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26 July 2019

Joint recreational submission to the review of sustainability measures for Red Snapper (RSN 1 and RSN 2) for 2019–20

Submission summary

1. The submitters know that Red snapper 1 (RSN 1) has been over fished.
2. Urgent management action is required as catch has been unconstrained for 40 years.
3. The submitters support a meaningful reduction of 100 t to the current TACC in RSN 1.
4. The submitters support catch sampling and ageing of red snapper in RSN 2. It is too late to get baseline data in RSN 1.
5. The submitters support option 1, no change to the TAC in RSN 2.

The submitters

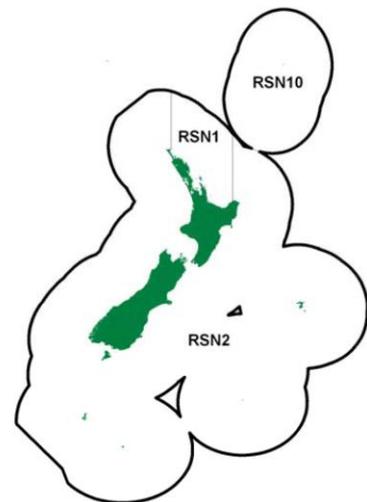
6. The New Zealand Sport Fishing Council (NZSFC) appreciates the opportunity to submit on the review of sustainability measures for 2019–20. Fisheries New Zealand (FNZ) advice of consultation was received on 18 June 2019, with submissions due by 26 July 2019.
7. The NZ Sport Fishing Council is a recognised 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. The submitters appreciate the somewhat longer consultation period (29 working days) for this year's October sustainability round.
11. Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from these reviews and would like to be kept informed of future developments. Our contact is Helen Pastor, secretary@nzsportfishing.org.nz

Background

12. Information on the biology of red snapper indicates that it is long-lived and likely to be a relatively unproductive species. While often caught on or around reef areas, Fisheries New Zealand say red snapper are also occasionally caught in open water habitats between 100-400m in depth. The Plenary Report states that red snapper is present throughout New Zealand coastal waters but is generally rare south of East Cape and Cape Egmont.
13. Red snapper has been targeted for many years in RSN 1 initially by set net fishers who wanted to catch non-quota species with no lease/ACE cost. The prevalence of set netting on reefs led to concerns about the demise of long lived resident reef species and ghost fishing by lost nets. Following a review of set netting in the Auckland Fisheries Management Area (AFMA) some areas were closed to set netting and 19 reef species to classified as non-commercial.
14. Red snapper became a target species for longliners following the reduction in the TACC for SNA 1 in 1997. There was a ready market for red snapper and longlines could be set to float over foul ground, and reefs without getting caught on the bottom. Fishers were not allowed to target non-QMS species so the target was mostly reported as snapper or trevally. Red snapper was introduced to the QMS in 2004 but by then the damage was done.
15. Red snapper came into the quota system in 2004 with a Total Allowable Commercial Catch (TACC) in RSN 1 of 124 t and 21 t in RSN 2. (Figure 1)



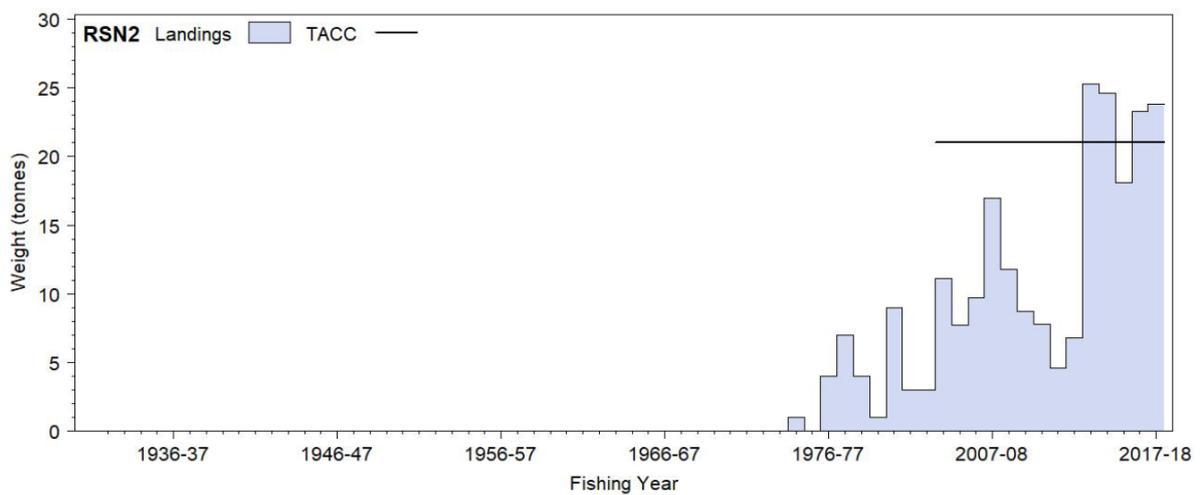
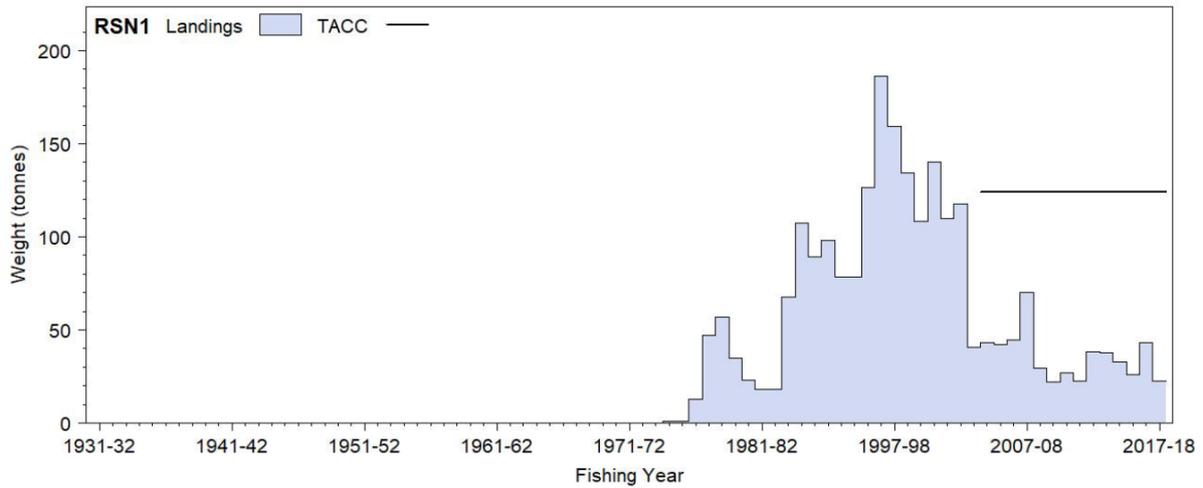


Figure 1: Reported commercial landings and TACC for RSN 1 (top) and RSN 2 (bottom).

Submission

- 16. There is no biological knowledge on the stocks; no stock size estimates, age structure of the stock, recruitment or productivity. There is no estimate of natural mortality or current fishing mortality. Studies suggest red snapper are slow growing and long lived, perhaps living longer than 50 years.
- 17. The exploitation of stocks with these characteristics is known to be problematic given the ease and degree in which they become depleted. Any exploitation needs to be below 5% of the current spawning stock biomass and measures must be taken to deliberately manage fishing effort in their prime habitat. None of these conditions have been met for either stock, RSN 1 or RSN 2.
- 18. There is a real dilemma with these stocks and others that occupy reefs and fringes, including hapuku, bass and tarakihi. Red snapper school over reefs or under overhangs during the day and disperse into open water at night to feed on large planktonic animals¹. Clearly RSN 1 was

¹ Ayling & Cox. Sea Fishes of New Zealand

fished down during the 1990s as it became a target species and the highest value fresh export species to Europe. Targeting of RSN still occurs in RSN 1 and this is spreading to RSN 2.

19. There are a number of fish species that are assessed as separate stocks on the east and west coast of the northern North Island, even if their QMAs spans both coasts. Tarakihi, red gurnard and trevally for example. It is highly likely that red snapper, which are more resident than these species, is one stock or several sub stocks within RSN 1.
20. It is incorrect to characterise RSN as one of a bundle of bycatch species encountered while targeting another species. RSN makes up a valuable part of commercial catch. The problem is that, except for RSN 2 over the last 4 years, the TACC has not constrained catch nor served any useful sustainability purpose. Now catch has increased in RSN 2 Fisheries New Zealand advocate removing the constraint and, with intent and purpose, allow the same open access that has destroyed RSN 1. The submitters reject this approach.
21. Fisheries New Zealand must dig deeper into the cause of the increase in RSN 2 landings. Is it a general increase across the fleet? The submitters object to the practice of trawling across new rough ground with heavy gear to “break it in” to access the last refuges for tarakihi and red snapper. If fishers are doing this they must be told to stop.
22. When asking the local commercial fishers about the state of RSN 1 the most common response is “what red snapper”. It’s been decades since red snapper of marketable size have been fished out of local and deep reefs. The appropriate response to the widespread depletion of RSN 1 is to set the TAC at a level that constrains catch. It might also constrain the catch of associated species, but this is just a function of the QMS and doesn’t relieve the Minister from the statutory obligation to “ensure sustainability”. The Chief Justice noted that under the Fisheries Act 1996 utilisation may be provided for, but sustainability must be ensured².
23. Given the information vacuum concerning catch settings for RSN 1 ensuring sustainability requires the TACC be set below current catch levels – at about 20t. To now take the experience and lessons from RSN 1 and apply them to RSN 2 requires that no change be made to the current TACC, as this stock is now being targeted and a rapid fish down will follow in exactly the same way as it did in RSN 1.
24. Clearly these stocks cannot be managed by output limits alone. RSN 1 has clearly become seriously depleted and allowed to do so by Fisheries New Zealand. RSN 2 is now well on the way through the fish down phase before abundance also falls away. This isn’t employing any notion of best practice or principle – it is a shallow superficial notion that an uncatchable TACC in one area can be ‘moved’ to a new area and as long as the aggregate is maintained there is no discernible impact.
25. The TACC that will be reduced by 60 t has never got within 60 t of that TACC for 20 years – there are no fish to justify leaving the TACC above current catch. The fact that this level of TACC in RSN 1 has destroyed the stock is the most important reason to not destroy RSN 2 by using the same sloppy reasoning.

² NEW ZEALAND RECREATIONAL FISHING COUNCIL INC AND ANOR V SANFORD LIMITED AND ORS SC 40/2008 [28 May 2009].