

## Mullet 1 (GMU1) West & East Coast North Island fishery

# DRAFT SUBMISSION

### Ministry of Fisheries Proposals

**Table 1: The proposed TACs (tonnes), TACCs (tonnes), and allowances (tonnes) for GMU 1 under each option for the 2005-06 fishing year**

Option	Approach to setting recreational allowance & TACC	Proposed TAC	Customary allowance	Recreational allowance	Other sources of fishing-related mortality	Proposed TACC
1a	Proportional	1 101	100	90	33	878
1b	Non-proportional	1 101	100	100	33	868
1c	Non-proportional	1 101	150	150	33	768
2a	Proportional	1 043	100	80	31	832
2b	Non-proportional	1 043	100	100	31	812
2c	Non-proportional	1 043	150	150	31	712
3a	Proportional	985	100	70	30	785
3b	Non-proportional	985	100	100	30	755
3c	Non-proportional	985	150	150	30	655

#### **option4 will submit that:**

Mullet are an easily accessible species important for the social and cultural well being of many local communities. The mullet stock has been allowed to become depleted through excessive Total Allowable Commercial Catches (TACC) being allocated since the introduction of the QMS.

Quote from IPP para 149 *“However, the grey mullet fishery was intensively fished in the early to mid 1980s. The commercial catch limit introduced in 1986 (as adjusted over time by quota appeals, and the reduction in 1998–99) has not constrained the commercial use of the fishery to what is considered a sustainable catch level.”*

On the other hand non-commercial fishers have been under-allocated in this fishery.

Quote from IPP para 58 *“Mfish considers that the recreational harvest of the GMU 1 stock is more likely to be in the order of 150 tonnes than 100 tonnes, as provided by the*

*existing allowance.”*

Further, MFish considers it prudent to reassess the recreational allowance in future years, when better information on the nature and extent of recreational harvest of grey mullet is available.

The combination of excess quota and massive size of the QMA has led to the development of a mobile fleet of set netters capable of depleting entire harbours and maintaining low stock levels in those harbours. This behaviour has been to the detriment of local non-commercial interests (and sometimes local commercial set netters) and is a major cause of conflict.

### **Initial Allocations**

Commercial fishing interests have had priority in this fishery since the introduction of the QMS. The excessive quotas issued have allowed commercial fishing interests to determine the biomass available to non-commercial fishers.

The current allowance for recreational fishing is based on an underestimate of actual catch in a depleted fishery.

As the minister will be reviewing allowances for non-commercial fishers in GMU1 we ask that the points raised in proportional document attached and the fishery specific points above be drawn to the Ministers attention in the FAP

### **option4 Recommendations for Mullet**

We are concerned that the mullet IPP contains seriously flawed advice on supposedly proportional cuts that could see non-commercial fishers allowances set or confirmed on the basis of known underestimates of catch in a depleted fishery. It is proposed under some options to reduce non-commercial catch further to fit within the proportional options after constraining them to the known under allowance. Recreational catch allowances could be reduced by half or more if this advice is given any credibility. On the other hand the **actual commercial catch** will be cut by a much lesser proportion than it's purported "proportion" because of the excessive quota commercial interests have been given.

As the Minister is required to "allow for non-commercial interests" option4 recommends option 3C as a minimum first step.

Other solutions are obvious and necessary to **actually** address the real issues. We ask that these be considered in addition to option 3C.

- This QMA is far too large for effective management of the mullet fishery on a local scale. The QMA needs to be subdivided and sustainable quotas allocated to contentious areas so that these fisheries can rebuild, and so that non-commercial fishing can be properly allowed for.
- Set netting and ring netting is the main commercial methods used in harbours for mullet. An increase in the minimum set and ring net mesh size for **commercial fishers only** would increase the biomass, and availability of mullet to non-commercial fishers. It would also increase commercial yield per recruit in the fishery. The capture and mortality of small mullet would be also be reduced at higher mesh sizes. A further benefit would be a significant reduction in the mortality of other juvenile fish found in harbours. The wasteful catch of undersized snapper and trevally and small dogfish and gurnard would decline markedly.
- Set netting can be an extremely wasteful method when nets are left to soak for extended periods of time in areas where sea lice are present. The current maximum soak times are far too long at 18 hours. If actual soak times prevalent in the fishery can be reduced, then wastage to scavenging will be reduced and productivity increased. Shorter soak times should apply to all set netting by all sectors.

**In addition to the above option4 submits that the Minister:**

1. Makes no changes to non-commercial bag limits, size limits or gear restrictions in GMU1
2. Sets the non-commercial allowances at a level sufficient to cover current or expected non-commercial catch
3. Notes that non-commercial access has been adversely affected by lack of constraint on commercial catch and therefore the allowance is not a fixed proportional division of the GMU1 fishery
4. Notes that recreational catch estimates and allowances are uncertain and will be subject to revision when better catch information is available.