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Tena koe

INITIAL POSITION PAPER ON MANAGEMENT OF SOUTHERN BLUEFIN TUNA

This submission is from Te Ohu Kaimoana (Te Ohu) in response to the Ministry of Fisheries' (MFish) Initial Position Paper (IPP) dated 10 November 2010.

Executive Summary

This submission addresses Total Allowable Catch (TAC) levels and sector allocations for Southern Bluefin Tuna (STN1) in the same order set out in the MFish IPP. They include:

A. **Short-term options** for the current year (i.e. 2010/11) which are to either:

1. Set the TAC at 420t¹ and allowances as follows:
 - Customary 1t, recreational 4t, other 2t and
 - TACC 413t and 444.213t of in-season ACE or
2. Set the TAC at 539t and allowances as follows:
 - Customary 1t, recreational 8t, other 3t and
 - TACC 558t including 114 of in-season ACE or
3. Set the TAC at 597t with the following allowances:
 - Customary 1t, recreational 8t, other 3t and
 - TACC 616t including 172t of in-season ACE

Te Ohu supports option 3 for the 2010/11 fishing year

B. **Medium-term options** for the next fishing year (i.e. 2011/12) which are to either:

1. Set the TAC at 420t² and allowances as follows:
 - Customary 1t, recreational 4t, other 2t and
 - TACC 413 including 444.213t of in season ACE
 - with voluntary arrangement to limit commercial catch or
2. Set the TAC at 308t and set the allowances as follows:
 - Customary 1t, recreational 3.5t, other 1.5t and TACC 374t
3. Either option above could be combined with a change to the fishing year for STN1 to align domestic and international management systems.

¹ Retain the status quo based on 2008/09 levels

² *ibid*

Te Ohu supports option 1 along with a change to the fishing year subject to industry providing suitably robust systems within the necessary timeframe.

Background and Context

1. Sustainability and stock status

- The international management body known as the Commission for the Conservation of Southern Bluefin Tuna (CCSBT) has a goal to manage global catch to achieve a spawning stock biomass of 20% - which is considered a sustainable level.
- Spawning stock biomass and recruitment can be used to estimate the status of the stock and model projections about its future based on a range of harvest strategies.
- Scientific advice suggests spawning stock biomass is very low (i.e. less than 5% of unfished spawning stock biomass).
- Therefore the CCSBT proposes to reduce global catch limits to more sustainable levels.

2. International Management and Historic Catch Levels

- The rate at which the reduction occurs is central to balancing the economic benefits that countries can obtain with the aim of rebuilding stock biomass to the desired level.
- Key players at the international level include Australia and Japan who harvest the lion's share followed by Korea, Taiwan, Indonesia and lastly New Zealand who harvests at significantly lower levels (see figure 1).

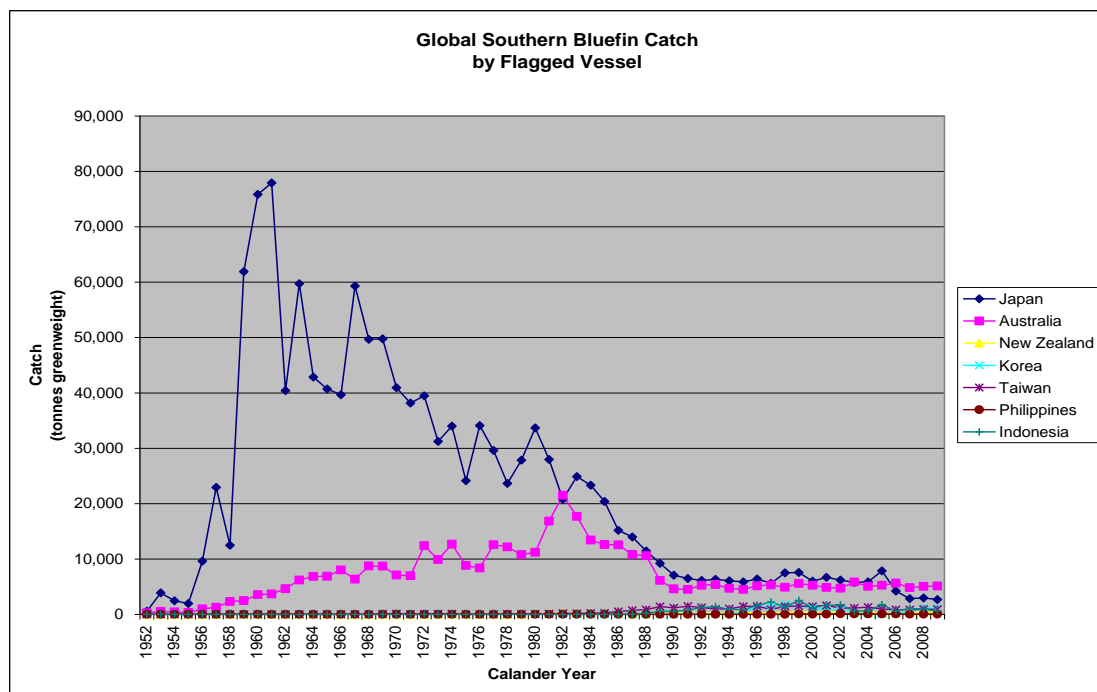


Figure 1: Adapted from www.ccsbt.org: Note reviews of southern bluefin tuna data presented to a special meeting of the Commission in 2006 suggested that the catches may have been substantially under-reported over the previous 10 to 20 years. The data presented here do not include estimates for this unreported catch.



3. *Economic Value of the Southern Bluefin Fishery*

- STN is a valuable fishery worth approx \$1.3 billion globally.
- New Zealand's component is estimated at about \$10 million.
- Iwi interest resulting from the Fisheries Settlement is approximately 20% of this collectively.

4. *New Zealand's Management and Historic Level of Catch*

- New Zealand is at the extreme eastern geographical limit of this species range (Figure 2) making our contribution to the fishery relatively small on a global scale and this highlights the need for New Zealand to be part of the globally agreed management measure to protect the sustainability of this stock.
- During the late 50's New Zealand employed Japanese foreign licensed vessels (i.e. a charter fleet) to harvest STN within our zone but this was phased out over a 15 year period following the declaration of New Zealand's EEZ in 1979 (Figure 3).
- Southern Bluefin Tuna entered the QMS on 1 October 2004 with a single stock management area (STN1).

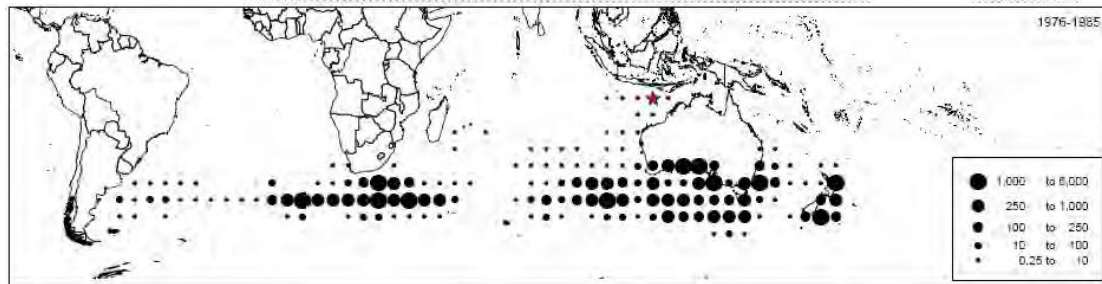


Figure 2: Geographical distribution of average annual southern bluefin tuna catches (t) by CCSBT members and cooperating non-members by oceanic region. The area marked with a star is an area of significant catch in the breeding ground. Source adapted from CCSBT 5th Meeting Report 11 September 2010.

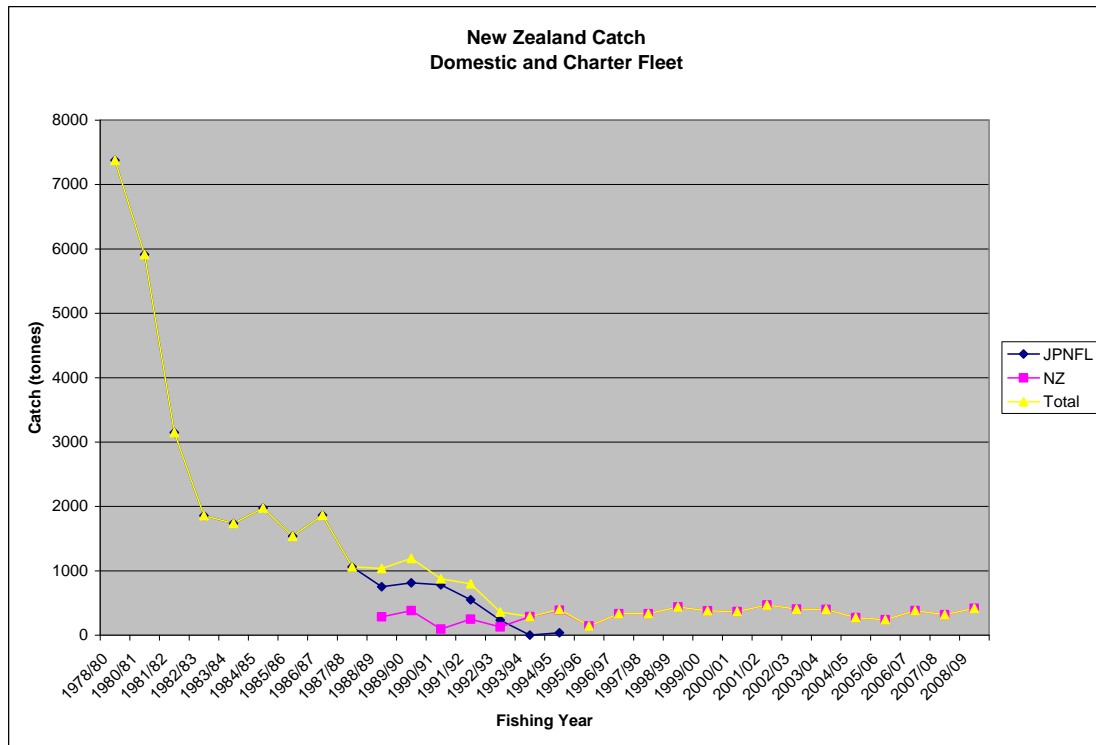


Figure 3: Adapted from MFish Plenary. While the yellow line shows the total NZ harvest the blue line represents that part of NZs harvest that was caught by Japanese Charter vessels while the pink line represents the domestic fleet catch levels over time.

Key Issues to be dealt with internationally and at home

5. Global efforts to ensure sustainability

- We support the the CCSBT decision to reduce global catch to achieve a spawning stock biomass of 20%.
- We are aware that some NGOs and one country¹ would prefer an immediate nil take of STN to improve global sustainability at the fastest possible rate.
- However unless all participating countries agree to such a measure New Zealand would simply lose our share of the global fishery to other countries seeking to increase their shares and remove ourselves from influencing the management regime.
- It is also highly unlikely to be agreed by all participants and is therefore a proposal that holds no credibility with the CCSBT.
- Because New Zealand is at the extreme eastern limit of the stock range we already have a relatively small catch and influence over the way the stock is managed. It is therefore critically important that New Zealand acts in unison with the CCSBT management process in our best endeavours to provide good quality information and advice along with other countries that participate in the CCSBT.

³ The IPP mentions that one of the countries participating in the CCSBT would prefer to see a nil take of STN but it does not state which country it is



6. *Achieving and implementing a country allocation for New Zealand*

- In October 2009 the CCSBT allocated New Zealand a country allocation of 754t. However because of a Memorandum of Understanding that was entered into between New Zealand, Japan and Australia at the first meeting of the CCSBT in 1994 New Zealand's shares have been reduced to an effective catch limit of 570t for the two year period between 2009/10 and 2010/11.
- During the 2008/09 fishing year MFish set a conservative TAC of 420t knowing that the CCSBT was yet to meet and decide on country allocations after the beginning of our fishing year which starts on 1 October. Once the allocation was set MFish then provided the opportunity for an in-season increase to enable fishers to realise the increase in New Zealand's shares consistent with the decisions of the CCSBT. This therefore provided for additional in-season ACE to be issued and caught after the beginning of the fishing year.
- In addition, in October 2009 the CCSBT also agreed to reduce global catches by an average of 20% from 11,801t to 9,449t in each of the next two fishing years (i.e. 2009/10 and 2010/11) to reduce the risk of a stock collapse.
- The overall catch reductions are coupled with other measures designed to improve management and control of the fishery including an agreement to adopt a science based management procedure that will be used to set future catches. Importantly in the event that the management procedure can not be used a default global reduction of between 5,000 and 6,000 has been agreed.
- The consequences of such a reduction for New Zealand can be anticipated based on the pro-rata reductions already discussed by the CCSBT. Therefore New Zealand would be wise to set the TAC for future years (i.e. the medium term) at a conservative level reflecting the worst case scenario but still allow for the additional shares to be realised in-season if the default is not triggered.
- To achieve this MFish have proposed that the domestic management measures are tackled from both a short and medium term perspective to assist with implementing the decisions of the CCSBT domestically.
- The short term approach (i.e. setting the TAC and allocations for the 2010-11 fishing year) contains three options which effectively either maintain the status quo or increase the amount of STN that can be taken by both the commercial and the recreational sector. However, all of these options are consistent with the measures agreed to by the CCSBT for the 2009-10 fishing year.
- The medium term approach (setting the TAC and allocations for the 2011 fishing year and beyond) provides two set of options (both of which are also consistent with New Zealand's country allocation under the CCSBT) with the addition of a change to the fishing year for STN to align implementation of domestic management measures more closely with the decisions of the CCSBT in the future (i.e. from 2010-11 onwards).

7. *Allocating New Zealand's share domestically amongst the sectors*

- We note that the CCSBT have established a system that allocates nominal shares of the global fishery to participating countries and then allocates a tonnage to each country on a pro-rata basis to achieve the desired rebuild.
- However, domestically we have not achieved a similar standard of pro-rated allocations between the sectors.
- Te Ohu Kaimoana supports a pro-rated system of allocations amongst the domestic fishing sectors with a view to constraining catch in the future if needed or alternatively increasing catch among the sectors on the same basis.

8. *Conclusions*

- We agree with the proposals to increase the commercial shares in both the short and medium term in conjunction with a change to the fishing year.
- We also support the provision for the industry to implement voluntary measures – if there is sufficient time to do so prior to the start of the 2011/12 fishing year.

Thank you for the opportunity to comment on the IPP. We are happy to discuss any questions that you may have in relation to this submission at the earliest possible opportunity.

Naku noa, na,

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