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NZ Sport Fishing Council submission on the review of management controls for the Snapper 7 fishery (SNA7) for 1 October 2016

Recommendations

1. The Minister increases the Total Allowable Catch to cover the sum of existing use, as follows:
 - a. Increases the Total Allowable Catch (TAC) from 306 tonnes to 490 tonnes;
 - b. Retains the Total Allowable Commercial Catch (TACC) at 200 tonnes;
 - c. Increases the allowance for Maori customary non-commercial interests, from 16 to 20 tonnes;
 - d. Increases the allowance for recreational interests, from 90 to 250 tonnes; and
 - e. Establishes an allowance for other sources of fishing related mortality, at 20 tonnes.
2. The Minister acknowledges that:
 - a. There has been a long overdue increase in snapper biomass in Tasman and Golden Bays based on one or two strong year classes;
 - b. The stock assessment is dominated by commercial fisheries data from Tasman and Golden Bays and does not capture the poor state of snapper stocks in the rest of SNA7;
 - c. The recreational harvest of snapper in Tasman and Golden Bays will have increased and must be allowed for;
 - d. New information on recreational harvest is currently being collected using proven survey methods; and
 - e. There is hope that the stock will continue to recover and new strong year classes will follow. Close monitoring of snapper recruitment and harvest by all sectors will be required to ensure the stock has the best chance of reaching the management target.
3. The Ministry for Primary Industries work with all stakeholders in the SNA7 fishery to develop an appropriate monitoring and management strategy.

NZ Sport Fishing Council - LEGASEA

1. The New Zealand Sport Fishing Council and our outreach LegaSea (the submitters) appreciate the opportunity to submit on the review of management controls for Snapper 7. The Ministry for Primary Industries (MPI) released their Discussion Paper on 10 June 2016 with submissions due by 11 July. Any changes will apply from 1 October 2016.

2. The NZ Sport Fishing Council is a national sports organisation with over 32,000 affiliated members from 57 clubs nationwide. The Council has initiated LegaSea to generate widespread awareness and support for the need to restore abundance in our inshore marine environment. Also, to broaden NZSFC involvement in marine management advocacy, research, education and alignment on behalf of our members and LegaSea supporters. www.legasea.co.nz
3. The submitters are committed to ensuring that sustainability measures and environmental management controls are designed and implemented to achieve the Purpose and Principles of the Fisheries Act 1996, including “maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations...” [s8(2)(a) Fisheries Act 1996]
4. The submitters continue to object to the Ministry’s tight, 21 working day consultation timetable. In our view this timeframe does not allow for adequate consultation, it is particularly offensive for non-commercial organisations such as ours that need to consult with a range of interests and volunteers. This is unacceptable consultation and, in our opinion most likely unlawful as per ss 12 and 13 of the Fisheries Act and as judged by the Court of Appeal¹.
5. NZSFC 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.

Snapper

6. Snapper occupy a wide range of habitats, including rocky reefs and areas of mud and sandy bottom. They are serial spawners, releasing many batches of eggs during spring and summer. Snapper first reach maturity from 20 to 28 cm fork length at 3-4 years of age. Water temperature appears to play an important part in spawning success and subsequent recruitment of legal size fish. Generally, strong year classes correspond to warm years and weak classes correspond to cold years. The snapper from Tasman Bay/Golden Bay (and the west coast North Island) grow faster and reach a larger average size than elsewhere.

Snapper 7 management

7. MPI is reviewing the Total Allowable Catch (TAC), Total Allowable Commercial Catch (TACC) and allowances for Snapper 7 (SNA7). The TACC was reduced from 374 t to 160.3 t in 1990. The stock was thought to be increasing in 1997 and the TACC was increased to 200 t.
8. Commercial snapper catch comes mostly from Tasman and Golden Bays largely from a mixed species trawl fishery, targeting snapper, flatfish and barracouta.
9. A recreational allowance of 90 t and a customary allowance of 16 t was set in 1997 for the first time. The National Panel Survey estimated recreational harvest in the 2011/12 fishing year to be 89 t for SNA7. This was based on about 111,000 fish with an average weight of just 0.8 kg from boat ramp surveys.
10. MPI believe that the recreational snapper harvest has increased significantly since 2011/12. This is in line with the new stock assessment that estimates a threefold increase in biomass in recent years, and early indications from a new harvest survey which shows an increase in the size and number of snapper kept by recreational fishers. The minimum legal size is 25 cm for all methods and recreational daily bag limit is 10 per person, except in the Marlborough Sounds where the daily bag limit is three per person.



¹ International Airport Ltd and Air New Zealand (CA 23/92, 73/92[1993] 1 NZLR 671).

11. The proposed options for the future management of SNA7 follows –

Table 1: Proposed TACs, TACCs and allowances for SNA 7 (all values in tonnes)

Option	Total Allowable Catch	Total Allowable Commercial Catch	Allowances		
			Customary Māori	Recreational	Other sources of fishing-related mortality
Option 1 (<i>Status quo</i>)	306	200	16	90	0
Option 2	545	250	20	250	25

12. Option 2 is for a substantial increase in the total allowable catch (TAC). The commercial catch would increase by 50 t (25%). The largest change would be to the recreational allowance with an increase of 160 t (78%). MPI say this will better align it with estimated recreational harvest and shift the ratio between commercial and recreational fisheries from 70/30 to 50/50. MPI also say:

“The increased recreational share acknowledges not only the change in estimated catches but the relative value of the fishery to recreational fishers which was not provided for while the fishery was more depleted.”

New Stock assessment

13. There has been a large increase in commercial catch rate of snapper, mainly from Tasman and Golden Bays and not Marlborough Sounds, and this is supported by independent NIWA trawl survey data. An ageing study shows a very successful spawning season in 2007 has boosted the population. A stock assessment in 2014 showed a rapid increase in biomass. More information was collected and a new assessment in 2015 came to the same conclusion (Figure 2).

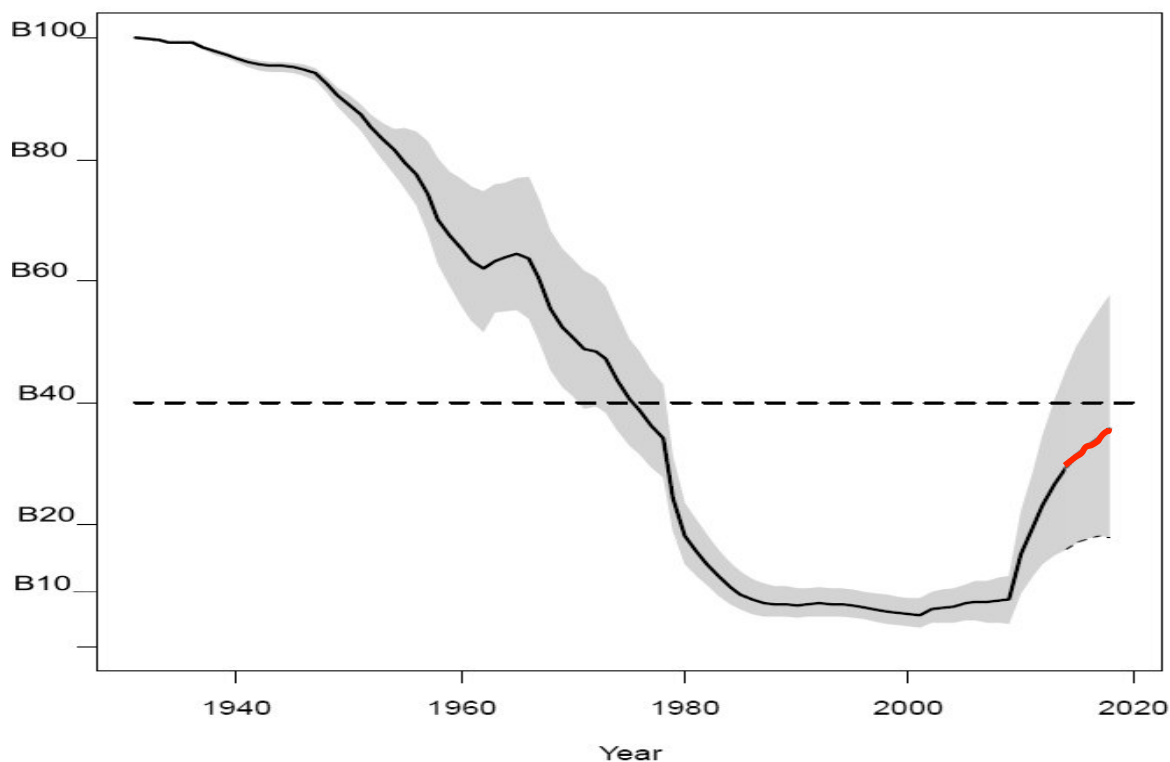


Figure 2: The estimated track of snapper 7 biomass from about 100 % in 1935 to about 29% in 2015. Also shown is the 4 year projected biomass (red) to 2019 and the interim target of 40% (B40).

14. Figure 2 shows this stock was over fished in the 1970s and 1980s. The introduction of the Quota Management System and reductions in the TACC did not rebuild this fishery. In fact, the biomass remained below 10% of the unfished biomass (B10) for 25 years. During this time the commercial catches and catch rate (CPUE) remained stable. **This is a graphic example of sustainable depletion.**
15. The stock assessment model assumes that recreational catch follows the same track as biomass since 1987 and passes through recent harvest estimates. This assumption means that a significant increase in recreational catch over the last 4 years is already factored into the model.

Future management

16. The stock assessment model shows that SNA7 stock has been below the hard limit (B10) for 25 years and predicts a sharp increase in biomass based on one or two strong year classes. Historically recruitment has been fickle in SNA7 and there is no guarantee that the current rebuild will be sustained. The same spawning success and recruitment has not occurred in the Marlborough Sounds. In fact the MPI Snapper Plenary report states that the Marlborough Sounds is a separate stock (Section 6). The assessment is dominated by the catch, trawl CPUE since 1989–90, and recruitment from Tasman and Golden Bays, and does not reflect abundance in other areas of SNA7.
17. The submitters are pleased that, finally, nature has stepped in and restored an important part of the snapper fishery in SNA7. This increase was not due to any management change or change in fishing practice. The quota has been at 200 t for 16 years and the only change in fishing practice was to let pair trawlers back into Tasman Bay.
18. Commercial fishers complain that they are finding it difficult to avoid snapper bycatch when targeting flatfish, red cod, barracouta, gurnard and tarakihi.
19. In a previous IPP figures were given for the commercial fishery which caught 48% of snapper by targeted bottom trawl and bottom pair trawl. Around 52% is “bycatch” mostly from bottom trawls, with small amounts from Danish seining, mid-water trawl and set nets.
20. Moreover, the NZSFC does not accept a TACC increase based on this “bycatch” issue. It is not “bycatch”. These snapper may be classed as unintended, discarded or unmanaged catch, but these operators know the waters they fish and they generally know when and where they catch different species throughout the year, so to suggest this is “bycatch” and they need an increased TACC to cover it is not reasonable. **What commercial operators seem to need is a better catch portfolio to cover what they are likely to catch in Area 7.**
21. The Minister cannot reasonably manage the 200 t SNA7 fishery in isolation of other species with TACCs that do not constrain catch. For example, the TACC for flatfish is 2,066 t, ten times the snapper TACC, and from 2000 to 2014/15 the amount of flatfish caught ranges from 21% to 68% of the TACC. The Red cod (RCO7) TACC is 3,126 t, and from 2000 to 2014/15 catch varied from 40% to 109%. So not only is the RCO7 TACC 15 times larger than the SNA7 quota, it does not constrain commercial effort anyway.
22. In Tasman and Golden Bays the snapper biomass may have been about B29 in 2015 but the same increase has not been reported in Marlborough Sounds or the West Coast where there is limited trawl data. Therefore, the overall SNA7 biomass will be less than the model predicts. **The submitters do not support an increase in the SNA7 TACC at this time.**
23. When there is some certainty that the interim target of B40 can be reached across all of SNA7, that will be the time to revisit the commercial allocation.

Recreational interests

24. Snapper is a very important species in the recreational fishery at the top of the South Island. The National Panel Survey estimated the amateur harvest of snapper was 88 t in 2011/12. The harvest estimates for other species from that survey were 77 t for blue cod, 32 t for trevally, 23 t for tarakihi and 20 t for kingfish. The strong 2007 year class was just starting to show up in the catch as 4 year olds in 2011 and the average snapper weight used in the survey for SNA7 that year was 0.80 kg, the lowest in the country. This is not typical for the area which usually has the highest average weight snapper in amateur harvest surveys – 2.1 to 2.4 kg average weights were recorded in surveys during the 1990s. So even without much increase in the number of snapper caught the amateur harvest will increase as these fish grow.
25. A recent survey conducted by Southwick Associates (Florida) estimates that \$1.7 billion of economic activity is generated by marine recreational fishers in New Zealand². This contributes \$638 million in GDP and supports 8,100 (full time equivalent) jobs. Based on the target species reported by survey participants, snapper fishing generates over 40% of that activity. With the low bag limits and seasonal closures of the blue cod fishery in the Marlborough Sounds and collapse of the scallop stocks we can expect increased interest in snapper as a recreational target species in Fisheries Management Area 7.
26. New amateur harvest estimates for the main areas in SNA7 will be available early in 2017 from the NIWA survey currently underway. Web cameras have been installed on two high-use boat ramps (Nelson and Waikawa). These will be part of ongoing monitoring of boat traffic 365 days a year, with 60 days of face to face surveys to measure catch and fishing effort. The National Panel Survey will be run again in 2017/18 providing another source of harvest information including land based methods.
27. The submitters support an allowance for recreational harvest that will cover what the Minister believes recreational fishers may reasonably be expected to catch. Current estimates are 250 t but this may change when the results of the NIWA aerial overflight and ramp surveys are finalised in March 2017.
28. Recreational fishers are increasingly aware of the need to conserve fish and are generally willing to do so. It will be important to engage with local and visiting fishers to ensure that both the right messages are getting out and that this opportunity to rebuild this stock to the target biomass is not lost.
29. Future management may include a seasonal reduction in daily bag limits to enable the available fish to be shared amongst the influx of visitors to Area 7 during peak holiday times. However, bold initiatives to rebuild and protect the fishery will only succeed if current management is perceived as fair and reasonable.

Customary interests

30. Maori customary fishers may also find that snapper is once again available for purposes of manaakitanga, and an increase in the allowance for customary fishers to 20 t is warranted.

Other mortality

31. The allowance of other sources of fishing mortality needs to be set at the best estimate of what it will be. MPI estimates of 20 to 25 t may be adequate but these tonnages do not seem to be based on any data or analysis. Having a record of the commercial discards of undersize snapper (using the code SNX) may help provide some data. This could also provide an early indication of strong or weak year classes that are about to recruit to the fishery.

² Recreational Fishing in New Zealand – A Billion Dollar Industry. March 2016.