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Dear Minister

Congratulations on becoming the Minister of Fisheries from the team at option4. I am sure you will find the portfolio both challenging and highly rewarding.

I write to you as project leader of option4, an NGO that promotes the interests of non-commercial marine fishers in New Zealand. Our group has been actively participating in fisheries management for the past five years and several of our team have over 20 years experience in fisheries management, and representing recreational fishers. A record of our process is online at www.option4.co.nz. Our main role is advocating on behalf of those who fish non-commercially and keeping the public informed about issues surrounding their ability to fish for food. The option4 team work very closely with the New Zealand Big Game Fishing Council, New Zealand Recreational Fishing Council and Ngapuhi on matters of mutual concern.

Our understanding is Mark Edward's team and Dr. Robin Connor are developing an Insectorial Allocation Policy with a view to possible legislative change. A fair and practical allocation method for non-commercial fishers is all we seek.

I have spent many years working very closely with Doug Kidd when he was the Minister of Fisheries and found that relationship mutually beneficial. My experience also includes working with the Department of Conservation to develop an underwater setting device to reduce seabird mortality and with MFish to improve hook technology to reduce the mortality of undersized snapper. I also represented recreational and environmental interests on the Set Net Task Force established by Doug Kidd in the mid 1990's. I am sure Doug Kidd would welcome a conversation with you regarding my involvement in past fisheries management should you require any further information.

More recently option4 has been privileged to participate in the building of close relationships with tangata whenua, particularly Ngapuhi, and the subsequent establishment of the Hokianga Accord.

We would like to discuss with you our concerns regarding the current proportional allocation model used in shared fisheries, and our participation in the development of any alternative allocation model. Stan Crothers gave an undertaking at the hui of the Hokianga Accord in August that the Ministry would work with option4 and others after October 1st to resolve the issues raised by proportional allocation. We appreciated that commitment and look forward to the Ministry following through on this promise.

Proportional Allocation

The Ministry continues to impose a proportional allocation model when reducing fishing quotas and allowances. There are many serious issues with this model, not the least of which is a complete absence of any proper process for setting the initial allocations.

It is of concern that proportional allocation decisions made under the current system completely removes all conservation incentives for non-commercial fishers. These decisions are also perceived as being unfair by non-commercial fishers as they create a double jeopardy situation where the non-commercial sector is penalised twice, while the commercial sector only receives one quota cut. Confidence in fisheries management and the QMS are compromised by the above as negative publicity inevitably follows each new decision.

Your Ministry has acknowledged many of the shortcomings of the proportional allocation model in their SNA 8 FAP in response to papers I wrote on proportional allocation¹ for this year's fisheries decisions. MFish have also acknowledged that allocation is the number one critical issue in domestic fisheries management. I have spent 15 years working on these issues and I do not have confidence in many of the recently appointed MAC members on this topic. I do not believe most have sufficient grasp of the complex issues surrounding proportional allocation to fulfil their primary function in giving strategic advice on this matter, nor do they have adequate resources.

One of the fundamental reasons for the failure of *Soundings*, the MFish consultation process on non-commercial fisheries reform launched in 2000, was that the initial process was conducted behind closed doors and the recreational participants had insufficient understanding of the issues and inadequate resources. It would be a shame to see any new process fail to gather the necessary public support for the same reasons.

My offer to you is that option4 would be available to fully engage in the early stages of this new process. Our participation would bring the resources of option4 to bear on the real issues. This would include paid legal and scientific advice, a robust communications network and a range of committed personnel, including myself, who would collectively bring a comprehensive variety of expertise in fisheries management.

I firmly believe it would be far better to have these resources working within the process rather than outside, as happened with *Soundings*. A more robust solution is the likely outcome, as the core issues would be dealt with before the public consultation gets underway. This would add transparency and confidence that the real issues, costs and benefits would be put openly before the public during the consultation phase.

¹ http://option4.co.nz/Fisheries_Mgmt/proportions.htm

The Preference Debate and MSY

Your predecessor, David Benson-Pope, announced in July “*that species important to recreational fishers should be managed above, or even significantly above, what fisheries documents refer to as B_{MSY} – the size of a fish stock that delivers the maximum sustainable yield.*” We believe that allocation and the target biomass fisheries are managed at are inextricably linked. When fisheries are managed below the level required to produce Maximum Sustainable Yield preference is given to commercial fishing interests. This is because they can maintain catches in depleted fisheries through bulk fishing methods, increasing effort by deploying more gear or fishing for longer periods of time. Technological advances also help to improve their efficiency and maintain catch rates even when fishing in depleted fisheries.

Non-commercial fishers catches are more controlled by the size of the fish stock. In healthy fisheries they will catch more because the fish are bigger or more abundant, or both. In depleted fisheries they will catch less because the fish are smaller and scarcer, or both. This means the commercial sector can cause a reduction in non-commercial catch by maintaining the stock at levels below the level required to produce the Maximum Sustainable Yield. This has already happened in many fisheries. When the Ministry finally takes action quota and non-commercial limits are generally cut in proportion. This is the double jeopardy situation mentioned above. First, the non-commercial catch is suppressed to low levels by the low stock size then this reduced catch is cut again in the name of sustainability and because of the preferred proportional allocation method used by the Ministry.

Conservation efforts by non-commercial fishers and excessive commercial fishing are ignored in the Ministry’s proportional allocation process. The recent snapper 8 decision is a good example, the decision has punished those who have conserved and rewarded those who have exceeded their entitlements.

Our team would like to meet with you at your earliest convenience to discuss the above issues. I suggest you invite Stan Crothers, Mark Edwards and Kevin Sullivan from your Ministry to this meeting, as I believe they could give you sound advice and answer any questions raised. option4 would send four or five of its best people to this meeting. We are sure that such a meeting would be of immense value to you and enable you to better understand the recreational perspective. We hope you find the time in your busy agenda to meet with us and if so, we look forward to meeting with you as soon as possible.

Wishing you a Merry Christmas and a Happy New Year.

Yours faithfully



Paul Barnes
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option4