



30 March 2013

## Re: Review of commercial access restrictions in the PAU 5D fishery

In the above discussion paper, you call for submissions on the proposed changes to commercial paua fishing areas in the Otago and Southland region.

*"Industry estimates that approximately 10 to 30 tonnes of paua are inaccessible to the commercial fishery because of the existing closures. There are no estimates of the number of recreational fishers that harvest in these areas."*

*"In providing submissions, stakeholders should provide information on any use, economic, social and cultural factors that may be relevant in assessing the management options. In particular, fishers should provide information on how these proposals may impact on their fishing activities."*

Our diving and fishing club represents a diverse group of around 50 recreational divers and fishermen (and women) from the wider Southland area. We have extensive knowledge of the "Bluff Hill from Steep Head to Barracoutta point" area. The discussion paper proposes that this area be opened up for commercial paua fishing.

We strongly oppose this change on the grounds that the area is one of the few places the recreational fisherman has easy accessible access. The recreational status which is in existence provides the recreational fisherman an area where he/she can go and get a feed, to show new divers where to look and how to harvest. The recreational status also provides less intense harvesting due to the restrictions in place, therefore giving the Paua population less stress than would happen if commercial harvesting was permitted"

The argument that the opening of these areas will "spread where the commercial catch is taken from to reduce fishing pressure in localised areas" is flawed. As your discussion paper points out, one of the reasons the commercial operators want this area opened up is because it gives them "ability to shift commercial catch effort to more sheltered areas along the southern coastline based on prevailing weather conditions." We propose that if this area was opened up it might "reduce commercial, customary and recreational overlap in existing harvesting areas", but there will still be overlap and the proposed changes will only serve to increase the area in which this overlap is occurring. In the case of Bluff the overlap will be intense.

The document suggests that, "Given the large spatial closures (regulatory, mātaītai and voluntary) already in place there are a number of areas where recreational fishers have sole access". There may be other areas available to the recreational fisherman, but we would suggest that the Bluff Hill (and surrounds) is the most easily accessible, and most used area, by recreational fishers of paua in Southland. It is a training ground for learner divers and ideal for those without access to a boat.

When we dive areas that commercial divers have recently harvested, it is clear that they are complying with their voluntary minimum harvest size (MHS) of 132mm. After harvest, the only paua left are those 125-132mm long and they take a lot of "picking over". Even if they are replaced straight away the catching process must be detrimental to the fish.



We note that *"all those high waters lying within 1 nautical mile seaward of the mean high-water mark of the coasts of Ruapuke Island and of Green Island, which lies to the east of Ruapuke Island."* are currently closed to commercial fishermen and ask why this area is not being considered in the proposal? Perhaps there might be too many submissions from iwi on that one, and it is not a nice sheltered easy area to harvest.

The document suggests that *"Opening these selected closed areas may also provide opportunity to increase overall economic benefit in the long-term."* We suggest, that it shouldn't be about economic benefit, it should be about managing the fishery so that the population of Invercargill and greater Southland can still go and "get a feed of paua" on the weekend.

We believe the first step should be assessing stock abundance in the areas, to see if the proposal is viable. We would be very interested in providing volunteer divers to participate in a survey. As the first quotes in this submission outline, we are currently working on estimates only. And they are provided by the commercial industry who may not be unbiased. The status quo should at least be maintained until further information is obtained.

We look forward to your response, and expect to be kept well informed.

Regards

Kath Taylor  
Secretary  
DiveSouth Inc

INVERCARGILL