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11 November 2011

NZ Sport Fishing Council Submission on the Proposed Southern bluefin tuna in season TAC increase

NZ Sport Fishing Council

1. The NZ Sport Fishing Council (NZSFC) submits in response to the proposed in-season Total Allowable Catch (TAC) increase for Southern bluefin tuna.
2. The NZSFC appreciates the opportunity to submit to the Ministry of Fisheries. NZSFC representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this review and would like to be kept informed of future developments. Our contact is Roz Nelson, secretary@nzsportfishing.org.nz.
3. The NZ Sport Fishing Council is a national sports organisation with over 32,000 affiliated members from 59 clubs nationwide.
4. 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.
5. 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.
6. 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.

New Zealand Sport Fishing Council Inc.

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

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7. NZSFC have engaged in the management of highly migratory species (HMS) for many years, particularly since the mid 1980s which saw the introduction of the Billfish Moratorium followed by the Billfish MOU with commercial fishing interests. More recently we have been actively involved in the development of the draft HMS Fisheries Plan.

Recommendations

- ⇒ MFish should highlight the need for the Minister of Fisheries to take a precautionary approach when managing the critically low southern bluefin tuna stocks. Increasing catch when the scientific advice shows spawning stock is critically low and continuing to decline is not consistent with the precautionary approach.
- ⇒ New Zealand must continue to develop a reputation as a responsible fishing nation in the regional fisheries management organisations it is party to and need not follow the lead of Japan, Australia and Taiwan.
- ⇒ NZSFC submit that the TAC of 420 t should be retained for the remainder of the 2011-12 fishing year

The proposals

8. The Ministry of Fisheries (MFish) proposes to alter the total allowable catch (TAC) of southern bluefin tuna (STN 1) in order to implement recent decisions made by the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). CCSBT is the regional fisheries management organisation that manages southern bluefin tuna. These decisions included an overall reduction in the global TAC for southern bluefin tuna, but an increased portion of that global TAC for New Zealand to reflect a longstanding agreement.
 9. Three options for 2011 presented in the MFish Initial Position Paper (IPP):
 - Option 1: keep the TAC and allowances at the 2008–09 level (420t). The TAC reverted to this level after an in-season increase in 2010–11.
 - Option 2: set the TAC at 570 t and the following allowances:
 - a) a customary allowance of 1t,
 - b) a recreational allowance of 8t,
 - c) an allowance for other fishing mortality of 3t, and
 - d) available Annual Catch Entitlements for commercial fishers of 558t (including 145t of in-season Annual Catch Entitlements).
 - Option 3: set the TAC at 800t and set the following allowances:
 - a) a customary allowance of 1t,
 - b) a recreational allowance of 8t,
 - c) an allowance for other fishing mortality of 4t, and
 - d) available Annual Catch Entitlements for commercial fishers of 787t (including 374t of in-season Annual Catch Entitlements).
- MFish note: These options outline the range of options open to the Minister, but intermediate options could also be chosen.

Stock status and management

10. Southern bluefin tuna is one of the most over fished highly migratory species in the world. The stock assessment models indicate that the spawning stock biomass was between 3% and 6% of unfished levels in the 2009 assessment and significant cuts to global catch were required to rebuild the stock.
11. The Commission for the Conservation of Southern Bluefin Tuna reduced the global TAC by 20 % to 9,449 tonnes for 2010 and 2011.
12. The IPP states that in July 2011, CCSBT's scientific committee again considered the status of the spawning stock biomass. "The scientific committee's advice on the estimated status of the stock remains unchanged from the advice provided in 2009."
13. So two years fishing at 9,449 t did not change the status of the spawning stock. It seems a high risk strategy to increase the global TAC to 10,449 in 2012 and 10,949 in 2013. There may be the first green shoots of a recovery with more juvenile fish in the last few years but poor recruitment in the early 2000s still hasn't flowed through.
14. Most southern bluefin are mature by 12 years of age. Three poor years of recruitment means that there are relatively few 9, 10 and 11 year old southern bluefin in 2011. Spawning stock biomass will continue to decline for the next 3 years.

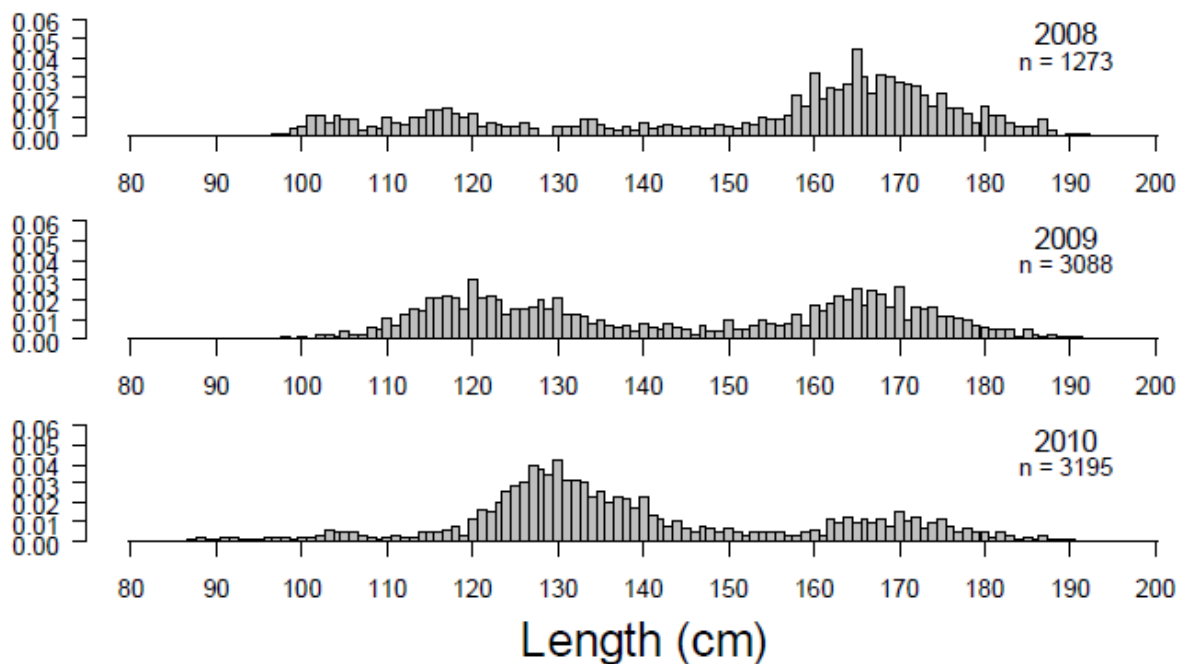


Figure 1: Southern bluefin proportion at length for the Japanese charter fleet catch operating in New Zealand Fishery waters for 2008 to 2010. These tuna reach maturity between 150 and 165 cm. Source: NZ Report to CCSBT (2011).

15. NZSFC acknowledge that getting an agreed management procedure in a regional fisheries management organisation like the CCSBT is a significant achievement and that the NZ delegation supported a gradual phase in of increased global TAC. However, we are very concerned that only the management procedures that support initial increases are accepted by participants (CCSBT and in New Zealand).
16. In particular the southern bluefin management procedure bases decision rules largely on catch rates and surveys of juvenile fish, and increases in global quota before those fish mature (Figure 1). This will only result in growth overfishing and longer rebuild times. There is also a greater risk of recruitment failure as seen in the early 2000s.
17. MFish must clearly explain to the Minister and the public why New Zealand is increasing the catch of southern bluefin in our waters when there is a high probability that the spawning stock biomass will decline in the next few years.

NZSFC submission

18. NZSFC have engaged in the management of HMS species for many years, particularly since the mid 1980s which saw the introduction of the Billfish Moratorium. This was followed by the Billfish Memorandum of Understanding with commercial fishing interests and submissions on the uncontrolled increase in swordfish catch in the late 1990s. More recently we have been actively involved in the HMS Working Group and HMS Fisheries Plan Working Group.
19. NZSFC continues to support the New Zealandisation of our commercial fisheries with catch from our waters taken by New Zealand companies rather than under foreign licences. Many of our members realise that this requires profitable tuna fisheries. Effective targeting of tuna also means there is less pressure put on bycatch species such as swordfish and sharks.
20. However, we also firmly believe in "*kia maha atu nga ika ki roto i te wai - more fish in the water*". A high risk approach to managing depleted fish stocks is not supported. MFish have developed a Harvest Strategy Standard. If southern bluefin tuna was a New Zealand only stock then this Standard would require that this fishery be closed. We also understand that in the international context of the CCSBT that management decisions are made by consensus.
21. NZSFC will promote tag and release of southern bluefin caught by recreational fishers. The New Zealand annual recreational catch of southern bluefin usually amounts to less than 10 fish. There has been one season (2007) where August trips targeting Pacific bluefin tuna caught about 55 southern bluefin on rod and reel.
22. New Zealand is currently the only place in the world where two species of bluefin tuna (southern bluefin *Thunnus maccoyii* and Pacific bluefin *Thunnus orientalis*) can be caught in a single recreational fishery. It is a rare privilege to be able to access these fish. The NZ Sport Fishing Council expects management to reflect the need to preserve access to this significant fishery.

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23. NZSFC does not support any increase in the TAC or TACC for southern bluefin. There is an urgent need to rebuild spawning stock biomass and the CCSBT has failed to achieve this to date. The science committee indicated that substantial cuts in global catches are needed in future to achieve a faster and more certain rebuild. The time to increase quotas is when the rebuild has occurred, not when a particular assessment model predicts it might occur.
24. New Zealand is on the eastern edge of the southern bluefin range. A reduced stock size could lead to a range contraction as seen in other heavily fished stocks. The very poor southern bluefin recruitment to New Zealand in the early 2000s was a warning that this could happen here.
25. In the mid 1990s more yellowfin tuna were recorded in NZSFC club records than any other species. Last season just 20 yellowfin were landed by our clubs (1% of the total recorded for all species). The range of this species appears to have contracted to the detriment of New Zealand commercial and sports fisheries.
26. With a spawning stock status worse than Atlantic bluefin it is possible that southern bluefin could be placed on the CITES list of endangered species. This would prohibit international trade in southern bluefin and the New Zealand longline fishery may become uneconomic or have to refocus on other species. NZSFC believe that New Zealand must do what we can to avoid this.
27. With the spawning stock biomass at such critically low levels, and predicted to go lower in the near future even with a 30% cut in catch by 2013 (Figure 2), the right thing for the Minister and New Zealand to do is not to increase the southern bluefin TAC from 420 t.

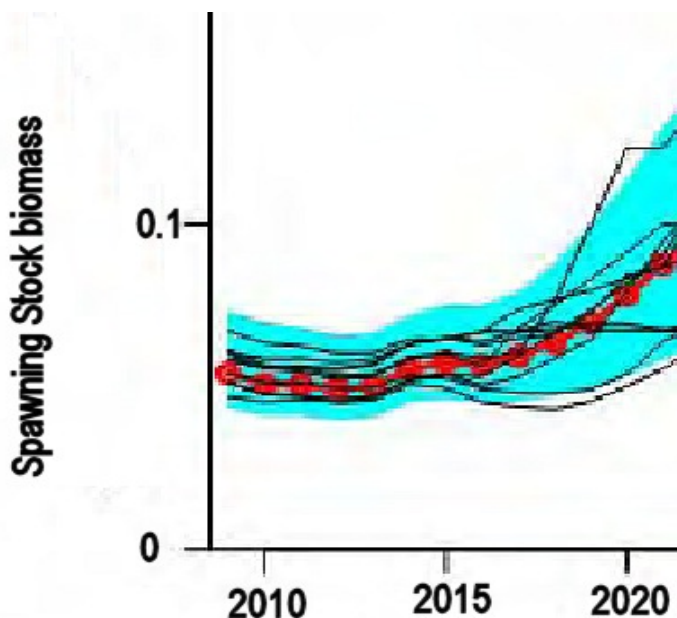


Figure 2: Projected spawning biomass for the next 10 years (red dots) from the reference set and management plan evaluation of a 30% reduction in catch by 2013 and a further reduction in 2016, tuning option 2 (part of Figure 1 CCSBT Science Committee 15 report). Note that spawning stock biomass continues to decline until significant catch reductions are in place.

28. CCSBT amended the Rules of Procedure to task the Scientific Committee to incorporate advice consistent with a precautionary approach:
Rule 8 Bis (SCIENTIFIC ADVICE)

“1. The Scientific Committee shall incorporate advice consistent with the precautionary approach in its advice to the Commission”.

29. There is no mention in the MFish IPP of caution or the precautionary approach. We submit that MFish need to incorporate advice consistent with the precautionary approach in its advice to the Minister. Increasing southern bluefin catch when the scientific advice is that the spawning stock is critically low and continuing to decline is not consistent with a precautionary approach.
30. **NZSFC submit that the TAC of 420 t should be retained** for the remainder of the 2011-12 fishing year.