

New Zealand Sport Fishing Council

(Incorporated)

Formerly – New Zealand Big Game Fishing Council Inc

Patron: J R Chibnall

President: R J Baker

Secretary: R T Nelson



PO Box 93

Whangarei

Phone: 09 433 9648

Fax: 09 433 9640

Email:

nzsportfishing@farmside.co.nz

Website: www.nzbgfc.org.nz

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Aquaculture Submissions

Ministry of Fisheries

PO Box 1020

WELLINGTON 6140

NZ Sport Fishing Council Submission on the Report of the Aquaculture Technical Advisory Group

NZ Sport Fishing Council

1. The New Zealand Sport Fishing Council (formerly the NZBGFC and now NZSFC) 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 58 clubs spread throughout NZ. We still run the nation-wide fishing tournament, which has evolved over time and remains successful.
2. NZSFC 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.
3. In 1996 the NZSFC 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.
4. Many of our most established fishing clubs have a focus on fishing for large pelagic species such as marlin, tuna, and sharks. In recent years our membership has expanded beyond the traditional deep sea angling clubs to include many local clubs targeting inshore species.

Background

5. From the introduction of the report: The government is concerned that the “complexity, cost, and uncertainty of the current regime, along with poor incentives for development, are impeding aquaculture growth. No new space has been created under the 2004 aquaculture reforms and it is unlikely that any new space will be created for several more years. The ability to research and innovate is being stifled by inflexible rules that limit the ability to advance new technologies and higher value species. This represents a significant opportunity cost in terms of lost aquaculture development and income.” A Technical Advisory Group (TAG) was established to provide the government with a report with recommendations “to enable the development of sustainable aquaculture in New Zealand.”
6. We have seen a number of very good submissions that respond to the TAG report in detail. NZSFC support the option4 submission and wish to make some specific points about the reforms and the proposals in the report.

Consultation

7. The TAG report makes no mention of consultation with recreational users of the marine environment. There is an impression given throughout the process to date that aquaculture reforms will be made, it is just a matter of how far they go. The people who have participated and contributed to the development of proposals are part of the aquaculture or seafood industry or Iwi, all with a vested interest in increasing space available for aquaculture and reducing costs. If the reforms are to have credibility with New Zealanders as a whole the Ministry and the Government need to show that they are taking a balanced approach to development in the marine environment and they will listen to public concerns.
8. Anyone who has had an interest in fisheries for a while can recall the boom and bust cycle of numerous commercial fisheries. It is not good for the country or aquaculture to swing too far in favour of expansion before the full impact on the environment and other marine users can be assessed. We do not support reforms that could lead to a gold rush mentality, where companies scramble to claim large areas of public space just so they can sub-lease it to hard working individuals who take all the financial risk in marine farming. The marine environment can be a tough place to run a business. Extreme weather, predation, algal blooms and the spread of introduced organisms are almost impossible to predict or control. There must be a staged and measured approach to aquaculture development.
9. The Minister has acknowledged that a key issue in the next few years will be a “race for space” in the marine environment. One of the safeguards proposed for public access are recreational only fishing areas. NZSFC submit that MFish must progress recreational only areas so that we do not get left behind other by claims made on marine space by other interests.
10. We support the creation of the National Policy Statement & National Environmental Standard. Non-commercial fishing and environmental groups must be involved in the development of these. It is crucial that the policy and standards require a credible and balanced approach to development and are not used as a rubber stamp for environmentally risky developments.

Aquaculture exclusion areas

11. Large scale aquaculture changes the nature and usability of an area. There are existing users, including our members, who would be impacted by aquaculture development. Some areas of particularly high aesthetic or recreational value must be protected. Councils must retain the ability, through their plans, to prohibit aquaculture in specific areas.
12. Areas of particular concern to members of the NZSFC are high use recreational fishing areas. These are generally near population centres or popular holiday destinations. Sheltered waters around bays, headlands and islands are often prime recreational fishing locations. It is the same natural shelter that makes them favoured sites for some forms of aquaculture. Marine farms must be sited away from prime recreational fishing locations.
13. Marine farms definitely change the nature of the seabed beneath them. Already productive ecosystems need to be protected. Reefs are natural fish attractants with high biodiversity. Marine farms should not be sited over reefs, rock or hard ground. (the same applies to guts or wells deeper than the surrounds). Marine farms should not be sited over or up current of scallop beds and other important shellfish stocks. Some bays can be identified as key spawning grounds for some species. Fish like snapper spawn in bays especially those with rivers flowing into them. Marine farms must be sited away from these sites. The National Policy Statement & National Environmental Standard needs to provide protection for key habitats and existing uses.
14. The policy and standards also need to help maintain safe anchorages. When it is dark and rough we need navigation routes and channels to be clear, with easy access to safe anchorages.

Finfish Farming

15. NZSFC has some specific concerns around the expansion of farming finfish in sea cages. Cages have to be located in sheltered areas. Often these areas have low current flows. Tonnes of artificial feed, some with antibiotics, are required to maintain growth at high stocking rates. This produces tonnes of waste with the potential of chemical contamination down stream from the farm. The effects on local water quality and the residual build-up in the wild fish stock surrounding the farm site remain a concern for the NZSFC.
16. Also there is a potential bio-security risk using fish feed from outside NZ. The massive fish kills of Pilchards around New Zealand in 1995 were linked to a herpes like virus that was imported to Australian Bluefin Tuna marine farms in feed from California. The virus spread to Australian wild pilchards, which were imported to New Zealand, and eventually our wild pilchard stocks.
17. NZSFC does not support the expansion of high volume low value commercial fisheries for small pelagic species in New Zealand. The pilchard, anchovy and sprat populations are vital links in the food chain for other species of fish, birds and marine mammals. The small pelagic species should not be used as cheap feed stock for fish farms.

Conclusion

18. The TAG report details the administrative and structural changes which would allow increased use of public space for aquaculture. It is crucial that the National Policy Statement & National Environmental Standard require a credible and balanced approach to development and a process that will protect important aspects of our marine heritage some of which we address in this submission. Non-commercial fishing and environmental groups must be involved in the development of the National Policy Statement & National Environmental Standard.