

**MINISTRY OF FISHERIES PROPOSED MINISTERIAL
PURPOSE FOR ISSUING A SPECIAL PERMIT**

SUBMISSION ON BEHALF OF NON-COMMERCIAL FISHERS

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Submitters

1. This submission is from the New Zealand Big Game Fishing Council (NZBGFC) and option4 (the submitters), organisations that promote the interests of non-commercial marine fishers in New Zealand.
2. The NZBGFC was formed in 1957 to act as an umbrella group for sport fishing clubs and to organise a tournament that would attract anglers from around the world. Club membership has grown steadily and we now represent over 30,000 members in 60 clubs spread throughout NZ. The NZBGFC still run the nation-wide fishing tournament, which has evolved over time and remains successful.
3. NZBGFC compile and publish the New Zealand records for fish caught in saltwater by recreational anglers and are members of the International Game Fish Association (IGFA) who publish catches that qualify as recreational world records.
4. In 1996 the NZBGFC 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.
5. For a number of years NZBGFC has made submissions on fisheries management issues, particularly (but not exclusively) those that directly affect our members.
6. In recent years our membership has expanded beyond the traditional deep-sea angling clubs to include many local clubs that fish for inshore and demersal species.
7. Both option4 and the NZBGFC work closely with other non-commercial fishing representatives, including the Hokianga Accord, who advocate for “*more fish in the water/ kia maha atu nga ika ki roto te wai,*” to enable New Zealanders to provide for their social, economic and cultural wellbeing.

Introduction

8. On the 26th of May the Ministry of Fisheries (MFish) released an Initial Position Paper (IPP) on a proposal to widen the use of Special Permits to allow for development of new commercial fisheries for species already in the quota management system (QMS).

Proposed new purpose

9. MFish’s proposed new purpose is:

“To allow persons or organisations to take fish from stocks with a nominal total allowable catch in conjunction with a research programme that is likely to provide sufficient information to establish commercial catch limits in accordance with statutory requirements.”

Intention of new purpose

10. MFish consider the current purposes for issuing Special Permits do not provide an appropriate mechanism to permit commercial exploratory fishing, research and data collection programmes that will help establish a more informed catch limit in the future.
11. This new purpose would only be applied to stocks within the QMS and where information on stocks with very low total allowable catches is unavailable or inadequate. No future quota allocations will be based on Special Permit activities.

12. MFish recommends limiting consideration of proposed purpose Special Permits to:
- a) Target fisheries, i.e., bycatch fisheries are not eligible.
 - b) Fisheries with zero or nominal recreational and customary allowances, or for which the Special Permit catch increase would not affect or be opposed by non-commercial fishers.
 - c) Fisheries in which all or a majority of quota owners support the harvest increase and scientific research programme.

Process

13. Following the submission process MFish will provide a Final Advice Paper (FAP), summarising submitters' input, to the Minister for his consideration. If approved, quota owners or their organisations will be able to apply for a Special Permit immediately. MFish will consult with stakeholders, "where relevant", on each specific application made under this purpose, as per section 97(2) of the Fisheries Act.

Submission

14. Non-commercial fishers agree with the MFish policy decision not to continue with adaptive management programmes (AMPs). There are a number of examples of commercial fishers considering the AMP TACC increases as a right, while they have not fulfilled their obligations to collect additional fisheries information to assist in stock monitoring and assessment.
15. Non-commercial fishers agree that a mechanism is required to allow the development of new fisheries (e.g., never been developed), and 'closed' fisheries (developed fishery for which catch limits were reduced to zero or nominal levels) for species that are already in the QMS.
16. The Special Permit system would be suitable to allow investigation of new fishing opportunities and the impact of fishing on the target species, non-target species, the marine environment and other marine stakeholders. The applicant and MFish should identify potential impacts of the new fishery and it is essential that these are monitored as a condition of the permit. Failure to monitor impacts should result in the permit being revoked.
17. Detailed reporting of catch, effort and location should be provided to MFish. There should be a regular review of catch and monitoring information by MFish with results available to the public.
18. Given the existing level of environmental damage caused by some fishing methods, harvesting in new fisheries must have a minimal effect on the environment, associated or dependant species and other marine interests, including fishers. If a significant impact is detected then the permit should be revoked.
19. Non-commercial fishers will not support applications to increase commercial catch in established fisheries using Special Permits rather than the TACC setting process set out in the Fisheries Act (1996). The new Special Permit purpose must clearly state that it applies to new and closed fisheries only.
20. Non-commercial fishers do not support the development of high volume, low value fisheries for species that are important links in the food chain such as anchovy, sprat and pilchard, even if their TAC's are considered "nominal".

21. The TACC for some quota species that may qualify under the new purpose may be very small or zero. Special permit applications should not be restricted to owners of quota for that species only. Others, such as registered commercial fishers, should have the opportunity to develop new fisheries by apply for a special permit. The owners of quota in that species may not have the skill or resources to be involved. However, the quota owners are likely to also benefit from the development of a fishery, as they will receive additional catch entitlement if the TACC is increased.
22. If potential to develop a new fishery is identified through the Special Permit process then a precautionary approach should be taken when a TACC is set, especially for long-lived or not particularly productive species.
23. There must be a full public consultation process for all Special Permit applications, prior to the issuance of permits for this purpose. MFish has developed a Consultation Standard that should apply to proposals to develop new commercial fisheries.
24. The submitters thank MFish for the opportunity to have input into the process to consider a new purpose for issuing a Special Permit.
25. The New Zealand Big Game Fishing Council and option4 want to be kept informed of further consultation on this matter of importance to non-commercial fishing interests.

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