

Proposed Fisheries Services July 2008 to June 2009

SUBMISSION ON BEHALF OF NON-COMMERCIAL FISHERS

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Introduction

This is a joint submission from the non-commercial fishers represented by NZ Big Game Fishing Council (NZBGFC), NZ Recreational Fishing Council (NZRFC), Hokianga Accord, NZ Marine Transport Association and option4.

The Ministry of Fisheries (MFish) has invited Iwi and fisheries stakeholders to comment on the fisheries services and research projects proposed for the 2008/09 financial year. The document outlines the expenditure and a brief description for each work area MFish propose for the next financial year. The document also contains the research project proposals for period starting 1 July 2008. These proposals have already been discussed by the Research Planning Working Groups and the Research Coordinating Committee. These have be split into Tier 1 proposals that will be tendered out in 2008–09 and Tier 2 proposals that are reliant on available funds.

Of particular interest are a range of proposals for new initiatives that would cost an additional \$21 million in 2008–09. This additional expenditure is in support of some of the shared fisheries proposals, Treaty settlement proposals, and compliance services. These initiatives will require Cabinet approval and resources from the Government’s budget announced in May. Without new funds allocated some initiatives will not go ahead.

As is set out in the MFish Statement of Intent 2007–2012

The goal of the Ministry is to:

Maximise the value New Zealanders obtain through the sustainable use of fisheries resources and protection of the aquatic environment.

To achieve this goal, the Ministry is working toward the following outcomes:

- the health of the aquatic environment is protected;
- people are able to realise the best value from the sustainable and efficient use of fisheries; and
- credible fisheries management.

It is intended that achieving this will help meet the Government’s strategic priorities of “economic transformation” and “enhancing national identity”.

The Government must consider their obligations to Maori to support kaitiakitanga and to ensure kai moana is available for customary non-commercial purposes.

It is worthwhile noting at this juncture that tangata whenua are increasingly aware that most of the fishing effort made by whanau is categorised as recreational fishing. The protection for that well settled common law right rests with the Minister’s fisheries management decisions that ensure inshore fish species regarded as staple foods are sufficiently abundant to “*enable people to provide for their social, economic and cultural well-being.*”

Tourism is New Zealand’s leading foreign exchange earner. A healthy environment and great lifestyle are key factors in attracting visitors and skilled immigrants. The New Zealand public generally has good access to marine recreation from the main population centers and holiday destinations. For many New Zealanders and visitors a quality recreational fishing experience is a key ingredient in our image, environment and national identity.

Submission

Non-commercial fishers made detailed submissions on the Shared Fisheries Policy Proposals in The Peoples Submission and the NZRFC Submission. We are working through some of the issues raised in a Joint Stakeholder Working Group with SeaFIC and TOKM at present. The Minister has asked MFish to take this opportunity to proceed with funding proposals for 2008–09. We accept that these proposals must be consulted on now, in order to be considered in this year's budget. This submission will focus on the key new initiatives.

Amateur Fishing Trust

All amateur representative bodies welcome the concept of an Amateur Fishing Trust with the purpose of increasing the capacity of non-commercial fishers to participate in fisheries management and represent amateur rights and values.

There is a strong desire from all current representative bodies to ensure that the Amateur Fishing Trust is set up properly and able to work independently of the Ministry. To ensure support from the entire sector, the structure that is set up needs to be robust and democratic with fair regional representation.

Minimal detail of the Amateur Fishing Trust proposal has been advised to date. If funding is approved it is imperative that non-commercial fishers can have input into the development of the Trust Deed. Eventually the appointment of trustees should be via a democratic process with individual voting rights rather than appointment by organisational affiliation or ministerial appointment.

Resourcing of the non-commercial sector has long been promised by a succession of governments. It is heartening to finally see a concrete proposal. . The proposed \$5 million as a one-off endowment may not be sufficient to establish a representative structure, secure long term funding and provide for current needs for meaningful input into 15 Fisheries Plans and 10 Fisheries Standards and 8 Fisheries Working Groups, etc.

Compare this one-off payment to the ongoing resourcing to some of the other new initiative proposals under consideration.

- Iwi Rohe Moana Management Plans **\$6.3 million in the first 3 years and \$2.6 m/yr ongoing**
- Foreshore and seabed negotiations with Ngati Porou and Te Whanau a Apanui Waikato-Tainui River Treaty settlement negotiations **\$6.3 million in the first 3 years then \$2.3 m/yr ongoing**
- Increased observer coverage **\$6 million in the first 3 years then \$3 m/yr ongoing (cost recovered)**

More consideration needs to be given to the actual cost of viable, mandated non-commercial representation. While some of the work would remain voluntary, it is the view of the recreational organisations submitting that running the organization and doing the work would require ongoing resourcing of at least \$2 million per year. We recognise that the Amateur Fishing Trust is a step in the right direction but MFish would need to at least maintain or increase its funding for existing research, management and compliance for amateur fishing and not try to pass the cost on to recreational fishers.

The following two statements made in the proposal require more explanation. They seem out of place in the context of the proposal to resource amateur involvement in fisheries management - unless, of course, the funding is conditional on as yet undisclosed terms – bold highlight added.

1. *“Operating under a Trust Deed and having a secure funding base will allow the Trust to provide an immediate boost to the amateur sector’s capacity to engage in fisheries management and **participate in a negotiated approach favoured for allocation and local area management.**”*
2. *“Involvement of amateur fishers in fisheries management decision-making also **increases the chance that all relevant information is considered by government and that fishers accept decisions that may adversely affect them**”*

Statements such as these (unsupported by meaningful explanation) must be expected to raise queries from those submitting. Please provide us with meaningful explanations at the earliest opportunity to help us achieve better understanding of the thinking behind the proposals.

Recreational Fishing Charter Vessel Reporting

Non-commercial fishers believe that MFish and industry over state the increase in charter operations and the impact of current charter vessel catch. The rationale in the consultation document states:

“The marine recreational fishing charter vessel sector is expanding, with currently unknown, but potentially significant local and stock-wide impacts on fisheries. For a few stocks, notably hāpuka and kingfish, catches from charter vessels are thought to comprise a majority of the total catch for some areas.”

If charter boat registration and compulsory catch reporting is introduced it needs to be done well, with a high degree of buy-in and a clear understanding of the real justification for it. If the system that MFish design is unwieldy or unworkable it will fail to collect accurate data, as happened in NSW, Australia when their logbook scheme was introduced. Charter skippers already have a huge responsibility with safety on their vessels any complex additional duties will add time, increased fatigue, increased risk and lower safety standards.

We support the proposal for ongoing Crown funding for this programme as we are opposed to the suggestion (not stated in the consultation document) that charter operators could be asked to bear the cost of data collection and management.

Charter vessel recording is a convenient way of collecting a sample of non-commercial fishers’ catch. Their catch is taken using amateur fishing methods and is part of their individual catch entitlement, which is nothing to do with the charter owner or operator or their catch entitlement.

A charter boat logbook is like an access point survey. Charging skippers for collecting and managing the data is analogous for making the owner of a boat ramp responsible for

collecting data on all catch that is landed at that point and then charging them for the cost of managing that data. This is unacceptable.

There are many agencies already “clipping the ticket” of charter operators. Extra costs and time commitment will not be welcome. Some skippers will view the requirement for reporting as a threat, eventually leading to a requirement for quota to be held by charter operators, as promoted by TOKM and some industry reps. This is also unwarranted and unacceptable given that their role is to facilitate non-commercial fishers’ catch of their individual lawful entitlement.

In general, better information on charter catch will help dispel the notion that catch taken on these boats is somehow a threat to commercial rights. The information may be useful for monitoring recreational fishing success (CPUE) over time and in key areas. This is more about monitoring the overall performance of recreational fisheries, which is a Crown responsibility.

Iwi Rohe Moana Management Plans

Non-commercial fishers support Iwi Rohe Moana Management Plans as the vehicle for tangata whenua to articulate their objectives for fisheries management based on Kaitiakitanga and to provide the basis for their effective participation. MFish will need to think carefully about how these plans are integrated with other Fisheries Plans, Fisheries Standards, Regional Iwi Forums, MPA plans etc.

Scientific research in support of fisheries management

Non-commercial fishers support the proposed increase in research funding. We are concerned that the real value of the research budget has declined significantly at a time when there are more species in the QMS and there are more environmental and non-commercial projects that require funding than before. We are also concerned that important large scale projects such as SNA1 tagging to estimate biomass get deferred, because they are expensive, while less important small projects proceed in Tier 1.

The Ministry has a duty to provide the Minister with information on the social, economic and cultural aspects of fishing in New Zealand. We are disappointed that the project “Improving economic information on recreational fishing” has been down graded to a Tier 2 project, while about 9 smaller projects for local monitoring of abundance or catch were given higher priority. 2008-09 would be good timing for a socio-economic project as there are no significant projects estimating recreational harvest programmed for this year (see note on REC2008/01). A cluster of recreational harvest surveys are proposed for 2009–10 and major expenditure in analysis and reporting would roll over into 2010–11. We submit that MFish must address their duty to provide better information to decision makers and not put off this socio-economic study until 2011–12. Project REC2008/08 should be classified as Tier 1.

Conclusion

The proposed funding for an Amateur Fishing Trust is a significant step toward increasing the capacity of amateur fishers to respond to management initiatives. There is a strong desire from all current representative bodies to ensure that the Amateur Fishing Trust is established properly and able to work independently of the Ministry.. MFish will need to at least maintain or increase its funding for existing research, management and compliance for amateur fishing and not try to pass the cost on to recreational fishers. Long-term sustainable funding remains a key issue to be addressed. Further explanation of some of the wording in the trust proposal as highlighted above is required help amateur fishers better understand what is being proposed.

We believe better information on charter catch will help dispel the notion that catch taken on these boats is somehow a threat to commercial rights. The information collected will be useful for monitoring recreational fishing success (CPUE) over time and in key areas. This is more about monitoring the overall performance of recreational fisheries, which is a Crown responsibility. It is not the responsibility of charter operators to pay for the collection of this information.

Iwi Rohe Moana Management Plans are supported as the vehicle for tangata whenua to articulate their objectives for fisheries management based on Kaitiakitanga and to provide the basis for their effective participation. MFish will need to think carefully about how these plans are integrated with other Fisheries Plans, Fisheries Standards, Regional Iwi Forums, MPA plans etc.

Non-commercial fishers support the proposed increase in research funding. Budget constraints seem to delay the most important projects based on cost. Instead a large number of minor projects are given priority. We submit that MFish must address their duty to provide better information to decision makers and not put off the socio-economic study REC2008/08. It should be classified as Tier 1.

It is our expectation that the new initiatives will be applied in a way that will promote the purpose and principles of the Act and to allow for the needs of future generations of New Zealanders. This will enable the public of New Zealand to provide for their social, economic and cultural wellbeing.

On behalf of

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