Hokianga Accord
Mid north iwi fisheries forum

NEW ZEALAND SPORT FISHING

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"More fish in the water/Kia maha atu nga ika ki roto i te wai"

Indicator Review
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Non-commercial submission in response to MFish request for information and advice on indicators to measure sector outcome performance.

Contents

Introduction

This submission is on behalf of NZ Sport Fishing Council, option4 and the Hokianga Accord, the mid north iwi fisheries forum.

Together we strive to achieve more abundant fisheries and a healthier marine environment, and thereby assist the Minister of Fisheries to fulfil his statutory obligations to give effect to Kaitiakitanga [guardianship] and the Purpose and Principles of the Fisheries Act 1996, to enable people to provide for their social, economic and cultural wellbeing.

On 4 June 2010 the Ministry of Fisheries (MFish) released another Fisheries 2030 document - Establish Mechanisms to Monitor Ministry and Sector Performance: Draft Possible Indicators for Consultation. Submissions are due by 2 July 2010. On 18 June a revised list of Draft Possible Indicators for Consultation was released and the submission date was extended to 9 July.

Representatives have been involved in the 2030 process from the first meetings in 2008. At previous meetings and in earlier submissions we have expressed serious concerns about the wording of some of the Goals and Outcomes.

To date it seems that 2030 has been more about managing MFish internal processes and objectives than managing the fishery.

Based on past experience, we have some doubts that our submission will have any effect.

Our team however, has considerable experience in participating in MAF, later MAF Fisheries, and now Ministry of Fisheries processes and have seen new ministry management systems come and go. Despite this ongoing investment the underlying, seemingly intractable problems remain in our fisheries. These unresolved issues include timely monitoring of fish stock abundance, recording total fishing related mortality, and preventing adverse effects on the ecosystem.

Background

Fisheries have proved impossible to proactively manage - the best we can do is to try and describe what has happened in the past and infer what may happen in the future. We have a very poor record of accurately anticipating fisheries outcomes. This results from the hidden and extremely complex nature of fish populations.

We do not know the size of fish stocks, stock boundaries (most are larger than QMAs), their productivity, their interdependence on other species; all we can do is fish and try to observe changes.

In almost all cases fisheries observations cannot be easily attributed - many possible explanations are available. Very few interactions can actively be managed

The Minister needs to approach key performance indicators (KPIs) in somewhat of a reverse nature. Rather than select a suite of outcomes, the Ministry need to start with a study of what data is currently gathered that can be accurately attributed, and from there determine if the outcomes this data is tracking are of interest.

The process of starting with a comprehensive list of outcome statements that try and cover all aspects of fishing, without thought to available information, has two major flaws. First, the outcome statements become solely aspirational in nature, describing states of nature in general terms and making broad assumptions about stakeholders interests etc. The second is when searching for KPIs for these outcome statements it becomes apparent that very little data currently exists that can measure any particular outcome. There is a powerful incentive to attribute irrelevant indicators, based on another raft of assumptions and hand waving, to complete the task. Only so much can be done for gathering new data sets for the purpose of creating KPIs.

The nature, extent, and usefulness of information varies widely by species and QMA. Fisheries management relies on looking at very few pieces of the puzzle and guessing. Creating artificial nationwide KPIs to complete a Performance Monitoring Plan does not lead to a better guess. It only adds another field for disagreement, time consuming comparable analyses, and opportunity for litigation.

Probably the most useful outcome of this search for performance indicators it that it further highlights the need for better quality information on fisheries and more regular monitoring of fish stocks. All the social, economic and cultural indicators rely on maintaining adequate catch rates for all sectors.

A number of recent stock assessments have failed because of conflicting and uncertain data on commercial CPUE and catch at age. The deep water sector has realised that better information and more resources are required to prove that they are harvesting within environmental limits. Other sectors must follow.

Performance monitoring plans

We have engaged in this process in good faith. The three 2030 outcomes are broken up into supporting outcomes. It sounds like the Ministry wants to develop Performance Monitoring Plans (PMP) that will build on the Outcomes that form the backbone of the 2030 planning project.

To be useful a Performance Monitoring Plan needs to include:

1. A detailed description of each performance indicator
2. The source, method, frequency, and schedule for data collection
3. Who is responsible for seeing the data is available on schedule
4. How the performance data will be analysed
5. How it will be reported, reviewed, and used to inform decisions.

Essential elements:

a. Definitions are required that ensure different people collecting, reading, or analysing data would all do the same thing. Using terms that import generalisations only reduce the usefulness of the Performance Monitoring Plan;

b. Results need to be expressed in clear unequivocal terms, typically with confidence limits and disclosure of unexpected factors encountered in the analysis.

Given that the implementation of 2030 is based around its Five Year Plan of Action we assume that effective performance indicators will be required several times in that period, if not annually. It seems in some cases finding clear unequivocal performance indicators for the 2030 Supporting Outcomes pose unsolvable problems. In part this is because some Supporting Outcomes are worded as aspirational statements which are not quantifiable. This is why a number of the performance indicators appear to be merely gap-fillers as they will not measure any useful attribute of the outcome.

Possible Indicators

There seems to be too many indicators, many of which cannot be managed or monitored. Having less, more focused outcomes would be more effective and likely to gain wider support.

Fisheries managers also need to acknowledge that there are some things that we cannot measure at this time. Being more transparent would be more productive and stop the pretence that we can, and do, monitor a series of measures that are irrelevant.

Sector performance needs to be viewed separately to the Ministry's performance. Sector performance is about how the sector is performing against a range of indicators, some of which are directly attributable to fisheries management interventions and others are due to external factors such as the national and international economic climate.

It is with these thoughts in mind that we turn to the consultation document and the 38 possible indicators released by MFish on 4 June.

Format of Ministry of Fisheries Key and Definitions

Key

Indicator	Definition
Intervention Logic	Intervention logic is the description of the casual links between an indicator and an outcome.
Relevancy	Ranking of low, medium or high. A subjective assessment taking into account both the relevancy to all components of an outcome and individual components of an outcome.
Cost	Cost below $10,000 a year is defined as low: $10,000 to $100,000 is medium; and above $100,000 is high.
Availability	Availability takes into account a number of factors including whether data quality was fit for purpose and whether the data could be obtained through investment.
Use	Name of agency or agencies that use a similar indicator.

Definitions

ACE is Annual Catch Entitlement.

DOC is the Department of Conservation.

EEA is the European Environmental Agency.

Governance conditions are the key conditions needed to achieve the outcomes and the goal. They include a requirement for monitoring and evaluation.

IFP is an Iwi Fisheries Plan.

Indicators provide a summary indication of an outcome, and permit the observation of progress or change. The progress can be measured over time or against benchmarks, targets or visions for the future.

MFE is the Ministry for the Environment.

OECD is the Organisation for Economic Development and Co-operation.

Outcomes elaborate on the goal of Fisheries 2030 by outlining more specific results desired for fisheries management at a national level.

QMS is the Quota Management System.

SACES is the South Australian Centre for Economic Studies.

SeaFIC is the New Zealand Seafood Industry Council.

Stakeholders are those with rights and interests in fisheries resources.

Stats NZ is Statistics New Zealand.

WB is the World Bank.

2010 EPI is the 2010 Environmental Performance Index Summary for Policy Makers compiled by Yale and Columbia Universities, USA.

MFish Use Supporting Outcomes

MFish USE1 SUPPORTING OUTCOME: An internationally competitive and profitable seafood industry that makes a significant contribution to our economy.

1. Indicator	Asset Value (Quota and ACE)
Intervention Logic	Asset Value demonstrates the value of the seafood industry to our economy.
Relevancy	High. Quota value provides an indication of the value and profitability of the seafood sector to the economy. Quota value is a measure of the net present value of expected future returns (profits) – ACE value is a measure of current profitability (or expected profits for the current year) and quota value goes that for all future years (discounted).
Cost	Low
Availability	Yes/ now. Annually (Normally published in Feb/ March). It is important to note that the asset value figure will be driven by the management of a few key species.
Use	Stats NZ, SeaFIC.

Indicator 1 – Rejected

1. The Ministry of Fisheries repeats previous mistakes in accepting the classic economic rationale for pricing quota assets in terms of discounted future earnings. This rationale requires an open market, frequent trades, and few barriers to entry.

2. The quota management system is best described as a small market with only a few participants that exhibit cartel-style monopolistic rent-seeking behaviours that encourage a myriad of incentives that skew values away from simple expectations of future earnings.

3. For most species only a very small proportion of quota is on the market or traded each year.

4. Both ITQ shares and ACE are useless indicators of profit, which is driven by earnings and costs. The book value, or recently traded value of access rights neither determines nor indicates profit.

5. If the Ministry is serious about this Performance Indicator (internationally competitive and profitable) then it needs to drill much further into the cost model of each fishery.

6. ACE is becoming a clumsy instrument for balancing catch in many inshore fisheries.

7. ACE is often traded several times within the same year, searching for a final unload to defend. Prices are subject to many disparate forces and cannot provide a reliable indicator for any profitability.

8. Quota and ACE values are attractive solely because they are readily available. But which would you use, book or traded value? In the case of Sanford there is up to 50 percent difference.

9. There should not be a need for such a disconnected proxy for profit. Companies report each year, profits are clearly visible from company accounts – each enterprise within the seafood sector has a current profit figure each year, use it.

10. If the industry fall behind the screen of commercial sensitivity and refuse to submit profit data then the Supporting Outcome should be abandoned.

11. Quota holders may be passing the costs of levy payments onto those purchasing ACE, either directly or indirectly, affecting the asset values calculated using ACE transfers. Revision of the SEEAF is expected to address this issue. Statistics NZ will apply recommendations for the treatment of levies as

soon as practicable.

Conclusion: Proposed Indicator 1 – Rejected - unrelated to outcome.

MFish USE1 SUPPORTING OUTCOME: An internationally competitive and profitable seafood industry that makes a significant contribution to our economy.

2. Indicator	Wild fisheries exports (earnings and volumes)
Intervention Logic	Export earnings indicate contribution to the economy.
Relevancy	High. Export earnings cover most of the contribution to the economy as 90-95% of fish landings are exported. When analysed against other countries export earnings it does provide an indication of New Zealand's international competitiveness as it compares costs. Must be adjusted for inflation and averaged exchange rates.
Cost	Low
Availability	Yes/now. Monthly 2-3 month lag. May also need to take into account diesel price.
Use	WB, SeaFIC and Stats NZ.

Indicator 2 – Qualified support

12. We agree that gross export receipts are a relevant indicator of the contribution industrial fishing makes to foreign exchange earnings.

13. Gross export earnings from fishing does not indicate competitiveness and embarking on comparisons with other nations will only import another raft of assumptions trying to enable analysis.

14. What defines competitiveness with respect to international fishing industries?

15. Matters such as costs (influenced by available subsidies), species fished, productivity, methods used, government costs, market prices, branding and many other factors will all influence how competitive, as a nation, an industry is.

16. We have no simple Performance Indicator that will measure competitiveness, but remain certain that gross earning receipts will not measure this aspect.

Conclusion: Proposed Indicator 2 – Qualified support only - as an indicator of contribution to foreign exchange earnings.

MFish USE1 SUPPORTING OUTCOME: An internationally competitive and profitable seafood industry that makes a significant contribution to our economy.

3. Indicator	Aquaculture exports (earnings and volumes)
Intervention Logic	Asset Value can be used to show that aquaculture industry makes a significant contribution to the economy.
Relevancy	High. Aquaculture export earnings cover most of the contribution to the economy as aquaculture exports are contained in the 90-95% of fish landings that are exported. When analysed against other countries export earnings it does provide an indication of New Zealand's international competitiveness as it compares earnings. Must be adjusted for inflation and averaged exchange rates.
Cost	Low
Availability	Yes, now monthly (2-3 month lag).
Use	WB, SeaFIC

Indicator 3 – Qualified support

17. The same comments related to Performance Indicator 2 relate to Indicator 3.

18. Separating aquaculture export receipts from wild fishery receipts is logical, as it adds almost no extra cost.

19. The inability to determine how gross receipts will be analysed to give comparable competitiveness data with other nations, and how this information will be reviewed or used, makes it unsuitable as an indicator of competitiveness.

Conclusion: Proposed Indicator 3 – Qualified support only – as an indicator of contribution to foreign exchange earnings.

MFish USE2 SUPPORTING OUTCOME: High-quality amateur fisheries that contribute to the social, cultural, and economic well-being of all New Zealanders.

4. Indicator	Amateur participation (rates)
Intervention Logic	Best available measure of this outcome but is unlikely that it will accurately represent the outcome.
Relevancy	Medium. The percentage of the population that goes fishing in a year assumes that increasing number of fishers each year is in response to high quality amateur fisheries. However, increasing numbers of amateur fishers may be in response to such issues as population increases, economic hardship and popularity.
Cost	Medium. $12,000.
Availability	Yes. Yearly. There are a number of different surveys available, eg. Ministry Public Perception Survey, SPARC and Stats NZ. Each use different methodologies and give a different participation rates.
Use	SPARC, Stats NZ.

Indicator 4 - Rejected

20. This is poorly thought out. The Use 2 Supporting Outcome requires two inter-dependent indicators: high quality fisheries and social, economic and cultural well-being.

21. High quality fisheries – this measures the degree to which the expectations of the amateur fishing public are met by their experiences in fishing. Quality describes how expectations are met or exceeded.

22. This process must begin by establishing the expectations of the fishing public, otherwise no indicator of quality is possible.

23. Participation rates respond to a raft of social and economic forces, which constantly change. Participation rates are not a simple function of quality.

24. High quality amateur fishing relates to much more than just catching fish, which is a moderate priority. Active fishers view a high quality fishery in terms of catch rates and size of fish rather than numbers of fishing participants.

25. We are not saying that knowing the number of public fishers is worthless, just that it does not serve as a proxy for quality.

26. A well thought out national diary survey will permit an estimate of days fished by the public.

27. In terms of the social, economic and cultural wellbeings, participation rate surveys indicate nothing.

Conclusion: Proposed Indicator 4 – Rejected - unrelated to outcome.

MFish USE2 SUPPORTING OUTCOME: High-quality amateur fisheries that contribute to the social, cultural, and economic well-being of all New Zealanders.

5. Indicator	Amateur catch per unit of effort and size (indices)
Intervention Logic	Catch per unit of effort and size indices measure catch rates and size of fish available which are the main factors amateur fishers attribute to the quality of their fishing.
Relevancy	High as it directly measures high quality amateur fisheries.
Cost	Medium to high.
Availability	Yes, but only for blue cod. Could possibly be used for other important target fisheries
Use	Unknown

Indicator 5 - Qualified support

28. Proposed Indicator 5 is supported for measuring quality if it is coupled with a thorough national survey that establishes baseline satisfaction points. It involves quite intense and expensive catch sampling, but this sampling also provides useful indicators for many other outcomes than simply the quality of public fishing.

29. Investment in catch sampling, where Catch Per Unit of Effort (CPUE) is gathered alongside fine-scale species, size, range and other data, ought to form the backbone of data collection for amateur fisheries.

30. The cost may be high for this type of sampling, but a long time series of this data informs on all aspects of public fishing.

31. There is other data collected on amateur catch and effort from ramp surveys undertaken in conjunction with most national harvest surveys. Some of this data was analysed by Elizabeth Bradford (NIWA). Also, the aerial overflight surveys in Snapper 1 and 8 and the Marlborough Sounds all collected this information, but no-one has asked for it to be compiled as Catch Per Unit of Effort (CPUE) per fisher trip.

32. The kahawai ramp surveys every year from 20001 to 2007 have Catch Per Unit of Effort (CPUE) from amateur fishers. This was used in the stock assessment model, as commercial CPUE from purse seine was unusable.

33. We have a 35-year Catch Per Unit of Effort (CPUE) index of recreational charter boat striped marlin catch, which was used by the Secretariat of the Pacific Community (SPC, New Caledonia) in a stock assessment model (Langley et al. 2006) as there has never been a target commercial fishery in New Zealand.

34. This year MFish is investing in a charter boat reporting scheme that will give catch and effort for some species. Catch Per Unit of Effort (CPUE) indices must be by species as there is no single gross number that means anything

35. As noted, the cost may be high for a survey of this nature, but a long time series of this data from catch sampling and surveys informs on all aspects of public fishing.

36. Include in national catch sampling programme.

Conclusion: Proposed Indicator 5 – Qualified support only - for measuring quality, if it is coupled with a thorough national survey that establishes baseline satisfaction points.

MFish USE2 SUPPORTING OUTCOME: High-quality amateur fisheries that contribute to the social, cultural, and economic well-being of all New Zealanders.

6. Indicator	Amateur fishing satisfaction (surveys)
Intervention Logic	A questionnaire could provide qualitative information on all aspects of this outcome.
Relevancy	High. Directly measures outcome.
Cost	High
Availability	Future. Mid to late 2012 (then likely to be repeated every 4-5 years). Likely to be a challenge to design a good survey.
Use	Unknown

Indicator 6 - Qualified support

37. Far from being a separate data collection exercise, satisfaction is a simple addition to the catch sampling surveys that have been identified for gathering essential baseline data. The cost need not be prohibitive and we believe a satisfaction survey is essential to indicate quality.

38. If MFish want to know the quality of public fishing just ask people for their views, do not become confused by trying to reinterpret extraneous data.

39. The cost of a direct answer is minimal if conducted on the diarists selected in the national harvest survey. Surveyors could ask about satisfaction at the start of the survey and again at the end of the diary survey. There would be catch data for the intervening period.

40. We can only assume MFish is reluctant to accept the direct results of satisfaction surveys and prefers to find an obscure indicator that is less threatening.

41. Survey costs are not necessarily high. There are researchers in New Zealand collecting some information that may be of value. Ken Hughey[1] at EOS Lincoln University has been surveying biennually the public perceptions of the NZ Environment, including fisheries and marine reserves, for a decade. There is data already available and Ministry could use this to achieve a measure of satisfaction.

42. Include in national catch sampling programme.

Conclusion: Proposed Indicator 6 – Qualified support only if representative sample used - measuring satisfaction levels is essential, and very cost effective if completed in conjunction with Performance Indicator 5 and a national recreational harvest survey.

[1] Hughey, K.F.D., Kerr, G.N. and Cullen, R. 2008. Public perceptions of New Zealand's Environment: 2008 EOS Ecology, Christchurch.

MFish USE2 SUPPORTING OUTCOME: High-quality amateur fisheries that contribute to the social, cultural, and economic well-being of all New Zealanders.

7. Indicator	Value of amateur fishing (surveys)
Intervention Logic	These surveys could be used to establish the value that amateur fishers place on the fishing experience.
Relevancy	Medium.
Cost	High. The work is very expensive (SACES project cost $104,000 in 1998.
Availability	Yes/future. When ad hoc projects are completed.
Use	Unknown

Indicator 7 - Qualified support

43. Surveys that seek to value different users of common pool resources, by using the marginal value of catch, are useless for anything. The challenge is to find an indicator for the Use 2 Supporting Outcome, of high quality public fishing providing for the social, economic and cultural wellbeing of all New Zealanders.

44. One of the weaknesses of valuing by marginal value is the difficulty in collecting and analysing the data. This process relies on many assumptions that can have large effects on the results. Some work has been done in this area. One pilot study in Blue Cod 7 has been abandoned.

45. Gross expenditure on public fishing is not too hard to get. On the other hand, marginal values are tricky to collect and interpret.

46. Expenditure by visitors to a region (tourist dollars) can be expressed as value to a region. Similarly, earnings from international visitors describe foreign exchange earnings and job creation.

47. Small fishing ports now devoid of jobs in commercial fishing derive social and economic benefits from boat-based tourism.

Conclusion: Proposed Indicator 7 – Qualified support only if measuring value to the nation – measuring marginal value of catch by various users of a common resource will not achieve Use 2 Supporting Outcome. Some indication of the contribution to the national economy would be useful.

MFish USE2 SUPPORTING OUTCOME: High-quality amateur fisheries that contribute to the social, cultural, and economic well-being of all New Zealanders.

8. Indicator	Amateur harvest estimate (national survey)
Intervention Logic	A new National Diary Survey would provide the most complete picture of recreational fishing in NZ. The amount of fish caught is an indicator of the participation in and quality of amateur fisheries.
Relevancy	High. Catch rates will provide an indication of the quality of amateur fisheries.
Cost	High.
Availability	Yes /future. There were issues with both the 1996 and 2001 National Diary surveys that mean they are not comparable. If a new survey can address these issues this survey could act as a baseline for future surveys.
Use	Unknown

Indicator 8 - Rejected

48. Poor indicator of quality and delivery of the social, economic and cultural wellbeings as described by Use 2 Supporting Outcome.

49. The pre-occupation with quantum of public catch seem to stem from matters related to sections 13 and

21 of the Fisheries Act 1996.

50. The unstated assumption with quantum of catch is that the size of a pile of dead fish somehow indicates quality of public fishing, and social, economic and cultural well-being.

51. Presumably then, a big pile of dead fish indicates high quality and well-satisfied well-beings for all New Zealanders; while a diminishing pile of dead fish translates into poor quality and under-nourished well-beings. What arrant nonsense.

52. A national diary survey has yet to deliver a useable Recreational Harvest Estimate (RHE).

53. Before rationalising extraneous indicators from an as-yet-to-be-designed survey, it is necessary to determine if it is possible to deliver the primary purpose – the description of a pile of dead fish.

54. Total fishing mortality from all sectors, catch at age, and Catch Per Unit of Effort (CPUE) are useful indicators of fish population trends.

55. There are huge problems when changes are made to the survey design each time a national survey is conducted. For example, the white pages phone book is becoming an increasingly poor sample frame.

56. If one comprehensive method of surveying fishers (random sub-sample) could be finalised it would be a great help with a number of indicators. These surveys collect information on the demographics of fishers, where they fish, species they target and species they discard. The concurrent boat ramp surveys collect size distribution of catch and Catch Per Unit of Effort (CPUE). If done well, questions on perceptions and relative values could be added.

Conclusion: Proposed Indicator 8 – Rejected - measuring landed catch is a poor indicator of quality and delivery of the well-beings and will not, on its own, achieve Use 2 Supporting Outcome.

SUMMARY STATEMENT - Use 2

A comprehensive catch sampling programme that tracks Catch Per Unit of Effort (CPUE), species size and mix of landed catch, a satisfaction index and others will provide the indicator for Use 2 Supporting Outcome alongside many indicators for other outcomes.

MFish USE3 SUPPORTING OUTCOME: Thriving customary fisheries, managed in accordance with kaitiakitanga, supporting the cultural well-being of iwi and hapū.

9. Indicator	Number of Iwi Fisheries Plans (IFPs) (number)
Intervention Logic	IFPs are a way of incorporating Māori world views into fisheries management and are broader than developing specific goals for customary fishers. This, in conjunction with abundant fisheries of appropriate quality, will support cultural well-being.
Relevancy	Medium/Short term indicator. IFPs move towards managing in accordance with kaitiakitanga but how well it relates to the outcome depends on their implementation and/or incorporation with Fisheries Plans.
Cost	Low. Already planned.
Availability	Yes/now.
Use	Unknown

Indicator 9 - Rejected

57. Use 3 Supporting Outcome – What is a "customary fishery"? This definition seems to have slipped through the list. The fisheries resources of Aotearoa are common pool resources; all users exploit a single fishery.

58. The thinking that gives rise to terms such as "customary fisheries" simply guts the integrity of efforts to harmonise the activities of user groups.

59. Proposed Indicator 9 – In the absence of any meaningful definition and separation of "customary fisheries" the usefulness or existence of one or 100 Iwi Fisheries Plans will not achieve Use 3 Supporting Outcome.

60. The promotion of Iwi Fisheries Plans as a mechanism for delivering management aspirations of Maori are a huge con. The management aspirations of Maori and local communities is to have influence over the way the local resources are managed. Fisheries Act section 11 plans cannot usurp the pre-eminence of the provisions of the Act itself. As such, Fisheries Plans can only include the most trivial and inconsequential of possible management interventions.

61. Do Iwi Fisheries Plans include the promulgation and implementation of Mahinga Mataitai?

62. Should the area managed within all Mahinga Mataitai be a performance indicator for the ability of Iwi to apply Kaitiakitanga?

63. MFish and the public need a better understanding of how iwi want to measure Kaitiakitanga and cultural well-being.

64. Although the Fisheries Act 1996 refers to Kaitiakitanga, the Act's provisions as a whole prevent it ever being exercised. That is because the Fisheries Act empowers the Minister to divide our seas into artificial areas, manages on a single species basis, provides powerful private rights to those who need only consider their own immediate self-interest.

65. To achieve such a lofty goal as the Use 3 Supporting Outcome the Fisheries Act 1996 will need to be completely rewritten to incorporate the concepts of local area management and integrated land and sea management, with an emphasis on providing for future generations' needs.

66. Iwi Fisheries Plans are nothing more than a promise of better times ahead while the depletion and degradation of our coastal resources continues. They ought to be abandoned.

67. The indicator sought is progress of legislation that provides for comprehensive local area management that integrates the administration of land and sea use.

Conclusion: Proposed Indicator 9 – Rejected - unrelated to outcome.

MFish USE3 SUPPORTING OUTCOME: Thriving customary fisheries, managed in accordance with kaitiakitanga, supporting the cultural well-being of iwi and hapū.

10. Indicator	**Tangata Tiaki/Kaitiaki (number)**
Intervention Logic	The number of Tangata Tiaki/Kaitiaki indicate that Maori are participating in managing their customary fisheries. Tangata Tiaki/Kaitiaki authorise customary fishing within their tangata whenua rohe moana accordance with tikanga Māori. Consequently, this indicator supports Kaitiakitanga and the culture well-being of iwi and hapū.
Relevancy	Medium –Provides a direct indication that customary fisheries are being managed in accordance with kaitiakitanga, supporting the cultural well-being of iwi and hapū. However, there are reporting issues that need to be resolved.
Cost	Low.
Availability	Yes/now.
Use	Unknown

Indicator 10 - Rejected

68. Numbers of appointed Kaitiaki do not equate to management participation nor does it define what "customary fisheries" are.

69. Quality is more important than numbers of Kaitiaki. Many Kaitiaki are concerned about the lack of knowledge on the abundance and sustainable harvest of kaimoana and enforcement issues. Increasing the numbers of Kaitaiki will amplify this frustration if these concerns are not adequately addressed.

70. At many fisheries hui Maori have openly acknowledged the distaste of having to obtain a permit to undertake traditional non-commercial food gathering activities.

71. We have considerable empathy for people who find their traditional food sources degraded and depleted from industrial exploitation of marine resources and reckless land use.

72. The number of Kaitiaki appointed indicate just that – the number appointed. Efforts to extract indicators for the degree of thriving fisheries or well-beings from counting Kaitiaki, is impossible.

73. Kaitiakitanga is not associated with permits, and it is not something that is partially exercised; the principles of Kaitiakitanga are those of inter-dependence, inter-connectedness, an obligation to past generations and duty of care for future generations, to nurture and sustain the environment, from the mountains to the sea. It is all or it is not Kaitiakitanga. There is no in-between.

74. Permitted fishing under the customary regulations represents a small fraction of total fishing by Maori.

75. As Ngapuhi's chairman, Sonny Tau has said on numerous occasions, *"99.9 percent of the time Ngapuhi fish to feed our babies we are categorised as 'recreational' fishers"*. The national catch sampling regime included in Use 2 Supporting Outcome is the best way to capture data on the degree that Maori fishing is thriving and supporting social and cultural well-being.

76. One carefully designed national catch sampling programme will provide indicators for many outcomes.

77. Include in national catch sampling programme.

Conclusion: Proposed Indicator 10 – Rejected - poor measure of Use 3 Supporting Outcome.

MFish USE3 SUPPORTING OUTCOME: Thriving customary fisheries, managed in accordance with kaitiakitanga, supporting the cultural well-being of iwi and hapū.

11. Indicator	**IFPs impact on national fisheries plans (number of IFP objectives given effect in national fisheries plans)**
Intervention Logic	Assessing how IFPs are reflected in National Fish Plans and decision making processes. Links to input/participation objectives, achieving more of a partnership with Maori and managing fisheries in accordance with kaitiakitanga.
Relevancy	Medium/high. An indicator for achieving sector outcomes and Ministry's support towards those outcomes.
Cost	Low.
Availability	Yes/future.
Use	Unknown

Indicator 11 - Rejected

78. Choosing an indicator from examining the relationship between two non-existent Fisheries Plan is rather obtuse.

79. Unless legislative amendment is made to empower Fisheries Plans to deliver locally formulated outcome statements then Fisheries Plans merely describe the same landscape using different terminology.

80. The draft Deepwater Plan contains verbose expositions of the status quo, framed in a way that imparts a sense of certainty and novelty. Plans remain an inappropriate source of data for Performance Indicators.

81. Worse still, is that development of Fisheries Plans raises Maori expectations that meaningful, local management is both possible and within grasp. Iwi Fisheries Plans in particular remain aspirational.

Conclusion: Proposed Indicator 11 – Rejected - unrelated to outcome.

MFish USE3 SUPPORTING OUTCOME: Thriving customary fisheries, managed in accordance with kaitiakitanga, supporting the cultural well-being of iwi and hapū.

12. Indicator	Customary fishery needs (catch)
Intervention Logic	Identifies whether customary fishing needs (catch) are being provided for.
Relevancy	Medium/high. Long term indicator that measures outcome indirectly.
Cost	Low/medium.
Availability	Yes/future. Information is required under regulation, however issues with accuracy, comparability and furnishing of forms.
Use	Unknown

Indicator 12 - Rejected

82. What is the indicator? Quantum of catch? Is it catch taken using a permit? Is it the number of permits issued for a level of catch? These answers need to be clarified, because the indicator statement is unclear.

83. As noted previously, catch sampling will allow the collection of data that will provide direct indicators for several outcome statements.

84. It is possible that using straight catch taken under permit as an indicator of providing well-being will result in more permits on commercial vessels, greater volumes of fish, and a greater disconnect with actual catching and the health of marine resources in individual rohe.

85. There could be a range of reasons why a Kaitiaki will, or will not, issue a permit for particular species, areas or methods. Unless these are quantified then the indicator does not demonstrate either a 'thriving' fishery or whether needs are being met.

86. Due to the tortuous, bureacratic process many Maori choose to fish under the amateur fishing regulations for customary purposes. A more productive indicator would be one that focusses on streamlining and supporting the customary permit regime.

Conclusion: Proposed Indicator 12 –Rejected - unrelated to Use 3 Supporting Outcome.

MFish USE4 SUPPORTING OUTCOME: Healthy fisheries resources in their aquatic environment that reflect and provide for intrinsic and amenity value.

13. Indicator	Marine protected areas (number and % surface area)
Intervention Logic	Provides an indication of habitats sustained at non-extractive levels. The assumption is that if marine reserve habitats are sustained at healthy levels in the long term then there is progress towards achieving this outcome.
Relevancy	Medium. Based on assumption. Can also be used as an indicator for ENV 1 SUPPORTING OUTCOME.
Cost	Low.
Availability	Yes/now but only for marine reserves. Will include all marine habitats that meet the protection standard once a national marine protected area inventory has been completed.
Use	MFE, 2010 EPI, OECD, WB.

Indicator 13 - Rejected

87. This is meaningless and immeasurable against the Use 4 Supporting Outcome. It is focussed on inputs not outputs.

88. Aquatic ecosystems start out as pristine. Degradation occurs as fishing and contamination from human use and other events accumulate.

89. Some definition of "healthy" would assist in determining its application in this Indicator context. Everyone will have a notion as to what constitutes a healthy fishery, but few will agree.

90. Accuracy will be improved by rethinking the Use 4 Supporting Outcome and rephrasing it in a way that permits a single definition and the selection of a useful indicator. The outcome being sought is worthy and one of the few directed at the wider public's well-being.

91. A possible initial statement could read, "Amenity and intrinsic values of marine ecosystems….." will lead to greater precision.

Conclusion: Proposed Indicator 13 – Rejected - more work is required redefine the Use 4 Supporting Outcome and Performance Indicator 13.

MFish USE4 SUPPORTING OUTCOME: Healthy fisheries resources in their aquatic environment that reflect and provide for intrinsic and amenity value.

14. Indicator	Intrinsic value perception (survey)
Intervention Logic	Describes whether the public believe the management of fisheries resources is providing for intrinsic and amenity values.
Relevancy	Medium. Perception survey is a qualitative estimate of healthy fisheries resources that reflect and provide for intrinsic and amenity value.
Cost	Medium.
Availability	Yes /future. Ministry public perception survey would need to be modified to provide for intrinsic and amenity values.
Use	Unknown.

Indicator 14 - Qualified support

92. Any survey that measures the perceived quality of fisheries could easily be folded into a survey that sought quality estimates on many separate aspects of fisheries outcomes.

93. It seems the cost of surveys is biasing indicator selection away from surveys and towards more readily

available data, even when these data are disconnected and rely on critical assumptions to enable analysis.

94. The business of measuring the social, economic and cultural wellbeing that is achieved through fisheries outcomes does appear to demand a quite comprehensive survey of the population.

(Note. Include in national catch sampling programme.)

Conclusion: Proposed Indicator 14 – Qualified support if representative sample used - Indicators measuring 'quality' with respect to intrinsic and amenity values have to come from the source – the public.

MFish Environmental Supporting Outcomes

MFish ENV1 SUPPORTING OUTCOME: Biodiversity and the function of ecological systems, including trophic linkages, are conserved.

15. Indicator	Stock status (number/percentage of stocks near or above target level, overfished, depleted and collapsed)
Intervention Logic	The percentage of stocks evaluated as near or above target level, overfished, depleted and collapsed as determined by the harvest strategy provides an indication of the overall status of New Zealand's fish stocks. The near or above target level is a safe level fluctuating around a target; overfishing is a stock being fished at levels that could lead to depletion; a depleted stock is below the soft limit and needs rebuilding; and a collapsed stock is below the hard limit and may need closure. Assumption is that if fish stocks are sustained at safe levels (near or above target) in the long term, then the outcome is being achieved.
Relevancy	High – directly relates to outcome as use of fishstocks is the main human use of marine resources that could impact on biodiversity. Maintaining fish stocks at sustainable levels is very important for this outcome.
Cost	Low, already resourced.
Availability	Yes/now.
Use	MFE, OECD, EEA.

Indicator 15 - Rejected

95. A classic avoidance manoeuvre. Choose a convenient indicator that exists and attribute wide ranging value and meaning, far beyond anything previously imagined or intended.

96. The few reviews of fish stocks that do occur in Aotearoa are undertaken in isolation from the systems that sustain them. The reductions in biodiversity and ecological resilience caused by fishing is often most damaging to non-target and incidental bycatch species.

97. Single species stock assessments are notoriously unreliable and depend on ignoring inter-dependence, productivity, and environmental effects caused by fishing. Rafts of convenient assumptions are imported to enable simple models to produce sufficient digital fish to set a total allowable catch (TAC) for a particular fish stock.

98. The ENV 1 Supporting Outcome begins with biodiversity. The Harvest Strategy Standard is unconcerned with biodiversity – it simply sets standards that are preferred by industrial fishing interests. The Harvest Strategy Standard contemplates depleting fish stocks to as low as 10% of original size before a definite rebuilding strategy is required. Choosing these 'targets' using the highest available risk and embodying them in a 'standard' does not validate them in terms of biodiversity.

99. In the interests of biodiversity the United Nations has promoted pulling back from these maximum yield strategies. Research has found fisheries produce better economic and ecological outcomes by applying a correcting factor to estimates of yield. The correction is to account for the risks to all aspects of the ecosystem by aggressively depleting key species.

100. Trotting out the 's' word, sustainability, in support of rationalising the targets embodied in the Harvest Strategy Standard does raise the vexed question, what is sustainable?

101. This concept of sustainability in practice is better expressed as extinction minus 1. The term has lost its mana from constant use in supporting maximum risk harvest strategies. Currently, granting fish

stocks the status of 'sustainable' only means they are yet to become commercially extinct.

102. The principles embodied within Kaitiakitanga reach far closer to expressing sustainability; an expression of the relationship between humans and the natural world of which they form a part, the overarching need to provide for future generations, the dismissal of excess exploitation, and the maintenance of biodiversity.

Conclusion: Proposed Indicator 15 – Rejected - unrelated to ENV 1 Supporting Outcome.

MFish ENV1 SUPPORTING OUTCOME: Biodiversity and the function of ecological systems, including trophic linkages, are conserved.

16. Indicator	Total commercial catch of QMS and QMS stocks (greenweight)
Intervention Logic	An indicator of the total amount of fish being taken from ecological systems and reflects pressure on the system.
Relevancy	Medium as it only provides a gross level of pressure on biodiversity.
Cost	Low.
Availability	Yes/now.
Use	OECD, Stats NZ, SeaFIC.

Indicator 16 - Rejected

103. Clearly acknowledged as useless and included only as frothy filler. Better to re-focus on biodiversity and productivity.

Conclusion: Proposed Indicator 16 – Rejected - unrelated to ENV 1 Supporting Outcome.

MFish ENV1 SUPPORTING OUTCOME: Biodiversity and the function of ecological systems, including trophic linkages, are conserved.

17. Indicator	Marine trophic index (trawl surveys or catch data)
Intervention Logic	High trophic levels reflect a high level of evolved biodiversity. Assumption is that if fisheries trophic levels are sustained at healthy levels in the long term, then the outcome is being achieved.
Relevancy	Medium. Declines in mean trophic levels of fisheries result in smaller food chains that leave marine ecosystems increasingly vulnerable to natural and human induced stress.
Cost	Medium.
Availability	Possible/ future. Requires comprehensive data analysis.
Use	WB, 2010 EPI, MFE.

Indicator 17 - Rejected

104. Generation of a separate data collection system and analysis would be the only way to enable a Performance Indicator to inform management.

105. It is also clear that MFish has a low priority for this and prefer to choose a completely unrelated data set and ascribe meanings that have no evidential basis whatsoever.

106. Maintaining biodiversity and trophic levels are essentially baseline outcomes for any fisheries management regime and deserves promoting beyond the lip service paid in the search for Performance Indicators.

Conclusion: Proposed Indicator 17 – Rejected - there is room for a far more serious attempts at defining and

achieving ENV 1 Supporting Outcome.

MFish ENV2 SUPPORTING OUTCOME: Habitats of special significance to fisheries are protected.

18. Indicator	Location of commercial trawling effort (total area trawled in square km)
Intervention Logic	Total area trawled in square km. Provides an indication of the impact of trawling on the seabed.
Relevancy	Medium.
Cost	Low.
Availability	Yes/now.
Use	OECD, 2010 EPI, MFE.

Indicator 18 - Rejected

107. When considering the vast array of habitats that comprise the entire marine habitat within the EEZ, what attributes elevate a portion to the status of 'special significance'?

108. The proposed Performance Indicator and intervention logic assumes that trawling needs managing to specifically prevent habitat damage. Perhaps limiting the concern to 'special' habitat distracts managers to the impacts on ecosystem productivity from trawling.

109. Spawning and nursery areas suggest themselves as suitable initial candidates for 'special significance' status.

110. A better indicator would be the number of spawning and nursery areas identified, and the number of regulations applied to them with the purpose of protecting them from the effects of fishing.

Conclusion: Proposed Indicator 18 – Rejected - Imprecise ENV 2 Supporting Outcome. Improvement could be made by adding 'from trawling' to the end of this Supporting Outcome.

MFish ENV2 SUPPORTING OUTCOME: Habitats of special significance to fisheries are protected.

19. Indicator	Habitats of special significance to fisheries (number/percentage of sea area)
Intervention Logic	Low Habitats of significance to fisheries need to be protected to provide for the diversity, productivity and health of species.
Relevancy	High. Directly relates to outcome.
Cost	High.
Availability	Possible/future.
Use	Unknown.

Indicator 19 - Rejected

111. Some confusion exists between proposed Performance Indicators 18 and 19. Performance Indicator 19 seems to focus on identifying areas of 'special significance', while PI 18 seems to discuss trawl damage.

112. It would be helpful if the proposed Performance Indicators 18 and 19 were combined into one; the outcome being sought could then be described as 'that habitats of special significance are identified and protected'. There is a logical order to follow.

113. We support this outcome statement as being fundamental to encompassing our view of sustainability. Commercial fisheries have a legacy of wanton destruction of habitats in the pursuit of economic efficiency. The profits are private, but the environmental cost is left to the public. This imbalance needs to be remedied.

Conclusion: Proposed Indicator 19 – Rejected - Imprecise to achieve ENV 2 Supporting Outcome. Appropriate Performance Indicators measure the number and importance of 'special habitats' identified, and the number of regulations protecting them.

MFish ENV3 SUPPORTING OUTCOME: Adverse effects on protected species are reduced or avoided.

20. Indicator	Threat status of protected species (number)
Intervention Logic	Threat level of species gives indication of health of species relative to established classification systems.
Relevancy	High.
Cost	Low.
Availability	Yes. But need to decide on classification system. The most internationally recognised classification is the IUCN Red List.
Use	ECD, EEA, WB and DoC

Indicator 20 - Qualified support

114. Supported as a Performance Indicator, but only at a very high level. It has no direct connection to fishing and serves only as a source of a flag to trigger a deeper investigation responding to increased threat classification.

Conclusion: Proposed Indicator 20 – Qualified support as a high level indicator only - vaguely related to ENV 3 Supporting Outcome.

MFish ENV3 SUPPORTING OUTCOME: Adverse effects on protected species are reduced or avoided.

21. Indicator	Fishing interactions with protected species (number)
Intervention Logic	Strong relationship between observed interactions and the level of adverse effects.
Relevancy	High. Provides direct indication of the known relationship between incidental fishing-related mortality and the level of adverse effect on protected species.
Cost	High. Costs of verification can be high.
Availability	Yes/now. Methodology is often difficult because of the low number of mortalities. Requires a high level of observation.
Use	Unknown.

Indicator 21 - Qualified support

115. The objective is to indicate the adverse effects of fishing on protected species. The general threat level to protected species might be part of an investigation procedure, but could not reasonably be used to express specific threats from fishing.

116. Data from observer coverage is better suited to informing on the interaction between fishing and protected species. Where observer coverage is unavailable, a specific programme to generate comparable data could be used. Both would be analysed to generate a single index.

Conclusion: Proposed Indicator 21 – Qualified spport only - Indicator suited to monitor ENV 3 Supporting Outcome.

MFish ENV4 SUPPORTING OUTCOME: Impacts, including cumulative impacts, of activities on land, air or water on aquatic ecosystems are addressed.

22. Indicator	River and lake water quality [nutrients (nitrogen and phosphorus), visual clarity, and macroinvertebrates or algae]
Intervention Logic	High nutrient levels are indicative of pollution caused by runoff etc. Can affect the freshwater aquatic environment by changing vegetation composition and vegetation structure. In coastal water it can lead to algal bloom and deoxygenated dead zones in which only a few bacteria may survive.
Relevancy	Medium. Provides an indication of cumulative impacts of activities on land, air or water on aquatic ecosystems primarily for freshwater only and aquaculture areas.
Cost	Low. Reported by MFE.
Availability	Yes/now. May have some potential to be extended to some coastal water areas.
Use	MFE.

Indicator 22 - Rejected

117. Not suitable as an indicator of impacts.

118. Indication for impacts on aquatic systems from 'upstream' resource use requires some knowledge of what these impacts are.

119. There is widespread acceptance that near shore resources are often degraded by contamination coming from the catchments. Land use often has huge impacts on estuarine areas and is suspected of degrading nursery habitats and reducing fishery production.

120. A direct indicator that imports data from the marine environment is needed. Perhaps coming from a more accurately targeted sampling programme.

Conclusion: Proposed Indicator 22 – Rejected - vaguely related to ENV 4 Supporting Outcome.

MFish ENV4 SUPPORTING OUTCOME: Impacts, including cumulative impacts, of activities on land, air or water on aquatic ecosystems are addressed.

23. Indicator	Water quality (E. coli levels)
Intervention Logic	Bacterial levels can act as a proxy for pollution levels.
Relevancy	Medium /high.
Cost	Low, but if extended to outside coastal swimming spots costs would rise.
Availability	Yes/now. Reported by MFE but only for coastal swimming spots.
Use	MFE.

Indicator 23 - Rejected

121. Complete nonsense. The huge degradation of near shore waters, acidification, sedimentation, loss of biodiversity and other factors has no link to *E.coli*.

Conclusion: Proposed Indicator 23 – Rejected - urelated to ENV 4 Supporting Outcome.

MFish ENV4 SUPPORTING OUTCOME: Impacts, including cumulative impacts, of activities on land, air or water on aquatic ecosystems are addressed.

24. Indicator	Sedimentation levels in aquatic ecosystem (survey)
Intervention Logic	Sedimentation can be harmful to some marine ecosystems.
Relevancy	Medium /low. Difficult to determine link in many habitats between sedimentation levels and impacts on the ecosystem).
Cost	High cost - would require new monitoring program.
Availability	Future.
Use	Unknown.

Indicator 24 - Rejected

122. It is difficult to measure and attribute changes to the marine environment; sedimentation provides no special challenge.

123. Again, any meaningful indicator will be based on data from the marine environment and could be something as simple as fine-scale pH records.

Conclusion: Proposed Indicator 24 – Rejected - vaguely related to ENV 4 Supporting Outcome.

MFish Governance Supporting Outcomes

MFish GOV1 SUPPORTING OUTCOME: The Treaty partnership is realised through the Crown and Maori clearly defining their respective rights and responsibilities in terms of governance and management of fisheries resources.

25. Indicator	National level forum (established)
Intervention Logic	Precursor to increasing effective participation in fisheries management. This will support the Treaty partnership being realised and increasing iwi input and participation.
Relevancy	Medium/high. Short term indicator. Would be a step towards realising Treaty partnership and participation of Iwi. Indicator could later be changed to "number of forum initiatives incorporated in national fisheries plans".
Cost	Low. Development already planned.
Availability	Yes/now.
Use	Unknown.

Indicator 25 - Rejected

124. The MFish GOV1 Supporting Outcome requires an indicator and definition. The implementation of any new forums or planning objectives are separate outcomes.

Conclusion: Proposed Indicator 25 – Rejected - First indicator ought to be the signing off by the Crown and Maori of a comprehensive agreement specifying rights and responsibilities.

MFish GOV1 SUPPORTING OUTCOME: The Treaty partnership is realised through the Crown and Maori clearly defining their respective rights and responsibilities in terms of governance and management of fisheries resources.

26. Indicator	Integrated iwi fisheries plans (IFP numbers)
Intervention Logic	The number of IFP's will indicate that the Treaty partnership is being realised through defining rights and responsibilities in terms of governance and management of fisheries.
Relevancy	Medium/high. Short term indicator. Once established are not an indicator of achieving this outcome. Indicator could be replaced with number of IFP objectives given effect in national fisheries plans.
Cost	Low. Development already planned.
Availability	Yes/now.
Use	Unknown.

Indicator 26 - Rejected

125. As already outlined, we believe Iwi Fisheries Plans are a cop-out that will serve no outcome purpose at all related to realising Treaty partnership aspirations.

126. GOV 1 Supporting Outcome statement is pompous and deceitful. It suggests defining rights and responsibilities will realise (to achieve something that has been hoped or worked for) Treaty obligations.

127. The Crown must assume that these obligations are trivial if agreeing on rights and responsibilities discharges them.

128. A better indicator of realisation would be the number of amendments to the Fisheries Act that enable

local area management. Or if the Crown concludes that Mahinga Mataitai is the vehicle for discharging Treaty obligations then the area managed as Mahinga Mataitai could be used.

129. Indicators need to be better directed if they are to be useful measures of the outcome.

Conclusion: Proposed Indicator 26 – Rejected - unrelated to GOV 1 Supporting Outcome.

MFish GOV1 SUPPORTING OUTCOME: The Treaty partnership is realised through the Crown and Maori clearly defining their respective rights and responsibilities in terms of governance and management of fisheries resources.

27. Indicator	Satisfaction survey (defined rights and responsibilities)
Intervention Logic	A questionnaire could provide qualitative information on all aspects of this outcome.
Relevancy	Medium/high. Depends of quality of survey and frequency.
Cost	Medium/high.
Availability	Yes/future. Careful consideration of survey questions, design and sampling methods needed for it to be any use. Risk that iwi will be influenced by external factors (e.g. other political issues, conjecture, etc) when responding to survey.
Use	Unknown.

Indicator 27 - Qualified support

130. Another chapter in the national survey.

Conclusion: Proposed Indicator 27 – Qualified support if representative sample used - again, satisfaction surveys need not be expensive and, as there is emerging a clear need for a national survey to gather data on a number of outcomes, proposed Performance Indicator 27 falls naturally into this basket.

MFish GOV1 SUPPORTING OUTCOME: The Treaty partnership is realised through the Crown and Maori clearly defining their respective rights and responsibilities in terms of governance and management of fisheries resources.

28. Indicator	Iwi/hapū represented in regional forums (number)
Intervention Logic	Used to track development and representation of new regional forums.
Relevancy	High. They help ensure that the Treaty partnership is realised through the defining of rights and responsibilities.
Cost	Low. Ministry records.
Availability	Yes/future.
Use	Unknown.

Indicator 28 - Rejected

131. Iwi do not need Fisheries Plans, tangata whenua want local management. The delivery of decision making power to locals is the indicator, not the extent that national plans will continue to be used to deliver unwanted outcomes to iwi and hapu in the regions.

132. Throughout many hui Maori have expressed their desire for more abundant fisheries, and at a local level, some influence to have these aspirations realised. Maori do not want to be the victims of Wellington (Crown) policies that have no regard for their well-being.

133. There are few demands for stronger rights or responsibilities, the repeated call is for tangata whenua to be able to exercise their sacred obligations to exercise Kaitiakitanga, which (as previously explained) requires activities currently prohibited by the Fisheries Act 1996.

134. Maori want abundance and diversity. The Crown needs to provide a legislative pre-eminence for Kaitiakitanga to be expressed at a local level.

Conclusion: Proposed Indicator 28 – Rejected - unrelated to GOV 1 Supporting Outcome.

MFish GOV2 SUPPORTING OUTCOME: The public have confidence and trust in the effectiveness and integrity of the fisheries and aquaculture management regimes.

29. Indicator	**Public confidence in fisheries management (% changes)**
Intervention Logic	The Ministry monitors the level of public confidence in fisheries management and administration. This provides an indication of the public perception of confidence and trust in the fisheries management regimes.
Relevancy	Medium. A shortcoming is that it does not differentiate between wild fisheries and aquaculture management.
Cost	Medium. The Ministry public perception survey costs $12,000.
Availability	Yes/now.
Use	Unknown.

Indicator 29 - Rejected

135. Another shortcoming is that the public do not have access to information to enable a balanced view to be formed. The public relies on MFish media releases which are preoccupied with self-promotion, not impartial reporting. This indicator is a complete waste of money and will only indicate the effectiveness of MFish media management, rather than public confidence.

Conclusion: Proposed Indicator 29 – Rejected - unrelated to GOV 2 Supporting Outcome.

MFish GOV2 SUPPORTING OUTCOME: The public have confidence and trust in the effectiveness and integrity of the fisheries and aquaculture management regimes.

30. Indicator	**Challenged legislation (number of successful challenges)**
Intervention Logic	The number of successful legislation challenges provides an indication of public confidence and trust in the effectiveness and integrity of the fisheries and aquaculture management regimes.
Relevancy	Medium/low.
Cost	Low.
Availability	Yes/future.
Use	Unknown.

Indicator 30 - Rejected

136. Judicial review cases taken over decisions under the Fisheries Act 1996 are almost always taken by commercial interests. The public cannot easily fund legal challenges and does not consider the number of challenges to have any relationship with confidence in effectiveness and integrity of MFish management.

Conclusion: Proposed Indicator 30 – Rejected - unrelated to GOV 2 Supporting Outcome.

MFish GOV3 SUPPORTING OUTCOME: All stakeholders have rights and responsibilities related to use and management of fisheries resources that are understood and for which people can be held individually and collectively accountable.

31. Indicator	Educational contacts (number)
Intervention Logic	Educational contacts such as school visits and boat shows increase stakeholders understanding of their rights and responsibilities related to the use and management of fisheries resources.
Relevancy	Medium. Only demonstrates MFish investment, however does not measure effectiveness of those contacts in increasing stakeholder understanding.
Cost	Low.
Availability	Yes/now.
Use	Unknown.

Indicator 31 - Rejected

137. A rather disconnected Outcome Statement. Seeks to measure the extent that selected sub-sets of the population of Aotearoa understands the rights and responsibilities with respect to the Fisheries Act 1996.

138. How do you measure accountability? Quotas not exceeded? Bag limits not exceeded? Seabird and marine mammal captures reported?

Conclusion: Proposed Indicator 31 – Rejected - if this was considered worthy (and we certainly do not consider it so) then this is better suited as an addition to the national survey, discussed earlier in this submission.

MFish GOV3 SUPPORTING OUTCOME: All stakeholders have rights and responsibilities related to use and management of fisheries resources that are understood and for which people can be held individually and collectively accountable.

32. Indicator	Ministry Website hits (number)
Intervention Logic	This measures the demand for information about the rules of fishing. Indicator demonstrates stakeholder interest in understanding their rights and responsibilities.
Relevancy	Medium/low.
Cost	Low.
Availability	Yes/future.
Use	Unknown.

Indicator 32 - Rejected

139. So obtuse we assume MFish is scrambling for something to say.

Conclusion: Proposed Indicator 32 – Rejected - unrelated to GOV 3 Supporting Outcome.

MFish GOV3 SUPPORTING OUTCOME: All stakeholders have rights and responsibilities related to use and management of fisheries resources that are understood and for which people can be held individually and collectively accountable.

33. Indicator	Number of prosecutions (% where prima facie cases established, % without adverse judicial comment about case handling)
Intervention Logic	Number of prosecutions measures the number of stakeholders complying with fisheries rules. Indicator demonstrates whether there is an understanding of the rights and responsibilities related to the use and management of fisheries resources.
Relevancy	Medium. Also dependent on MFish's resources to prosecute.
Cost	Low.
Availability	Yes/now.
Use	Unknown.

Indicator 33 - Rejected

140. The number of prosecutions only indicate the detection rate, which will rise and fall with resourcing and interpretation.

141. The Court definition of primary taker probably had a large effect on the number of prosecutions.

142. This is not a good measure of the public's understanding of rights and responsibilities in respect of the Fisheries Act 1996.

Conclusion: Proposed Indicator 33 – Rejected - unrelated to GOV 3 Supporting Outcome.

MFish GOV3 SUPPORTING OUTCOME: All stakeholders have rights and responsibilities related to use and management of fisheries resources that are understood and for which people can be held individually and collectively accountable.

34. Indicator	Compliance rates (commercial and non-commercial percentage rates)
Intervention Logic	Observed compliance rate percentage measures the number of stakeholders complying with the rules. The compliance rate demonstrates understanding of the rights and responsibilities of stakeholders.
Relevancy	Medium.
Cost	Low.
Availability	Yes/now.
Use	Unknown.

Indicator 34 - Rejected

143. Percentage of what? As above MFish do not know the rates of compliance, and can only guess at the rates of detection.

Conclusion: Proposed Indicator 34 – Rejected - unrelated to GOV 3 Supporting Outcome.

MFish GOV4 SUPPORTING OUTCOME: We have an enabling framework that allows stakeholders to create optimal economic, social and cultural value from their rights and interests.

35. Indicator	Regulations (number)
Intervention Logic	This indicator presumes that regulation is restrictive and less regulation provides for an enabling framework.
Relevancy	Low. Ideally, monitoring regulatory intervention would focus on the effectiveness of regulations but this is not monitored so indicator is a proxy for effectiveness of regulations.
Cost	Low.
Availability	Yes/now.
Use	Unknown.

Indicator 35 - Rejected

144. Totally disagree. Why would MFish bother to suggest such an obvious cheap shot at degrading the value of regulations? Is it at the insistence of the industrial lobby who just hate being regulated at all, and really just want to be trusted? They play the self-interest card at any opportunity – without ever quite letting go of it.

145. The number of regulations indicate the number of issues that have been examined and the efforts of MFish in mitigating the effects of fishing.

146. In many ways the number of regulations reassure the public that MFish is taking a wider view of managing fisheries than just pandering to the industrial lobby.

Conclusion: Proposed Indicator 35 – Rejected - unrelated to GOV 4 Supporting Outcome.

MFish GOV4 SUPPORTING OUTCOME: We have an enabling framework that allows stakeholders to create optimal economic, social and cultural value from their rights and interests.

36. Indicator	Cost recovery levy (amount $)
Intervention Logic	Changes in cost recovery levied on commercial stakeholders may demonstrate stakeholder participation in management of fisheries. It also identifies the level of cost recovered services provided by the Ministry that are necessary to manage fisheries.
Relevancy	Medium. The reasons for the change to cost recovery levies may not be apparent without significant evaluation, and may not directly relate to this outcome.
Cost	Low.
Availability	Yes/now.
Use	Unknown.

Indicator 36 - Rejected

147. MFish needs to get out from under the veil of economic outlook. The reduction in cost recovery levies most likely serves as an indicator for the decreasing quantity and quality of marine research.

148. While some parts of the industrial fishing industry are clearly able to undertake research projects at their own cost, or complete other administrative functions, and others take over minor duties, the assumption that these lead to optimum social, economic and cultural values being generated is unfounded.

149. To enable does not automatically enhance the outcome. Some alternative indicator is needed. If MFish

are hunting for an indicator of 'enableness', we wish you well.

Conclusion: Proposed Indicator 36 – Rejected - unrelated to GOV 4 Supporting Outcome.

MFish GOV5 SUPPORTING OUTCOME: We have an accountable, responsive, dynamic and transparent system of management.

37. Indicator	Public awareness (survey)
Intervention Logic	CoA public perception survey could provide qualitative information on all aspects of this outcome.
Relevancy	Medium. Perception may be influenced by other factors not directly relating to this outcome.
Cost	Medium.
Availability	Yes/future.
Use	Unknown.

Indicator 37 - Rejected

150. Another mouthful of generalised jargon uttered without thought. To give a precise enough definition to each of the four wonderful sounding attributes in the GOV 5 Supporting Outcome would take another 20-page paper.

151. The public will never be in a position to speak to the subject. They can only try and please. There is no logic to any of this.

Conclusion: Proposed Indicator 37 – Rejected - unrelated to GOV 5 Supporting Outcome.

MFish GOV5 SUPPORTING OUTCOME: We have an accountable, responsive, dynamic and transparent system of management.

38. Indicator	Complaints (number)
Intervention Logic	Will identify stakeholder concerns with MFish, which may identify issues relating to the achievement of the outcome.
Relevancy	Low. Some complaints may not be relevant for the measurement of this outcome.
Cost	Low.
Availability	Yes/future.
Use	Unknown.

Indicator 38 – Rejected

152. Complaints about what? Received by who? How would they be analysed?

153. A request for complaints will generate complaints.

Conclusion: Proposed Indicator 38 – Rejected - unrelated to GOV 5 Supporting Outcome.

The joint submitters of the Hokianga Accord, NZ Sport Fishing and option4 appreciate the opportunity to submit in response to the Ministry of Fisheries' request for information and advice on indicators to measure sector outcome performance. We would like to be kept informed of future developments.

Yours sincerely,

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