



N Z RECREATIONAL FISHING COUNCIL

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Supplementary Submission on TAR1 AMP Proposal

Thank you for the opportunity to make further submissions to our combined submission with N.Z. Big Game Fishing Council, and option 4.

THE AMP PROCESS

Our Council has been involved in the politics of fishing since the very early 90's and the author of this submission was involved and present at the meeting when the Ministry first introduced the AMP process. At the time of introduction our Council supported the new process as it allowed for sectors of the fishing industry to search out new species and new fishing areas and they were to be rewarded with a token TACC for a given time to make it economically viable to carry out the research. Our Council still supports this type of AMP proposal.

Our Council understands the various reasons why the AMP framework was put in place but have some concern about the way that the programme is currently being used. From our viewpoint it would now appear to be one of the methods that industry is using to get higher TACC allowances.

An example of this is where under the Adaptive Management Programme TACC's LIN3 and LIN4 were increased by about 30% for the 1994/95 season. The intention being that it was expected to allow any decline in biomass to be detected by trawl surveys of the Chatham Rise. The TACC's were set at 2810t and 5720t respectively. These stocks were removed from the AMP on Oct 1 1998 and the TACC's maintained at the increased levels. However from Oct 1 2000 just 2 years later, the TACC's for LIN3 and 4 were reduced to 2060 and 4200t respectively.

This type of action tells us to be wary of any species being considered for the AMP process. We believe that there are too many "guesstimates" being used as to whether a stock is suitable for inclusion into the programme.

At the time of writing our final submission in August 2002 for the 2002/03 year we were unaware changes had been made to the AMP process that allowed for species and areas as proposed for the TAR1 area. Our Council was unaware of when the changes took place to the "new look AMP". None of our members were aware of any consultation taking place otherwise concerns that we have now would have been raised at the time.

We could find nothing on our files that proposed any changes to the way the AMP rules of play were changed. It is only since we have had discussion with some Ministry personnel that we have found that some obscure document was released

approximately three years ago proposing the changes. We believe that this is totally unsatisfactory and changes proposed then should have had wide, open consultation between the various stakeholders. If this had of been the case we would not find ourselves in the position that we are presently in.

TAR1 for example is a major recreational fishing area where non-commercial users in some areas take a significant percentage of the catch. To introduce TAR1 into the AMP process is offensive to our Council because it is basically taking fish off our sector to give to Industry, and we are to carry the costs if the AMP fails, as was the case with LIN3 and LIN4.

We can envisage the huge pressure placed on the Ministry to maintain the higher levels of a TACC at the end of the evaluation process, and it is for this reason that we cannot support any AMP proposals for a fishery where we are involved as a major stakeholder. TAR1 being the shared fishery that it is, an AMP is totally inappropriate

TAR1 FISHERY

TAR1 being a fishery that has already been fished for some 50-60 years we believe that it has probably already been fished down to MSY. If TAR1 is not already down to MSY, it must be very close to it after 50 years of effort.

The IPP paper suggests that there is **"No quantitative assessment of the status of the TAR1 stock, relative to the stock level that would produce the MSY"** and the plenary goes on to suggest that there is only a **"reasonable probability that the biomass is greater than the size that will produce MSY"**

Whilst part of the Northern Inshore Fisheries Company's proposal looks good on paper we have a number of concerns with the proposal. A large amount of the proposal relies on voluntary agreement by the quota holders. Our past experience tells us that voluntary agreements don't work and the more persons involved, the less likelihood of it working.

The NIFCL have proposed to spread the additional tonnage over all areas. We realise that it is a great temptation to obtain the quota as close to the homeports as possible to keep costs to a minimum, and we are aware of some quota holders (not NIFCL fishers) who have been charged with "Trucking" in the past, and no doubt others will be caught in the future. These past demeanours by some operators raise an element of suspicion.

If the proposal was to proceed, we believe that the only method of allaying our fears would be satellite monitoring of all vessels involved and observer coverage, but NIFCL have already indicated that the value of the additional catch would not be viable with the cost of monitoring.

In the NIFCL proposal they have indicated employing a contractor to manage the catch, CPUE, etc. Whilst we appreciate the importance of obtaining the relevant data, we do not believe an employee of NIFCL should carry out the work. They have a vested economic interest in the results and an employee of the company has the ability to manipulate results to the company's advantage. It is our belief that the work should be carried out by an independent agency, which can

stand up to validation, and the costs to be carried by the NIFCL. This would not only allay any fears that we may have but also protect the NIFCL against any future accusations.

NIFCL SUPPLEMENTRY PAPER

We have found in this paper a number of assumptions which supports the Company's proposal and our views differ greatly.

In relation to spatial conflict, the Company do not acknowledge that there will be any. They have suggested that recreational anglers do not fish outside the 50-metre mark. This statement is totally wrong. The fishers fish where the fish are. Tarakihi are a mobile species that can be inside the 20 metre mark and then a week later they can be out to 50 metres. There are a number of areas that I personally fish along with many others that is 120 metres deep. To suggest that all fishers fish inside 50 metres is far too simplistic.

The paper also suggests that recreational anglers only fish over foul ground and therefore trawlers would not affect the recreational ability to catch Tarakihi. This is another statement that is totally misleading. The majority of Tarakihi caught in the Bay of Plenty are caught over either sandy or mud bottoms, and anglers are therefore in direct spatial conflict with trawlers. There have been many situations in the past when we have been fishing outside a line where trawlers have been operating.

Most recreational anglers, who are targeting Tarakihi, travel at speed to the depth of water where they intend fishing. They then slow the boat right down to a crawl, waiting for a school of Tarakihi to show up on the sounder. They will then stop the boat and drift fish. If the school do not stay under the boat, the crew will relocate the school and go through the same process again. While some Tarakihi are caught by the recreational sector over foul, they are usually by-catch when targeting Snapper.

The proposal also suggests that recreational anglers are targeting Tarakihi using set nets. Set nets are almost a thing of the past in open fishing waters. Whilst they are still used in harbours for mullet and flounder, there are a minimal number used in the open water, and these are usually targeting "flats" inshore, and not other species in deeper waters.

We do not support the NIFCL proposals rationale that MFish have got it wrong when establishing the recreational tonnage by using an average between the 96 and 2000 surveys. The Company wants to stick with the 96 survey because it is a lower figure and makes our sector look a smaller stakeholder. We are aware that there have been difficulties in establishing which figure is correct, but we believe the 96 figure is too low when compared with earlier surveys, and that the 2000 survey is closer to the real tonnage taken.

We also have difficulty with comments made by a "mystery overseas scientist" that it is not feasible to carry out work on the present recreational catch. A number of people in our sector have been involved with ramp survey work on Kahawai for a number of years. We do not see it as difficult to question all returning anglers as to whether they have been targeting Tarakihi and measuring any fish caught.

We are aware that there have been 28 boat ramps between Mangonui and East Cape manned over a period of four months to obtain statistics on the recreational Kahawai catch in KAH1, and with a slightly modified interview form and some additional ramps on the West Coast we believe that sufficient data could be obtained to satisfy our concerns.

Apart from the interviewers, we appreciate that we would need sweepers, a number cruncher, Data inputter and a modeller to produce the report but the work can be done to find the answers that we would require at a cost. We aware that the data obtained probably would not be statistically robust data and one would probably be able to drive a bus through the gaps.

We also find it strange that the proposal suggests that there will be difference in any new maps because they will be on GPS marks rather than statistical areas. It is our belief that if the shots in the past are correct as far as statistical areas, then there should be a similarity to the location of the shots in the future using GPS. We appreciate that they may not be exact but there should be a similar number of shots plus a few extra, which can be attributed to the present statistical areas. Quite frankly, if the AMP proposal proceeds, we are not prepared to wait two years for any results. We would expect figures to be available at the end of the first twelve months.

We are unaware why the NIFCL have suggested existing Fishing Regulations also serve to give effective separation in relation to Tarakihi (par25). Recreational anglers are not allowed to fish in Marine Reserves either so we fail to see how these reserves create effective separation.

We also fail to see what the 46m rule has got to do with trawling for Tarakihi. We are unaware of any vessels in excess of 46 metres targeting Tarakihi. Should any vessel in excess of 46 metres attempt fishing the Tarakihi grounds the Government will be told in uncertain terms.

We can see nothing in the NIFCL proposal for TAR1 that gives us confidence that we will be guaranteed the same access to a reasonable daily bag limit and similar fish sizes to what we are now able to achieve therefore

OUR RECOMMENDATION IS

That the AMP proposal be declined as it is inappropriate for a shared fishery, and it is our sector who carries all of the risk.

Ross Gildon
President

