

New Zealand Sport Fishing Council

(Incorporated)

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NZ Sport Fishing Council submission on the review of sustainability measures for CRA3 (Gisborne) and CRA4 (Wellington/Hawke Bay) rock lobster fisheries for 1 April 2010

NZ Sport Fishing Council

1. The NZ Sport Fishing Council (NZSFC) formerly NZ Big Game Fishing Council is an umbrella group for sport fishing clubs. Club membership has grown steadily and we now represent over 30,000 members in 58 clubs spread throughout NZ. We run the NZ Nationals fishing tournament, which has evolved over time and remains successful.
2. NZSFC compile and publish the New Zealand records for fish caught in saltwater by recreational anglers. NZSFC is affiliated to the International Game Fish Association (IGFA) which records and publishes catches that qualify as recreational world records.
3. In 1996 the NZSFC helped establish the NZ Marine Research Foundation, which aims to sponsor research on marine species and fisheries, for the benefit of all New Zealanders, including participants in ocean recreation.
4. Many of our most established fishing clubs have a focus on fishing for large pelagic species such as marlin, tuna, and sharks. In recent years our membership has expanded beyond the traditional deep sea angling clubs to include many local clubs targeting inshore species.

The proposal

- The National Rock Lobster Management Group (NRLMG) has been providing management advice directly to the Minister since 1992. Over that time they have developed their own stock targets and more recently decision rules which use seasonal commercial catch rate data (number of kg per pot lift) in a formula which is used to generate proposals for changes to the TAC in the following year. Management in this way can be more responsive to changes in stock abundance than a fixed TAC with occasional review, but as seen in CRA4 can lead to wild fluctuations in proposed catch.
- Two options are presented for decision rules to be used in the troubled CRA3 area for the first time. Neither of these options addresses the inequity which allows commercial fishers a concession to harvest rock lobster at a smaller size than the legal size for amateur fishers.

CRA 3	Option 1 2010-11 Catch Limits from Operation of the "Rule 2a" CRA 3 Management Procedure (Current Catch Limits)	Option 2 2010-11 Catch Limits from Operation of the "Rule 5" CRA 3 Management Procedure
TAC	293 tonnes	273 tonnes
TACC	164 tonnes	144 tonnes
Customary Allowance	20 tonnes	<i>Unchanged</i>
Recreational Allowance	20 tonnes	<i>Unchanged</i>
Other Fishing Mortality	89 tonnes	<i>Unchanged</i>

- Two options are presented for the recently in trouble CRA4 area one using the existing decision rule proposes a 200 t increase to the commercial catch and the other keeping last seasons TAC.

Stock		Option 1 Adopt Catch Limits from Operation of Management Procedures	Option 2 Retain Current Catch Limits
CRA 4	TAC	660.5 tonnes	461 tonnes
	TACC	465.5 tonnes	266 tonnes
	Customary Allowance	<i>Unchanged</i>	35 tonnes
	Recreational Allowance	<i>Unchanged</i>	85 tonnes
	Other Fishing Mortality	<i>Unchanged</i>	75 tonnes

Stock status and management

CRA3

8. NZSFC and fish club representatives have been involved in rock lobster management process for a long time. Council past-president John Hough was involved in the ground breaking multi-sector agreements of the 1990s. It is extremely disheartening that the gains made in the late 1990s could not be sustained. As the stocks declined fishers became defensive and the spirit of cooperation has not lasted. The CRA3 Multi-Stakeholder Fishing Forum has been working on a draft Fisheries Plan and has reviewed the draft decision rules for CRA3.
9. There has been a reduced productivity observed in this stock. The NRLMG note that *“The base case model used to evaluate rules therefore has low stock productivity, caused by assuming that the low recruitments in the last 10 years will persist into the future as will the slow growth observed from 1996-2008. These assumptions result in a level of productivity that may not be able to sustain future catches as high as historical catches.”*
10. Commercial catches are at historic lows and there is only a gradual improvement in commercial catch per unit effort (CPUE in kg per pot lift). What is not shown in Figure 1 is the Decrease (26 t) in TACC to 164 t in 2009–10 and a slight rise in CPUE.

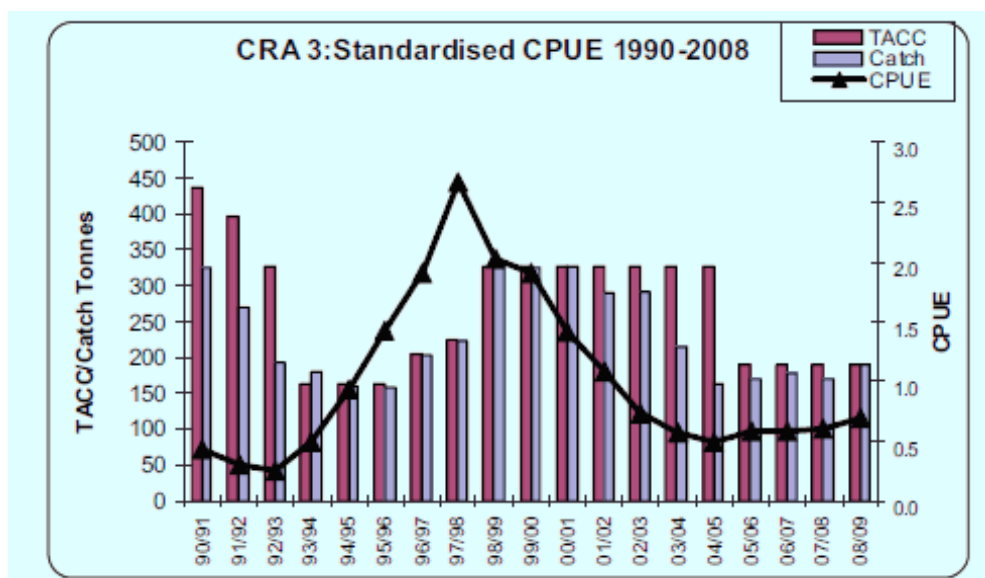


Figure 1: TACC and commercial catch on CRA3 since 1990–91 (bars and left hand scale) CPUE used here is slightly different to that used in the decision rule (line and right hand scale).

11. NZSFC and member clubs in the area have been concerned about the availability of rock lobster to amateur fishers in CRA3 for some time. The Council and our members on the CRA3 Multi-Stakeholder Fishing Forum have our reservations about the decision rules proposed. However, as an interim measure NZSFC support “Rule 5”. The 20 t reduction in the TAC should then be taken from the TACC. The reason for this is we also strongly submit that it is time that the concession allowing commercial fishers to take undersized and immature rock lobster be removed. The reduction of 20 t would mean that fishing pressure on adult fish would not increase.

Stock status and management

CRA4

12. Recreational groups in the area including NZSFC clubs and members have supported a voluntary reduction in amateur bag limit in CRA4 due to concern about low abundance and in support of the need for a rebuild. Although hard to quantify we are disappointed the NRLMG chose to ignore this contribution in their advice to the Minister. The NRLMG appears to have a solely commercial focus.
13. NZSFC has serious concerns about the application of the decision rule for 2010–11 in CRA4. The NRLMG state in the IPP that “Standardised CPUE is considered to be a reliable indicator of relative stock size in CRA 4 and is the abundance indicator used in the CRA 4 Management Procedure.” (IPP para 169). Below this statement is Figure 1 which shows an increase in standardised autumn-winter CPUE from 0.58 kg in 2008–09 to 0.871 kg per pot lift in 2009–10. This is in excess of a 50% increase. Has no-one done a reality check on this? NRLMG are basing their advice to the Minister based on the assumption that the CRA4 stock size has increased 50% in one year. Clearly for a relatively slow growing species this is not plausible.
14. There are some possible drivers for a rapid increase in CPUE.
 - A mass migration from another stock, but this would leave another area depleted.
 - A mass recruitment of juveniles into the fishery, but no data has been produced to support this.
 - Fishers may not accurately report all fishing effort, knowing that this will feedback into the size of next years TAC. There is no mention of any work done to validate the catch reporting by commercial fishers.
15. Maybe there was some discussion on the plausibility of this increase behind closed doors but none of this has made it into the advice to the Minister. He is expected to accept a 50% increase in biomass in one year at face value.
16. There was a large cut to the TACC in 2009–10. We would expect having less fish to catch leads to a change in behaviour of fishers. Probably they would concentrate their effort in places and times with good catch rates and not have to fish through the season to catch their quota. The NRLMG note in their discussion on the choice of CRA3 decision rule that “*In reality, future CPUE will not be independent of the TAC. For example, setting a lower TAC would result in a higher CPUE the following year than would setting a higher TAC.*”
17. NZSFC submit that in reality the CRA4 biomass has not increased by 50% in one year and therefore the proposed increase in TAC would mean an over allocation of catch in a fishery that is just starting to recover. The only alternative offered to the Minister is to not increase the TAC and to review the decision rule in 2010.
18. The plot that needs to go into the Final Advice Paper to the Minister is the catch and CPUE trends in this fishery since 1990. This clearly shows that since the TACC was increased to 576 t that there has been a steady decline in catch per unit effort (black line Figure 2). It was not until the commercial catch dropped below 320 t that there was a turn around. MFish and the Minister must be able to see that this fishery could not have completely turned around a 9 year trend and rebuilt the fishery in the last two seasons (note current season 2009–10 not shown). Not only is the decision rule based on an improbable new abundance estimate it lacks reference to the full history of this fishery.
19. NZSFC endorse the submission from option4 calling for better process and consideration of statutory obligations.

20. NZSFC submit that there be no increase in CRA4 TAC for 2010–11 and a review the decision rule in 2010 (Option 2).

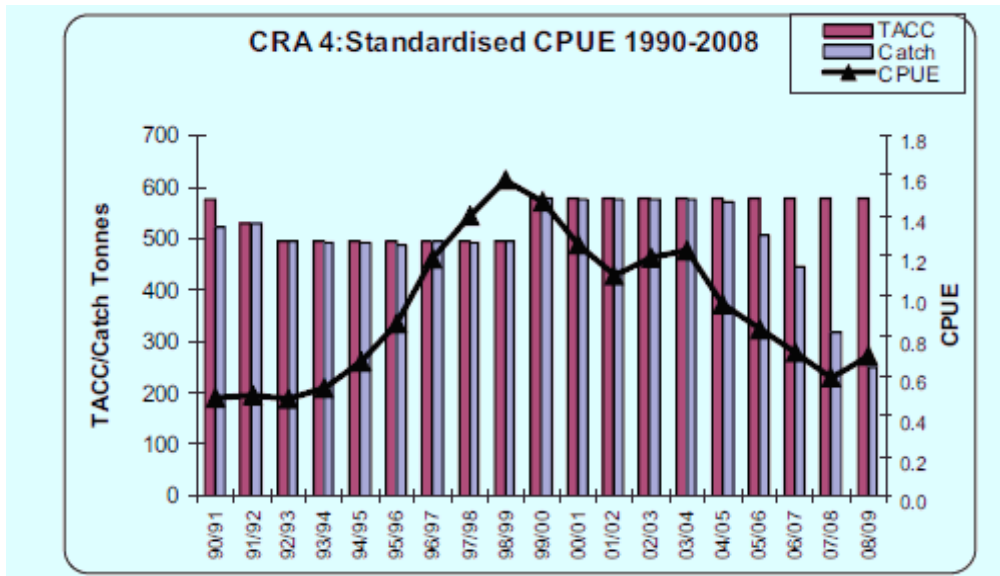


Figure 2: TACC and commercial catch on CRA4 since 1990–91 (bars and left had scale) CPUE used here is slightly different to that used in the decision rule (line and right hand scale).

Summary

21. NZSFC and member clubs in the area have been concerned about the availability of rock lobster to amateur fishers in CRA3 for some time. The Council and our members on the CRA3 Multi-Stakeholder Fishing Forum have our reservations about the decision rules proposed.
22. NZSFC support “Rule 5” as an interim measure. The 20 t reduction in the CRA3 TAC should then be taken from the TACC. The reason for this is we also strongly submit that it is time that the concession allowing commercial fishers to take undersized and immature rock lobster be removed. The reduction of 20 t would mean that fishing pressure on adult fish would not increase.
23. NZSFC submit that in reality the CRA4 biomass has not increased by 50% in one year and therefore the proposed increase in TAC would mean an over allocation of catch in a fishery that is just starting to recover. Not only is the decision rule based on an improbable new abundance estimate it lacks reference to the full history of this fishery.
24. NZSFC submit that there be no increase in CRA4 TAC for 2010–11 and a review the decision rule in 2010.
25. NZSFC endorse the submission from option4 calling for better process and consideration of statutory obligations. Non-commercial fishing interests and the contribution of a large number of amateur fishers to the rebuild of stocks has been ignored by the NRLMG.

Richard Baker President