

Phil Appleyard
President
NZ Sport Fishing Council
PO Box 207-012
Hunua 2254
secretary@nzsportfishing.org.nz



Offshore Fisheries Management
Ministry for Primary Industries
PO Box 2526
Wellington 6011
FMSubmission@mpi.govt.nz

4 August 2017

NZ Sport Fishing Council submission on the National Fisheries Plan for Highly Migratory Species

1. THE SUBMITTERS

- 1.1 The New Zealand Sport Fishing Council and supporters of our public outreach LegaSea, (the submitters) appreciate the opportunity to submit feedback on the *Discussion Paper No: 2017/27 National Fisheries Plan for Highly Migratory Species*.
- 1.2 The Ministry for Primary Industries (MPI) released the Discussion Paper on 4 July 2017 and submissions are due by 12pm 4 August 2017.
- 1.3 The New Zealand Sport Fishing Council is a National Sports Organisation with almost 34,000 affiliated members from 55 clubs nationwide and a growing number of contributing supporters to LegaSea. Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this review and would like to be kept informed of future developments. Our contact is Dave Lockwood, secretary@nzsportfishing.org.nz.

2. INTRODUCTION

- 2.1 MPI is consulting on the revision of the [Highly Migratory Species Fisheries Plan](#) which is now seven years old.
- 2.2 The New Zealand Sport Fishing Council (NZSFC) has attended the planning meetings and commented on the Plan at those meetings. The submitters have comments and recommendations to make on Management Objectives 1, 2, 4 and 5 of the Highly Migratory Species Fisheries Plan.

3. HMS FISHERIES PLAN OBJECTIVES

OBJECTIVE 1: Support viable and profitable commercial tuna fisheries in New Zealand

- 3.1 **The NZSFC has supported this objective** throughout the Fisheries Plan process. Profitable tuna fisheries should mean there is less reliance by commercial fishers on swordfish as a target species.
- 3.2 There remains a problem with high value quota species, such as bigeye tuna, that are over allocated. Cost recovery charges on hundreds of tonnes of uncaught quota impose an unnecessary cost to the surface longline sector.
- 3.3 As highlighted in the [NZSFC submission to the Future Of Our Fisheries](#) (FOOF) process, there are a number of problems with the current annual species based cost recovery system that need to be addressed.
- 3.4 **The submitters request** that they are kept informed about progress on the revision of the MPI cost recovery rules and are consulted on proposed changes.
- 3.5 **The submitters note** that MPI's role in supporting the implementation of the Integrated Electronic Monitoring and Reporting System (IEMRS) needs to be included in this Objective and Key Performance Indicators. Given the importance of maintaining consistent and accurate recording of catch during the transition to the new reporting system, MPI needs to include IEMRS implementation across a number of objectives in the HMS Fisheries Plan.

OBJECTIVE 2: Maintain and enhance world class game fisheries in New Zealand fisheries waters

- 3.6 **The submitters support this objective** and reiterate the importance of maintaining the recreational-only status for marlin, for our clubs and game fishers in general.
- 3.7 The gradual encroachment of commercial fishers into billfish fisheries such as swordfish in New Zealand and striped marlin in Australia are clear examples of how, within a relatively short timeframe, incidental bycatch morphs into target commercial fisheries for these species.
- 3.8 NZSFC members also have a particular interest in broadbill swordfish and other billfish species, yellowfin tuna and most recently southern bluefin tuna.
- 3.9 Interest and charter fishing opportunities to fish for Pacific bluefin tuna have waned in recent years. Sportfishing clubs generally discourage the targeting and landing of pelagic sharks these days.
- 3.10 Since the introduction for swordfish into the QMS the surface longline fleet have actively targeted swordfish on occasions. Fishing effort and catch of swordfish by recreational fishers has increased over recent years with the successful use of deep-set daytime baits. Our members continue to report cases of gear conflict with surface longliners on some of the more accessible deep water features, like the Garden Patch and Poor Knights Rise. This issue could be addresses in Annual Operating Plans.
- 3.11 There remains a more pressing unresolved issue with the potential conflict between game fishers and purse seiners around access to skipjack schools. This seems to be more of a problem when fishing for both sectors is hard, as it was in 2017.

- 3.12 **The submitters recommend** that MPI support and assist stakeholders to identify and resolve unsatisfactory fishing interactions between recreational fishers and purse seine fishers working skipjack schools in the Auckland Fisheries Management Area.
- 3.13 The recent development of the recreational southern bluefin tuna fishery from Cape Runaway to East Cape has generated significant interest and fishing effort over a relatively short period. The expansion of the bluefin sport fishery in southern Australia has highlighted the potential opportunities and problems that can occur.
- 3.14 **NZSFC will collate club records** of landed catch and tag and release data from the game fish tagging database and provided that information to MPI.
- 3.15 **The NZSFC will also engage with clubs** to encourage responsible fishing practices and retention rules, while maintaining incentives for recreational fishers to report their catch.
- 3.16 NZSFC members were encouraged that some yellowfin tuna returned to New Zealand waters in 2015 and 2016. However, few of these fish returned to the eastern Bay of Plenty and the 2017 catch was poor.
- 3.17 Yellowfin tuna remain an important fishery in the Southwest Pacific and potentially in New Zealand. Work by the Secretariat for the Pacific Community (SPC) on range contraction of HMS needs to continue. This work shows a clear link between increased commercial catch and reduced availability of many species at the edge of their natural range.
- 3.18 The plan covers maintaining the capacity and integrity of the aquatic environment, habitats and species at levels that provide for current and future use under Objective 4 in the Plan. International management of large tuna species must be improved.
- 3.19 **We submit** that stronger Conservation and Management Measures are required for bigeye and yellowfin tuna in the Western and Central Pacific Fisheries Commission (WCPFC) area.

OBJECTIVE 5: Implement an ecosystem approach to fisheries management, taking into account associated and dependent species

5.1 Recognise value of HMS and their ecosystems, including predators, prey, and protected species.

- 3.20 **The submitters support** the move towards an ecosystem approach to fisheries management that recognises the importance of Highly Migratory Species and their ecosystems, including predators, prey, and protected species.
- 3.21 NZSFC clubs have raised concerns about the amount of **small forage fish being removed by purse seine vessels** in the Bay of Plenty and East Northland, and how this affects the feeding patterns and distribution of HMS and the unknown effects this activity has on seabirds, their young and survival rates.
- 3.22 While migratory species come to New Zealand to find food, searching large areas, it is the availability of forage species that hold the larger fish and help fishers locate areas where fish are most likely to be present.
- 3.23 **We submit** management initiatives under Objective 5 must include forage fish.
- 3.24 **The submitters recommend** that MPI monitor available information in relation to the values of HMS, forage species and their ecosystems.

- 3.25 **We submit** it is not sufficient to have a Key Performance Indicator (KPI) that only states, “No bycatch species’ sustainability is compromised”. Some individual forage species could be heavily fished at sustainable, but depleted levels. It is other dependent species that could be most affected.
- 3.26 **The KPIs for Objective 5 must include** the following statement – Important forage species must not be depleted by commercial fishing.