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NZ Sport Fishing Council Submission on the Proposed Southern bluefin tuna in season TAC increase

NZ Sport Fishing Council

1. The NZ Sport Fishing Council (NZSFC) formerly NZ Big Game Fishing Council is an umbrella group for sport fishing clubs. Club membership has grown steadily and we now represent over 30,000 members in 57 clubs spread throughout NZ. We run the NZ Nationals fishing tournament, which has evolved over time and remains successful.
2. NZSFC compile and publish the New Zealand records for fish caught in saltwater by recreational anglers. NZSFC is affiliated to the International Game Fish Association (IGFA) which records and publishes catches that qualify as recreational world records.
3. In 1996 the NZSFC helped establish the NZ Marine Research Foundation, which aims to sponsor research on marine species and fisheries for the benefit of all New Zealanders, including participants in ocean recreation.
4. Many of our most established fishing clubs have a focus on fishing for large pelagic species such as marlin, tuna, and sharks. In recent years our membership has expanded beyond the traditional deep sea angling clubs to include many local clubs targeting inshore species.
5. NZSFC have engaged in the management of highly migratory species (HMS) for many years, particularly since the mid 1980s which saw the introduction of the Billfish Moratorium. This was followed by the Billfish Memorandum of Understanding with commercial fishing interests. More recently we have been actively involved in the development of the draft HMS Fisheries Plan.

New Zealand Sport Fishing Council Inc.

(Previously New Zealand Big Game Fishing Council Est. 1957)

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Recommendations

- ⇒ MFish incorporate and highlight the need for the Minister of Fisheries to take a precautionary approach when managing the critically low southern bluefin tuna stocks
- ⇒ The Total allowable catch (TAC) of 420 tonnes be retained and the carry-over of Annual Catch Entitlement (ACE) to the following year be prohibited
- ⇒ In 2011-12 the TAC should be set at 380 tonnes and the carry-over of ACE to the following year be prohibited; and
- ⇒ The commencement of the fishing year for southern bluefin tuna should be changed from 1 October to 1 April, to better align with CCSBT decisions.

The proposals

6. The Ministry of Fisheries (MFish) proposes to alter the total allowable catch (TAC) of southern bluefin tuna (STN 1) in order to implement recent decisions made by the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). CCSBT is the regional fisheries management organisation that manages southern bluefin tuna. These decisions included an overall reduction in the global TAC for southern bluefin tuna, but an increased portion of that global TAC for New Zealand to reflect a longstanding agreement.
7. Three options for 2011 presented in the MFish Initial Position Paper (IPP):
 1. Retain the TAC of 420t and allow carry over of 31 t of unused ACE from the previous season.
 2. A one year in-season increase of the TAC to 539t (up 119 t) with:
 - i) a customary allowance of 1 tonne,
 - ii) a recreational allowance of 8 t, up from 4 t,
 - iii) an allowance for other fishing mortality of 3 t, up from 2 t, and
 - iv) available Annual Catch Entitlements for commercial fishers of 558t (including 114t of in-season Annual Catch Entitlements).
 3. A one year in-season increase of the TAC to 597t with:
 - i. a customary allowance of 1t,
 - ii. a recreational allowance of 8t,
 - iii. an allowance for other fishing mortality of 3t, and
 - iv. available Annual Catch Entitlements for commercial fishers of 616t (including 172t of in-season Annual Catch Entitlements)
8. Also two medium-term options are presented to ensure New Zealand is able to implement a likely decision by CCSBT to further reduce the global TAC for southern bluefin tuna:

1. Retain the TAC, total allowable commercial catch (TACC) and allowances at 2008-09 levels, with commercial fishers implementing a voluntary arrangement to limit their catches if required to ensure total catches do not exceed New Zealand's national allocation (i.e. if the allocation is reduced below 420t).
2. Decrease the TAC to 380t and set the following allowances:
 - i. a customary allowance of 1t,
 - ii. a recreational allowance of 3.5t,
 - iii. an allowance for other fishing mortality of 1.5t, and
 - iv. a TACC of 374t

Either option could be combined with a change to the fishing year for southern bluefin tuna, to make future implementation of CCSBT decisions more straight-forward and to better align with the current fishing season.

Stock status and management

9. Southern bluefin tuna are one of the most over fished highly migratory species in the world. The stock assessment models indicate that the current spawning stock biomass is between 3% and 6% of unfished levels (virgin biomass).
10. The Commission for the Conservation of Southern Bluefin Tuna has been in existence for over 17 years. Prior to that NZ, Japan and Australia cooperated to set catch limits to ensure sustainability of the stock. All the evidence to date is that the CCSBT has failed to rebuild southern bluefin stocks. In fact spawning stock biomass may be at historically low levels and there have been some years of poor recruitment recently. The CCSBT scientific committee has recommended meaningful reductions in catch to reduce the risk of stock collapse.
11. For many years it appears that Japanese vessels were catching southern bluefin well in excess of their quota and there are some doubts about how well Australian purse seine catch is estimated. Until recently other nations appear to have increased their catches despite the clear need for conservation. Under reporting of catch makes it very difficult to monitor the stock using catch per unit effort information.
12. Recently Japan has taken a significant cut to their catch limit and a requirement to individually tag and document all southern bluefin will make it much harder for unreported catch to be sold. At last year's commission meeting an effective catch reduction of 20% was passed for the next two years.
13. At the same meeting New Zealand's nominal quota was restored to 1,000 t in line with an historical agreement. The CCSBT national allocation for New Zealand is 709 t for the next 2 years. New Zealand has accepted this allocation and can choose to set a TAC lower than this.

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NZSFC submission

14. NZSFC have engaged in the management of HMS species for many years, particularly since the mid 1980s which saw the introduction of the Billfish Moratorium. This was followed by the Billfish Memorandum of Understanding with commercial fishing interests and submissions on the uncontrolled increase in swordfish catch in the late 1990s. More recently we have been actively involved in the HMS Working Group and HMS Fisheries Plan Working Group.
15. NZSFC continues to support the New Zealandisation of our commercial fisheries with catch from our waters taken by New Zealand companies rather than under foreign licences. Many of our members realise that this requires profitable tuna fisheries. Effective targeting of tuna also means there is less pressure put on bycatch species such as swordfish and sharks.
16. However, we also firmly believe in *kia maha atu nga ika ki roto i te wai* - more fish in the water. A high risk approach to managing depleted fish stocks is not supported. MFish have developed a Harvest Strategy Standard. If southern bluefin tuna was a New Zealand only stock then this Standard would require that this fishery be closed. We also understand that in the international context of the CCSBT that effective reductions in catch by the larger fishing nations have been agreed to but there is still uncertainty about how catch reductions will be implemented in future.
17. NZSFC will promote tag and release of southern bluefin caught by recreational fishers. The NZ annual recreational catch of southern bluefin usually amounts to less than 10 fish. There has been one season (2007) where August trips targeting Pacific bluefin tuna caught about 55 southern bluefin on rod and reel.
18. New Zealand is the only place in the world where two species of bluefin tuna (southern bluefin *Thunnus maccoyii* and Pacific bluefin *Thunnus orientalis*) can be caught in a single recreational fishery. It is a rare privilege to be able to access these fish. The NZ Sport Fishing Council expects management to reflect the need to preserve access to this significant fishery.
19. NZSFC does not support any increase in the TAC or TACC for southern bluefin. Stocks urgently need to be rebuilt and the CCSBT has failed to achieve this to date. The science committee indicated that more substantial cuts in global catches are needed in future to achieve a faster and more certain rebuild. Why wait before implementing these when there is a critical shortage of spawning stock biomass now?
20. New Zealand is on the eastern edge of the southern bluefin range. A reduced stock size could lead to a range contraction as seen in other heavily fished stocks. The very poor southern bluefin recruitment to New Zealand in the early 2000s was a warning that this could happen here. If fish stopped recruiting to New Zealand then, over time, southern bluefin could disappear from our waters.

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21. In the mid 1990s more Yellowfin Tuna were recorded in NZSFC club records than any other species. Last season just 59 yellowfin were landed by our clubs (2% of the total recorded for all species). The range of this species appears to have contracted to the detriment of New Zealand commercial and sports fisheries.
22. Without an effective rebuild plan southern bluefin could be placed on the CITES list of endangered species. This would prohibit international trade in southern bluefin and the New Zealand longline fishery may become uneconomic or have to refocus on other species. NZSFC believe that New Zealand must do what we can to avoid this.
23. Last year NZSFC supported the proposal to remove the provision for commercial fishers to carry-forward unfished Annual Catch Entitlements (ACE) to the following year. CCSBT has agreed that no carry over of unfished allocation will be allowed in 2012. NZSFC oppose the carry over of ACE into 2011. With the spawning stock biomass at such critically low levels, and predicted to go lower in the near future (Figure 1), the right thing for the Minister and New Zealand to do is to reduce southern bluefin catch, not look for every opportunity to increase it.

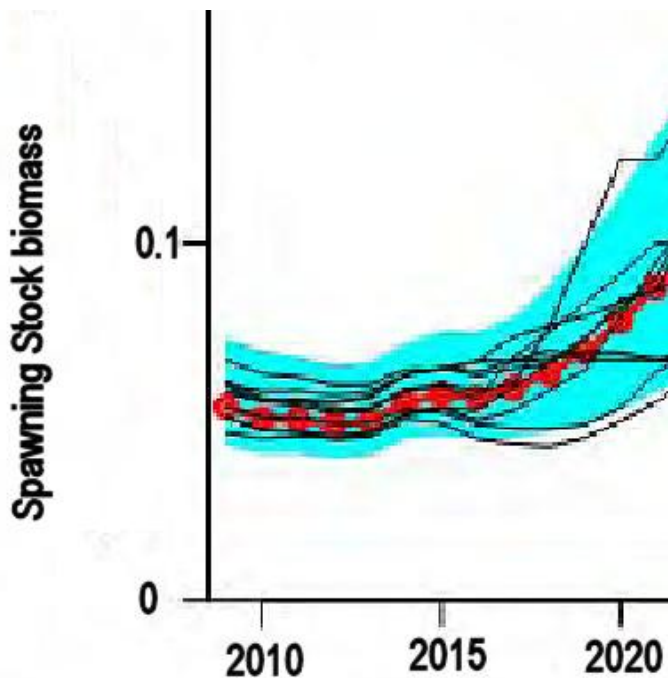


Figure1: Projected spawning biomass for the next 10 years (red dots) from the reference set and management plan evaluation of a 30% reduction in catch by 2013 and a further reduction in 2016, tuning option 2 (part of Figure 1 CCSBT Science Committee 15 report). Note that spawning stock biomass continues to decline until significant catch reductions are in place.

24. This year the CCSBT amended the Rules of Procedure to task the Scientific Committee to incorporate advice consistent with a precautionary approach:
Rule 8 Bis (SCIENTIFIC ADVICE)
- “1.The Scientific Committee shall incorporate advice consistent with the precautionary approach in its advice to the Commission”.*
25. There is no mention in the MFish IPP of caution or the precautionary approach. We submit that MFish need to incorporate advice consistent with the precautionary approach in its advice to the Minister. Providing “Short Term” advice to increase southern bluefin catch when the scientific advice is that the spawning stock is critically low and continuing to decline is not consistent with a precautionary approach.
26. **NZSFC submit that the TAC of 420 t should be retained** and that no carry over of ACE be allowed.
27. **NZSFC submit that in 2011–12 that the TAC should decrease to 380 t** with no carry over of ACE.
28. **NZSFC support a change to the start to the fishing year** for southern bluefin from 1 October to 1 April to better align with CCSBT decisions.
29. We believe New Zealand has a strong record as a responsible fishing nation that has adopted good fisheries management principles and conservation ethics in this fishery by accepting a reduction from 1000 to 420 t for 16 years, and adhering to this limit. The NZ Sport Fishing Council does not consider there are any substantial reasons why this responsible attitude should change now, especially when the fishery is acknowledged to be in a dire situation.

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