

9 August 2013

Inshore and Deepwater Fisheries Management
Ministry for Primary Industries
PO Box 2526
Wellington 6-11
FMsubmissions@mpi.govt.nz

Stocks for review – October 2013

1. This submission is from Te Ohu Kaimoana Trustee Limited (Te Ohu Kaimoana) in its role as corporate trustee of Te Ohu Kaimoana Trust. Te Ohu Kaimoana Trust was established under the Maori Fisheries Act 2004 to advance the interests of iwi individually and collectively, primarily in the development of fisheries, fishing and fisheries-related activities.

Deepwater stocks

2. Te Ohu Kaimoana (Te Ohu) is a shareholder of the Deepwater Group Limited (DWG). We support the submission made by the Deepwater Group (DWG) on LIN5, ORH3B, and SC12. In summary, the DWG and Te Ohu Kaimoana support the MPI proposition for:
 - an increase in the LIN5 TACC from 3,595 t to 3,955 t;
 - an increase in the ORH3B TACC from 3,600 t to 4,500 t; and
 - an increase in the SC12 TACC from 100 t to 133 t.
3. With respect to HOK1, LIN6 and LIN7 Te Ohu Kaimoana supports the following.

Hoki 1

4. Te Ohu supports an increase of 20,000 t. This support is based on clear information that shows the stocks biomass is increasing with both stocks projected to remain within the management target range with catch increases of up to 30,000 t.

Ling 7

5. Te Ohu supports an increase in the TACC. The 2013 stock assessment for LIN7 estimates that the total biomass of the stock is significantly above the level of the maximum sustainable yield and the management target of 40% B_0 . MPI notes that at present catch limits, catches regularly exceed the catch limit by 10% in LIN7 and with the proposed catches in the HOK1 TACC, the potential for catches to further exceed the TACC for LIN7 increases further.
6. We are aware that concerns amongst some quota owners exist about the sustainability of this stock and whether it is appropriate to increase the TACC. This could well arise from the fact that there are two fisheries, one which is a bycatch fishery of the hoki fishery, the other involving smaller vessels targeting ling using trawl and longline methods. MPI states that the catch from smaller vessels has gradually increased since the early 2000s making up nearly 50% of the catch in 2011/12. The catch from the hoki target fishery has varied over time in relation to the hoki TACC. It is not clear what effect increased take as a result of the hoki fishery will have on the ling target fishery. This matter, along with the clear uncertainty in the model used to estimate B_0 , should be taken into account in the next review scheduled for 2016.

Ling 6

7. Te Ohu supports retaining the current TACC. The 2013 stock assessment for LIN5 and LIN6 (LIN5 and Sub-Antarctic LIN6 are assessed as the same biological stock) estimates that the stock is significantly above the level that will produce a maximum sustainable yield (which is 40% B_0) at 70% B_0 . According to MPI the stock assessment the relatively high stock size and the light exploitation to date suggest that a TACC increase would be sustainable. The scientific advice provided to MPI suggests that a somewhat precautionary TACC increase in the vicinity of 10% would not adversely affect the stock sustainability.
8. We note that LIN 5 and 6 are understood to be one stock. We support the proposed increase for LIN 5 to 3955 t. However we also understand that LIN6 has only ever been lightly fished and that this situation is not likely to change. The stock has not been fished to the TACC level for the last 8 fishing years. If fishing companies and quota holders are unlikely to access an increased TACC, an increase doesn't appear necessary, particularly if it results in an oversupply of ACE combined with an increase in levies for quota owners.

Inshore stocks

Leatherjacket 3

9. The option for change put forward is to increase the TACC from 100 to 130 tonnes, with an increase of 6 tonnes for other sources of fishing related mortality. Te Ohu supports this increase.
10. The fishery is primarily a by-catch fishery and the current TACC has been exceeded in the last four years. Where the TACC is exceeded fishers have to pay deemed values. Essentially it would provide for current levels of catch. MPI considers that catches at this level are relatively cautious. The proposed increase is unlikely to result in increased fishing effort but will mean the commercial sector can gain greater value from the fishery.

Kingfish 7

11. The option for change put forward is for an increase to the TAC from 21 to 41 tonnes. This includes an increase in the TACC from 7 to 15 tonnes; an increase to the allowance for other sources of mortality from 2 to 4 tonnes; an increase in the recreational allowance from 10 to 20 tonnes and no change to the customary allowance. Te Ohu supports an increase in the TACC to cover the current commercial catch (7 to 15 tonnes). We recommend any increase in the recreational allowance be conditional on a commitment from the sector to report their catch.
12. The proposed increase to the TACC will provide for current levels of commercial catch – which, as part of a by-catch fishery - can't be avoided, and decrease costs to the commercial sector.
13. By way of background, and in relation to the recreational fishery, Te Ohu wishes to remind MPI of the concerns we expressed in 2003 about the primacy given to recreational fishing over ITQ when kingfish were introduced into the QMS. A portion of the ITQ in all fisheries is allocated to iwi under the Fisheries Settlement, which settled their claims to fisheries. This priority was based on a view that the recreational sector valued the fishery most. As a result of this policy, this commercial fishery is now managed as a bycatch fishery.
14. A related aspect to this is the fact that the information provided by the recreational sector is less robust than that provided by the commercial sector. We have submitted for many years that more needs to be done to improve management in the recreational sector by developing:
 - clearer means of restraining catch where needed (rights go along with responsibilities)
 - a better means of obtaining catch information as a basis for monitoring the sector's impact on the fishery, primarily through catch reporting.

15. We note there is already a greater requirement on the customary sector to report than the recreational sector, and also note that efforts are being made by iwi in different parts of the country to streamline their own reporting processes in the interests of better management. While in this fishery, survey results suggest that the recreational catch has increased significantly from the current 10 tonne allowance, we consider that greater responsibility should rest with the recreational sector to report its catch – particularly in a fishery such as this where they have been given greater priority.

Snapper 7

16. The option for change put forward proposes an increase to the TAC from 306 tonnes to 357 tonnes. This includes an increase to the TACC from 200 – 220 tonnes (10%), an increase in the allowance for other sources of fishing related mortality to 22 tonnes (10% of the TACC); retention of the customary allowance of 16 tonnes, an increase in the recreational allowance from 90 – 99 tonnes. In addition this option proposes an increase in the daily bag limit for snapper in the Marlborough Sounds from 3 to 5 (within the wider Challenger bag limit of 10).

17. Te Ohu:


- supports the proposed increase in the TACC
- supports the proposed increase in the recreational allowance (subject to comments below)
- recommends the increase to the daily bag limit be subject to a greater requirement to report (including charter boats)
- note the retention of the customary allowance is based on a lack of information but better information on catch could well lead to an increase.

18. The increase in the commercial catch reflects current catch in a mixed fishery. The proposed increase will continue to enable the stock to move towards B_{msy} – albeit over a longer timeframe. An overall increase can be shared by the recreational sector however we note the comments made by MPI about poor information on recreational harvest and recommend the sector commit to a reporting regime as part of any increase. Such a regime could be trialled within the Marlborough Sounds as a condition of an increased bag limit. We note that for the wider area, a daily bag limit of 10 fish appears generous.

19. Alan Riwaka will already have forwarded a submission from Te Ohu on OYS 4.

20. Please don't hesitate to contact me if you need to clarify anything.

Naku noa, na



Kirsty Woods
Manager, Fisheries Leadership