

Hokianga Accord
Mid north iwi fisheries forum



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

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Proposed MFish Decision Criteria

Introduction

1. This submission is made on behalf of option4, the Hokianga Accord and NZ Sport Fishing (the joint submitters) and in the interests of assisting the Minister and Ministry of Fisheries to achieve abundant fisheries that 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 Ministry of Fisheries (MFish) Decision Criteria, released for consultation on 7 May, with submissions due by 28 May 2010.

Submission

3. The joint submitters support the principle of developing a standard set of decision criteria to guide MFish processes. The one general and six specific headings under which decisions will be tested are supported, however, we note they are inherently conflicted.
4. Historically, the decision criteria have been invisible and from the outside appear to move seamlessly to support commercial fishing interests, particularly those of quota owners. While we support the existence of a commercial industry that supplies the domestic market, we do not support the wider interests of the

public being subsumed by the very small subset of society that benefits from mass exploitation of our taonga – our precious fisheries.

5. Total allowable catch (TAC) and total allowable commercial catch (TACC) decision-making will benefit from greater tension resulting from the application of well-considered decision criteria. To be acceptable and meaningful these decision criteria will need to specifically address the interests of the public, in the use, environmental, and governance outcomes.
6. The weakness in the notion of testing options against a set of decision criteria lies in the ability for the test to deliver an obvious and unequivocal answer. The outcome statements being used to test for value, policy compliance etc must be specific enough to deliver a single answer, and not so vague as to enable equivalent weightings to a number of proposals.
7. The Fisheries 2030 objectives are so general that they cannot be used for a specific test. The proposed decision criteria are designed to justify almost any activity, because most will both conform and conflict with the 2030 objectives.
8. Moreover, the Ministry are seeking, through this process, to determine the impact of a proposed activity on MFish objectives. The focus ought to be on the management of fisheries to ensure particular regard is given to Kaitiakitanga and compliance with Purpose and Principles of the Fisheries Act 1996. Directing attention on MFish objectives is self-serving.
9. Analysis of compatibility with the government's priorities, including economic growth, needs to consider more than just monetary growth. There are other economic values, including social and cultural well-being, that need to be incorporated into this analysis.

Summary

10. The strength of utilising decision criteria is to improve the efficacy of decision-making processes. This purpose is lost by virtue of the criteria being imported from 2030 (to be used for test purposes) are so broad they serve as an umbrella rather than a guide.
11. The proposed decision criteria will enable MFish to write a decision-tree summary with justifications, and generate some defence for decisions taken, but will not add anything of value to the decision itself.
12. The decision criteria appears to serve only MFish and does little, if anything, to achieve more robust and transparent fisheries management that will enable all New Zealanders to benefit from having "more fish in the water/kia maha atu nga ika ki roto i te wai".
13. Given the lack of clarity in the proposed decision criteria document this consultation process would benefit from a case study, to enable us to extract a better understanding of how MFish might use these decision criteria in the future.
14. Therefore, support for the principles in the Decision Criteria consultation document is conditional on MFish providing both case studies and a fuller explanation.

The joint submitters of option4, the Hokianga Accord and NZ Sport Fishing appreciate the opportunity to submit on the proposed MFish Decision Criteria and would like to be kept informed of future developments.

Yours sincerely,

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