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Joint recreational submission to the review of sustainability measures for Hoki (HOK 1) for 2019–20

Submission summary

1. The submitters assume that the true stock status of hoki is closer to 30% than 60% of the western stock unfished biomass. The survey data, CPUE and industry action to reduce catch all indicate the stock has been in decline.
2. The submitters support option 2, a 33% reduction in the catch from the western stock, as it is the only option based on the current western stock-focused model that is predicted to significantly increase biomass over the next five years.
3. If the western stock is really in trouble, then the appropriate response is to reduce catches to no more than 50,000 t and rebuild the biomass to above 40% of unfished biomass within six years.
4. If more survey data will provide reliable stock abundance trends for the western stock, then Fisheries New Zealand must ensure that survey frequency is increased. There will be no new data on the western stock biomass until 2021.
5. The submitters support the call for the government to end bottom trawl fishing on seamounts and similar deep sea benthic features wherever they are known to occur.

The submitters

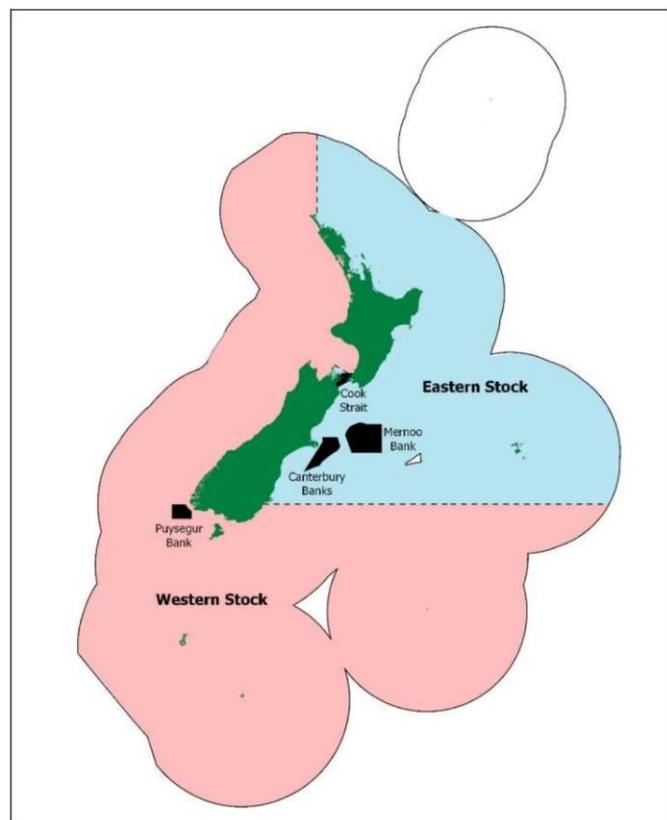
6. The New Zealand Sport Fishing Council (NZSFC) appreciates the opportunity to submit on the review of sustainability measures for Hoki (HOK 1) for 2019–20. Fisheries New Zealand (FNZ) advice of consultation was received on 18 June 2019, with submissions due by 26 July 2019.
7. The NZ Sport Fishing Council is a recognised national sports organisation of 54 affiliated clubs with over 35,000 members nationwide. The Council has initiated LegaSea to generate

widespread awareness and support for the need to restore abundance in our inshore marine environment. Also, to broaden NZSFC involvement in marine management advocacy, research, education and alignment on behalf of our members and LegaSea supporters. www.legasea.co.nz.

8. The New Zealand Angling and Casting Association (NZACA) is the representative body for its 35 member clubs throughout the country. The Association promotes recreational fishing and the camaraderie of enjoying the activity with fellow fishers. The NZACA is committed to protecting fish stocks and representing its members' right to fish.
9. Collectively we are 'the submitters'. The submitters are committed to ensuring that sustainability measures and environmental management controls are designed and implemented to achieve the Purpose and Principles of the Fisheries Act 1996, including "maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations..." [s8(2)(a) Fisheries Act 1996].
10. We would like to be kept informed of future developments. Our contact is Helen Pastor, secretary@nzsportfishing.org.nz

Background

11. Hoki is the largest New Zealand fishery and represents around a quarter of all fish caught commercially in New Zealand waters. They are fast growing but can live to 25 years old.
12. The main trawl fisheries are in Cook Strait and on the Chatham Rise (eastern stock, blue) and off West Coast and in the sub-Antarctic (western stock, pink).
13. In 2018 deepwater fishing companies made a collective decision not to catch 20,000 tonnes of quota for the year, reducing the overall catch to 130,000 tonnes due to concerns about the lower catches in the western stock.



14. Fisheries do fluctuate according to a wide range of factors. The Tasman Sea surface temperatures were as much as 6 degrees C above the norm in the summer of 2017 but temperatures at the depth of 200 to 600 m, where hoki are found, are much more stable.

Fisheries New Zealand Proposals

15. The largest fishery for HOK 1 is the spawning west coast South Island fishery, which operates seasonally from May-September. In 2017/18, 41% of overall HOK 1 catch was taken from the West Coast South Island fishery which represented 77% of the total catch from the western stock. The 20,000 t industry catch reduction will be applied to the western stock in 2018–19. Total hoki catch from this area will still be around 70,000 t.
16. Fisheries New Zealand proposed changes rely on industry catch spreading within the HOK 1 QMA. Option 1 would match the current industry reduction in the western stock of 22%, while option 2 is intended to reduce the commercial catch in the western stock by 33% (Table 1).

Table 1: Proposed TAC, TACC and allowances in tonnes for HOK 1 from 1 October 2019.

Option	Non-regulatory catch split arrangement				Allowances (tonnes)		
	TAC	TACC	Eastern stock limit	Western stock limit	Customary Māori	Recreational	Other sources of fishing related mortality
Current status	151,540	150,000	60,000	90,000	20	20	1,500
Option 1	131,340↓ (13%)	130,000↓	60,000	70,000↓ (22%)	20	20	1,300↓
Option 2	121,340↓ (20%)	120,000↓	60,000	60,000↓ (33%)	20	20	1,200↓

Submission

17. There is a high degree of uncertainty in the stock status advice for the western stock in 2019. Depending on which model is used, the western stock could be at 29% of the unfished biomass. Alternatively, the stock could be at 56% of the unfished biomass with no need for management change.
18. The submitters are stunned that in New Zealand's most valuable fishery there has only been one acoustic survey of west coast hoki in the last 6 years when this fishery represents 77% of the commercial catch in that stock. The other component of the western stock in the sub-Antarctic has had three December trawl surveys in the last 6 years. These provide the only data on biomass changes as the working group has determined that trawl Catch Per Unit of Effort (CPUE) does not accurately index abundance over the long term.
19. There are plenty of inshore fish stocks that use trawl CPUE and the submitters agree that in most cases this does not accurately index abundance over the long term, but it is still used.
20. The fishing industry has determined that short term declines in CPUE were of sufficient concern to reduce catch by 20,000 t and forego gross income of \$33.8 million.

21. Therefore, the submitters assume that the true stock status is closer to 30% than 60% of the western stock unfished biomass. Option 2 is the only current option predicted to significantly increase biomass over the next five years
22. The submitters are concerned that FNZ are only proposing one option that reduces the TACC below the level that commercial interests have already implemented. While we acknowledge the conservation efforts in 2018 to suggest that the fishery will rebuild by reducing current catch by 10,000 t (11% of the western stock) is unrealistic. If we are to rebuild this fishery the Minister needs to consider real cuts.
23. Skippers have been complaining for years that the older fish are gone and catches are maintained by taking small fish, and the situation is getting worse. If the western stock is really in trouble, then the appropriate response is to reduce catches to no more than 50,000 t and rebuild the biomass to above 40% of unfished biomass within 6 years.
24. If in future we find the fishery was more abundant than predicted there will be no losers, the fish will still be available to be caught. We don't have to risk pushing the stock lower.
25. In a deepwater trawl fishery we are concerned that the allowance for other fishing related mortality is only 1% of the TACC. Even in mid and inshore trawl fisheries the mortality rate is higher than the hoki allowance. It is not feasible that hoki can be returned to the wild given the depths being trawled. The Minister has a statutory duty to use best available information and act in a precautionary manner when making decisions. Given the uncertainty around the current stock status an allowance of 10% of the TACC is the minimum that ought to be set aside to account for expected mortality.
26. We reiterate the need for FNZ to develop policy on setting an allowance for other sources of fishing related mortality. The submitters support the default setting of 10% of the TACC, as a minimum for trawl fisheries, and expect that any variation from this is adequately explained and supported by data.
27. There are many similarities between hoki and the northwest cod stock off New Foundland that collapsed in a spectacular manner, causing the 1992 moratorium on harvest and throwing 30,000 people out of work. If hoki stock sizes are overestimated and high exploitation rates are maintained this leaves them vulnerable to sudden collapse.
28. Where is the MSC in all this? The hoki fishery was certified last year by MSC and is supposed to offer comfort that the fishery is managed sustainably. How can any assurance be given when there is a lack of basic understanding about current stock sizes and no biomass surveys that collect a reliable time series of relative abundance estimates? Certification for hoki ought to be immediately suspended until sustainability can be assured.
29. The submitters have read the submission from the Deep Sea Conservation Coalition and fully support the need for action to stop bottom trawling destroying the ancient coral forests found on seamounts and similar deep-sea features.

30. We strongly reject the argument that, having protected some seamounts (including through seamount closures and the so-called benthic protected areas), it is acceptable to continue to destroy other seamount ecosystems with bottom trawl fishing. This is central to the justifications set out by Fisheries New Zealand in its proposed “sustainability” measures for hoki and orange roughy in 2019, which are anything but sustainable.
31. Biodiversity loss that bottom trawling entails – destruction of deepwater corals, sponges and other deep-sea life over thousands of square kilometres – cannot be justified by the existence of the Benthic Protection Areas (BPAs).
32. New Zealand still hasn’t defined the “habitat of particular significance for fisheries management [that] should be protected” a principle under the Fisheries Act 1996. Meanwhile, negotiations in New York are currently underway for a new international agreement for the conservation and sustainable use of marine biological diversity in areas beyond national jurisdiction, underlining international concern and alarm at the many threats to marine biological diversity. It is entirely unacceptable for New Zealand to be destroying marine biological diversity in its EEZ and issuing high seas permits allowing extensive bottom trawling on seamounts, at the same time as recognising the need to protect it internationally.
33. Historically, when the hoki stock is in decline a lower proportion of the TACC is taken by mid-water trawling on spawning aggregations and the number of bottom trawl tows targeting hoki increases. Overall, midwater trawling has declined by about 77% since the peak in 1997. The submitters support the call for the government to end bottom trawl fishing on seamounts and similar deep sea benthic features wherever they are known to occur.