

27 June 2014

Inshore Fisheries Management  
Ministry for Primary Industries  
PO Box 2526  
WELLINGTON 6011

## **RE: Proposed management measures relating to the introduction of the common Hagfish into the QMS on 1 October 2014.**

### **Introduction**

1. The Ministry for Primary Industries (MPI) is seeking tangata whenua and stakeholder views on the proposed management measures for common hagfish *Eptatretus cirrhatus* following the species' announced introduction into the Quota Management System from 1 October 2014.
2. This submission is from Te Ohu Kai Moana Trustee Ltd (Te Ohu) in its role as corporate trustee of Te Ohu Kai Moana Trust. Te Ohu Kai Moana Trust was established under s.31 of the Maori Fisheries Act 2004. The purpose of Te Ohu Kai Moana Trust is to advance the interests of Iwi individually and collectively, primarily in the development of fisheries, fishing, and fisheries-related activities, in order to:
  - ultimately benefit the members of Iwi and Maori generally
  - further the agreements made in the Deed of Settlement and to assist the Crown to discharge its obligations under the Deed of Settlement and the Treaty of Waitangi
  - contribute to the achievement of an enduring settlement of the claims and grievances referred to in the Deed of Settlement.

### **The Proposal**

3. We note there are a number of options throughout the document for which MPI are seeking comment. We have addressed each of these separately:
  - Level of TAC and TACC
  - Appropriate Deemed Values
  - Participation in the development of a management strategy

### **Total Allowable Catch/Total Allowable Commercial Catch (TAC/TACC)**

4. Regarding the levels of TAC, Te Ohu Kaimoana prefers Option 1.

5. We consider the industry has proven itself to be stable after 7 years of sustained catch history for Hagfish to justify the higher TAC/TACC. We consider that proven catch history, coupled with stringent reporting requirements that could be described in a management strategy, would provide decision makers with more information with which to base future decisions on TAC/TACCs and deemed value levels.

### **Deemed Values**

6. MPI is proposing 3 options for setting deemed value rates for common hagfish stocks. Te Ohu Kaimoana supports the adoption of Option 1.
7. We do not consider it is necessary to have different deemed values depending on the nature of the hagfish (frozen or live) when it is landed. Setting a lower deemed value rate will encourage fishers to land their catch and improve reporting accuracy. Further, given the relatively low port prices being seen for Hagfish, and the distinct lack of accurate data on catch levels, it is difficult to justify a high price for deemed values. Te Ohu is concerned that MPI should not obstruct development in this fishery by setting a higher rate for deemed values, when there is no scientific basis to justify this.

### **Sixth Schedule**

8. Te Ohu supports adding hagfish to the Sixth Schedule of the Fisheries Act 1996. Given the nature of the specific fishing method using pots, it is likely that the majority of those fishers who are catching hagfish, are indeed targeting them, rather than higher incidental levels of by-catch being seen. The consultation document notes that hagfish is a by-catch of ling, rock-lobster and scampi fisheries, but only in nominal quantities. It would serve no purpose to impose unnecessary costs on these fishers by requiring them to land all hagfish catch where in many cases it could be returned to the sea provided it is live and is considered likely to survive.

### **Management Strategy**

9. Te Ohu Kaimoana supports the initiative to develop a management strategy for the ongoing management of hagfish. We would seek representation on such a group as representative of 20% of quota owners. Te Ohu considers one of the primary purposes of a management strategy would be to identify information gaps that will allow industry and MPI to make informed fisheries management decisions for hagfish. The strategy could also describe reporting requirements, and require MPI to conduct in depth analysis of catch data (in the absence of any current science) and CPUE to inform future sustainable levels for the TAC and TACC.
10. Please contact Graeme Hastilow of this office ([Graeme.Hastilow@teohu.maori.nz](mailto:Graeme.Hastilow@teohu.maori.nz)) if you wish to discuss this submission.

Naku noa, na



Kirsty Woods  
Manager, Fisheries Leadership