



Te Ohu Kaimoana's response to the review of sustainability measures for the 1 October 2024/2025 fishing year



Contents

- This is our response to this year's sustainability review 3**
- Tāmure | Snapper (SNA8) 5**
- Tāmure | Snapper (SNA7) 6**

This is our response to this year's sustainability review

1. E te Minita, tēnei te mihi ki a koe i tēnei āhuatanga o te wā. This document provides Te Ohu Kaimoana's advice for your review of the sustainability measures for October 2024/25. We invite Fisheries New Zealand to discuss the contents of this response with us, kanohi ki te kanohi.
2. Our role in this review process arises from our responsibility to protect the rights and interests of Iwi/Māori and to assist the Crown to discharge its obligations under both Te Tiriti and the Deed of Settlement¹. We note in particular that Te Tiriti guaranteed that Māori would maintain tino rangatiratanga over our fisheries resources, the need for both parties to work toward furthering the fisheries settlement, and the requirement to interpret and use powers under the Fisheries Act in a manner consistent with the fisheries settlement². Our response to the sustainability round and the fisheries management measures proposed by Fisheries New Zealand (FNZ) are shaped by the following:

Te Ao Māori centred fisheries management

3. Te Hā o Tangaroa kia ora ai tāua translates to the 'breath of Tangaroa sustains us'. Māori rights in fisheries are not just a right to harvest but also to use the resource in a way that provides for social, cultural and economic wellbeing now, and for future generations. Te Hā o Tangaroa kia ora ai tāua, the basis for our advice, does not mean that Māori have a right to use fisheries resources to the detriment of other children of Tangaroa: rights are an extension of responsibility. It is an expression of the unique and lasting connection Māori have with the environment and contains the principles we use to analyse and develop modern fisheries policy, including the positions we have provided in this response.

Protection of the settlement

4. Any regulatory decision that may potentially undermine the settlement is a cause for concern. One of the purposes of Te Ohu Kaimoana is to protect and advance the interests of Iwi to ensure that the fisheries settlement endures, and so assisting the Crown to ensure that regulatory decisions do not diminish the value of settlement assets would be captured within our statutory role³.

Māngai and tautoko for Māori interests

5. We work on behalf of 58 Mandated Iwi Organisations⁴ (MIO) who represent iwi throughout Aotearoa. We also support the Asset Holding Companies (AHCs) who hold Māori Fisheries Settlement Assets on behalf of their MIOs.

¹ Māori Fisheries Deed of Settlement 1992. The Deed is, in part, given effect to by the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992 and the Māori Fisheries Act 2004. The Ohu Kaimoana's statutory purpose is set out in s 32 of the Māori Fisheries Act 2004.

² See Article 2 of te Tiriti o Waitangi, s 32(b) of the Māori Fisheries Settlement Act 2004, and Fisheries Act 1996, s 5.

³ Notes 32(d) of the Māori Fisheries Settlement Act 2004.

⁴ MIO as defined in The Māori Fisheries Act 2004: in relation to an iwi, means an organisation recognised by Te Ohu Kai Moana Trustee Limited under section 13 (1) as the representative organisation of that iwi under this Act, and a reference to a mandated iwi organisation includes a reference to a recognised iwi organisation to the extent provided for by section 27.

Those assets include Individual Transferable Quota (ITQ) and shares in Aotearoa Fisheries Limited (trading as Moana New Zealand), which owns 50% of Sealord Group Limited.

Our response to this year's sustainability review

6. We do not intend for our response to conflict with or override any response provided independently by Iwi, through their MIOs or AHCs.
7. In developing our response, we sought input from the Māori owned fishing entities, Moana New Zealand and Sealord Group Limited.
8. There are 18 stocks being considered as part of the 2024 sustainability review. We have provided positions on snapper (SNA7/8) and the associated measures we deem as pertinent to our purpose to protect and enhance the Deed of Settlement.

Tāmure | Snapper (SNA8)

Our view

- We support option 4 for SNA8

Proposed Options

Table 1: Proposed management options (in tonnes) for SNA 8 from 1 October 2024.

Option	TAC	TACC	Allowances		
			Customary Māori	Recreational	All other mortality caused by fishing
Option 1 (<i>Status quo</i>)	3,065	1,600	100	1,205	160
Option 2	3,505 (↑ 440)	2,000 (↑ 400)	100	1,205	200 (↑ 40)
Option 3	3,637 (↑ 572)	2,120 (↑ 520)	100	1,205	212 (↑ 52)
Option 4	3,769 (↑ 704)	2,240 (↑ 640)	100	1,205	224 (↑ 64)
Option 5	4,165 (↑ 1,100)	2,600 (↑ 1,000)	100	1,205	260 (↑ 100)

Our approach

Estimates of current and future state enable increased utilisation

9. West coast snapper biomass has been increasing in a manner whereby current settings for SNA8 inhibit the sustainable use of fisheries resource. The 2024 stock assessment indicated a 30% increase in spawning biomass since 2021, with an expectation of rapid growth in the stock. This continued increase in biomass provides a substantial utilisation opportunity.
10. Projections indicates it will exceed fishing mortality target for the first 3 years, but biomass growth from recent recruitment will balance to meet the management target over the 5-year projection.
11. The SNA8 fishery is described as a “choke” fishery. Fishers actively adapt their practise to avoid catching snapper due to a limited amount of fishable ACE available.
12. The proposed options 1 & 2 would be a missed opportunity to give relief to west coast fishers. As scientific models project rapid and continued growth in the stock, this underutilisation will further burden west coast fishers who already are actively avoiding snapper while harvesting species such as gurnard, John dory, and tarakihi.
13. Option 4 will provide the ability to balance unavoidable snapper bycatch sustainably. Given that we can ensure sustainability because of the confidence in the stock assessment, we support increasing the TACC to 2240 tonnes.
14. The high payment of deemed values is indicative of a need to increase the TACC due to an increase in SNA8 abundance. We support a review of deemed values without delay as these currently do not adequately reflect the sustainability status and economic factors of the stock.

15. This increase will simply give relief to fishers, rather than altering or increasing fishing behaviours and the relative fishing footprint.
16. We support a review of this stock within 3 years, to confirm the recruitment rate that has been projected is most appropriate.

Providing for customary use

17. We support maintaining the customary allowance as its current levels. In 2021 there was an increase from 45t to 100t and to the best of our knowledge, this is still at appropriate levels to support our kaitiaki in their aspirations and use of pataka in their rohe.

Tāmure | Snapper (SNA7)

Our view

- We support option 3 for SNA7

Proposed Options

Table 1. Proposed management options (in tonnes) for SNA 7 from 1 October 2024.

Stock	Option	TAC	TACC	Allowances		
				Customary Māori	Recreational	All other mortality caused by fishing
	Option 1 (<i>Status quo</i>)	768	450	30	250	38
SNA 7	Option 2	1,311 (↑543)	900 (↑450)	60 (↑30)	275 (↑25)	76 (↑38)
	Option 3	1,445 (↑677)	1,000 (↑550)	60 (↑30)	300 (↑50)	85 (↑47)

Our approach

Integrated stock management

18. SNA7 is being reviewed together with FLA7 and ELE7 as part of the inshore mixed trawl fishery. Though our response below pertains only to the snapper stock, it considers the complex relationship of this mixed fishery.
19. We acknowledge a small degree of connectivity between the SNA7 and SNA8 stocks due to a mutual area of interest along the Southern Taranaki Bight and Kapiti Coast. Models were run to consider their relationship, giving confidence in the TAC increase for both stocks along the entire west coast.
20. As described previously, fishers actively adapt their practise to avoid catching snapper due to a limited amount of fishable ACE available compared to the abundance of stock. Option 3 provides an ability to balance unavoidable snapper bycatch sustainably.

Providing for customary use

21. We support the consideration of an option that provides for increased customary use in line with the aspirations of kaitiaki to increase the use of Pātaka kai in their rohe.