

Review of Sustainability Measures and Other Management Controls for 1 October Fish Stocks

Initial Position Paper

SUBMISSION RE TREVALLY (TRE2)

The following submission is on behalf of Zone 5 Fishing Clubs affiliated to the New Zealand Sports Fishing Council Inc., which are in MFish Area 2. These clubs are:

Gisborne-Tatapouri Sports Fishing Club (2259 members)
Mahia Boating & Fishing Club (616 members)
Hawke's Bay Sports Fishing Club (1211 members)
Akitio Boating Club (338 members)
Porongahau Fishing Club (120 members)
Wairarapa Sports Fishing Club (156 members)
Pukemanu Boating and Fishing Club (173 members)
Ngawi Sports Fishing Club (523 members)
Twin Harbours Fishing Club (50 members)
Wanganui-Manawatu Sea Fishing Club (263 members)
Tangimoana Boating Club (198 members)

This represents a total of 6007 recreational fishermen.

The submission is also supported by:

Firmans Marine
Profile Boats
Hamills, Hastings
Guns & Tackle, Napier
Guns & Tackle Charters
Dickey Boats
Standfast Adventures

The above clubs and businesses feel strongly that there should be no increase to TRE2 Total Allowable Commercial Catch. From the information contained in the Initial Position Paper, we have listed what we believe to be the main "Pros and Cons" with respect to increasing the TACC. As can be seen from the "Pros and Cons" listed below, reasons opposing any such increase far outweigh any reason for an increase.

Pros and Cons

Cons:

1. Reference biomass unknown
2. Stock status in relation to unknown biomass also unknown
3. Commercial catch information is the only reliable information.
4. On its own, "catch" is not considered a reliable indication of abundance or stock status.
5. The risk to the TRE2 stock posed by harvesting at the MCY (Maximum Constant Yield) has not been assessed.
6. It is not known if the catches over the last few years are sustainable.

7. Trevally are relatively long-lived and moderately productive. Therefore, they are vulnerable to over-fishing.
8. Recreational catch is unknown. MFish surveys "*may be very inaccurate*", "*may contain methodological errors*" so they are unusable. Hawke's Bay Sports Fishing Club ramp surveys over the last 3 years show a steady decline. Not even one fish per angler per day (see attached). Recreational anglers are a long way short of their daily bag limit.
9. Customary take is unknown.

Pros:

1. Financial benefit to commercial operators associated with increasing the TACC.

Summary

The only justification for increasing the TACC in this IPP is based on the average landings over the last 23 years. During 2004-2007, the landings were grossly above the TACC and the IPP indicates that this gross over-fishing was only done by a small number of operators. This was because the deemed value made it very financially viable to target Trevally without ACE.

The landings in those three years grossly distort the average and if you drop those three years down to the TACC (241T), the average reduces to 245.9T which would indicate that the TACC is currently set pretty well on the mark at 241T.

To have three operators grossly over-catching by 176T (2005-2006) is by no means accidental, and to use this as a reason to increase the TACC is offensive to the recreational sector, and we would imagine, to Customary as well.

It is interesting that this IPP uses average catch history as justification to increase the TACC. If the same justification was applied to other species, eg Gurnard, the TACC for that species would be reduced and therefore the by-catch of Trevally would also decrease which would bring the mixed fishery TACC more into balance.

Option 1 - In our view, Option 1 is the only viable option available. It is good to see that Recreational and Customary are allowed for at last. This recognition has raised the TAC in effect by 108T.

Option 2 is based on the greed of a small number of fishers blatantly abusing the fishery. These fishers have already gained financially when they sold the over-caught fish. To reward them further by increasing the TACC would be morally unjust. It is also more than coincidental that these same operators are using large, high horse-powered vessels on the inshore fishery with total disregard to the fishery or any other users, including their colleagues. This very damaging practice has to be addressed sooner rather than later. As already mentioned, if you drop the three years of abuse in 2004-2007 down to the TACC (241T), the average landings reduce down to 245.9T which is very close to the current TACC. The IPP also notes that the proposed increase "*might be sustainable in the medium term*". We think this fishery deserves better than a guess.

Option 3 – we agree with MFish that this option is the least desirable and we note that it suggests "*this option would pose substantial risks to sustainability*". Option 3 in our opinion is simply not an option. We wonder why this option was even placed before us.

It is a *"key responsibility of Government to provide for user interests fairly"* (Area 2 Aquatic Environment pg 18). Our Ramp surveys indicate this is not happening.

It is encouraging to see that more research information will be available in 2011 and the deemed value on TRE2 is being reviewed. It would make sense to review the TRE2 harvest after these results.

It is noticed that more fish receivers are also now retailing wet fish. Whilst this increases profits (which we have no problem with), it also makes deeming fish more attractive (which we do have a major problem with). Deeming is undermining the Quota Management System and needs to be abolished.

There is an option to replace deeming as we see it and this to take it off the following year's ACE as the fish has already been taken out of the sea.

The TACC should be exactly that – **TOTAL** Allowable Commercial Catch.

Wayne Bicknell
Zone 5 Delegate to NZSFC Management Committee

On Behalf of Zone 5 Clubs and listed local fishing/boating businesses