

7 December 2010

Denise Ashley
Ministry of Fisheries
PO Box 1020
Wellington 6140
Email: bluefin.tuna@fish.govt.nz

RE: Inappropriate action on critically endangered southern bluefin tuna

Dear Denise,

Greenpeace is an independent global campaigning organisation that acts to change attitudes and behaviour, to protect and conserve the environment and to promote peace. Greenpeace does not accept funds from governments, corporations or political parties but is solely funded by private donations from our supporters.

Greenpeace has approximately four million supporters world wide. Greenpeace Aotearoa New Zealand has over 55,000 supporters and, each year, staff in our frontline programme speak with 250,000 New Zealanders.

General comments

This submission is in regard to the critically endangered marine fish species *Thunnus maccoyii*, southern bluefin tuna.

The Ministry of Fisheries' **Initial Position Paper on Management Options for the Southern Bluefin Tuna (STN1) Fishery** is grossly and entirely inconsistent with the New Zealand Fisheries Harvest Management Strategy and a precautionary fisheries management regime - much less the responsible management of a critically endangered species.

Status of the species

The latest science indicates that southern bluefin tuna has been reduced to a spawning stock biomass of just 4.6% - a truly precarious level. This population level is at an historic low, and the species is in an even worse state than when it was listed as critically endangered by the International Union for the Conservation of Nature in 1996.

By any fisheries management definition, this is a severely overfished stock. New Zealand's own Harvest Management Strategy classifies a fishery as collapsed when it is reduced below the "hard limit" which, as a default, is $\frac{1}{4}$ B_{MSY} or 10% B₀, whichever is higher. Under New Zealand legislation, this fishery should be considered for closure. The stock status of southern bluefin is less than half the level that would be classified collapsed, yet it has not been considered for closure and the Ministry is proposing a second catch increase this year.

The global context

Bluefin tunas are highly migratory species that have supported important fisheries worldwide, including the Pacific, Indian and Atlantic Oceans and the Mediterranean Sea. However, as a result of ever-increasing demand for bluefin tuna in international markets, the species are now endangered and populations of all three species have declined substantially.

Bluefin tuna fisheries have a global history of commercial collapses or local extinctions, including the disappearance of northern bluefin tuna from the North Sea, Norwegian Sea and off the coast of Brazil. In wiping out 95% of southern bluefin tuna, fishing nations have brought this more recently exploited species to the brink of collapse in record time.

The global 20% catch reduction for southern bluefin tuna is absolutely inadequate to address the threat to the species. In fact under this level of catch the stock is likely to fall even further in the short term, and is unlikely to increase to above the level of a collapsed fishery (10%) in the next decade. The Ministry's reference to a global reduction in catches is nothing more than an attempt to distract attention from the fact it has allowed our own fishing industry to ramp up its catch of this critically endangered species.

The New Zealand fishery

Like the areas in which Atlantic bluefin has been wiped out and the fisheries no longer exist, New Zealand is at the migratory limit of southern bluefin tuna. This means that as the range of the species contracts due to extreme overfishing, the species is likely to disappear altogether from New Zealand waters.

In addition to the impacts of continued fishing on southern bluefin tuna itself, the fishery for this species also has unacceptable impacts on sharks. The tuna longline fishery, which is a mixture of New Zealand vessels and chartered Japanese vessels, catches as many or more sharks than tunas (and substantially more sharks than bluefin tunas). In New Zealand waters it is legally permitted to cut the fins off sharks and dump their bodies overboard.

The practice of shark finning has been widely condemned as being cruel and wasteful, and is banned in many countries. New Zealand has only gone as far as to require that the sharks be killed before their fins are cut off. However, this may not always be the case in practice. In any case, there is no excuse for the wasteful practice of shark finning when many species of shark are themselves threatened.

The Ministry's proposed management options

Despite the critical state of this species, the Ministry of Fisheries has outlined three management options for the southern bluefin tuna fishery, all of them inappropriate for the recovery of a critically endangered species:

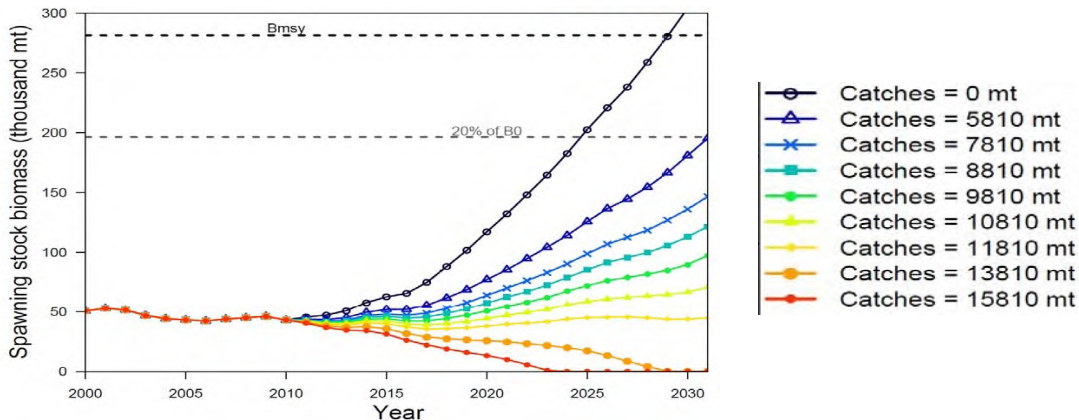
Status quo: Retain fishing at the official TAC level of last season, the time at which the Ministry of Fisheries was made aware of the species' 4.6% stock status.

Retain increase: Continue to allow a higher level of fishing that the NZ Ministry of Fisheries proposed, and the Minister approved, following the alarming scientific advice of near collapse.

Greater increase: Allow an even higher level of fishing including both the in-season increase approved earlier this year and a carry-over of catch that was not taken in the last season.

There is **no proposal for any reduction** of the New Zealand catch of southern bluefin tuna in response to the critical stock level, despite the fact the scientific advice received last year indicates that **only a global catch of zero** is likely to allow the fishery to recover to 20% biomass by 2025.

Stock projections based on various global catch levels for southern bluefin tuna:
(From the 2009 scientific advice to the CCSBT)



These proposed management options represent a complete failure by the New Zealand Ministry of Fisheries to take seriously the threat to this species and to the fishing industry, recreational fishers and others that utilise it. It also disregards and undermines the Ministry's own Harvest Strategy Standard.

The proposed options also reflect a fundamental failure to consider New Zealand's responsibilities under the Law of the Sea and the Fish Stocks Agreement to conserve marine biodiversity in areas beyond national jurisdiction and protect species that migrate or straddle between EEZs.

Appropriate management approach

The Fisheries Act states that the Minister should provide for utilisation while ensuring sustainability. There is nothing remotely sustainable about a stock reduced to less than 5% of its unfished biomass, therefore utilisation must go on hold until such time as the stock is restored to a sustainable level.

The recent mismanagement of this species, and lack of action to recover the stock, indicates that both the Minister and Ministry of Fisheries are being unduly influenced by the fishing industry and are not adequately considering the interests of other stakeholders in the marine environment and fisheries. If it was only the future of the fishing industry itself that was at stake, that would be one thing – however, this issue affects the very survival of a species.

The management of this species should be removed from the hands of the Minister, and Ministry of Fisheries. Responsibility and mandate for the effective management of southern bluefin tuna must be transferred to the Department of Conservation, a zero TACC enacted and a proposal developed to list this species under the Convention on the International Trade in Endangered Species.

There should be no commercial exploitation of southern bluefin tuna anywhere while it is in an endangered state. The fishery must be closed until such time as stocks recover and a management arrangement is established to ensure that the same mistakes are not repeated again. New Zealand will have no integrity in advocating for responsible management and a zero catch internationally if it has done the opposite and increased catches domestically.

Greenpeace recommendations

Given the critically endangered classification of this species, and the overfishing of the stock to 4.6% of its original spawning biomass, Greenpeace strongly recommends the following action be taken:

- (1) A zero TACC must be applied immediately in New Zealand, and a global zero catch advocated within the CCSBT to follow scientific advice giving the population the possibility to recover to 20% by 2025.
- (2) Southern bluefin tuna management, along with appropriate mandate and resources, must be transferred to the Department of Conservation to implement measures to protect the species.
- (3) The New Zealand Government must prepare a proposal to CITES to list southern bluefin tuna on Appendix 1 thereby banning international trade in the species.
- (4) New Zealand must adopt legislation to ban the cruel and wasteful practice of shark finning, something that has already been adopted and implemented in many other countries.

In this, the international year of biodiversity, New Zealand has the opportunity to restore its reputation for the management of endangered species by taking the above-mentioned action.

Kind regards,



Karli Thomas
Greenpeace Oceans campaigner