

Nathan Guy
Minister for Primary Industries
Parliament Office
Private Bag 18888
Parliament Buildings
Wellington 6160
nathan.guy@ministers.govt.nz



cc: Andy Doube, MPI manager
Andrew.Doube@mpi.govt.nz
NZSFC club delegates

28 June 2013

Adverse decisions for CRA 3

Dear Mr Guy,

On behalf of our members and public supporters in Gisborne and the surrounding districts, the New Zealand Sport Fishing Council (NZSFC) strongly objects to the recent management decisions applying to Crayfish 3 (CRA 3). In particular the increase in commercial catch and the continued support for the concession enabling commercial fishers to harvest under sized crayfish.

The NZSFC requests a meeting with you to seek your support for a comprehensive management review of the rock lobster fisheries and in particular the use of Management Procedures based solely upon Catch Per Unit of Effort (CPUE) controls.

Your most recent decision for CRA 3, to increase the Total Allowable Catch (TAC) and Total Allowable Commercial Catch (TACC) by 23.2 tonnes and more recently to remove regulations controlling the take and sale of crayfish, just perpetuates the legitimate concerns of the public that their non-commercial interests are not being allowed for. In our view, mismanagement of CRA 3 is manifested in the following ways:

- Public fishers are denied access to sufficient numbers of legal sized rock lobsters due to the unjust concession, enabling commercial fishers to harvest crayfish smaller than the Minimum Legal Size.
- A lack of crayfish available to enable the wider public and tangata whenua to provide for their social, economic and cultural wellbeing, pursuant to s8 of the Fisheries Act 1996 (the Act).
- No validation of what is recorded by commercial fishers, as 'returned to the sea', leading to inflated catch rates.
- The lack of any system to record and publicly report the proportion of concession fish landed compared to crayfish above the MLS.

We note your comment in your most recent decision letter (14 June 2013) that, *"The changes are aimed at reducing unnecessary regulatory constraints and providing the rock lobster industry with increased opportunities to maximise benefits from the fishery.....and are no longer required to maintain the integrity of the quota management system for rock lobster"*.

New Zealand Sport Fishing Council Inc.

(Previously New Zealand Big Game Fishing Council Est. 1957)

Patron: J R Chibnall

President: M Connor

Secretary: R T Nelson

www.nzsportfishing.org.nz

PO Box 93

Whangarei 0140

P: 09 4339648

F: 09 4339640

secretary@nzsportfishing.org.nz

While you may choose to increase the benefits accruing to commercial interests, within a statutory requirement that fisheries are managed sustainably, any decision must be made with the Purpose of the Act in mind. That is, to both enable people to provide for their social, economic and cultural wellbeing and to maintain the potential of that fishery for the foreseeable needs of future generations. [FA 1996, s8]

We are concerned that you may not be receiving the best available information in regards to the raft of statutory obligations on you as a Minister.

As with all the Crayfish fisheries, CRA 3 is highly valued by recreational, customary, environmental and commercial interests, yet the advice from the National Rock Lobster Management Group (NRLMG) is dominated by commercial interests. This domination is reflected in the NRLMG annual reports, advice papers and the inability of us, as recreational interests, to easily access the raw data that much of the advice is based on.

Ensuring ready public access to information that is paid for, in part, by the Crown is an absolute ethical requirement. We are not talking national security or GCSB here.

Management of the rock lobster fisheries is of national, public interest and information that underpins your decisions must be available for public scrutiny, preferably in machine readable form, if any such information is to qualify as the best in respect of s10 of the Act.

In an attempt to track management progress in this important fishery we have resorted to maintaining our own [CRA 3 record online](#), and at www.nzsportfishing.co.nz - Fisheries – Species Management – Crayfish, but this in no way represents a comprehensive list of management actions.

The information available, from both science sources and locals, casts serious doubts on the sustainability of the CRA 3 fishery. Crayfish recruitment is declining as is the availability to non-commercial users. The continued concession to permit the commercial harvest of undersized crayfish is causing concern and ongoing conflict. This concession is unjust and must be revoked.

We ask you to act decisively in demanding a comprehensive management review in the interests of the fishery, its dependent and associated species, and for the social, economic and cultural wellbeing of the public and tangata whenua.

We welcome any questions you have and are available to discuss this in more detail in a meeting with you, at your earliest convenience.

Yours faithfully,



Mark Connor
President
NZ Sport Fishing Council

New Zealand Sport Fishing Council Inc.

(Previously New Zealand Big Game Fishing Council Est. 1957)

Patron: J R Chibnall

President: M Connor

Secretary: R T Nelson

www.nzsportfishing.org.nz

PO Box 93

Whangarei 0140

P: 09 4339648

F: 09 4339640

secretary@nzsportfishing.org.nz