past submissions and this year these cannot be tolerated.

As submitters we are only interested in firstly, maintaining the marine ecosystem so species such as rock lobster (crayfish) can thrive, and secondly, to ensure the public has reasonable access, taking into account the state of the ecosystem and popularity of the species.

In respect of current rock lobster management, the National Rock Lobster Management Group processes show no genuine regard for the public's interests, in environmental and fishing terms, and our social, economic and cultural wellbeings.

These interests and wellbeings are largely ignored or passed over with a cursory paragraph or two. This sense of disengagement is amplified by the truncated submission periods offered to stakeholders by the Ministry.

The Minister must be advised that we are tired of his Ministry using short timeframes, for submission preparation and constituency consultation, so offensively. We question the legality of this process and whether it complies with the Court of Appeal's definition of effective consultation –

“Consultation must allow sufficient time, and a genuine effort must be made. It is a reality not a charade. To consult is not merely to tell or present. Nor, at the other extreme is it to agree. Consultation does not necessarily involve negotiation towards an agreement, although the latter not uncommonly can follow, as the tendency in consultation is to seek at least consensus. Consultation is an intermediate situation involving meaningful discussion.....Consulting involves the statement of a proposal not yet fully decided upon, listening to what others have to say, considering their responses and then deciding what will be done.

“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. It is also implicit that the party obliged to consult, while quite entitled to have working plan in mind, must keep its mind open and be ready to change and even start afresh. Beyond that, there are no universal requirements as to form.”<sup>1</sup>

This current process compromises our ability to offer the NZSFC club delegates and their committees, and LegaSea supporters the opportunity to review and offer feedback on our draft submission. Accordingly, we expect to undertake the necessary public awareness work after the Ministry's deadline. We expect to make supplementary comments to the Minister following this consultation.

The New Zealand Sport Fishing Council and LegaSea supporters are adamant that 2014 is the year this mismanagement must stop, and we expect the Minister to intervene on the public's behalf so that we can restore our rock lobster fisheries to abundant levels.

While we aspire to have our rock lobster fisheries managed well above *Bmsy* most of us have not seen that level of abundance. These videos of crayfish off the Taranaki coast (CRA 9) offer some hope that we can have abundance in other crayfish stocks –

<https://www.youtube.com/watch?v=j7XFwPsU3rs>

[http://www.youtube.com/watch?v=R\\_RB2P2wLnw](http://www.youtube.com/watch?v=R_RB2P2wLnw)

<http://www.youtube.com/watch?v=nTodtHoBjP4>

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<sup>1</sup> International Airport Ltd and Air New Zealand (CA 23/92, 73/92[1993] 1 NZLR 671).

<sup>2</sup> NRLMG 2003 Annual Report.

## 2. RECOMMENDATIONS

- The Minister must take a more active role in the management of rock lobster, to restore abundance and to decrease the risks associated with low biomass levels, and to provide for reasonable public use.
- The Minister addresses the sustainability concerns of non-commercial stakeholders by agreeing to stop the use of Management Procedures based on Catch Per Unit of Effort (CPUE) controls, and to initiate a full review of rock lobster management.
- CRA 2 -
  - The Minister must address the long-term depletion evident in CRA 2 by implementing measures to double the existing biomass.
  - The Ministry must present the Minister an option in the final advice paper to achieve the rebuild required to double the biomass.
- CRA 3 –
  - The Minister selects option CRA 3\_02 and retains the current TACC until the Management Procedure is reviewed in 2014, and then provides for public use in a reasonable manner.
  - The Minister rejects any TACC increase while the concession enabling commercial fishers to take undersized rock lobster remains.
- CRA 4 – The Minister supports CRA4\_01 to reduce the TAC and TACC in CRA 4.
- CRA 7 – The Minister rejects any TACC increase in CRA 7 while the concession enabling commercial fishers to take undersized rock lobster remains.
- CRA 9 – The Minister applies a precautionary management approach when setting the TAC in CRA 9 to ensure sustainability, and in doing so set aside reasonable allowances to account for the uncertainty in the current harvest estimates -
  - 20 t for Maori customary non-commercial fishing interests;
  - 30 t for recreational; and
  - 5 t for other fishing related mortality.

## 3. NZ SPORT FISHING COUNCIL - LEGASEA

1. The New Zealand Sport Fishing Council and our public outreach LegaSea, (the submitters) appreciate the opportunity to submit feedback on the *Discussion Document No: 2014/06 Review of Rock Lobster Sustainability Measures for 1 April 2014*. The Ministry for Primary Industries (MPI) released their proposals on 27 January 2013, with submissions due by 21 February 2014.
2. The submitters object to the Ministry's tight consultation timetable giving only 18 working days to respond to the complex sustainability measures for selected crayfish stocks and SCA 7. It is unreasonable to expect non-commercial entities to respond with adequate information to inform the Minister's decision, as required by ss 12 and 13 of the Fisheries Act 1996 (the Act).
3. The New Zealand Sport Fishing Council is a National Sports Organisation with over 32,000 affiliated members from 55 clubs nationwide and a growing number of contributing supporters to LegaSea. 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 Roz Nelson, secretary@nzsportfishing.org.nz.
4. Rock lobster must be abundant to enable us to provide for our social, economic and cultural wellbeings, and be sustainable to meet the reasonably foreseeable needs of future generations, as per section 8(2)(a & b) of the Act.



5. The submitters are committed to ensuring that sustainability measures and management controls are designed and implemented to achieve the purpose and principles of the Act. A precautionary approach needs to be taken in this highly valued fishery, which is managed using uncertain and incomplete information. For many club members and LegaSea supporters, these prized crayfish simply cannot be valued in dollars.
6. The New Zealand Sport Fishing Council is concerned that our members, LegaSea supporters and others nationwide are becoming disillusioned with the ongoing mismanagement and subsequent depletion of our taonga [treasure], our crayfish.

#### 4. EXECUTIVE SUMMARY

7. The Ministry for Primary Industries (MPI) is following advice from the National Rock Lobster Management Group (NRLMG) that will maintain rock lobster stocks in Crayfish 2 (Pakiri to East Cape) below levels that provide for reasonable public use.
8. Catch Per Unit of Effort (CPUE) point estimates, with little supporting information, are not a reliable proxy for abundance, particularly in CRA 2. In our view implementation of the proposed Management Procedures will maintain this stock at depleted levels for years and not meet the statutory obligations in the Fisheries Act 1996 (the Act).
9. The growing gap between modeled stocks and the observed stocks is diverging to the point where the standardised CPUE, the Management Procedures based on CPUE, and stock assessment models can no longer be relied upon as providing the 'best available information', as required by the Act. Where there is uncertainty in what is being measured by CPUE the Minister is obliged to apply a precautionary management approach to ensure sustainability.
10. A full review must be undertaken to correct the misnomer that in all rock lobster stocks 'CPUE is a reliable indicator of abundance'. An alternative management strategy must be used where CPUE does not reflect abundance.
11. The submitters consider the current proposals benefit commercial interests, as have management interventions for the past decade. Despite our advice at the time pointing out the costs of such folly, the last management intervention in CRA 2 was to increase the TACC by 10%, resulting in further stock depletion and subsequent collapse of the public catch. The cost has been passed to recreational interests and the ecosystem in which rock lobster are part, while commercial interests have banked another 2000t of catch. Now the fishery is in a state of near collapse the cost of rebuilding must be largely borne by commercial interests.
12. The once-prolific Gisborne fishery, CRA 3, is now so depleted that surveys of recreational catch estimate just 8 tonne of catch, with the lowest average weight (580g) per crayfish in the country. Recreational harvest is being constrained by low levels of availability, small animal size and the concession granting commercial fishers access to undersized rock lobster. While the concession remains the submitters will reject any Total Allowable Commercial Catch (TACC) increase.
13. The submitters support a reduction in the Total Allowable Catch (TAC) and TACC in CRA 4, between Hawke Bay and Wellington. Only time will tell whether the previous, large TACC increases are sustainable – we think not.
14. The submitters remain committed to opposing the CRA 7 (Otago) concession allowing commercial fishers to harvest undersized crayfish. We reiterate our requests to review the data on the number of concession sized crayfish taken by fishing year and the proportion of CRA 7 landings in this category. If

stock abundance is improving then there is no need for the concession, which contributes to growth overfishing.

15. CRA 9, extending from the Kaipara Harbour to Westland, west coast of the South Island has a relatively healthy fish stock with a reasonable number of large adult fish. The submitters support a TAC being set in CRA 9 for the first time and expect the Minister to set aside reasonable allowances for non-commercial environmental and fishing interests.
16. The Minister cannot continue to hide behind the veil of the National Rock Lobster Management Group when it comes to the sustainable management of our taonga, our crayfish. Consultation, the science process and ongoing management are being hijacked by a few interested parties, to the detriment of the marine environment. It is time the Minister became more active and risk averse when managing our fragile fisheries and ecosystems.

## 5. ROCK LOBSTER MANAGEMENT

### 5.1. NRLMG advice

17. In 1992 the National Rock Lobster Management Group (NRLMG) was established as a statutory body to provide advice to the Minister on managing the rock lobster fisheries. It is advertised as a multi-stakeholder group comprising representatives of customary, recreational and commercial fishing interests, and the Ministry for Primary Industries (MPI). In reality, sector representatives are limited to Te Ohu Kaimoana (TOKM), NZ Rock Lobster Industry Council (NZ RLIC), New Zealand Recreational Fishing Council (NZRFC) and the Environment and Conservation Organisations of Aotearoa New Zealand (ECO).
18. Representatives sitting on the NRLMG routinely select data with the comment “agreed to by Working Group members”. This arises from the demands of the stock assessment models or Management Procedures for information, much of which is unknown. In our view, what is known about rock lobster stocks is overwhelmed by the unknowns.
19. The potentially most valuable data sets to inform on the status of a rock lobster fishery relate to:
  - a. Annual recruitment and abundance of pre-recruits; and
  - b. The full description of the catch and harvest by sex and size.It seems that these data are missing or merely guessed at.
20. The purpose and principles of the Fisheries Act 1996, sections 8-10, support the management of fisheries at abundant levels to enable people to provide for their social, economic and cultural wellbeings. The public has rights to fish for food and recreation under the Act and failure to properly provide for these rights is unreasonable. There are many ways that the public’s fishing interest in the stock could be advanced in advice papers, but these are forgone in the pursuit of commercial benefits through higher catches.
21. In our view the NRLMG fails to give advice that enables all sectors to maximise the benefits from the rock lobster fisheries, instead adopting strategies and crafting advice that benefit commercial users, while barely noting the effect of continued low abundance on non-commercial fishers.
22. In 2001 it was agreed by the Minister and the NRLMG that the group would “*provide well informed, credible, and consistent research and management information and advice to sector groups,*

*Government agencies, and Ministers<sup>2</sup>*". The NRLMG must be held accountable to all stakeholders for achieving this unfulfilled commitment.

23. The submission period is too short. Details of the review of rock lobster sustainability measures for CRA 2, CRA 3, CRA 4, CRA 7 and CRA 9 as well as South Island scallops in SCA 7 were released on 24 January 2014 with submissions due on 21 February. A submission timeframe of just 18 working days has limited our consultation to only a few of our members and interested parties.
24. Consultation, the science process and ongoing management are being hijacked by commercial interests, to the detriment of the marine ecosystem. It is time the Minister became more active and risk averse when managing our fragile fisheries. The Minister cannot continue to ignore the weaknesses in the NRLMG process that enables commercial interests to so easily capture the advice he is given.
25. The introduction of Management Procedures for CRA 2 and CRA 9 for the first time are significant management changes. Once adopted they may not be reviewed for the next five years. We have raised concerns about problems with CPUE-based Management Procedures in previous submissions and these latest proposals just reinforce our concerns regarding this high-risk strategy and the lawfulness of this approach.
26. Applying the current Management Procedure in CRA 4 now means a TACC reduction is required. It is notable that even commercial fishers do not now believe their CPUE is reflecting abundance.

## **5.2. CPUE as a proxy for abundance**

27. Assuming that commercial Catch Per Unit of Effort (CPUE) is proportional to abundance comes with many risks. Commercial CPUE is often affected by operational changes and market demands, but there is no consistent way that these changes are recorded or taken into account.
28. The practice of high grading and returning the less profitable grades to the sea has become widespread. This is allowed under Schedule 6 of the Fisheries Act, but legal fish released are included in the CPUE (kg/potlift). Fisher estimates of the weight of those released crayfish have a significant influence on CPUE. The use of holding pots also complicates the recording of retained catch, which has to be estimated by the fisher each day. At the peak of the season some fishers work a lot of pots or work further afield. Is the fishing effort of a pot lifted every day the same as a pot lifted every 2 or 3 days? No account seems to be taken of these operational changes when assuming that standardised CPUE is proportional to abundance.
29. Another critical assumption is that commercial fishing effort effectively samples the vulnerable biomass. The submitters reject the assumption that CPUE gives an unbiased sample of population abundance, primarily on the grounds that rock lobster have always suffered serial depletion, as the stock is fished down effort is redeployed to pockets of remaining adult stock.
30. The rock lobster population is fished at different rates across its range. Areas close to home ports such as Gisborne are the first to be depleted. As catch rates diminish pots are moved to grounds holding a less heavily fished population, where abundance is greater. When that is getting exhausted another move is made, allowing stocks to be serially depleted without any apparent decline in CPUE to highlight changes in stock size.
31. Without knowing what effort is applied to the same area, in the same way, and the catch composition, the changes in raw CPUE data becomes non-attributable.

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<sup>2</sup> NRLMG 2003 Annual Report.

32. Anecdotal reports in 2013 from remote areas in CRA 2 are that large numbers of commercial pots are turning up in areas that have seldom been fished.
33. In future, some form of electronic logging of location and catch by potlift would show the extent of shifting effort.

### **5.3. Application of Management Procedures**

34. Management Procedures are a mechanism used to guide catch limit decisions in most rock lobster fisheries. Management Procedures are driven by the annual standardised CPUE from the previous year.
35. Setting and altering the Total Allowable Catches based on un-validated fisher-recorded catch, including legal crayfish returned to the sea and number of potlifts, requires a good deal of faith to overcome the possibility that fishers can ignore the high incentive to report an increase in CPUE.
36. Fishers have ready access to better boats, better haulers, and pots. Electronic aids such as sounders, sonar, GPS and bottom mapping software are now available. A potlift in 2013 is not directly comparable to a potlift 10, 20 or 33 years ago.
37. The basic understanding of rock lobster settlement, recruitment, growth, migration, natural mortality, and natural variances are mostly missing. A few small pieces have been studied, but the knowledge base is dominated by the unknown, and this alone reinforces the need for the Minister to act in a lawful, precautionary manner when managing rock lobster fisheries.
38. To understand how the stock is affected by fishing it is critical that we know the numbers of each cohort being taken in commercial crayfish pots. This data is important if we are to have any understanding of population changes and exploitation rate, particularly when no reliable index of rock lobster settlement and recruitment exists.

### **5.4. MLS and size concessions**

39. Tracking changes in the age/size composition of the harvest is essential if the effects of a Minimum Legal Size (MLS) concession are to be understood.
40. Moreover, we are seriously concerned that commercial fishers, in CRA 3 in particular, are reliant on concession fish. At earlier CRA 3 regional meetings fisheries managers advised that concession fish were estimated to be between 60 and 70% of landed catch.
41. The Minister must insist that information on where, when and how many fish below the Minimum Legal Size, at 52mm and 53mm, are being harvested by commercial fishers as per the concession. This information is critical to determining whether it is the abundance of these small fish that are skewing the CPUE results. Having validated this information the Minister will then be empowered to make a more informed TAC decision.
42. Without this information we can only guess at the proportion of how many rock lobster below the MLS are contributing to the CPUE.
43. In 2013 the NZSFC requested the following information. We received no response. We repeat our questions with the expectation of receiving answers this year –
  - a. What percentage of fish below the MLS are landed, per stock?
  - b. Where and when fish below the MLS are being harvested, per stock?
  - c. What proportion of legal rock lobster catch is returned to the sea?
  - d. What is the trend in high grading over time in each rock lobster fishery?

Management without this supporting information means there is no ability to cross-check the changes observed in CPUE. Validation of such important information enables credible management.

44. In a fishery of such high social, economic and cultural value it is important for the Minister to insist he receives full and balanced advice, and MPI must provide the Minister with the best information – not just an all-powerful point estimate of standardised average CPUE.

#### **5.5. Fisheries Act support for reasonable public catch**

45. Advice to the Minister includes comments on his statutory duties when making decisions under the provisions of the Fisheries Act 1996. This advice would include, among other matters, how the decision conforms to the Act's purpose in section 8.
46. The purpose directs the Minister to manage fisheries sustainably, to both enable people to provide for their social, economic and cultural wellbeing, and to maintain the potential of the fishery to meet the reasonably foreseeable needs of future generations. (s8)(2)(a & b).
47. The Supreme Court has also identified the obligations of the Minister in saying, "*the notion of people providing for their wellbeing, and in particular their social wellbeing, is an important element of recreational interests*<sup>3</sup>".
48. The submitters urge the Minister to make a lawful decision. To do so, the Minister must be informed that the application of Management Procedures to set TACs and TACCs, particularly in CRA 2, ignores the public's fishing interests and has resulted in further depriving the public of an opportunity to a reasonable catch.
49. Increasing abundance in our rock lobster fisheries would yield many benefits for the Minister and all other interests including, but not limited to:
  - a. Improved marine environment, with more diversity and robust fisheries;
  - b. Increased real-time CPUE for commercial fishers;
  - c. Increased size and abundance of rock lobster available for non-commercial use;
  - d. Reduced conflict between various interest groups; and
  - e. Simplified and more credible management processes inclusive of stakeholder input.
50. We note the reasonable relationship between commercial and non-commercial interests in CRA 5 (North and east coast, South Island) has many benefits. CRAMAC5, the local industry body, manages this fishery to a more abundant level than what is deemed necessary by Management Procedures. This provides the local community reasonable access to rock lobster and it enables people to provide for their wellbeings. It also gives the community confidence in local commercial rock lobster fishing operations and a measure of confidence that there will be crayfish available for future generations.

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<sup>3</sup> NEW ZEALAND RECREATIONAL FISHING COUNCIL INC AND ANOR V SANFORD LIMITED AND ORS SC 40/2008 [28 May 2009]. Para 54.

## 6. ROCK LOBSTER PROPOSALS

### 6.1. Crayfish 2 (CRA 2) Pakiri to East Cape

Stock	Option	TAC	Customary	Recreational	Other mortality	TACC
	CRA2_01: Be guided by the <u>new Rule 4</u> CRA 2 management procedure and decrease the TAC and TACC	416.5 t ↓	16.5 t	140 t	60 t	200 t ↓
CRA 2	CRA2_02: Be guided by the <u>new Rule 6</u> CRA 2 management procedure and decrease the TAC and TACC	426.5 t ↓	16.5 t	140 t	60 t	210 t ↓
	CRA2_03: Retain the current CRA 2 TAC, allowances and TACC	452.583 t	16.5 t	140 t	60 t	236.083 t

Table 1: MPI summary of Total Allowable Catch, allowances and Total Allowable Commercial Catch proposals for CRA2.

#### *Differing worlds of modeled and observed stock*

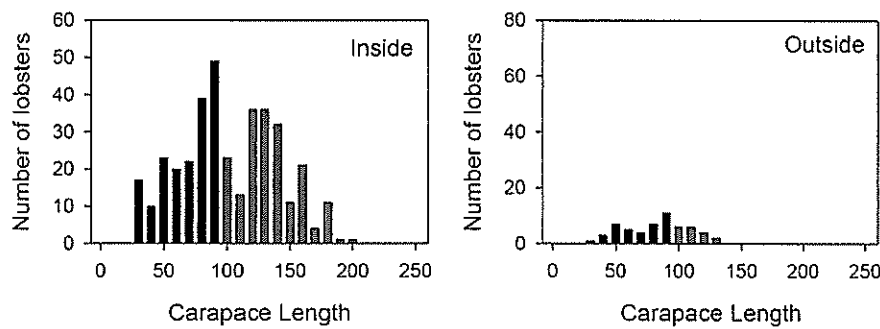
51. The submitters are unable to endorse either option proposed by the National Rock Lobster Management Group. (Table 1 above).
52. We totally reject the CRA 2 stock assessment estimate that the stock is at 37% of the unfished biomass ( $B_0$ ). There has clearly been an enormous reduction in the number and size of rock lobster in east Northland, the Hauraki Gulf, outer islands and Bay of Plenty. Formerly rock lobster was one of the top three species in the Hauraki Gulf ecosystem and now they are near the bottom<sup>4</sup>.
53. If it is true that the current spawning biomass is 530 t (37%  $B_0$ ), then using standard calculations the original, unfished biomass would have been 1430 t. This estimate is implausible given the prime crayfish habitat between Pakiri in the north and East Cape.
54. The assumptions made of stable rock lobster stocks, used as a basis to estimate historical abundance (*Bref*) and *Bmsy*, is an illusion – convenient certainly, but unfortunately not supported by observation.
55. There has not been a stable period since the Second World War. Ask any fisher that worked through the 1960s, 70s and 80s and hear of expansion, as better boats, mechanical haulers and better pots enabled the exploitation of new grounds. The major fishing strategy was breaking in new territory.
56. Clearly there is something fundamentally wrong with a model that cannot be confirmed by observations. The changing size of rock lobster in the CRA 2 population and the loss of range confirm a stock that long-time observers have estimated at less than 10% of the unfished stock – below the Ministry’s Harvest Strategy Standard (HSS) ‘hard limit’, requiring consideration to close the fishery for rebuilding.
57. In the mid 1990s non-commercial representatives were concerned about the long-term viability of CRA 2. They warned the then Minister, John Luxton, against increasing the TACC when setting the TAC for the first time. He ignored their advice and proceeded to increase the TACC from 214.6 t to 236.1 t from the 1997-98 fishing year. CRA 2 now has the lowest CPUE of all areas. In fact, the CRA 2 stock has been depleted for so long that even the stock assessment model concludes that this is its natural state. The submitters reject both this view and the model that would perpetuate this depletion.
58. Quite small pockets of marine protected area can maintain more and larger rock lobster than similar habitats subject to fishing. It is simply not true that habitats in CRA 2 are different to those in other areas and cannot support abundant crayfish numbers (see figure below).

<sup>4</sup> A Long View – the impacts of humans on the New Zealand marine ecosystem since first settlement. By a multi disciplinary team drawn from 14 institutions.

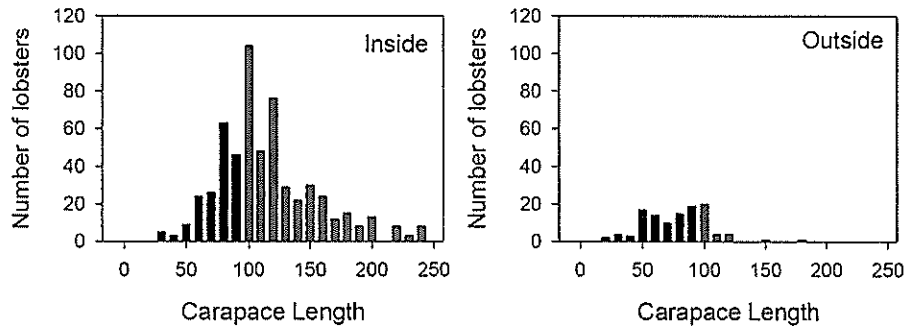
59. The average number of rock lobsters in fished areas outside the Cape Rodney to Okakari Point Marine Reserve has fluctuated between 6% and 28% of those encountered within the reserve, while average number of rock lobsters outside the Te Whanganui-a-Hei Marine Reserve have fluctuated between 5% and 15% of those encountered inside. Reserve populations are dominated by lobsters above the legal size limit, with relatively high numbers of old and large animals. In contrast, fished populations are dominated by sub-legal animals.

Figure 22: Comparison of lobster size and abundance between protected and non-protected areas. Data are presented from the a) Cape Rodney to Okakari Point Marine Reserve in 2009<sup>1</sup> and b) Te Whanganui-a-Hei Marine Reserve in 2009<sup>2</sup>, and c) Tawharanui Marine Park in 2009<sup>1</sup>. Note that the patterns in the Cape Rodney to Okakari Point Marine Reserve in 2009 and Te Whanganui-a-Hei Marine Reserve are also consistent with those reported from other years.

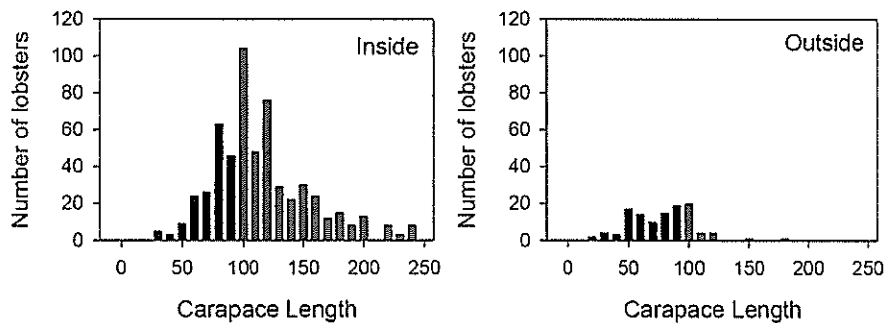
a) Lobsters inside and outside Cape Rodney to Okakari Point Marine Reserve in 2009



b) Lobsters inside and outside Te Whanganui-a-Hei Marine Reserve in 2009



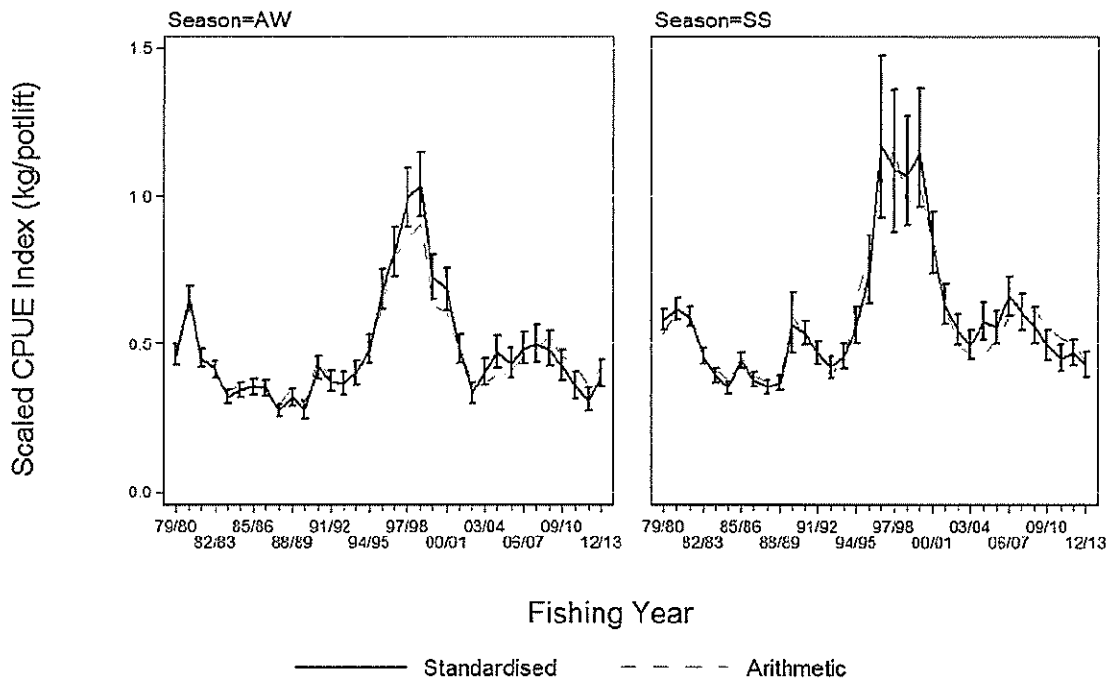
c) Lobsters inside and outside the Tawharanui Marine Park in 2009



<sup>1</sup> Data from Haggitt and Mead (2009a)

<sup>2</sup> Data from Haggitt and Mead (2009b)

## CRA 2 Seasonal



**Figure 1:** CRA 2 CPUE comparing the standardised time series used in the model with the raw data (Arithmetic) by fishing year and season.

### **Commercial potlift effort and catch**

60. In Figure 1 the standardised CPUE, used as an index of abundance in the stock assessment for CRA 2 and the raw CPUE (red dashes) are almost identical. The standardisation is intended to take account of changes in vessel, area, season and fishing power. The plot in Figure 1 shows that a potlift in 1979–80 has the same effective fishing power as a potlift in 2012–12. This is clearly not true. The speed and power of vessels and haulers has increased, the pot design has improved, fishers have GPS and broad band sounders with bottom mapping capability. They know exactly where they are, where they have been and what reef systems are ahead of them.
61. Commercial fishers in CRA 2 are making a similar number of potlifts in 2012–13 as in 1979–80 (530,000 per year) with less than half the number of boats. There are now 35 boats in this fishery compared to 80 in 1979-80.
62. The submitters believe there has been a significant improvement in the efficiency of commercial pots and the efficacy of the way they are deployed. If this had been accounted for, then the standardised CPUE would fall below the raw CPUE in Figure 1.
63. Anecdotal information from recreational fishers is that crayfish abundance was much higher in the 1980s than it is today. This was most evident in remote areas of Coromandel, Mercury Islands, Little Barrier and Great Barrier. All these areas have progressively been fished down by commercial fishers.
  - The CPUE analysis and therefore the model that fits to it are significantly underestimating the decline in the CRA 2 stock, and the reference biomass estimated for 1979 to 1981 should be significantly higher.



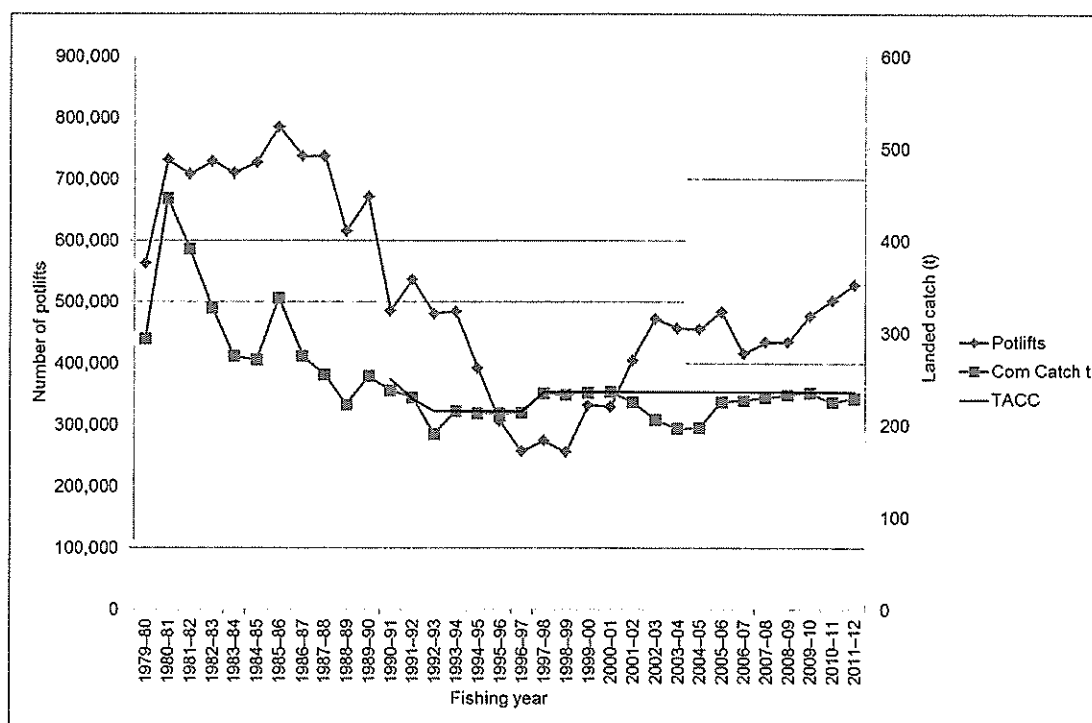


Figure 2: The number of potlifts and catch in tonnes in the CRA 2 commercial fishery since 1979–80.

64. The available catch history shows a high catch in 1980–81 declining over the next 10 years. Introduction to the Quota Management System capped annual landings in 1990. The TACC was increased to 236.1 t in 1997–98. Since then potlifts have increased 105%, and in the last few years the TACC has not been fully caught. Add in the benefit of new technology and it is clear to us that **this is a fishery that has continued to decline.**
65. The stock assessment estimates of biomass in 2012 36% above *Bmsy*, and 37% of the unfished biomass are simply not credible to anyone with experience in this fishery.
66. The number of potlifts is now well over 500,000 per year and still the TACC cannot be caught. (Refer Figure 2 above). This is not good for commercial fishers, it is increasing pressure on an already depleted fishery, and it reduces ecosystem productivity and the availability of crayfish to recreational and customary fishers.
67. The Management Procedure options presented by the NRLMG have no hard limit and a broad plateau at 200 t or 210 t. Catch at these plateau levels make relatively minor adjustment (11 to 15% reduction) to the TACC and are totally inadequate to turn this fishery around from years of overfishing. Indeed, such paltry reductions are known to be inconsequential when there is a need for a substantial rebuild.
68. International best practice is to restore stocks to target quickly, as having them languish below fully productive levels imposes huge costs across all benefit sectors, including the ecosystem, social, cultural, and economic, and maintains excessive and unnecessary risks. This CPUE-based Management Procedure is not a plausible stock rebuild strategy– it’s a do-nothing strategy.
69. Where are the real effective management options for the Minister?

70. The two Management Procedures presented have just a 10 t difference in TACC until CPUE reaches 0.5 kg/potlift and a projected average catch rate of 0.48 kg/potlift under Rule 4 or 0.46 kg/potlift under Rule 6. Given the uncertainty around these projections it seems the outcome is effectively identical.
- Under the proposed Management Procedures CRA 2 will remain the most severely depleted rock lobster fishery in NZ, with by far the worst commercial catch rate and expectations of extremely poor recreational catch for the foreseeable future. This is unacceptable.
71. The Harvest Strategy Standard defines a Hard Limit for stocks such as CRA 2 as 25% *Bref*. Stocks that are below the hard limit must be closed.
72. For CRA 4, 5, 8, and the proposed Management Procedure in CRA 9, if CPUE falls below 0.3 to 0.5 kg/potlift the TACC is set at zero. The same standard is not being applied in CRA 2. Neither of the proposed Management Procedures reduces the TACC to zero if CRA 2 is below the hard limit.
73. The NRLMG and MPI propose CRA 2 is managed by generating TACC based on CPUE at only 10% of the level that closes other fisheries. There is nothing that makes CRA2 different – same fish, growth, distribution and ecosystem function. The same principles ought to apply!
74. By ignoring existing principles and making a rule that allows current practice of depletion to continue exposes the NRLMG and MPI to charges that their only interest is protecting existing quota owners, as these proposals have no regard for the public or the resource.
75. In our view, the Management Procedures being proposed for CRA 2 fail to meet the provisions of ss8 13, 20, 21 of the Fisheries Act 1996, by making changes to the TACC while barely paying lip-service to the need to provide for public catch or comply with other statutory duties.
76. Where is the option that will see CRA 2 stock rebuild to a point that will provide for the reasonably foreseeable needs of future generations?
- The CRA 2 biomass must be doubled from where it is now.
  - The Minister must be presented with an option in the final advice paper to achieve the rebuild required to double the existing biomass.

#### ***Hauraki Gulf Marine Park Act***

77. The Hauraki Gulf Marine Park boundaries fall within the CRA 2 management area. When setting the TAC the Minister is required, under s11(2)(c) of the Hauraki Gulf Marine Park Act 2000, to have *particular regard* to sections 7 and 8. These sections recognise the Hauraki Gulf's national significance, the wellbeing of people and the protection and enhancement of the natural resources, including kaimoana, within the Park.
78. The submitters emphasise the need for the Minister to comply with the provisions of the Hauraki Gulf Marine Park Act, to rebuild this fishery to abundant levels to improve marine diversity and to enable people to provide for their social, economic and cultural wellbeings.

#### ***Public frustration with CRA 2 depletion***

79. Abundance continues to fall along in the northeastern rock lobster fisheries. Non-commercial catches have been adversely affected by stock depletion.

80. The concentration of commercial potting on the remnants of the rock lobster stock has the public questioning the process that permits increasing fishing effort to be applied to a stock that, in many places, is almost completely fished out.
  81. The cycle of NRLMG advice being accepted on face value, in stark contrast to the observations of the public, has seriously eroded confidence in the Ministry's ability to control and manage commercial activity in the rock lobster fisheries.
  82. There are increasing numbers of people aware that this advice is only guided by a goal of securing a short-term commercial benefit. NZSFC members have asked the executive to explore other means of influencing these decisions.
  83. The NRLMG and the Minister need to show that they take non-commercial interests and needs seriously, and recognise that advice from the NRLMG is almost all simple commercial advocacy. The notion of impartial advice remains invisible.
  84. There was a clear message from the stakeholders' meeting held in Tauranga in May 2013. Joint sector aspirations were identified and high abundance was the goal:
    - Higher abundance (including a wide size distribution of rock lobsters)
    - Improved stability
    - Improved CPUE
    - Improved information on non-commercial catches and recruitment dynamics.
- We submit –
- Neither of the near-identical CRA 2 management proposals will meet non-commercial expectations or the Minister's statutory obligations
  - The Minister must not implement either of the proposed CRA 2 Management Procedures
  - The CRA 2 biomass must be doubled from where it is now
  - That we are willing to discuss measures required to achieve doubling CRA 2 biomass
  - That the final advice paper to the Minister must contain advice on management action required to double the biomass in CRA 2, to mitigate the risks associated with low biomass levels, and to address serious public concerns over the depleted state of the fishery.

## 6.2. Proposed TAC changes in CRA 3 (Gisborne)

Stock	Option	TAC	Customary	Recreational	Other mortality	TACC
CRA 3	CRA3_01: Be guided by the CRA 3 management procedure and increase the TAC and TACC	389.95 t ↑	20 t	20 t	89 t	260.95 t ↑
	CRA3_02: Retain the current CRA 3 TAC, TACC and allowances	354.5 t	20 t	20 t	89 t	225.5 t

**Table 2:** MPI summary of Total Allowable Catch, allowances and Total Allowable Commercial Catch proposals for CRA3.

85. CRA 3 is a relatively small but significant fishery for commercial, customary and recreational fishers. It is well documented that recreational fishers feel disadvantaged by the commercial concession allowing undersized male rock lobster to be taken.
  - The Minister must revoke the concession that allows commercial fishers to take undersized male rock lobster.
  - While the concession remains the submitters will reject any TACC increase.

86. In 2013 the standardised commercial CPUE in CRA 3 was 2.36 kg/potlift. The existing Management Procedure would allow a 50 t increase for 2014, but a 10% cap on the size of annual increases is also part of the Rule. NRLMG propose to add all of the 34.5 t increase to the TACC, which would rise from 225.5 t to 261 t, up 15.7%.
87. Again, there is a disconnect between trends in commercial CPUE and what recreational fishers are experiencing. Recreational fishers struggle to find legal sized crayfish in places where they have historically been. A 2011–12 national survey of amateur harvest estimated just 8 tonne (cv 0.33) in CRA 3, with the lowest average weight (580 g) per animal in the country.
88. While the NRLMG state in the Discussion Document “*the allowances made for recreational fishers do not constrain their overall harvest*” there is obviously considerable constraint due to low availability, small average rock lobster size, number of fishable days and limited access. The allowance for the public should be caught, and providing abundance that enables opportunity for this catch is a basic statutory duty.
89. Does a management process that provides 2% of the TAC for public catch in a populated region sound even vaguely reasonable? It clearly is nonsense.
- NZSFC has not supported the CRA 3 Management Procedure from the outset.
  - The CRA 3 Management Procedure selected in 2010 is not a good fit to current fishery performance and we look forward to its review in 2014.
  - We submit the Minister select option CRA 3\_02 and retain the current TACC until the Management Procedure is reviewed in 2014.

### 6.3. Proposed TAC changes in CRA 4 (Hawke Bay – Wellington)

Stock	Option	TAC	Customary	Recreational	Other mortality	TACC
CRA 4	CRA4_01: Be guided by the CRA 4 management procedure and decrease the TAC and TACC	662 t ↓	35 t	85 t	75 t	467 t ↓
	CRA4_02: Retain the current CRA 4 TAC, allowances and TACC	694.7 t	35 t	85 t	75 t	499.7 t

**Table 3:** MPI summary of Total Allowable Catch, allowances and Total Allowable Commercial Catch proposals for CRA4.

90. This is the third year that the CRA 4 Management Procedure has been in operation. CRA 4 includes southern Hawke Bay, Wairarapa and Wellington. Last fishing year the TACC was increased by 33 t. This year the proposal generated by the Management Procedure is to reduce the TAC by about 5% and the TACC by 33 t. (Figure 3 below).
91. The Discussion Document says that commercial fishers claim that the decrease in the 2013 CPUE was caused by poor weather in autumn-winter and low market prices, rather than a reflection of available abundance. This is another example of operational changes affecting the standardised CPUE, which in 2013 may not be tracking abundance.
92. Based on current catch the extra 33 t made available from last year’s increase may not be caught.
93. Rock lobster is a popular target species in the CRA 4 area with a total amateur harvest in the 2011–12 national survey of 44 t (cv 0.17). The current allowance for recreational fishers is 85 t, the customary allowance 35 t and other sources of fishing related mortality 75 t.
- The submitters support a reduction in the Total Allowable Catch (TAC) and TACC in CRA 4. Only time will tell whether the previous, large TACC increases are sustainable – we think not.

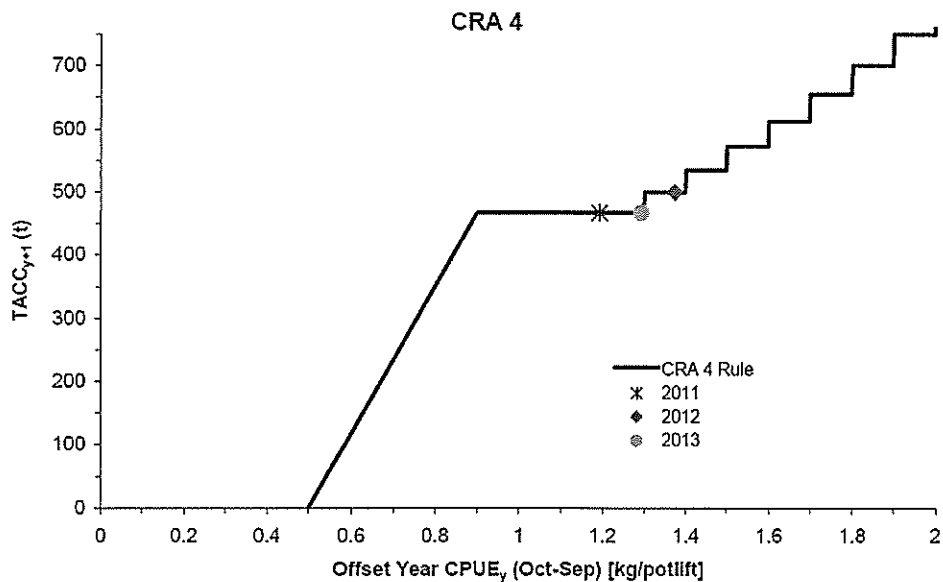


Figure 3: The CRA 4 Management Procedure with the main plateau at 467 t and a first step to 500 t.

#### 6.4. Proposed TAC changes in CRA 7 (Otago)

Stock	Option	TAC	Customary	Recreational	Other mortality	TACC
CRA 7	CRA7_01: Be guided by the CRA 7 management procedure and increase the TAC and TACC	86 t ↑	10 t	5 t	5 t	66 t ↑
	CRA7_02: Retain the current CRA 7 TAC, allowances and TACC	64 t	10 t	5 t	5 t	44 t

Table 4: MPI summary of Total Allowable Catch, allowances and Total Allowable Commercial Catch proposals for CRA7.

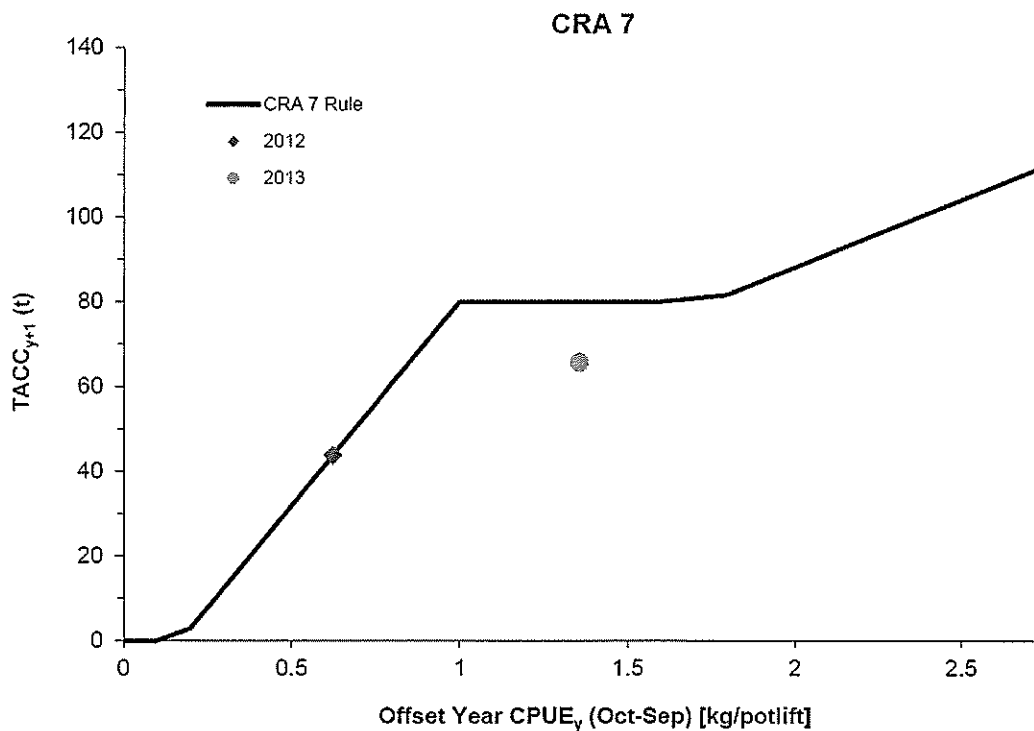
94. This is the second year that the revised CRA 7 Management Procedure has been in operation. CRA 7 is located on the east coast of Otago. There are limited areas of reef habitat and this fishery relies heavily on new recruits reaching the legal size.
95. The TACC has been as high as 189 t in 2009–10 but was not caught (137 t). Last year the TACC was reduced from 64 t to 44 t. This year the proposal generated by the Management Procedure is to increase the TACC by 50%, the maximum allowed by a Rule in the current Management Procedure (Figure 4).
96. In 2013 CPUE increased over the previous year by 69% to 1.36 kg/potlift. It is encouraging to see the commercial catch rate in CRA 7 increase and hope that this can be maintained for several years.
97. Currently it is assumed that after a few years crayfish recruited in one year i.e. 2013, will move out of CRA 7 to Foveaux Strait and Stewart Island. Our concern is that this Management Procedure will always be chasing the tail of CPUE and probably won't reflect true abundance in the current or the following fishing year. We believe commercial fishers in CRA 7 understand this pattern and have accepted a conservative Management Procedure because of the uncertainty.

98. The NRLMG have ignored the significant regulation changes made on 1 October 2013. The removal of the commercial closure of the Otago Concession Buffer Zone, and the removal of the commercial closed season from 20 November to 31 May, are major operational changes in CRA 7. These must have an impact on commercial CPUE.

99. Yet again, operational changes will mask real trends in stock abundance in years to come. NRLMG advice to the Minister stating “*Standardised commercial CPUE is considered to be a reliable indicator of relative stock size in CRA 7*” is wrong, as it is in CRA 2, CRA 4 and CRA 9. This is a fundamental flaw in Management Procedures.

100. We ask again to see the data on the number of concession sized crayfish taken by fishing year and the proportion of CRA 7 landings in this category. If stock abundance is improving then there is no need for the concession, which contributes to growth overfishing.

- The submitters recommend the Minister reject any TACC increase while the concession enabling commercial fishers to take undersized rock lobster in CRA 7 remains.



**Figure 4:** The CRA 7 Management Procedure with the main plateau at 80 t TACC but a rule that the increase in any one year will not exceed 50% limits the proposed new TACC to 66 t.

## 6.5. New Management Procedure proposals and allowances for CRA 9 (Kaipara Harbour - Westland)

Stock	Option	TAC	Customary	Recreational	Other mortality	TACC
CRA 9	CRA9_01: Be guided by the <u>new Rule 4041</u> CRA 9 management procedure, set a TAC of 91.8 tonnes and increase the TACC	91.8 t	5 t	25 t	1 t	60.8 t ↑
	CRA9_02: Be guided by the <u>new Rule 4041</u> CRA 9 management procedure, set a TAC of 115.8 t and increase the TACC	115.8 t	20 t	30 t	5t	60.8 t ↑
	CRA9_03: Be guided by the <u>new Rule 4144</u> CRA 9 management procedure, set a TAC of 98.6 t and increase the TACC	98.6 t	5 t	25 t	1 t	67.6 t ↑
	CRA9_04: Be guided by the <u>new Rule 4144</u> CRA 9 management procedure, set a TAC of 122.6 t and increase the TACC	122.6 t	20 t	30 t	5t	67.6 t ↑
	CRA9_05: Retain the current CRA 9 TACC (no TAC or allowances have been previously set for CRA 9)	N/A	N/A	N/A	N/A	47.008 t

Table 5: MPI summary of Total Allowable Catch, allowances and Total Allowable Commercial Catch proposals for CRA9.

101. CRA 9 is a large area covering the west coast of the North Island, south of the Kaipara Harbour, and northwest coast of the South Island. The current TACC is 47 t and this is fished by relatively few boats. From 1982 to 2000 CPUE was about 1 kg/potlift but it has increased markedly over the last few years to a new peak of 3.2 kg/potlift. Large rock lobster caught and release are included in the standardised CPUE.
102. The NRLMG state “For CRA 9 there is a small amount of commercial catch data available for CPUE analysis, which may result in CPUE indices that are sensitive to different catching patterns rather than changes in stock size. Despite this sensitivity, CRA 9 CPUE has been used as the abundance indicator in the new CRA 9 management procedure.”
103. The submitters are concerned that CPUE indices for all rock lobster stocks are sensitive to different catching patterns and advancements in technology. Where there is uncertainty in what is being measured by CPUE the Minister is obliged to apply a precautionary management approach to ensure sustainability.
104. The Management Procedure proposed for CRA 9 is reasonably conservative. The model projections predict a long-term average around 2 kg/potlift. (The Management Procedures in CRA 2 and CRA 3 are not conservative, with regular increases in the TACC if there is good recruitment and/or the CPUE index increases).
105. A healthy fish stock has a reasonable number of large adult fish. Large crayfish are prime breeding stock and can play an important role in the ecosystem. It is encouraging that CRA 9 still has reasonable numbers of large crayfish.
106. This is the first time a TAC and allowances have been set for CRA 9. The submitters support reasonable allowances for non-commercial fishers -
- 20 t for Maori customary non-commercial fishing interests;
  - 30 t for recreational; and
  - 5 t for other fishing related mortality, to allow for the uncertainty in the current estimates.

## 7. PREVIOUS NZSFC SUBMISSIONS

2013 – Submission on the review of Rock Lobster sustainability measures for 1 April 2013.

2012 – Submission on the review of Rock Lobster regulatory controls.

2012 – Submission on the review of Rock Lobster sustainability measures for 1 April 2012.

2011 – Submission on the review of Rock Lobster commercial Concession Area Regulations

2011 – Submission on the review of Rock Lobster sustainability measures for 1 April 2011

2010 – Submission on the review of sustainability measures for CRA 3 & 4, for 1 April 2010.

2010 – NZSFC Zone 5 clubs submission on the review of CRA sustainability measures for 1 April 2012.





# NZ ROCK LOBSTER INDUSTRY COUNCIL

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## Review of Rock Lobster Sustainability Measures for 1 April 2014

February 21<sup>st</sup> 2014-02-21

### 1.1 THE NEW ZEALAND ROCK LOBSTER INDUSTRY COUNCIL

The NZ Rock Lobster Industry Council Ltd (NZ RLIC) operates as a non-profit organisation comprised of nine commercial stakeholder organizations (CRAMACs) whose members are involved in the harvesting, processing, wholesaling, retailing and exporting of rock lobsters in New Zealand.

The rock lobster industry has consistently supported and advocated for the New Zealand fisheries management regime (Quota Management System - QMS), one which has a rights-based framework (although so far incomplete) which itself allows resolution of competing interests, including changing societal values in relation to the marine environment, to be resolved by way of market-based outcomes.

Working within the QMS framework the NZ RLIC continues building and informing a united and sustainable industry operating to acceptable levels of environmental performance to contribute to regional and national economies and therefore valued and respected by Government and by the wider New Zealand community.

The NZ RLIC has developed and supported a *Strategic Vision for the New Zealand Rock Lobster Fisheries*. The vision is consistent with the New Zealand Fisheries Act 1996, enhances an agreed management framework, and provides a basis for consideration of

short, medium, and long term research and management issues. Good science and best available information guide our responses and our initiatives in relation to lobster fisheries.

## **1.2 FORWARD:**

At the very core of the rock lobster industry organisation and advocacy is the recognition that all benefits - commercial, social, cultural, economic - arise from healthy, productive and abundant fisheries.

The CRAMACs and the NZ RLIC are the manifestations of an industry looking to improve the quality of the fishing experience for all legitimate users and assure itself of a rightful share of those improvements.

New Zealand rock lobster fisheries are intended to be managed within the context of an agreed plan of management endorsed by the National Rock Lobster Management Group (NRLMG). The NZ RLIC holds the view that a fully functional and effective management plan would give greater emphasis to:

- Ensuring all fisheries stakeholders can be held individually and collectively accountable for their actions;
- Establishing an enabling framework that allows stakeholders to create optimal economic, social, and cultural value from their rights and interests;
- Developing and implementing an allocation policy for shared fisheries;
- Mechanisms that enable best-value use of marine water space;
- Market mechanisms to manage environmental impacts of fishing;
- Enabling quota owners to take collective management action; and
- Improving the specification of the rights and responsibilities of those who utilise fisheries resources.

**The NZ RLIC regards it as being particularly unfortunate therefore that the 2014 IPP discussions and recommendations fall well short of several of those goals, especially in relation to the CRA 2 management options.**

There is a very high level of community interest in high value/ low volume stocks like rock lobsters and paua. Cultural values associated with traditional customary use by Maori; culinary values of paua and rock lobsters in the tourism and hospitality industries; recreational and sustenance values for the public at large are all significant factors.

Increased leisure time; affordable transportation; affordable and improved vessel, navigation and fishing technologies; product, lifestyle and event promotions; Government subsidised training opportunities; increased stock abundance; changing ethnic mix and increasing population have placed new and different demands on the fisheries and on fisheries managers. It seems that MPI in particular are loathe to grapple with the situation.

The NZ RLIC submission to the 2014 IPP is focused mainly on the decisions that need to be confirmed for implementation on 01 April 2014 but we give notice of our intention to seek a detailed 'post mortem' of the current IPP process and the role of the NRLMG in that once those decisions are confirmed.

## PROPOSAL TO USE NEW CRA 2 & CRA 9 MANAGEMENT PROCEDURES TO GUIDE TAC SETTING

### SUMMARY OF IPP OPTIONS FOR CRA 2 AND CRA 9

Stock	Option	Description
CRA 2	CRA2_A	Agree to use the <u>new Rule 4</u> CRA 2 management procedure to guide TAC setting in CRA 2
	<del>CRA2_B</del>	<del>Agree to use the <u>new Rule 6</u> CRA 2 management procedure to guide TAC setting in CRA 2</del>
	<del>CRA2_C</del>	<del>Continue to use periodic stock assessments to guide TAC setting in CRA 2 (<i>status quo</i>)</del>
CRA 9	CRA9_A	Agree to use the <u>new Rule 4041</u> CRA 9 management procedure to guide TAC setting in CRA 9
	<del>CRA9_A</del>	<del>Agree to use the <u>new Rule 4144</u> CRA 9 management procedure to guide TAC setting in CRA 9</del>

Stock	Option	Description
	CRA9_C	Continue to use periodic 'informal' stock assessments to guide TAC setting in CRA 9 (status quo)

The NZ RLIC supports **Option CRA\_2 A**

The NZ RLIC supports **Option CRA\_9 A** – but with modifications as discussed below.

## PROPOSED TACs, ALLOWANCES AND TACCs FOR CRA 2, CRA 3, CRA 4, CRA 7 & CRA 9

The NZ RLIC conditionally endorses:

Stock	Option	TAC	Customary	Recreational	Other	TACC
CRA2_01:		416.5 t				
	Be guided by the <u>new</u> Rule 4 CRA 2 management procedure and decrease the TAC and TACC	↓	16.5 t	140 t	60 t	200 t ↓

The NZ RLIC endorses:

CRA3_01:	Be guided by the CRA 3 management procedure and increase the TAC and TACC	389.95 t ↑	20 t	20 t	89 t	260.95 t ↑
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The NZ RLIC endorses:

CRA4_01:	Be guided by the CRA 4 management procedure and decrease the TAC and TACC	662 t ↓	35 t	85 t	75 t	467 t ↓
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The NZ RLIC endorses:

CRA7_01:	Be guided by the CRA 7 management procedure and increase the TAC and TACC	86 t ↑	10 t	5 t	5 t	66 t ↑
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The NZ RLIC conditionally endorses with minor amendment:

CRA9_01:	Be guided by the <u>new</u> Rule 4041 CRA 9 management procedure, set a TAC of 91.8 tonnes and increase the TACC	91.8 t	5 t	25 t	1 t	60.8 t ↑
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However the NZ RLIC is willing to reconsider CRA9\_01 non-commercial allowances subject to the best available information available to the NRLMG as a consequence of statutory consultation. The NZ RLIC notes that CRAMAC 9 will agree an alternative customary allowance in CRA 9 TAC setting.

## DISCUSSION

### 1.3 CRA 2

The CRA 2 Rock Lobster Management Company Ltd is the representative commercial stakeholder organisation for CRA 2. The company has consulted all CRA 2 quota share and ACE owners and balloted all CRA 2 quota share owners. The clear preference of the CRA 2 industry is to take the most responsible and conservative option so as to halt further stock decline and accelerate an intended rebuild of the CRA 2 fishery.

The CRA 2 Rock Lobster Management Company Board being mindful of the preferences of all CRA 2 QSOs is greatly disappointed that the statutory consultation contains no reference to the recreational sector being asked or expected to make even a token contribution to an enhanced CRA 2 stock status.

In circumstances where the most recent CRA 2 stock assessment confirms that about 50% of any proposed TACC reduction will end up as being catch available to non-commercial sectors the conservative and more ethical response from the CRA 2 industry will in part comprise a donation of available catch to other sectors.

The CRA 2 industry and the NZ RLIC will not back down from accepting a responsible TAC/TACC decision - we maintain support for a TACC reduction- but in the circumstances industry offers the most conservative option as being conditional upon a commensurate reduction to the current recreational allowance and a commitment from MPI to work with industry to effectively constrain illegal unreported removals.

The CRA 2 industry is disappointed and annoyed that the IPP Options exclude any recognition of CRA 2 being a shared fishery and offer no consideration of even a token

reduction in the recreational allowance when setting a new TAC. The CRA 2 industry and the NZ RLIC highlight the obvious latent effort which exists within the recreational catchment of the CRA 2 management area boundaries. It is irresponsible in our view and also inequitable to rely solely on a TACC reduction intended to improve stock abundance knowing that the reduction will likely have a more immediate impact in terms of improving recreational fishing success.

The NZ RLIC and CRA 2 Rock Lobster Management Company note that in previous NRLMG discussions during 2013 the NRLMG sector representatives (customary, recreational and commercial) did reach agreement on a proposal to decrease the CRA 2 recreational allowance from 140 to 120 tonnes. That may well be only a token reduction but at least serves to underline the nature of shared responsibilities in shared fisheries.

#### **1.4 CRA 3**

The Tairāwhiti Rock Lobster Industry Association (TRLIA) is the commercial stakeholder organisation for the CRA 3 fishery. The TRLIA and the NZ RLIC support that the Minister is guided by the current CRA 3 management procedure and increases the CRA 3 TAC and TACC (CRA 3\_01)

The CRA 3 management procedure was developed in consultation with the customary, recreational and commercial sectors at considerable cost in time and resources. The outcomes of this management procedure are particularly conservative and “safe”. The design of the management procedure ensures that the commercial harvest is adjusted to maintain recreational and customary harvest opportunities at a healthy level.

#### **1.5 CRA 4**

The CRA 4 Rock Lobster Industry Association (CRAMAC 4) is the commercial stakeholder organisation for CRA 4. CRAMAC 4 has notified all CRA 4 quota share and ACE owners of the IPP options and the CRAMAC and the NZ RLIC endorse CRA 4\_01.

## 1.6 CRA 7

The Otago Rock Lobster Industry Association (ORLIA) is the commercial stakeholder organisation for CRA 7. ORLIA and the NZ RLIC endorse CRA 7\_01. The ORLIA do not consider that there is any reliable information available to support any reconsideration of non-commercial allowances but signal that in future they would be responsive to such information if it meets Fishery Assessment Working Group standards.

## 1.7 CRA 9

The CRA 9 Rock Lobster Industry Association (CRAMAC 9) is the commercial stakeholder organisation for CRA 9. The association has a very high mandate from quota share and ACE owners and their endorsement of a modified CRA 9\_01 outcome is supported by greater than 78% of the total CRA 9 quota shares owned.

The basic CRA 9\_01 options as detailed in the IPP are perceived by CRAMAC 9 to be too aggressive in terms of possible TACC increases and insufficiently responsive to any observed CPUE reductions.

CRAMAC 9 reminds the NRLMG and the Minister that industry support for the development and implementation of a CRA 9 management procedure was intended to provide a possible opportunity for a CRA 9 commercial harvest strategy to target very large and less valuable grades of lobsters which are otherwise being routinely discarded.

It was always a CRA 9 industry intention to take any TACC increase only as 'big fish'. CRAMAC 9 has developed a draft "business plan" to cover off the catching, landing and marketing of the larger grades in manageable quantities. The market for such large grades is currently not large but has potential to be developed.

CRAMAC 9 does not want successive TACC increases in excess of what they can reasonably expect to handle from one season to the next. The CRA 9 industry believes that even limited landings of large lobsters will significantly increase CPUE in the first full season of a

new TAC/TACC and that such an increase will invoke another TACC increase from 2015 – an increase well in excess of what the CRA 9 industry can reasonably handle to maximum economic advantage. It is very possible that the CPUE could reach 7.0 kgs/potlift in the first season under the new management procedure which could then give a TACC increase to 120 tonnes in 2015. (See Appendix 1)

Therefore, CRAMAC 9 supports a modified CRA 9\_01 option in which the TACC only takes one step at a time if the CPUE allows for a step or steps to be taken. When CPUE is higher than the next step in the rule sequence and confirms that a TACC could ‘jump’ more than one incremental amount as determined by the current management procedure parameters, the CRA 9 industry proposes that only one incremental increase be invoked.

However when CPUE declines to a level which would take the TACC down by more than one incremental step the CRA 9 industry supports the immediate TACC reduction to the amount specified by the rule parameter.

Using the example above – CPUE of 7.0 kgs /potlift would invoke a more modest TACC of 70 tonnes in Year 2 and increase to 80 tonnes in the subsequent season in response to the same CPUE. If CPUE in Year 3 declined to less than 3.0 kgs /potlift the TACC would reduce to 52.9 tonnes in the subsequent season. Increases are constrained to one “step”; decreases are made in full.

In effect CRAMAC 9 are supporting an asymmetric management procedure based on the current CRA 9 4401 Rule option. TACC increases are limited to one increment in a season not matter the amount of CPUE increase above the rule threshold – and TACC reductions are immediately invoked in response to observed CPUE.

CRAMAC 9 and the NZ RLIC consider this to be the best management procedure in support of the CRA 9 stock abundance and the economic growth opportunity enabled by a TACC increase that will be taken and landed as large grades of lobsters at less aggregate value than an equivalent tonnage of premium grade lobsters.



For the NZ RLIC and on behalf of:

CRA 2 Rock Lobster Management Company Ltd

Tairāwhiti Rock Lobster Industry Association

CRA 4 Rock Lobster Industry Association

Otago Rock Lobster Industry Association

CRA 9 Rock Lobster Industry Association.

***Daryl Sykes***

Executive Officer

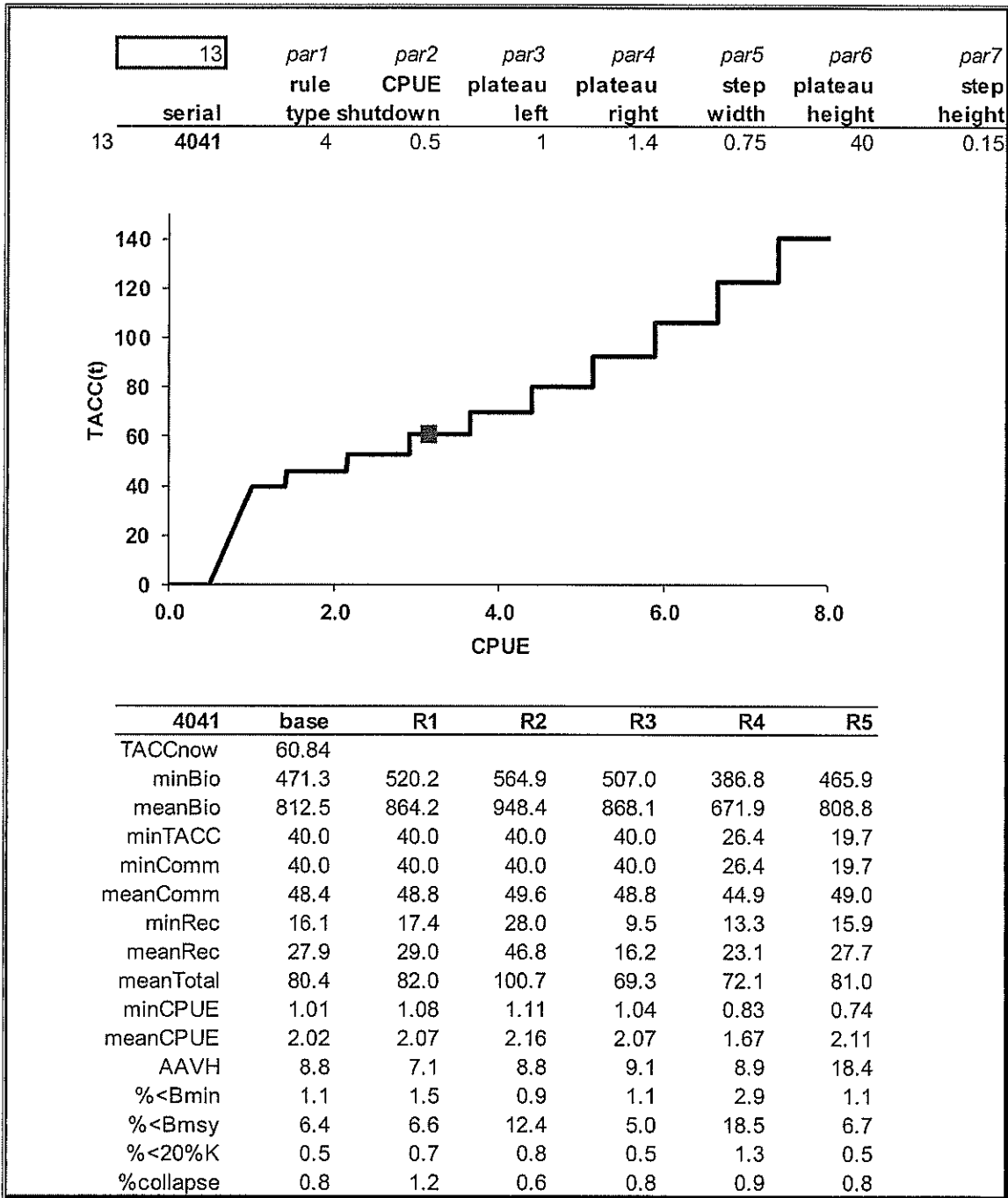
**NZ Rock Lobster Industry Council**

Private Bag 24901

Wellington 6142

[lobster@seafood.co.nz](mailto:lobster@seafood.co.nz)

APPENDIX 1:



CRA 9 Management Procedure with CPUE Projections

**CRAMAC 9**  
**CRA 9 INDUSTRY ASSOCIATION INCORPORATED**  
**75 THE CLIFFS, NELSON**  
**Phone 0275390399 email g.levy@xtra.co.nz**

**CRAMAC 9 CRA9 IPP Submission**

The CRAMAC 9 committee presents a submission on behalf of the CRA 9 quota shareholders to set a modified CRA 9 Management Procedure to guide TAC/TACC setting from 2014.

The CRAMAC 9 committee supports Option CRA9\_02 Rule 4041 Management Procedure.

We support this Rule based on the condition that the TACC only increases one step at a time if the CPUE allows for a step or steps to be taken, if the CPUE is higher than the next step and indicates that two steps can be taken to a new TACC we will only accept the one step increase.

The reason for requesting the Rule to be operated in this way is to restrain the TACC taking large leaps in volume which will create logistical issues on the LFR side of the CRA 9 lobster industry.

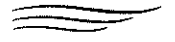
Under the new Rule 4041 it is very possible that the CPUE could reach 7.0 in the first season (stat area 935 currently has a CPUE of 6.77) which would then give a TACC increase up to 122 tonnes (from 68)\*. Industry simply cannot have this happen so we urge the NRLMG and MPI endorse our recommendation to limit the steps taken when operating Rule 4041.

CRAMAC 9 supports the allowances made for the Customary and Recreational sectors in Option CRA9\_02. We recommend that MPI implements proper audit and monitoring of all non-commercial removals so that in future better informed management decisions can be made for the CRA 9 fishery that we all share.

We request that the NRLMG and MPI need implement this based on the concerns that the only credible data used for the CRA 9 assessment and management procedure development is commercial harvesting from only two statistical areas out of the seven statistical areas in CRA 9.

*Gary Levy*  
Chairman  
CRAMAC 9

←should  
be 60.8.



20 February 2014  
Rock Lobster Submissions  
Fisheries Management - Inshore  
Ministry for Primary Industries  
P O Box 2526  
WELLINGTON 6140  
FMSubmissions@mpi.govt.nz

Tena koutou

## PROPOSALS FOR ROCK LOBSTER 2014-15 FISHING YEAR

### Introduction

Te Ohu Kaimoana Trustee Ltd (Te Ohu) welcomes the opportunity to submit on the Ministry for Primary Industries (MPI) Initial Position Paper (IPP) on Rock Lobster proposals, dated January 2014.

### NRLMG Proposals

The IPP deals with two proposals:

- a) The introduction of management procedures in CRA2 and CRA9, and
- b) TAC adjustments in CRA3, CRA4, CRA7, and CRA9.

### Our Position

- Te Ohu supports the proposal to use management procedures in CRA2 and CRA9
- In CRA2 we support the adoption of rule 6 and the resulting TACC reduction
- In CRA9 we support adopting rule 4041
- We support increases to the TACCs in CRA3 (236 tonnes to 260 tonnes), CRA7 (44 tonnes to 66 tonnes) and CRA9 (47 tonnes to 67 tonnes).
- We support the proposed reductions in the CRA2 TACC (236 tonnes to 210 tonnes), and the CRA4 TACC (499 tonnes to 467 tonnes)
- We are concerned about the customary allowances in CRA9. Our position is the customary allowance should be set at 20 tonnes

## **Who are we?**

The purpose of Te Ohu is to advance the interests of Iwi individually and collectively, primarily in the development of fisheries, fishing and fisheries-related activities. Amongst other things, this purpose is intended to:

- a) Ultimately benefit the members of Iwi and Maori generally
- b) Assist the Crown to discharge its obligations under the 1992 Fisheries Deed of Settlement and the Treaty of Waitangi and
- c) Contribute to the achievement of an enduring settlement of the claims and grievances referred to in the 1992 Fisheries Deed of Settlement.

This submission does not seek to take away the right of Iwi to make their own submissions on the NRLMG proposals. Indeed we encourage Iwi to make their own submissions on such important issues.

## **Management Procedures**

We agree with the NRLMG that these management procedures provide more value than the traditional management strategies. They are an effective way to make decisions quickly and responsively and all relevant factors are considered. Therefore Te Ohu supports the proposal to use management procedures in CRA2 and CRA9.

In CRA2 we support the adoption of rule 6 and the resulting TACC reduction. In CRA9 we support adopting rule 4041. However we ask the NRLMG to consider modifying the management procedure so that if the CPUE increases hugely it won't trigger any major TACC increases.

T

## **TAC Adjustments**

We support increases to the TACCs in CRA3 (236 tonnes to 260 tonnes), CRA7 (44 tonnes to 66 tonnes) and CRA9 (47 tonnes to 67 tonnes). We also support the proposed reductions in the CRA2 TACC (236 tonnes to 210 tonnes), and the CRA4 TACC (499 tonnes to 467 tonnes).

In relation to CRA2 we are concerned about the potential for recreational catches in the Hauraki/Coromandel area to be increasing and the impact this could eventually have on TAC allocations in the future. Industry representatives have raised allocation as a possible discussion for the NRLMG in the first quarter of 2014. We support this.

In relation to CRA9 we have concerns regarding the small amount of information we have to manage the CRA9 fishery, and it only reflects a part of the CRA9 quota management area. Hopefully this problem can be improved as this fishery continues to be developed.

Although it is not part of the IPP we consider the NRLMG should in the future give consideration to subdividing the CRA9 quota management area into 2 or more new QMAs. We consider this would better serve the sustainability of the fishery.

We continue to be concerned about the customary allowances in CRA9. Currently it is set at 1 tonne and there are proposals in the IPP to increase the TACC to either 5 tonnes or 20 tonnes. Our position is the customary allowance should be set at 20 tonnes for the following reasons:

1. The current 1 tonne and the proposed 5 tonne allowance are totally unrealistic. There are roughly 23 iwi and 100 marae with links to the CRA9 fishery. A 20 tonne allowance is realistic.
2. There is support from recreational, commercial, and iwi for a 20 tonne customary allowance.
3. The CRA9 fishery should handle a 20 tonne customary allowance without impacting the proposed increases in commercial and recreational allowances.
4. The customary catch information used by MPI only relates to the areas where mandatory customary reporting is required. The majority of iwi are outside these areas.
5. The boundary for CRA9 spans roughly half the south and north island west coast. The commercial catch information used by the rock lobster working group to calculate stock size only relates to roughly half the CRA9 area.
6. The Te Tai Hauauru Forum moved a resolution at their November 2013 meeting to support a 20 tonne customary allowance for the Manawatu/Taranaki region of CRA9. This was noted at the December 2013 NRLMG meeting.
7. Recreational NRLMG members expressed their support for the increase at the last NRLMG meeting.
8. CRAMAC9 also support a 20 tonne customary allowance.

With respect to recreational allowances in CRA9, we also support the proposed increases.

If you would like to discuss this submission you can contact me on 049319512 or 0212275289.

Noho ora mai

Alan T Riwaka  
Senior Fisheries Management Advisor

Shellfish Submissions  
Fisheries Management – Inshore Fisheries  
Ministry for Primary Industries  
P O Box 2526  
Wellington 6140

Re- Rock Lobster Proposal

As the representative organisation of tangata whenua from Kopututea ki Paritu (Ngai Tāmanuhiri), we support proposal CRA3\_O2: Retain the current CRA 3 TAC, TACC and allowances.

The historic CPUE data provided in the proposal indicates that we are on a trend towards a peak which is sure to be followed by a devastating decline.

The commercial sector has already received an increase to the TACC of approx. 37.5 % over the previous 2 years. A further 10% increase would take the commercial increase to nearly 50% over 3 years.

Although the commercial sector CPUE tool indicates that there was sufficient catch to warrant an increase, this abundance has not been measured over a longer period than the current fishing year.

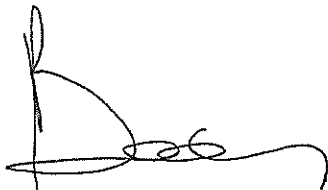
We consider that this approach is not sustainable management of crayfish stocks in CRA3. The CPUE data provided in this proposal would be better used as support for the removal of the “size concession” that the commercial sector benefit from in the CRA3 fishery.

As kaitieki we are also responsible to those of our members who practice traditional methods of harvesting (“rock hopping”) and indications from this sector indicate very little success in catching a “legal sized” crayfish over the last few years. However, there is no robust data to determine the extent of this issue.

All customary take has been carried out by those whanau with access to boats. This group have made no complaints over abundance and size.

Unless all sectors of CRA3 are considered to be having parity in harvesting abundant legal sized crayfish consistently, we do not support an increase to the TAC/TACC for the 2014-2015 year.

We acknowledge the opportunity to have input into the management of the CRA3 fisheries.



Richard Brooking  
General Manager  
Tāmanuhiri Tutu Poroporo Trust



**From:** Nikki Searancke [mailto:searanckenikki@yahoo.com]  
**Sent:** Friday, 21 February 2014 4:22 p.m.  
**To:** FMSubmissions  
**Subject:** ROCK LOBSTER YEAR 1/4/2014 CRA3

Submission From Ngati Oneone Hapu for the 1/4/2014 fishing year - CRA 3

We do not support any increase in the TACC as proposed.  
We oppose the concession measurer currently used by commercial users.

Regards, Nikki Searancke  
on behalf of Ngati Oneone Hapu - Ingrid Searancke  
Temple Isaacs & Rutene Irwin.

20 February 2014

File

Rock Lobster Submissions  
Fisheries Management - Inshore  
Ministry for Primary Industries  
P O Box 2526  
WELLINGTON 6140  
FMSubmissions@mpi.govt.nz

Tena koutou

## **PROPOSALS FOR ROCK LOBSTER 2014-15 FISHING YEAR**

### **Introduction**

Te Hoiere Asset Holding Company Limited is a wholly owned company of Te Runanga o Ngati Kuia Charitable Trust, the Mandated Iwi Organisation (MIO) for Ngati Kuia. Te Hoiere Asset Holding Company holds settlement quota and is governed by the Maori Fisheries Act. Te Hoiere supports Te Ohu Kaimoana submission with regards the proposal for Rock lobster 2014-2015 fishing year, in particular Cra9. We welcome the opportunity to submit our support for TOKM on the Ministry for Primary Industries (MPI) Initial Position Paper (IPP) on Rock Lobster proposals, dated January 2014.

### **NRLMG Proposals**

The IPP deals with two proposals:

- a) The introduction of management procedures in CRA2 and CRA9, and
- b) TAC adjustments in CRA9.

### **Our Position**

- Te Hoiere Holding Company supports TOKM proposal to use management procedures in CRA9
- In CRA9 we support adopting rule 4041
- We support increases to the TACCs in CRA9 (47 tonnes to 67 tonnes).
- Concerned about the customary allowances in CRA9,
- Our position is the customary allowance should be set at 20 tonnes

### **Management Procedures**

We agree with the NRLMG that these management procedures provide more value than the traditional management strategies. They are an effective way to make decisions quickly and responsively and all relevant factors are considered. Therefore Te Hoiere supports the proposal to use management procedures in CRA9.

In CRA9 we support adopting rule 4041. However we ask the NRLMG to consider modifying the management procedure so that if the CPUE increases hugely it won't trigger any major TACC increases.

## TAC Adjustments

We support TOKM submission to increase the TACCs in CRA9 (47 tonnes to 67 tonnes)

In relation to CRA9 we have concerns regarding the small amount of information we have to manage the CRA9 fishery, and it only reflects a part of the CRA9 quota management area. Hopefully this problem can be improved as this fishery continues to be developed.

Although it is not part of the IPP we consider the NRLMG should in the future give consideration to subdividing the CRA9 quota management area into 2 or more new QMAs. We consider this would better serve the sustainability of the fishery.

We continue to be concerned about the customary allowances in CRA9. Currently it is set at 1 tonne and there are proposals in the IPP to increase the TACC to either 5 tonnes or 20 tonnes. Our position is the customary allowance should be set at 20 tonnes for the following reasons:

1. The current 1 tonne and the proposed 5 tonne allowance are totally unrealistic. There are roughly 23 iwi and 100 marae with links to the CRA9 fishery. A 20 tonne allowance is realistic.
  2. There is support from recreational, commercial, and iwi for a 20 tonne customary allowance.
  3. The CRA9 fishery should handle a 20 tonne customary allowance without impacting the proposed increases in commercial and recreational allowances.
  4. The CRA9 fishery should handle a 20 tonne customary allowance without impacting the proposed increases in commercial and recreational allowances.
- Recommend that Customary allowance should be set at 20 tonnes

Noho ora mai  
Sharyn Smith  
Commercial fisheries mandate holder  
Te Runanga o Ngati Kuia Charitable Trust

## Ruamano Quota Holding Limited

ROCK LOBSTER SUBMISSIONS.

FISHERIES MANAGEMENT – INSHORE.

MINISTRY FOR PRIMARY INDUSTRIES.

[FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

Tena Koutou,

Ruamano welcomes the opportunity to submit on the MPI Initial Position Paper on the Rock Lobster proposals dated Jan 2014.

We wish to deal only with the CRA 3 TAC adjustment.

We committed ourselves to the Management procedures in 2010 as they provided more value than the tradition management strategies.

Therefore we support the increase to the TACCs in the CRA 3.

236 tonnes to 260 tonnes.

We note the review which will take place in the CRA 3 this year and fully support this.

Noho ora mai,

Stan Pardoe

Director

Ruamano Quota Holding Limited.