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Submission on the 2013 Review of Sustainability measures and management controls for fishstocks: Part 2

The Environment and Conservation Organisations of NZ (ECO) is the national alliance of 55 groups with a concern for the environment. ECO has been concerned at the state of marine management and the impacts of fishing on threatened species for over 20 years.

Thank you for the opportunity to make submissions on these proposals.

B. SUMMARY

- **Bluenose (BNS 1,2,3,7 and 8)**

1. ECO supports measures to rebuild the bluenose fishery as a whole to over 40% B_0 within 10 years.
2. The current stock assessment notes that the stock is: "Very Unlikely (< 10%) to be at or above the default Target (MPD range $B_{2011} = 14-27\% B_0$)"
3. The MPD estimates of current stock size ranged from 14-27% B . Biomass is estimated to have declined continuously since the 1980s and has been below the default target biomass since around 2000.
4. While ECO would prefer a rebuild strategy within 10 years, option 2 is the closest to our preferred strategy so as to ensure that rebuilding does actually occur.

- **Snapper (SNA1)**

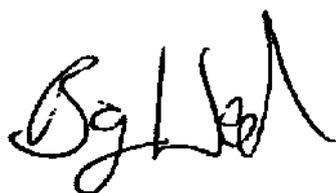
1. ECO rejects the options put forward in the IPP as contrary to the Fisheries Act, in particular the purpose and principles of the Act.
2. ECO supports measures to rebuild the fishery in an equitable way across all extractive users.

3. Develop a plan to rebuild the snapper stock to over 40%Bo within 10 years.
4. ECO notes that the stock was supposed to be rebuilt within 20 years of the 1996 catch changes.
5. Take greater action to rebuild catches in the Bay of Plenty or the combined Hauraki Gulf-Bay of Plenty fishery given the highly depleted state of the Bay of Plenty snapper “stock”. Measures may need to include prevent targetting of snapper by commercial opertors in the Bay of Plenty.
6. Ensure that cuts to catches and bag limits are equitable across all sectors.
7. Take measures to reduce waste and eliminate dumping of catches particularly by commercial operators.
8. Recognise the value of the recreational snapper fishery and undertake a consultation process to develop principles and agreed approaches to allocation between sectors in this shared fishery.
9. Adopt principles of allocation which are: First the environment and sustainability; secondly customary; thirdly recreational; and then commercial.

Deemed Values

- Adjust deemed values to reduce the incentive to overfish catches for stocks that meet the review criteria and stocks under review.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B. Weeber', written in a cursive style.

Barry Weeber
Co-Chairperson
Environment and Conservation Organisations

1. INTRODUCTION

Thank you for this opportunity to comment on the proposed sustainability measures and management controls for the 2013-14 Fishing Year.

B. GENERAL PRINCIPLES

Our main submissions on the Ministry's IPP are:

1. The proposals do not consider all the obligations on a decision-maker under sections 5, 8 to 10, and 11 to 14 of the Fisheries Act 1996.
2. Some of the considerations are a backward step over last year - there is little consideration of international obligations (section 5) and section 9 obligations, especially marine biodiversity and habitat of particular significance to fisheries management.
3. The Ministry needs to consider how environmental considerations are better integrated with pure single stock assessment considerations. Every year the inclusion of by-catch, adverse effects of fishing, maintenance of biodiversity, etc, tend to be after-thought considerations rather than central issues to setting catch limits. The Ministry could learn from the approaches taken by CCAMLR in this regard.
4. The Ministry needs to consider the obligations on future generations and the need to avoid, remedy or mitigate the effects of fishing on the marine environment.
5. International agreements and measures have further articulated the precautionary approach. Section 5 of the Fisheries Act requires decision makers to act in a manner consistent with "New Zealand's international obligations relating to fishing". Amongst these obligations is the United Nations Food and Agriculture Organisation (FAO) Code of Conduct on Responsible Fisheries (1995) which states that:

"6.5 States and subregional and regional fisheries management organizations should apply a precautionary approach widely to conservation, management and exploitation of living aquatic resources in order to protect them and preserve the aquatic environment, taking account of the best scientific evidence available. The absence of adequate scientific information should not be used as a reason for postponing or failing to take measures to conserve target species, associated or dependent species and non-target species and their environment."

Article 7.5 of the Code of Conduct further set out what constitutes precautionary management in fisheries.¹

¹ 7.5 Precautionary approach

- 7.5.1 States should apply the precautionary approach widely to conservation, management and exploitation of living aquatic resources in order to protect them and preserve the aquatic environment. The absence of adequate scientific information should not be used as a reason for postponing or failing to take conservation and management measures.

The United Nations Implementing Agreement on High Seas Fisheries and Straddling Stocks² includes a requirement on “*coastal States and States fishing on the high seas [to] apply the precautionary approach in accordance with article 6.*” Article 6 includes requirements for:

- “1. *States shall apply the precautionary approach widely to conservation, management and exploitation of straddling fishstocks and highly migratory fishstocks in order to protect the living marine resources and preserve the marine environment.*
2. *States shall be more cautious when information is uncertain, unreliable or inadequate. The absence of adequate scientific information shall not be used as a reason for postponing or failing to take conservation and management measures.*”

Therefore, where information is uncertain or unknown about the state of a stock or biological information, the decision should favour lower catch limits or more environmentally stringent regulations.

- 6, Six key issues regarding the management of fisheries-related impacts on the aquatic environment were identified through the Strategy on the Management of the Environmental Effects of Fishing consultation process undertaken by ECO and Forest and Bird in 2001. These issues describe problems relating primarily to the institutional, legal and policy frameworks under which fisheries-related impacts on the aquatic environment are managed. The key issues identified were:
 - Limited opportunities for public participation in fisheries management;
 - Gaps in information, monitoring and research capacity;

7.5.2 In implementing the precautionary approach, States should take into account, inter alia, uncertainties relating to the size and productivity of the stocks, reference points, stock condition in relation to such reference points, levels and distribution of fishing mortality and the impact of fishing activities, including discards, on non-target and associated or dependent species, as well as environmental and socio-economic conditions.

7.5.3 States and subregional or regional fisheries management organizations and arrangements should, on the basis of the best scientific evidence available, inter alia, determine: stock specific target reference points, and, at the same time, the action to be taken if they are exceeded; and stock-specific limit reference points, and, at the same time, the action to be taken if they are exceeded; when a limit reference point is approached, measures should be taken to ensure that it will not be exceeded.

7.5.4 In the case of new or exploratory fisheries, States should adopt as soon as possible cautious conservation and management measures, including, inter alia, catch limits and effort limits. Such measures should remain in force until there are sufficient data to allow assessment of the impact of the fisheries on the long-term sustainability of the stocks, whereupon conservation and management measures based on that assessment should be implemented. The latter measures should, if appropriate, allow for the gradual development of the fisheries.

7.5.5 If a natural phenomenon has a significant adverse impact on the status of living aquatic resources, States should adopt conservation and management measures on an emergency basis to ensure that fishing activity does not exacerbate such adverse impact. States should also adopt such measures on an emergency basis where fishing activity presents a serious threat to the sustainability of such resources. Measures taken on an emergency basis should be temporary and should be based on the best scientific evidence available.

² The United Nations Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks (in force as from 11 December 2001).

- Lack of precaution and environmental assessment in decision-making;
- Lack of spatial and ecotype approach to policy and planning;
- Dominance of private property rights approach;
- Lack of recognition of non-extractive use values.

7. A recent review of application of the FAO Code of Practice³ indicates that New Zealand needs to do a lot more to implement the code, particularly in the area of stock management, impacts of fishing, and bycatch and habitat effects.

B.2. Research needs

We are concerned that the Ministry is not undertaking adequate research to manage most of the species under the Quota Management System. Less than 15 percent of the stocks in the quota management system have estimates of current biomass or yield estimates.

ECO notes that the Worm et al (2009)¹ paper only accepted 19 assessments which in total cover 18 quota stocks out of the 629 fish stocks quota management system. This indicates that the Ministry needs to know much more about our fisheries if that is all of our stock assessments the international fisheries science community will accept.

We note that this report also recommends that stocks be maintained above Bmsy:
"In fisheries science, there is a growing consensus that the exploitation rate that achieves maximum sustainable yield should be reinterpreted as an upper limit rather than a management target. This requires overall reductions in exploitation rates, which can be achieved through a range of management tools."

New Zealand is undertaking less trawl surveys and fisheries research than it was 15 years ago. ECO considers the comments made by McKoy (2006)² are still relevant and that New Zealand has a fisheries management regime which has:

- "Insufficient research resources, people, equipment and funding;
- Limitation of scientific method and theory to tackle many questions;
- An inadequate understanding of the dynamics of New Zealand marine ecosystems;
- A management system which provides very strong perverse incentive to keep research funding low;
- A management system which treats the QMS as the whole of the system and which has not been able to develop any coherent management objectives on which to base decisions about the effectiveness of management or the allocation of scarce resource such as research resources."

¹ Worm B, R Hilborn, J K. Baum, T A Branch, J S Collie, C Costello, M J Fogarty, E A Fulton, J A Hutchings, S Jennings, O P Jensen, H K Lotze, P M Mace, T R McClanahan, C Minto, S R Palumbi, A M Parma, D Ricard, A A Rosenberg, R Watson, D Zeller (2009) Rebuilding Global Fisheries *Science* 31 July 2009: Vol. 325. no. 5940, pp. 578 – 585 DOI: 10.1126/science.1173146

² McKoy J (2006) Fisheries resource knowledge, management, and opportunities: Has the Emperor got no clothes? p35-44. In New Zealand's ocean and its future: knowledge, opportunities and management. Proceedings of a conference organised by the Royal Society of New Zealand, 16 November 2006, Miscellaneous Series 70.

The long echoed comment in Antarctic fisheries management (CCAMLR) first echoed by the former UK representative, John Heap, of “no data, no fish”, should be taken to heart in the New Zealand fisheries management regime.

B.3. Effects of Climate change

The effects of climate change on fisheries and the emissions of greenhouse gases from the fishing industry needs to be included in the considerations of the Ministry of Fisheries. This includes the consideration of the impacts of acidification of the marine environment on fisheries.

2. FISH STOCKS FOR REVIEW

D. Fish Stocks:

Bluenose (BNS 1,2,3,7 and 8)

ECO supports the rebuild in the bluenose fishery to over 40%Bo within 10 years.

ECO notes that: *“It estimated the maximum combined catch (TACs) that would allow for a rebuild to 40% BMIN in 2x T (20 to 26 years) ranged between 574 and 840 t.”*

As noted in Starr and Kendrick (2013):

“Although CPUE is generally considered a relatively poor indicator of changes in biomass, the concurrence amongst these five areas and two capture methods gives some comfort that these indices may be tracking an underlying process which has caused these simultaneous declines in bluenose indices, beginning in the early 2000s. In the absence of other explanations, the NINSWG has accepted that this decline was caused by an overall drop in the abundance of bluenose in the NZ EEZ.”

Despite cuts that have occurred in the TACC last years the fishery overall was well under-caught last year.

ECO notes that the *“Minister must take into account the principle that absence of, or uncertainty in, any information should not be used as a reason for postponing or failing to take any measure (including reducing TACs) to achieve the purpose of the Act (s 10).”*

Section 10 includes a requirement for decision to take into account:

- “(a) Decisions should be based on the best available information:*
- (b) Decision makers should consider any uncertainty in the information available in any case:*
- (c) Decision makers should be cautious when information is uncertain, unreliable, or inadequate:*
- (d) The absence of, or any uncertainty in, any information should not be used as a reason for postponing or failing to take any measure to achieve the purpose of this Act.”*

ECO notes that cuts have been signalled to the fishing industry in past years and agree with the MPI comment that: *“short-term gains may be at the expense of longer-term losses, as stocks will possibly not rebuild as quickly if further reductions are delayed.”*

ECO notes that: *“Option 2 projects bluenose stocks to rebuild to BTGT within 2 x TMIN – 14-28 years. This is based on taking the projections from the 2011 stock assessment of 16-30 years and deducting two years, as the first two steps in the phase reduction were taken in 2011 and 2012. MPI considers the most likely actual rebuild timeframe from 2013 will be around 18-24 years.”*

As the Stock Assessment Plenary report notes:

Under a rebuild plan following the 2011 stock assessment, there have been further phased reductions to TACCs for bluenose stocks. On 1 October 2011, TACCs were reduced to: 571 (BNS 1), 629 (BNS 2), and 248 (BNS 3); BNS 7 and BNS 8 were not reduced at that time. On 1 October 2012, TACCs were further reduced for all bluenose stocks to: 400 (BNS 1), 438

(BNS 2), 171 (BNS 3), 62 (BNS 7) and 29 (BNS 8). **The rebuild plan calls for a further and final phase of reductions in 2013.** (Our emphasis).

Bluenose are longlived fish with low natural mortality. As noted in the Stock Assessment Plenary:

Horn & Sutton (2011) recorded a maximum age of 71 years for BNS 1, and estimated natural mortality (M) to be in the range 0.09-0.15, based on 1% of the unfished population living to 30- 50 years. Given the maximum recorded age, they commented that estimates of M less than 0.09 may be appropriate as bluenose live to at least 71 years and older fish may be poorly sampled by the line fishery.

The current stock assessment and forward projects show the need to complete the already flagged level of cuts to the TACC:

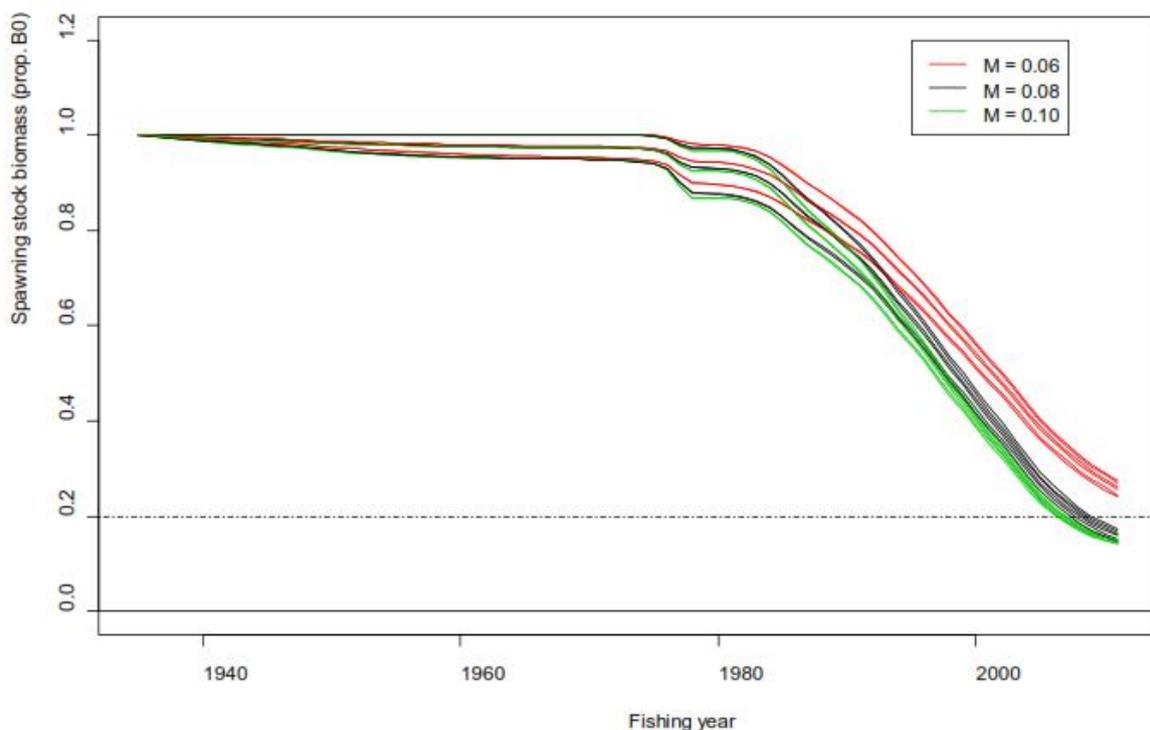


Figure 9: Biomass trajectories (proportion of B_0) for the final set of 18 MPD runs.

The stock assessment plenary sets out the need for urgent and continuing action:

“Catches at the level of the current TACC or the current catch (which is not much less than the TACC) are predicted to cause the stock to decline to very low abundance over the next 20 years (Figure 11).

Further the report notes:

The estimates of T_{min} range from 10 to 13 years (Table 5) and the maximum catches that allow a rebuild to 40% B_0 within twice T_{min} (the maximum rebuilding time under the Harvest Strategy Standard) range from 570–840 t (Table 6).

ECO notes that the stock assessment indicates that the stock is “Very Unlikely (< 10%) to be at or above the default Target (MPD range $B_{2011} = 14-27\% B_0$)”

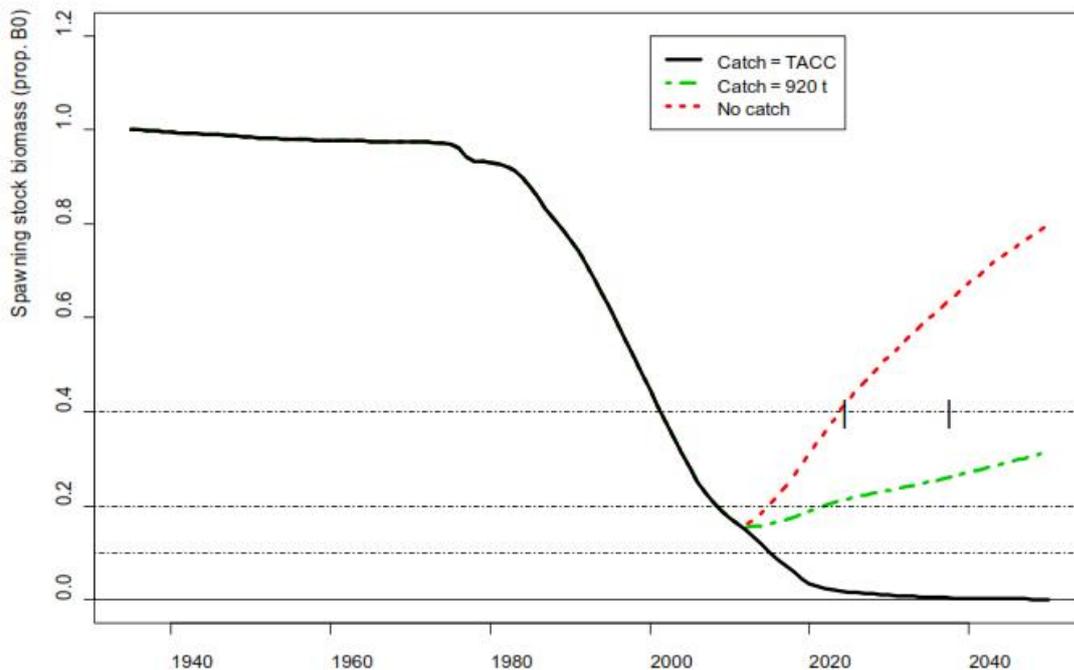


Figure 11: Projected SSB at different catch levels from the run with mid catch, $M = 0.08$ and $h = 0.75$. The two short vertical lines at $40\% B_0$ mark $2011 + T_{min}$ and $2011 + 2 T_{min}$.

Further “The MPD estimates of current stock size ranged from 14-27% B_0 . Biomass is estimated to have declined continuously since the 1980s and has been below the default target biomass since around 2000.”

Summary:

1. ECO supports measures to rebuild the bluenose fishery as a whole to over $40\% B_0$ within 10 years.
2. The current stock assessment notes that the stock is: “Very Unlikely ($< 10\%$) to be at or above the default Target (MPD range $B_{2011} = 14-27\% B_0$)”
3. The MPD estimates of current stock size ranged from 14-27% B . Biomass is estimated to have declined continuously since the 1980s and has been below the default target biomass since around 2000.
4. While ECO would prefer a rebuild strategy within 10 years, option 2 is the closest to our preferred strategy so as to ensure that rebuilding does actually occur.

Snapper (SNA 1):

The debate over the sustainability of snapper has been extensive over the last 20 years. Since 1992 ECO has been involved in processes over the review of the SNA1 fishery. ECO made submissions on several reviews of the fishery in 1990s.

ECO notes that the current stock assessment indicates that:

“In terms of current biomass, both the stock BOP and area BP are estimated to be more depleted (3–10% B₀) than the other stocks and areas (15–30% B₀) (Table 15).”

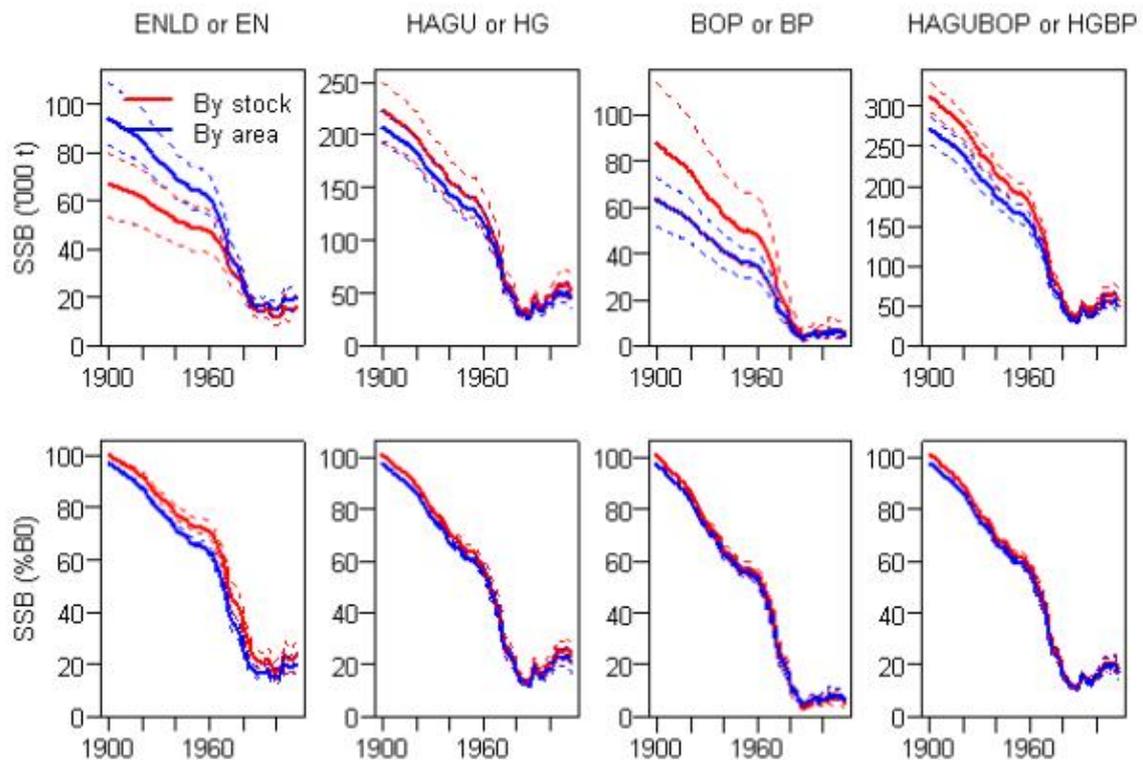


Figure 11: SSB trajectories by stock (red lines) and area (blue lines) from the base model. Solid lines are MCMC medians, broken lines are 95% confidence intervals.

Further the report notes:

- *East Northland: B₂₀₁₃ was estimated to be 24% B₀; Very Unlikely (< 10%) to be at or above the target*
- *Hauraki Gulf + Bay of Plenty: B₂₀₁₃ was estimated to be 19% B₀; Very Unlikely (< 10%) to be at or above the target*

Further:

“No stock or area is at or above the target and none but the Bay of Plenty is below the hard limit. Probabilities of being below the soft limit range from 0.04 to 1.00 (Table 18).”

ECO further notes that fishing intensity has increased and is very high in the Bay of Plenty (figure 13).

ECO notes that deterministic Bmsy is calculated at 25-26%Bo for all individual stocks and 30% Bo for the combined Hauraki Gulf/Bay of Plenty. ECO agrees that deterministic Bmsy is a risky target which should not be used as the target for rebuilding the fishery. ECO endorses the reasons set out on page 207 of the Plenary report (and associated reviews) and that the interim target of 40%Bo is much more appropriate.

The Bay of Plenty “stock” is in the worse state and action must be taken to reduce catches in this area or cuts in the combined Hauraki Gulf-Bay of Plenty stock.

On stock trends:

- *East Northland: Stock biomass was estimated to have experienced a long steep decline from about 1960 to 1985, and has fluctuated without trend since then.*
- *Hauraki Gulf+Bay of Plenty: Stock biomass was estimated to have experienced a long steep decline from about 1960 to about 1988, after which it gradually increased to 2010 and then declined slightly.*

Given the static nature of stock this further indicates that to reach the interim target (B_{40%}) cuts will be required to rebuild the fisheries to this level.

Further:

- *East Northland: Current catch is Very Likely (> 90%) to cause overfishing to continue*
- *Hauraki Gulf + Bay of Plenty: Current catch is Very Likely (> 90%) to cause overfishing to continue*

The stock assessment plenary sets out a strong case for cuts in catches and total removals in the fisheries. In particular it highlights the need for greater action in the Bay of Plenty or the combined Hauraki Gulf-Bay of Plenty stock given the highly depleted nature of the Bay of Plenty “stock”.

Research:

ECO notes the concerns set out in the Plenary report on the need for further research. ECO has been a supporter of a new tagging study for SNA1. It is now over 20 years since the last tagging survey was undertaken. ECO consider the cost recovery system as operated by the Ministry has been a barrier to undertaken appropriate fisheries research.

ECO consider that the costs of a tagging survey undertaken every 5 to 10 years should be cost recovered over several years and not required to be recovered in one year or in the years the expenditure takes place.

In addition to tagging programme, improved catch at age sampling is required.

ECO notes that the results of the current major research into the recreational fishing being undertaken by the Ministry has not yet been completed. We await the final results of this research as it is important in assessing the size and better assessing trends in recreational catch.

Ecological considerations

ECO notes that snapper is long-lived species (up to 60 years) with low natural mortality (0.075).

Snapper is an important predator in northern waters and is an important ecological species affective coastal and inshore biodiversity. The numerous papers on the role of snapper undertaken in the Leigh Marine Reserve and adjacent areas shows that it is an important species. ECO considers this is additional reason for a rebuild of the fishery.

Trawling can have major impacts on benthic species. There is research on the impacts of trawling in the Hauraki Gulf on soft sediment communities (see Thrush et al 1998 and others). This showed a decrease in density of echinoderms, long-lived taxa, epifauna, especially large species, the total number of species and individuals with increasing fishing pressure.

ECO notes in addition concern at the bycatch of seabirds in the snapper fishery and considers it essential that the Ministry move to implement the recently adopted National Plan of Action of Seabirds for the inshore fisheries, in particular the snapper fishery. It is also essential that recreational fishers are made more aware of this national plan and the need to ensure fishing does not catch seabirds. There are a number of threatened seabirds in the SNA1 area including black petrels.

Considerations:

The Court of Appeal in its decision on the previous Ministers snapper decisions stated in regard to the 1996 Act:

“It is thus made clear that in setting the TAC for a fishery whose yield is below MSY the Minister has an obligation to move the stock in questions towards or above a level which can produce MSY.

“In short, the Minister now has a clear obligation to move the stock towards MSY and when deciding upon the time frame and the ways to achieve that statutory objective the Minister must consider all relevant social, cultural and economic factors.”

They went on to say:

“... we are of the preliminary view that the economic factors of which s13(3) speaks need not necessarily be confined to matters directly affecting the industry. In our view wider considerations affecting the national economic interest are capable of being regarded as relevant. MSY is itself directed at the national interest as well as at sectional interests and this supports the view that national economic factors can be relevant to a TAC assessment under s13.”

The Court also made it clear the quota property rights “are not absolute” and are “subject to the provisions of legislation... [that] contains the capacity for quota to be reduced”.

The Court also found that the Minister could “be able to vary the ratio between commercial and recreational interests”.

The Court of Appeal decision did not consider the issues in the purpose of the Fisheries Act 1996. We consider that relevant consideration include the definitions of “*Sustainable utilisation*”:

“(a) *Maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations; and*

(b) Avoiding, remedying, or mitigating any adverse effects of fishing on the aquatic environment.

Future generations needs include having fish stock restored to at or above Bmsy. The need to remedy the depleted state of the snapper stock from the adverse effects of fishing would also support a reduction in the TACC.

The Minister should also consider the information principle (section 10) This includes a requirement for decision to take into account:

“(a) *Decisions should be based on the best available information:*

(b) Decision makers should consider any uncertainty in the information available in any case:

(c) Decision makers should be cautious when information is uncertain, unreliable, or inadequate:

(d) The absence of, or any uncertainty in, any information should not be used as a reason for postponing or failing to take any measure to achieve the purpose of this Act.”

We consider there is adequate information for the need to take action and reduce the TAC and TACC for snapper.

In 1998 we noted that: “*We consider the Hauraki Gulf-Bay of Plenty Fishery should be rebuilt within 10-15 years. The previous Minister agreed to a 20 year rebuild but we consider this period to be too long.*”

We acknowledge there will be impacts on the commercial sector of a cut required to rebuild the fishery in this period. However we must note that this is in part self inflicted by the commercial sector. Since 1992 Ministers have requested the commercial sector address the issues of a stock rebuild and work with other stakeholders to achieve this.

We recognise that the recreational sector has accepted and promoted cuts in their catch. The minimum legal size (MLS) was increased from 25 cm to 27 cm in 1994 and the bag limit was reduced from 25 to 15 in 1992 and to 9 in 1995.

We reluctantly suggested 1997 a rebuild over 10-15 years to 2010. We consider this time horizon would have been consistent with the Ministers obligations under section 13(2)(ii) because:

- * it would involve less drastic cuts on the commercial and recreational fisheries than a shorter time period of 5 years;
- * it is a time horizon within which most fishers (commercial, recreational and traditional) today may see the benefits;
- * consistent with the biology of snapper, including variable recruitment, caused by water temperature.

- * a longer time period would create uncertainty due to variable recruitment and any cuts may not result in the rebuild of the fishery.
- * this time period is credible both to rebuild the fishery for future generations and to meet public concern over the state of the snapper fishery.

As we noted in 1998: *“a staged reduction would slow the rebuild time and create uncertainty, especially with poor recruitment as to whether there was any rebuild at all.”*

The impacts and benefit of any TAC cut is a relevant consideration of the Minister under section 13(3) of the Fisheries Act 1996. We note that the Court of Appeal has indicated that the *“Minister would be wise to undertake a careful cost/benefit analysis of a reasonable range of options available to him in moving the fishery towards MSY.”*

We note that the fishing industry has in the past opposed the Ministry improving the economic information it has at its disposal. This then leaves the Minister relying on partisan information.

Any consideration of economic factors should take into account the value of non-market services from the environment and from recreational and traditional benefits directly consumed which do not go through the market. Such a consideration should also take into account the joint products where for example recreation there are benefits gained in addition to the actual extractive benefits.

Recreational fishing take is likely to have much higher value added per fish than industrial commercial take. The benefits to the nation from tourism and much higher job multipliers attached to tourism in comparison to those attached to commercial fishing should also be considered. For example increased snapper numbers benefits recreational fishers and those wishing to see snapper in the natural environment without catching them.

It will be important in making a decision to look at the long term expectations and incentives created by that decision. In particular you must make it clear that if fishers over-fish over a period of years that jeopardy to economic interests will result so that they develop a greater sense of responsibility in future TACC setting rounds.

ECO would like to see the value of the communities of small scale fishers acknowledged and preferential treatment given to them over industrial commercial fishers but not in such a way that there incentives to responsible behaviour or the environment itself are jeopardised.

The temptation to avoid hurt now by postponing necessary decisions is unfair on the future and indeed it is this failure to act over the last 5 to 10 years which is responsible for the current problem and the intensity of the problem we now face. Further delay simply digs us deeper into this particular hole of unsustainability.

If changes are not made the environment will continue to subsidise commercial fishers.

A detailed economic assessment is likely to indicate that the recreational catch of snapper is more valuable to New Zealand than the commercial catch. Any analysis would have to consider the amenity values attached with fishing for and catching snapper. There are several

economic techniques that can be used to estimate these values, including the use of surrogate markets used in the NRB survey.

The economic benefits of a reduction in the TACC are:

- increase in stock size will mean that fish are easier to catch so the costs of catching a tonne of snapper will decline;
- a rebuilt stock will have a higher TACC as the TAC could be increased to the MSY level;
- the recreational fishery will have increased satisfaction as bag limits will be easier to achieve;
- the increased ability of tourists to see snapper in the marine environment.

The community at large will strongly support a decision to place the snapper fishery on a sustainable footing. All three groups get strong feedback from members and the general public on the need to manage fisheries sustainably.

On any changes to recreational bag limits it is important to ensure some balance with the SNA8 fishery. This stock is probably in a worse state than the SNA1 fishery.

Summary

1. ECO rejects the options put forward in the IPP as contrary to the Fisheries Act, in particular the purpose and principles of the Act.
2. ECO supports measures to rebuild the fishery in an equitable way across all extractive users.
3. Develop a plan to rebuild the snapper stock to over 40%Bo within 10 years.
4. ECO notes that the stock was supposed to be rebuilt within 20 years of the 1996-1997 catch changes.
5. Take greater action to rebuild catches in the Bay of Plenty or the combined Hauraki Gulf-Bay of Plenty fishery given the highly depleted state of the Bay of Plenty snapper "stock". Measures may need to include prevent targetting of snapper by commercial operators in the Bay of Plenty.
6. Ensure that cuts to catches and bag limits are equitable across all sectors.
7. Take measures to reduce waste and eliminate dumping of catches particularly by commercial operators.
8. Recognise the value of the recreational snapper fishery and undertake a consultation process to develop principles and agreed approaches to allocation between sectors in this shared fishery.
9. Adopt principles of allocation which are: First the environment and sustainability; secondly customary; thirdly recreational; and then commercial.

E. DEEMED VALUES REVIEW

ECO supports changes to deemed values to reduce the incentive for over-fishing.

1. Elephant Fish (ELE 1, 2, 3, 5, 7)
2. Kingfish (KIN 1, 2, 3, 4, 7, 8)
3. Leatherjacket (LEA 1, 2, 3, 4)
4. Rough Skate (RSK 1, 3, 7, 8)
5. Smooth Skate (SSK 1, 3, 7, 8)
6. Sea Perch (SPE 1, 2, 3, 4, 4 (CI), 5, 6, 7, 8, 9)
7. Stargazer (STA 1, 2, 3, 4, 4 (CI), 5, 6, 7, 8)