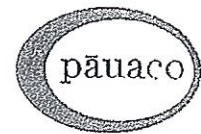


PauaCo Limited PO Box 28006, Christchurch 8242, New Zealand  
T +64 3 365 2830.



Ministry of Primary Industries  
PO Box 2526  
WELLINGTON 6140

19/04/2013

RE: Submission - Review of commercial access restrictions in the PAU 5D fishery – MPI  
Discussion Paper 2013/06

We are a domestic supplier and exporter of Live and processed paua and are a quota owner in PAU 5D.

We are in favour of Option 2 - amend the existing commercial shellfish harvest prohibitions to allow the commercial harvest of paua in all, or some, of the following areas:

- Otago Peninsula from Cape Saunders to Harakeke Point and from Robertson's Creek (Boulder Beach) to Smalls Beach (see Appendix, Map 1);
- Waipapa Point (see Appendix, Map 2);
- Clutha River Mouth (see Appendix, Map 3); and
- Bluff Hill area from Steep Head to Barracouta Point (see Appendix Map 4).

We agree with the conclusions laid out in Section 6 of the MPI Discussion Paper No: 2013/06.

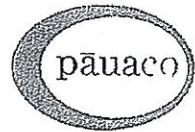
We concur with the following views:

1. The original purpose for which the areas were set aside is no longer relevant.
2. Better catch effort spreading across the 5D area.
3. Better control and observation of illegal catch efforts.
4. Increased economic benefit to New Zealand through export revenue.

Of the 972 kilometres of coastline in the Otago/Southland area (Pau5D), 165 kilometres are closed to commercial fishing because of previous water sanitation issues, which no longer exist and are no longer managed under the Fisheries Act. These closed areas are not "recreational only" areas – they are simply areas that are closed to commercial paua fishing. The sanitation issues were sorted many years ago but the commercial closures still remain. The purpose of the Fisheries Act is to provide for utilisation whilst ensuring sustainability. The redundant closures are an undue barrier to commercial utilisation.

Industry is asking that the Minister of Fisheries address this access discrimination by allowing access to approximately 25 of the 165 kilometres currently closed. If the original reasons for the closures no longer exist, and legislative frameworks have changed, then surely the closures should be lifted. MPI has agreed with this in the Initial Position Paper (IPP). Industry accepts that in this shared fishery there will be a range of views – there will those that want the status quo to remain, and there will be those that think the closure should be lifted.

PauaCo Limited PO Box 28005, Christchurch 8242, New Zealand  
T +64 3 365 2830.



The commercial paua industry has a good track record over the past ten years in sustainable management. We understand that the long term viability and sustainability of the resource is paramount to all stakeholders. The many improvements in monitoring have allowed well thought out and managed voluntary management actions to be implemented and harvest strategies to emerge. The data is showing that these actions are having a positive outcome on the health of the fishery. MPI has confirmed (media release 28 March 2012) that PAU 5D is a well-managed fishery and that paua numbers have been growing since the early 2000's.

The commercial industry is not asking for an increase in their allowable catches. We simply want approximately 15% of the currently closed areas opened so that we can spread catch effort across a greater proportion of the PAU 5D coastline. An increasing biomass and improving status of the stocks gives utilisation benefits to all paua fishers whether they are recreational, customary or commercial. We refer you to the PauaMac5 submission for more detail.

The proviso to removing these closures should be that the commercial industry fishes these areas to an MPI agreed harvest strategy that carefully balances sustainability and utilisation within a shared fishery context. We support option 2 of the Ministries IPP.

Please consider these views in consultation and ultimate decision.

Yours sincerely

Iain Miller  
Chief Executive

[iain@pauaco.co.nz](mailto:iain@pauaco.co.nz)