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

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Harvest Management Measures to Support the Introduction of Attached Bladder Kelp Stocks (KBB3G, KBB4G) into the Quota Management System.

Introduction

1. This submission is made on behalf of option4, the Hokianga Accord, the mid north iwi fisheries forum, and NZ Sport Fishing (NZSF). This submission is also made in the interests of assisting the Minister of Fisheries (the Minister) and Ministry of Fisheries (MFish) to achieve abundant fisheries that will enable all New Zealanders to provide for their social, economic and cultural well-being.
2. The joint submitters appreciate the opportunity to comment on the proposed harvest management measures to support the introduction of attached Bladder Kelp (*Macrocystis pyrifera*) stocks KBB3G, KBB4G into the quota management system (QMS) on 1 October 2010. The proposed harvest management measures were released for consultation on 11 June, with submissions due by 23 July 2010.

Submission

3. The Hokianga Accord and option4 reiterate our earlier concerns¹ about introducing attached Bladder Kelp seaweed (*Macrocystis pyrifera*) into the QMS. These concerns relate to the extensive commercial harvesting of this vital species and the creation of private property rights to attached Bladder Kelp seaweed, because of its very high ecological, environmental, social and cultural values.

¹ http://www.option4.co.nz/Fisheries_Mgmt/bladderkelp.htm#sub10

4. The joint submitters acknowledge and support the Ministry's process to consult and institute additional harvesting management measures and a framework for attached Bladder Kelp, in response to concerns expressed in earlier stakeholder submissions. However, it is difficult to comment on effective management measures when no Ministerial decision has been announced regarding Total allowable catch (TACs) and total allowable commercial catch (TACCs) for attached Bladder Kelp seaweed in KBB3G and KBB4G.
5. The joint submitters acknowledge and appreciate the technical expertise and guidance provided by the Seaweed Association of New Zealand (SANZ) in the development of this submission.

Proposed management options

6. The joint submitters do not agree with option 1, status quo, as a suitable management measure for attached Bladder Kelp seaweed.
7. We support option 2, with implementation of all five harvest management measures and propose another measure:
 - a. **Maximum cutting depth** – institute a maximum cutting depth of no more than 1.2 metres;
 - b. **Finer spatial scale reporting** – require the latitude and longitude location of each harvested kelp bed to be reported;
 - c. **Maximum canopy removal** – allow no more than 50 percent of any one kelp bed's canopy biomass to be harvested over a period of less than six months;
 - d. **Maximum canopy harvest frequency** – require that no one area (i.e. kelp bed) may be harvested more than twice in one year;
 - e. **Maximum canopy harvest width** – constrain harvesting of the canopy biomass to strips no greater than five metres in width; and
 - f. **Minimum space between harvesting strips** – a defined space between harvesting strips is maintained and monitored.

Implementation framework

8. The joint submitters support implementation of these harvesting management measures by way of option C – using a combination of regulation and voluntary industry mechanisms.
9. We agree with SANZ that kelp beds are both spatially and temporally variable, seasonally and annually.
10. We also agree a definition of a 'kelp bed' is essential for the sustainable management of this taonga [treasure]. Option 2 measures above will be ineffective without a clear definition of what does or does not constitute a kelp bed.
11. Given the limited number of commercial interests involved in the harvest of attached Bladder Kelp seaweed (*Macrocystis pyrifera*) reaching an agreement on a definition of a 'kelp bed' should not be that difficult.
12. Following this definition process a mapping exercise ought to be carried out to determine the nature and extent of existing kelp beds. This exercise is required if option 2 measures above are to be effective.

13. Again, reaching agreement on existing or potentially new kelp beds should not be that difficult given the limited commercial interests involved in this fishery.
14. If MFish choose not to map the beds of attached Bladder Kelp seaweed beds then a system needs to be implemented that requires *Macrocystis pyrifera* harvesters to map out the spatial extent of each bed, specify the areas within that bed they intend to harvest and monitor recovery rates. This requirement fits within option 2(b) above, for finer scale management.
15. Localised depletion is a major concern so the extent and rate of recovery after harvesting is an important factor in ensuring the ongoing sustainable harvest of *Macrocystis pyrifera*.
16. The joint submitters agree that ‘control’ beds must be established in each harvesting area to assist with monitoring. These ‘control’ areas would not be harvested, but would be in close proximity to beds that are being utilised. The control areas would need to be mapped and monitored annually.
17. Having control sites would enable MFish and harvesters to gather information on the natural variation of beds not subject to harvesting within the same area i.e. Akaroa Harbour, and enable comparison with remote control sites across KBB3G and KBB4G, such as coastal beds and those at the Chatham Islands.

The joint submitters are unsure if the one harvester per area scenario is appropriate, given past experience of the quota management system and the potential for that harvester to, in future, claim sole, private access to the kelp bed. However, we do acknowledge that in the case of *Macrocystis pyrifera* having a one area-one harvester policy may be beneficial, in that the onus would be on the harvester to sustainably manage their plots. As noted above, success of this initiative is dependent on the TAC and TACCs set by the Minister.

The Hokianga Accord and option4 are still awaiting answers from MFish for two important questions posed in paragraph 52 (a) and (b) of our last submission, dated 15 April 2010. These concerns relate to the “input and participation” of tangata whenua into these consultation processes and the regard, if any, given to Kaitiakitanga [guardianship] throughout this process.

The joint submitters of option4, the Hokianga Accord and NZ Sport Fishing appreciate the opportunity to submit on the proposed harvest management measures to support the introduction of attached Bladder Kelp seaweed (*Macrocystis pyrifera*) in KBB3G and KBB4G into the QMS on 1 October 2010.

As managers of this taonga [treasure] the public expect the Minister and the Ministry of Fisheries to ensure that attached Bladder Kelp seaweed (*Macrocystis pyrifera*) is conserved so the environment can sustain itself and future generations of New Zealanders.

We look forward to MFish addressing our concerns. We would like to be kept informed of future developments.

Yours faithfully,

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