

Monitoring fisheries at finer spatial scale: Effective fisheries management takes place at a sub-QMA level.

[Not relevant to request]

Would you like to comment?

We have GPS, need a simple app.

[Not relevant to request]

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

I want to see illegal dumping as much as possible eliminated from commercial fishing.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered? The current reporting system works well and with the introduction of cedric a much easier alternative

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

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Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? More legislation has to be implemented before I would agree with any electronic monitoring .

There is no room for error in this it is my belief future discussion on VOL2 strategic management of fish stocks i.e. Discards ,Minimum legal size schedule 6

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?NO

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?COST

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

The same way they always have or sorry have meant to have look at the Data they are receiving

And believe us we are in this profession to protect our future

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

The only monitoring I have on my vessel is AIS

I use CEDRIC to do my TCER MHR and CLR

Do you operate this technology on your own behalf, or as an input into someone else's operations?YES

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

NO

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

[Not relevant to request]

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- Strongly disagree ☐
- Disagree ☐
- Neither ☒
- Agree ☐
- Strongly Agree ☐

Would you like to comment? For instance, how would you describe the current system?
What other factors should be considered?
Overburdened

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- Strongly disagree ☐
- Disagree ☐
- Neither ☒
- Agree ☐
- Strongly Agree ☐

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- Strongly disagree ☒
- Disagree ☐
- Neither ☐
- Agree ☐
- Strongly Agree ☐

Would you like to comment?

Option 1: Current state

Do you agree with this option (please tick only one box)?

- Strongly disagree ☐

Disagree ☐
Neither ☒
Agree ☐
Strongly Agree ☐

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

Strongly disagree ☐
Disagree ☐
Neither ☐
Agree ☐
Strongly Agree ☒

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

Strongly disagree ☒
Disagree ☐
Neither ☐
Agree ☐
Strongly Agree ☐

Would you like to comment?

This option is impossible for small inshore boats who have no room for a computer and they are open boats.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Leave the status Quo. No where on a small boat to mount a camera as it would get in the way.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Placement of cameras on small boat. Out in the weather

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Keep present system. Total volumes brought aboard small inshore boats is negligible.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?
Sounder

Do you operate this technology on your own behalf, or as an input into someone else's operations?
Own

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

No

What issues do you currently have with
ER?
No reception

What sort of feedback do you want from ER? What sort of data from ER would be helpful to
you?
NA

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in
being an “early adopter”?
No

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data
collection on fishing activity with MPI on a confidential basis?
NA

How might your existing systems used by you and your stakeholders deliver on IEMRS
objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those
represented by your organisation?

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- Strongly disagree ☐
- Disagree ☐
- Neither ☐
- Agree ☐
- Strongly Agree ☐

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- Strongly disagree ☐
- Disagree ☐
- Neither ☐
- Agree ☐
- Strongly Agree ☐

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

[Not relevant to request]

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- Strongly disagree ☐
- Disagree ☐
- Neither ☒
- Agree ☐
- Strongly Agree ☐

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- Strongly disagree ☐
- Disagree ☐
- Neither ☒
- Agree ☐
- Strongly Agree ☐

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

Strongly disagree

☐

Disagree

☒

Neither

☐

Agree

☐

Strongly Agree

☐

Would you like to comment?

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Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting?

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither
- ☒ Agree
- ☐ Strongly agree

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Problem definition

Do you agree with how we have defined the problem?

- ☒ Strongly disagree
- ☐ Disagree
- ☐ Neither
- ☐ Agree
- ☐ Strongly agree

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

It is fine how it is

Objectives

Do you agree with the objectives of IEMRS?

☐
Strongly
disagree

☒
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment?

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Option 1: Current state

Do you agree with this option?

☐
Strongly disagree

☐
Disagree

☐
Neither

☐
Agree

☒
Strongly agree

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

☒
Strongly disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly agree

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option?

☒
Strongly disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly agree

Would you like to comment?

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Finance and lack of privacy

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

How it is done at present

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

None

Do you operate this technology on your own behalf, or as an input into someone else's operations?

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

No

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

Licensed fish receivers

What problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements?



Strongly disagree



Disagree



Neither



Agree



Strongly agree

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements?



Strongly
disagree



Disagree



Neither



Agree



Strongly
agree

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

To the reveiw panel. I,ve been an inshore commercial fisherman since 1997, a skipper since 2005 and a boat owner since 2010. My main income with my own vessel is trolling (not trawling, big difference) for albacore tuna, starting the beggining of dec till early may mainly off the west coast of the north and south islands. I love this life and are very proud of how this type of fishing has a very low enviromental impact. I even use sail as my father did when i can and s 9(2)(b)(ii). Birds catches are very rare. We are known as the mosquito fleet because we move about as the fish 'pop there heads up' as they say in different areas. We have to work s 9(2)(b)(ii)

to make a good catch. Our up and coming crew learn many skills, engineering, seamanship, navigation and ofcourse fishing, the hunt. We are like farmers and bush workers deer hunters and even doc workers out in the remote wilds, so with these comments you may see why when it is suggested we be forced to have a hidious big brother cameras on our boats that are also our houses nearly half the year I am in shock. It hits me deep into my stomach. I ca,nt beleive its happening or even being suggested. We do,nt need cameras, we need decent communication from you and the public such as seeing you walk down the wharf and talk. Certainly not the fisheries officers in the dark blue intimidating uniforms who mostly we beleive to be reject policeman with an atitude of we,ll 'do' you if we can. We need you guys (mpi) to work with fisherman on fish discard or technique problems. Recreational fisherman need to realise not everybody can go fishing and we commercial fisherman supply to those that can,t catch their own fish and the fish we catch also earns export dollars for our schools etc. I have taken an observer on my boat and i will again if asked but a camera to me is a shock to my inner core and reaks of a surveylance society which is not the way to go. Yours sincerely fin horder, fishing vessel s 9(2)(a).

Dear Sirs,

My name is Rodney Davidson. Fisheries Fin number is ; s 9(2)(a) and my web site is; www.kansaifishing.co.nz

This is my submission as requested and pertaining to the recent publication of the year long Fisheries ' Review ' as undertaken by MPI as supposed Fisheries Management in New Zealand.

[Not relevant to request]

[Redacted text block]

[Redacted text block]

[Redacted text block]

Let me now move on to the CAMERAS on board part of the review. Whoa! Seems to me that you are indeed heading into deeper water here and the unknown as far as legality is concerned here. Making camera,s MANDATORY for full time use on any and all private commercial fishing vessels is actually COMMANDEERING the vessel, for zero benefit to the Owner or Crew of the vessel, and with the sole purpose of supplying Fisheries with real at sea RESEARCH information WITHOUT PAY OR BENEFIT WHATSOEVER being acknowledged or considered. IE; You are taking a responsibility on here as an EMPLOYER with this and with all that entails. i AM SURE THIS WILL BE LOOKED AT NOW AND VERY COMPREHENSIVELY TOO IN THE FUTURE.




As to the computer software upgrade it is what it is and no more than a more comprehensive more efficient way to track money supposedly owed by anyone that your organisation can extract anything from and as maliciously as possible and for as little effort as possible too. Enough said about this!

Hello my name is Slade Fisher. [Not relevant to request]



Last but far from the least, in fact this is by far the largest concern by all fisherman that I have heard from or spoken directly to... The proposals for electronic monitoring , specifically installing cameras on the boat. Inshore fishing vessels are a second home for the captain and crew, there is much recreation aboard alongside work. It is a ludicrous and draconian measure for the state to command us to film ourselves in this environment at our own cost and hand that footage over ... to who ?. The privacy concerns here are at such a high level the industry is shaking their head in disbelief. Just one example I will provide here, for safety reasons we often need to urinate on the boat in view of where a camera would likely go. The thought of things like this going into the hands of outsiders and then perhaps even on wards to third parties makes me want to leave the industry.

[Not relevant to request]



My name is Jayce Fisher, s 9(2)(a)

We are 100 per cent against all forms of electronic surveillance and monitoring on board the s 9(2)(a), for the following reasons:

Our vessel has been a part of our way of life for generations, the methods and locations that we fish at particular times of year are an accumulation of 3 generations of knowledge in which want to safeguard from outside interests. We consider this knowledge intellectual property, and as such is to be considered commercially sensitive and ancestrally sensitive.

The vessel is our home, our property, not only a work place and would find it abhorrent to be monitored during our leisure time. We also believe that the cameras would impose on our personal privacy as during rough weather it is our safety policy to urinate in the middle of the fishing deck, or out the wheelhouse door as to avoid being washed over the bulwarks.

The draconian blanket policy which has given zero consideration to the individuality of each industry is appalling. And there has been no mention...anywhere, about the success of the cray fishing industry as leading the word in sustainability. MPI has not tried to work in with the industries on a personal level to improve practices, there has been no workshops, or educational or supportive dialogue to keep the fishing practices improving, but has always stuck to its guns as covertly snooping, and that style of fisheries management taken by MPI has created an 'us', and 'them' divide. That is going to get much worse.

[Not relevant to request]

At this point there has been a massive lack of information given to us from MPI regarding who is actually able to utilise the information that your seek to gather. This poses a situation of fear in stress into a workplace that is already tough enough, when the person looking over your shoulder you don't even know who it is. It is a psychological safety concern for the skippers and crew.

Our vessel is owned by us, it is our property. We will not allow a camera or GPS to be installed, as this is as much of a home for us as it is a workplace. Can you imagine taking your paperwork home from your job to do some work in your home office and there is a camera on you in your own home?? It is the same thing and is sickening that the surveillance era is infiltrating our places where we sleep, rest, eat, and talk openly. Do you realise that having 3 people stuck on a boat for a week at a time is stressful enough but now there is a 4th person on the boat, but nobody knows them.... They just sit there and listen to everything you say, every word, they know your every move, they see you go to the toilet, and you don't know who they are? Very uncomfortable, stressful, depressing, insulting, disgusting, and backwards.

CATAGORICAL NO

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[Not relevant to request]

Integrated Electronic Monitoring and Reporting System

13. Moana supports electronic monitoring and reporting of commercial fishing operations as a means of gathering better information for fisheries management. Moana was a participant in the trial of electronic monitoring undertaken in SNA1 by MPI in 2014, has supported the voluntary adoption of vessel position monitoring systems on all vessels operating in SNA1, and has supported the voluntary electronic monitoring of the SNA1 trawl fleet to verify reporting of sub minimum legal size snapper returns to sea.
14. Moana supports in principle MPI's Integrated Electronic Monitoring and Reporting (IEMRS) proposals as set out in Volume III of the FoF document.
15. Moana's support for IEMRS is conditional:
 - a) The FoF does not provide a substantive analysis of the full costs of IEMRS against expected benefits from improvements in fisheries management and compliance nor is there any indication that MPI has undertaken this analysis. MPI's earlier statements and releases regarding IEMRS indicated that deployment would be scaled to the size and fishing effort of individual vessels. There will clearly be a point at which the marginal cost of deployment outweighs expected benefits. Moana's support for IEMRS will depend on reviewing MPI's full assessment of costs and benefits and a pragmatic approach to scaling IEMRS deployment to likely benefits. Moana does not support deployment on all commercial fishing vessels as is proposed in FoF.
 - b) The primary benefit of IEMRS is the collection of information to improve fisheries management and the utilisation of fisheries resources. Electronic monitoring is not a panacea. The assumption in FoF that IEMRS will satisfy most data requirements is incorrect. Simply taking video footage of fishing operation does not result in useable information unless the information requirement, the monitoring, and the vessel's operations are aligned to produce useable data. Moana's support for IEMRS is conditional on the data generated by IEMRS being targeted to, and available to meet, defined data needs, including industry requirements to support fisheries management, supply chain management, fisheries certification and product assurance, marketing, and other functions.
 - c) The initial focus of IEMRS from an MPI, political, and public perspective will, inevitably, be on the use of IEMRS for enforcement of fisheries regulations and prosecution of commercial fishers. Moana's support for IEMRS is conditional on MPI conducting a review of the offences and penalties regime set out in Part 13 of the Fisheries Act 1996 and implementing changes to reflect the greater likelihood of offences being detected and prosecuted.
 - d) Moana's support is also conditional on direct industry engagement in the design and deployment of the system as discussed in this submission.

⁶ The Future Of Our Fisheries, Volume III, Integrated Electronic Monitoring and Reporting System

⁷ The Future Of Our Fisheries, Volume II, The Fisheries Management Systems Review, Strategic Proposal 2 Better Fisheries Information, Option 2 Gather more information to support decision making and value adding, Monitoring of non commercial fisheries, page 14

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16. It is essential for MPI and the commercial fishing industry that deployment of IEMRS is successful. IEMRS will require major expenditure on:
 - a) Development of equipment and data standards
 - b) Acquisition and installation of equipment, equipment maintenance, and replacement
 - c) Development of new databases and analytical tools
 - d) Data collection, communication, storage, and destruction
 - e) Development of reporting applications and observation software
 - f) Observation of collected camera footage
 - g) Data access management and reporting
 - h) Media management
 - i) Programme management
17. MPI has encouraged high media and Government expectations of IEMRS. Deployment will be subject to intense media and political scrutiny adding to execution risk. None of the parties with a vested interest in the successful deployment of IEMRS can afford a Novopay outcome.
18. The IEMRS programme is complex and involves the development and use of technology that has not been used in New Zealand other than on a relatively small scale within the SNA1 trawl fishery and a number of paua fisheries. Successful deployment of IEMRS will require close cooperation between service and equipment providers, industry, and various sections of MPI. Successful integration of the components of IEMRS represents a significant challenge.
19. Based on experience from the deployment and use of electronic monitoring in FMA1 fisheries Moana's view is that the IEMRS deployment timetable given in FoF is simply not achievable. The FoF documents do not provide any detailed implementation planning or comprehensive risk assessments. As far as Moana is aware MPI has not engaged with industry or Trident Systems LP, the only New Zealand business with direct experience with electronic monitoring systems in New Zealand fin fisheries, in any systematic way to assess readiness to deploy IEMRS or to assess the risks associated with deployment.
20. Given the likely cost of IEMRS and the risks associated with deployment MPI is unlikely to secure support for IEMRS unless industry and Iwi are fully involved in the design and delivery of the system. Formation of a joint MPI / industry / Iwi entity, based on the approved service delivery organisation (ASDO) model set out in Part 15A of the Fisheries Act 1996, is a prerequisite to successful management of IEMRS implementation. The entity would be responsible to the Director General of MPI for deployment of the components of IEMRS. It would not be responsible for the storage and use of IEMRS information for statutory and enforcement purposes. Joint industry / MPI / Iwi accountability for delivery of IEMRS will maximise the opportunity for successful deployment at least cost to industry and Government.
21. Use of IEMRS for the purposes of fisheries monitoring, compliance, enforcement, prosecution and more generally for the purposes of fisheries management constitutes expenditure for the public good as there are no specifically identifiable individuals or groups that derive a benefit from the activity. In Moana's view it is unreasonable for MPI to propose that the costs of IEMRS be fully absorbed by industry.

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[Not relevant to request]

Bringing all fisheries management activity into a single team will assist in de-risking IEMRS implementation.

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N
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t]

Formalised joint management of shared fisheries offers the greatest opportunity to make decisions in an agile and responsive manner that fully utilises the additional fisheries management information that may arise from IEMRS. [Not relevant to request]

¹⁷ The Future Of Our Fisheries, Volume II, The Fisheries Management Systems Review, Strategic Proposal 3 Agile and Responsive Decision Making, Option 3 Develop a more flexible decision making framework page 22.

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Auckland 1140, New Zealand
P +64 9 302 1520
W moana.co.nz



[Not relevant to request]

45. Moana supports in principle the development of IEMRS and the adoption of new regulations to facilitate the use of innovative trawl technologies. Moana's support for IEMRS is heavily qualified in the absence of any substantive analysis of the purpose, scope, costs, benefits, and risks associated the programme.

[Not relevant to request]

[Not relevant to request]

Nāku noa, na

s 9(2)(a)

Carl Carrington
Chief Executive Officer
MOANA NEW ZEALAND

Hellfire Enterprises Limited

PO Box 70,
Bluff

Telephone s 9(2)(a) }
Cell s 9(2)(a) }

21 December 2016

Ministry of Primary Industries
PO Box 2526
WELLINGTON 6140

Dear Sir Madam,

SUBMISSION IEMRS

[Not relevant to request]

This historical data is our family legacy, and I see any monitoring of this by a tracking system as theft of our intellectual property.

My fishing, charter and also recreational s 9(2) is used for fishing CRA8 quota by my sons since my retirement. When not in use for commercial fishing operations, it is used by me and others for recreational fishing, holidaying with family, hunting trips etc. I strongly oppose the idea of cameras watching us in our private activities. The vessel is our home and an extension to our family and extended family. It is inconceivable to think our family will be being observed by unknown individuals during leisure times.

We understand some of the concerns by certain action groups in regards to the dumping of unwanted fish and the accidental deaths of birdlife. However, in the crayfish industry, the method in which we use to catch crayfish has limited bycatch, and this may be recorded and used as bait. During my 40 plus years fishing experience, I have never witnessed any bird or marine mammal adversely affected by crayfish pots.

[Not relevant
to request];

The proposed monitoring may result in skilled mariners exiting the industry due to their intolerance to the massive intrusion on their privacy. As the crayfishing industry contributes directly and indirectly to the livelihoods of a wide sector of society, I can foresee far reaching consequences if these measures are forced upon us.

Y s 9(2)(a)

(VAUGHN FISHER)
NZ Coastal Master
Company Director

21/12/16

Troy & Neil & Leanne Bramley
Bramasole Trust - CRA4 Quota share owners.
Seamade NZ Ltd - CRA4 Fishing Company.
Sustainable Seafood Ltd CRA4 Fishing Company.

s 9(2)(a)

[Not relevant to request]

Proposal 3 - Electronic monitoring & Camera monitoring - We work inshore in 6 metre open boats. We can't see how this could be practical or cost effective. It would have to cost millions to install this system & maintain on exposed vessels & the cost to administrate & monitor would be extensive. There would have to be a far better & more effective ways to enhance & better manage any wrong doing on CRA boats.

We know that one of the main concerns is holding pots - Holding pots are very good with minimal loss if used right. We suggest stop all long term holding, have a maximum day limit on hold & ban out right holding Lobster from one season over to the next. This is outright disgraceful and it's one example of a simple cost effective rule change that would have a far greater and a more positive impact than any Camera monitoring.

[Not relevant to request]

Yours Sincerely
Neil Bramley & Co.



Level 6
135 Victoria Street
Wellington 6011

PO Box 297
Wellington 6140
New Zealand

www.tridentsystems.co.nz

22 December 2016

Future of our Fisheries
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140
New Zealand

Submission: The Future of Our Fisheries

Trident Systems appreciates the opportunity to comment on the Ministry for Primary Industries' consultation document "The Future of our Fisheries". This submission has been prepared by David Middleton, Trident's Chief Executive, and is approved by Trident's Board of Directors.

[Not relevant to request]

[Redacted content]

Trident's submission is limited to commentary on proposals for obtaining better fisheries information:

- [Not relevant to request]
- [Redacted content]
- Regulatory Change Proposal 1: implementation of an Integrated Electronic Monitoring and Reporting System (IEMRS).

Integrated Electronic Monitoring and Reporting System

Trident agrees that further implementing of:

- automated geospatial reporting of vessel positions (vessel monitoring systems, VMS);
- electronic catch reporting; and
- electronic monitoring (fisheries observation using video systems);

can offer significant improvements in the information from fishers and about fishing activity.

However, in developing and implementing such a proposal, Trident suggests that MPI should consider a number of issues, as discussed below.

The value of information

Noting that MPI intends to restrict the IEMRS initiative to the commercial sector, it is necessary to be cautious about the benefits that will accrue in terms of TAC and TACC setting. In shared fisheries, the greatest uncertainty in stock assessment results can arise due to uncertainty about levels of non-commercial harvest. The latest assessments for SNA 8 and SNA 7 provide clear examples of this issue. Credible fisheries management requires good information from all fisheries, not just one sector.

The information that it is proposed to be collected under the IEMRS programme will have the greatest value if it can be put to the greatest possible range of uses, consistent with privacy and confidentiality constraints. Thus, for example, any geospatial information, electronic reports, and footage should be available for use by vessel operators, LFRs, quota holders, and researchers as well as by Government. Apart from obvious efficiencies of not having to implement parallel systems, accessing a common source of data creates transparency and builds trust.

Vessel position monitoring

New Zealand was an early adopter of Inmarsat-C based vessel monitoring systems technology. However, over the last decade rapidly changing technologies, highlighted by the fact that GPS devices are ubiquitous in cell phones and many other devices, have opened the door to new possibilities in fisheries data collection. This allowed Trident Systems to implement a non-statutory vessel tracking system for the Snapper 1 fleet that provided much finer scale tracking at a similar operating cost to traditional systems.

Traditional VMS implementations have been characterised by input standards requiring type approval on the equipment that can be employed, and providing limited opportunities for innovation. A future regime that focuses on output standards – where fisheries managers specify information needs but provide flexibility around how these are met – will provide greater opportunities for capturing the benefits of rapidly evolving technologies.

Electronic catch reporting

In general, the data collected from New Zealand's commercial fisheries over the last three decades has provided a rich source of information for fisheries management. This is illustrated at the Fisheries of New Zealand website, fonz.tridentsystems.co.nz, and underpins the information presented in the annual Fisheries Assessment Plenary.

Continuity in fisheries time series is a key requirement. There is, for example, limited continuity between the QMS-era data systems and the previous Fisheries Statistical Unit (FSU) data that limits the value of the FSU data in contemporary stock assessments. The IEMRS initiative should be regarded as a "continuous improvement" process, focussing on improving data quality and data verification processes, rather than a requirement to "start from scratch".

The introduction of fine scale reporting for many inshore fisheries in 2007 provides a good example of improvements in data that nevertheless create complications, some anticipated, some not, for subsequent assessment and management processes. A gradual introduction of improved reporting under IEMRS should focus on providing a period of “overlap” that ensures pre and post IEMRS data can be compared and, where necessary, calibrated.

In our view, the uptake in the current incarnation of electronic data transmission (EDT) provided by FishServe’s CEDRIC system has been limited by a number of factors:

- a focus on simply reproducing the paper reporting system that prevents the front end (i.e. the software interface used by fishers) from taking full advantage of user interface improvements and automation possibilities;
- limited incentives to provide data in addition to that required by the regulated forms, even where this can be easily provided.

The development of electronic reporting under IEMRS needs to strike a balance between:

- ensuring that comparable data are provided, irrespective of the mode of reporting adopted;
- flexibility to take advantage of the innovations and improvements that can be offered by an electronic reporting platform.

IEMRS needs to facilitate the development of at-sea data entry applications that make it easier for fishers to provide high quality data. In particular such systems must focus on reducing the reporting overheads and duplication that are inherent in the current system.

The IEMRS consultation document provides a high level view that reporting will be “event based”. In general this is appropriate, but the concepts will require considerable further work before they can be implemented effectively. In particular, definitions must deal with the complexities that arise in real world fishing operations.

For example, in longline fisheries a “set” is usually the fishing event of interest, and this is the unit of effort (i.e. “the event”) that will be used in the majority of analyses. In reality, however, a “set” consists of both a line “setting event” and a line “hauling event”. While a line setting operation can be defined based on continuity in the longline backbone, the same piece of line could be retrieved via a number of different periods of hauling (i.e. multiple “hauling events” can be associated with a single set).

Likewise, many analyses associate a set with a single geographic position while the reality is that the line may follow a complex path between the start and end point of the line, and may not remain entirely static on the seabed.

Ensuring that complex and detailed fine scale information can be effectively consolidated into “fishing events” that are appropriate for inclusion in statistical standardisation models will be critical in order that catch per unit effort can be used as an indicator of abundance.

Electronic monitoring/video observation

Just as “a picture is worth a thousand words”, video footage from fishing vessels can provide great insights into how fisheries are operating. However, the collection of video footage from fishing vessels is not a silver bullet for validation of fisheries data.

Clearly, for footage to be useful it must be of the area or activity of interest, and must provide sufficient resolution. In general footage collection must be planned to meet specific information needs; it would be naïve to think that general footage can be sufficiently ubiquitous that any future query can be answered.

In addition to technical considerations, video observation typically requires vessel cooperation. At its simplest, the cooperation of crew will be required to ensure that camera lenses are cleaned on a regular basis. However, many forms of quantitative data collection from video footage will require vessel procedures to be modified to facilitate observation.

MPI proposes that vessel operators will be required to install equipment to provide footage to MPI's standards and specifications. In developing these standards careful consideration must also be given to how footage is going to be stored and reviewed, as a coherent infrastructure from footage collection through to observational data generation is required.

Conflicts of interest

The IEMRS consultation document notes "MPI will manage the reviewing function and ensure there are no conflicts of interest between the providers of EM hardware and the MPI-managed monitoring function."

Trident, as a research provider established and owned by quota owners, has recently been labelled a "fox in charge of the henhouse" in undertaking video observation services for MPI.

Trident notes that:

- Involvement of industry organisations in research and monitoring is common throughout the primary sector, and in many other parts of society;
- Government's contracting processes, together with MPI's Research and Science Information Standard, provide assurance that research services are undertaken in an appropriate manner;
- Absolute independence in service delivery can, of course, only be achieved by contracting organisations with no knowledge or expertise in the service to be delivered. This is clearly inefficient.

As discussed above, video observation involves a combination of cameras to collect video images and vessel management and fish handling procedures that will allow the video images to be observed to produce useable data. The view that the processes of vessel management, video image collection, and observation are independent is a misconception. MPI, vessel operators, and service providers thus need to work to build confidence in the integrity of systems, rather than relying on perceptions of independence (or not).

Contact details:

Dr David A. J. Middleton
Chief Executive, Trident Systems LP

PO Box 297,
Wellington 6140, NZ

DDI: s 9(2)(a)

Mob: s 9(2)(a)

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My name is Storm Wardrop

s 9(2)(a)

We are strongly against all forms of electronic surveillance and monitoring on board the KIRI-LEE for the following reasons:

This vessel is our home,our property,our workplace.We would find it abhorrent and invasive to be under constant surveillance and monitored during our leisure time and while onboard during any practices of work or leisure.We also believe that the cameras would impose on our personal privacy as during rough weather conditions it is our safety policy to urinate in the middle of the fishing deck,or out the wheelhouse door to avoid being washed over board,this also applies while some are in bed during travelling whilst crew or others are taking watch of the helm.We believe that cameras on the boat would impede on the privacy of my children while they are on board with me as they come on occasional fishing trips/during school holidays.s 9(2)(a) Being viewed going to the toilet overboard and getting dressed/undressed is a total invasion of privacy and this practice is not accepted anywhere in the world.

The draconian blanket policy which has given zero consideration to the individuality of each industry is appalling.And there has been no mention anywhere about the success of the crayfishing industry as leading the word in sustainability.MPI has not tried to work in with the industries on a personal level to improve practices,there has been no workshops,or educational or supportive dialogue to keep the fishing practices improving,but has always stuck to its guns as covertly snooping,and that style of fisheries management taken by MPI has created an 'us' and 'them' divide.

Our fishing practices are sustainable,our fish dumping is nil.And i strongly believe the pot fishing method is right amongst some of the most efficient methods of todays fishing.All untargeted species are returned to the sea alive instantly once the pot has been emptied.

At this point there has been a massive lack of information given to us from MPI regarding who is actually able to utilise the information(video recordings) that you seek to gather.This poses a situation of fear and stress into a workplace that is already tough enough,while the person(s) looking over your shoulder you dont even know who it is.It is a psychological safety concern for the skippers and crew.

I find it absurd that you dont only expect us to have this in our home but also for us to have to pay for this product when were talking tens of thousands of dollars to purchase,install and maintain upkeep.To give you some idea each crayfishing vessel will have to catch a minimum of 1tonne of fish to make this viable.In essence it gets much more complicated as todays lease prices reach an all time high of \$65 per kilo.So essentially were expected to pay \$65,000 dollars for a camera to be placed in our homes while it is completely unnecessary.

Our vessel is owned by my partner and I,it is our property.We will not allow a camera or GPS to be installed,as this is as much of a home for us as it is a workplace.It is sickening that the surveillance era is infiltrating our places where we sleep,rest,eat,and talk openly.Do you

realise that having 3 people stuck on a boat for a week at a time is stressful enough but now there is a 4th person on the boat, but nobody knows them..they just sit there and listen to everything you say, every word, they know your every move, they see you go to the toilet, and you don't know who they are? Insulting, Disgusting and backwards.

I

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We are not opposed in principle to electronic catch reporting. However cameras on boats would not work for Lake Ellesmere as the boats are too small for this, and the fishery is easily monitored for compliance at landing points/ramps etc.

Privacy

Fishing spots are commercially sensitive. The Privacy Act should apply here.

[Not relevant to request]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Yours faithfully


Garry Pullan

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Electronic reporting and monitoring

14. We agree that electronic reporting and monitoring and reporting are mechanisms that can be very useful and, as such we support them in principle. However, the FOOF proposals in this regard appear to be a knee-jerk response to negative publicity, rather than anything more thought out. In particular, we are concerned that the estimated costs (to operators) and benefits (to all sectors of the community) are unsubstantiated and the proposed implementation timeframe appears ridiculously ambitious, given the limited extent to which the relevant technology has been successfully implemented in New Zealand to date.
15. In addition, if use of this technology is to become mandatory, we believe that must be accompanied by reduced penalties for relevant offences under the Fisheries Act and regulations, including a reconsideration of the automatic forfeiture regime. The current high level of penalties are justified by the difficulty in detecting fisheries offending, which will no longer be the case for vessels that are using the technology.
16. In any event, we would expect full industry involvement and consultation in the development of regulations to implement this aspect of the FOOF.


s 9(2)(a)



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To whom it may concern

[Not relevant to request]



Camera's, I went to a meeting in Invercargill over this and the reason for them seems more political than about looking after our fishery. As a fisher we don't want them and don't need them. we are limited to the days we can work down here area 5, by weather and usually Struggle to get enough time to catch our quota. Out of our quota species there is 13 species that has a size limit, The quota was introduced on market saleable fish. Now you are saying you want us to bring in fish that is useless to any market and want us to use our markable quota on this. (codend size mesh of 5 inch eliminates most of the small fish which most fishers in area 5 have taken on them self's to use). The undersized fish were not factored in at the time quota was bought in. so an increase will be needed here or size limits will need to be put in place... the recreational fishers have a size limit on gur3 of 25cm the commercial have none. Theres so many issues with cameras. If we have to pay all the costs why is the information yours, if we pay then the information should be ours and if you want some of it come to us and ask for it. We have no guarantee that you wont share this footage with other parties. the privacy act of watching us on our boat house bedroom toilet all the above what gives you the right to do this, If we are criminals why aren't we behind bars and prisoners who are released are not monitored 24 7 at this stage we are feeling like we are the worst kind of criminal.

We listen to the weather looks like a calm spell coming arrange ice fuel tubs. do our check on boat gear etc, off too work only trawl at daytime so the fish get a break and we don't scatter them. if we lucky we mite get 3 or 4 days in before next lot of rubbish arrives or maybe 2 trips even 3, its a unknown. bit like what you going to throw at us next, and now you want to watch what we do. Are we criminals for trying to make a dollar and put fresh fish on peoples tables. You really need to revisit what your priorities are here cause you are going to make a lot of honest people into criminals as with the number of rules in fishing it is nearly impossible not to break any no matter how hard you try. we have had enough between MOSS and MPI MPA and all the other costs in this game it just aren't worth putting up with your SHIT.

If you want to look at who is actually looking after the fisheries talk to the fishers and listen to them. We are the scientists as we are out there and experiencing the fisheries all the time

Ross Jenkins
Director of
Jenkins Trust Enterprises Ltd

The report is well written and accurately reflects the current state and problem definition. Below are a few comments from a EM service provider perspective:

1. While I agree that ER is a useful approach for improving self-reported data, I think the problem is over simplified. The existing state of data quality is the result of long reporting intervals, paper based systems, limited ability for timely error correction, and highly variable catch accounting methods. Moving to event based reporting is probably much more significant than electronic reporting, particularly if outreach efforts are directed toward the catch accounting methods used on deck. Accurate catch accounting starts with well organized catch handling procedures and this often doesn't get enough attention.
2. Recognizing the inshore fishery is a multitude of gears, target species and unique characteristics, the logic of applying the three option framework is probably more applicable at the level of these different sub-fisheries, than to the inshore fishery as a whole. While option 3 is clearly the best choice from a data quality point of view and should be considered wherever possible, there are likely sectors where this level of information richness cannot be justified from a cost and risk management perspective. Option 1 and 2 might apply in situations where the risk to the resource is low, and the monitoring costs aren't supported by the economics of the fishery. I don't know enough about these fisheries to know if this is the case.
3. The phased-in approach seems problematic from an operational perspective. An EM system should be able to fulfill all aspects of the IEMRS reporting requirements, including ER and positional reporting, yet it is third in order of implementation. Placing ER and positional reporting before EM could limit implementation options. Also, our experience has shown that data quality from self-reporting is greatly aided when feedback provided by EM is introduced at the same time. It seemed to me that there are benefits to phasing in all elements of IEMRS on a sub fishery basis (see point above) versus phasing in some components on a more global basis. This might better serve both implementation and risk management perspectives.
4. While this was not the purpose of this paper, 'The devil is in the detail' and a lot more effort needs to go into operational planning and project costing. The document doesn't provide a lot of detail on service delivery framework and it is hard to understand the potential opportunity for service provider companies. I would encourage a lot more work be done in this area as soon as possible.
5. MPI should move away from the idea of archiving video and sensor data files for lengthy periods of time. The report correctly noted that the fishery data are derived from sensor and video data. In my view, the pluses of only keeping essential data far outweigh the drawbacks, from a cost, fisher buy-in, and administrative perspective.
6. Related to the last point, fisher buy in is essential to making a technology based monitoring program work. This shouldn't be mistaken with buy in from the boat owner, or share owner. Buy-in needs to come from the people on the boats who carry the responsibilities of keeping the system powered, cleaning camera lenses clean, and adhering to catch handling protocols.

I congratulate your initiative and hope my comments are of use.

Cheers,

Howard McElderry
VP Monitoring Technologies
Archipelago Marine Research Ltd.

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[Not relevant to request]

6. Vessel Monitoring systems (i.e. cameras on boats). There is no need for this for Kina fishermen. There are significant logistic difficulties with this, especially video monitoring, which will cause the system (as proposed) to be very expensive and unnecessary.

[Not relevant to request]

[Redacted text block]

Yours faithfully

s 9(2)(a)

pp: Peter Herbert – Chairman
Kina Industry Council

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Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Its working fine why change it

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

There is no problem

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

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Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Keep it the way it is

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Do you operate this technology on your own behalf, or as an input into someone else's operations?

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

The Cost!

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

The current system works fine along as fishers are honest.

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

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Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |
-

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |
-

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |
-

Would you like to comment?

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Cost.

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Why do they not trust there system they have in place

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Q M system

Do you operate this technology on your own behalf, or as an input into someone else's operations?

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

Nothing

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an "early adopter"?

No

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

No

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Not well

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

No

Licensed fish receivers

Would problems do you experience with landing data?

Nothing, it's pretty straight forward

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

No

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

The ~~Finance~~ finance, with this purpose system there won't be ~~many~~ many boats in the industry so how does MPI fund it.

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

General questions: Volume I

What will success look like in the future fisheries management system?

Our proposed long-term vision and objectives are as follows:

Vision			
Abundant fisheries and a healthy aquatic environment that provide for all our people, now and in the future			
Objective 1: Abundant fisheries in our seas and a healthy aquatic environment	Objective 2: Everyone plays their part in managing New Zealand's shared aquatic resources	Objective 3: Everyone can share fairly in the social, economic, cultural and environmental benefits of our aquatic resources	Objective 4: The fisheries management system is widely trusted in New Zealand and internationally

[Not relevant to request]

Would you like to comment?

No to Cameras

[Not relevant to request]

Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting?



Strongly disagree



Disagree



Neither



Agree



Strongly agree

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

No changes. Electronic monitoring to FishServe or paper model.

No Cameras on board all boats — NOT without sufficient safeguards. eg minimum size limits on all fish

Problem definition

Do you agree with how we have defined the problem?



Strongly disagree



Disagree



Neither



Agree



Strongly agree

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

But what "problem" have you defined?
"Discards"? There is no problem. Should be more, not less. Put a size limit in place will address the problem for named species

Objectives

Do you agree with the objectives of IEMRS?



Strongly disagree



Disagree



Neither



Agree



Strongly agree

Would you like to comment?

Strongly disagree until such time as minimum size limits for named species are in place and property rights around data being gathered are in place.

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Option 1: Current state

Do you agree with this option?

☐ Strongly disagree ☐ Disagree ☐ Neither ☐ Agree ☒ Strongly agree

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

☒ Strongly disagree ☐ Disagree ☐ Neither ☐ Agree ☐ Strongly agree

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option?

☒ Strongly disagree ☐ Disagree ☐ Neither ☐ Agree ☐ Strongly agree

Would you like to comment?

Strongly disagree. What other sector in N.Z. is subject to this degree of invasion and monitoring of their daily life and work.

And permit holders bearing installation + compliance costs. Strongly disagree

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Catch/effort reporting is already done on the papers.

No benefit to permit owners. Additional compliance costs look like \$5,000 to \$18,000 plus annual costs on top of MOSS \$1200 and Annual Survey \$1200.

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

It would close down the inshore fishery over night and you would be out of a job just as much as me.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

In stages?

Certain boats out of each port? Don't comply. Refuse? They will be made "an example" of and soon be out of business.

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Most fisherman can't work computers or read and write very well and spend long periods of time out of phone range

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Catch/effort reporting is currently done on the papers.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

None.

Do you operate this technology on your own behalf, or as an input into someone else's operations?

N/a

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

N/a

What issues do you currently have with ER?

Don't have it, don't want it.

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

Dont have it. Dont want it.
Serious concerns around data-gathering + the
information being shared.

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an "early adopter"?

No.

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

Already do. Dont want the cameras — simple
as that.

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

No

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

No

Licensed fish receivers

What problems do you experience with landing data?

No problems.

Implementation plan

Do you agree with the proposed implementation arrangements?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment?

Not enough time. The data belongs to us. It will take to 2018 to consider size limits before implementing cameras on boats.

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

Maybe.
No

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

No

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements?



Strongly disagree



Disagree



Neither



Agree



Strongly agree

Would you like to comment?

The CRAG model should be pursued in close cahoots with quota owners/fishers and factories. Each sector has its own input, Just don't want The proposed electronic monitoring.

What do you think should be monitored? To whom should the results be reported?

Not to the commercial sector or to the companies who have been sub-contracted to collect the data. Safely held as quota owners/skipper's property ONLY.

Preferred Option – Amend existing regulations

[Not relevant to request]

Are there other EITT assessment criteria that should be considered?

Privacy issues around data gathering and data sharing.

Privacy issues around being the only sector of N.Z. population being subjected to electronic monitoring.

[Not relevant to request]

Option 3: Develop a more flexible decision-making framework

A more flexible and responsive decision-making framework is developed that considers how decisions are made and the scale at which fisheries are managed.

[Not relevant to request]

Would you like to comment?

I doubt that IEMRS is going to be the wonder tool.

[Not relevant to request]

Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting?

☐

Strongly disagree

☒

Disagree

☐

Neither

☐

Agree

☐

Strongly agree

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

The current state is lacking, but to go 100% big brother is watching isn't necessary. Position monitoring should be looked at and maybe cameras on some vessels. Small vessels less than 45 foot 14 metres do not have the room or power supplies to run all this IEMRS gear. Boats trialing the gear have had their Batteries go dead and have been put in dangerous situations. Having to get towed home.

Problem definition

Do you agree with how we have defined the problem?

☒

Strongly disagree

☐

Disagree

☐

Neither

☐

Agree

☐

Strongly agree

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

At the workshop meetings, we were told we were getting IEMRS because of the Bobby Calf Issue (Come on this has nothing to do with Fishing). Smaller vessels fishing close inshore are not the problem with Fish Discarding, especially now there are only a few left of the under 14m fishing vessels in most places. A small vessels fishing operations need to be looked at on a case by case situation.

Objectives

Do you agree with the objectives of IEMRS?



Strongly disagree



Disagree



Neither



Agree



Strongly agree

Would you like to comment?

It all sounds good, and vessels fishing further out to sea away from the public eye and any chance of being boarded often by MPI compliance, may have to have IEMRS.

Option 1: Current state

Do you agree with this option?

☐ Strongly disagree ☐ Disagree ☒ Neither ☐ Agree ☐ Strongly agree

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

☒ Strongly disagree ☐ Disagree ☐ Neither ☐ Agree ☐ Strongly agree

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option?

☒ Strongly disagree ☐ Disagree ☐ Neither ☐ Agree ☐ Strongly agree

Would you like to comment?

More work needs to be done on where, how, and who. This whole thing sounds like the whim of an out of touch Minister. Has any of the Minister's advisers advised him of the limited power arrangements on small commercial vessels.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Discarding could be made penalty free like it is in Australia for (Undersized fish, (Damaged fish) (Unmarketable fish.) It is still recorded, and Management decisions can be based on this better quality of information.

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

GPR would be a usefull Safety tool. EM would have value on large vessels where the operations are not monitored, and relayed to the wheelhouse. Most large vessels already have this option.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

No Comment.

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Vessels with 12 vdf systems are not going to be able to have a camera going 24/7, as it will jeopardize the safety of the vessel using sonar & radar. A lot of smaller vessels do not have toilets on board. And with a camera on a small vessel this will be viewing all of the vessel. Camera's will have to be Modified so they only operate in fishing operations, as far as I know this option doesn't exist, and would cost wise put small fishermen out of Business. Most small fishing operations are teetering on the edge of surviving.

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

With vessels fishing close inshore, they are checked regularly by MPI compliance when they are patrolling the Recreational & other users.

This is already being achieved. I have recently been boarded by MPI compliance officers on 2 out of 3 fishing days.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

None.

Do you operate this technology on your own behalf, or as an input into someone else's operations?

N/A.

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

N/A.

What issues do you currently have with ER?

N/A.

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

N/A.

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an "early adopter"?

No, it is hard enough at the present time to make a living out of fishing, without taking on extra Activities.

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

N/A.

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?


N/A.

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

N/A.

Licensed fish receivers

What problems do you experience with landing data?



Implementation plan

Do you agree with the proposed implementation arrangements?

☐

Strongly disagree

☐

Disagree

☐

Neither

☐

Agree

☐

Strongly agree


Would you like to comment?



Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?



What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?



Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements?



Strongly disagree



Disagree



Neither



Agree



Strongly agree

not sure if this?
relates to LFR's
or is separate.

Would you like to comment?

Some vessels may have to be monitored.
It isn't going to work on every vessel, the Dashboard on my vessel is already full, it only measures 1.7m X 500mm I have nowhere to put any extra electronic equipment.

What do you think should be monitored? To whom should the results be reported?

IEMRS-Integrated Electronic Management and Reporting System

Trinity Fishing Ltd are fully in support of gathering good robust information for use in decision making regarding fisheries management. But the information must be relevant, appropriate, cost –effective, and have specific management purposes and objectives.


We support transparency and validation but have some concerns regarding problems relating to cameras on fishing vessels during recent trials. Bad media releases of late and MPI's unhelpful and less than supportive comments, cameras are as yet proving to cause more problems for the fishers on the water, thus having the opposite affect than their intention. Problems have included reliability of cameras working, validation of information with Trident being put under the microscope, release of actual camera footage under the

OIA and issues with un-resolved discards policies, not to mention regulations on home freight and the "111".

These issues need to be sorted before any general roll out on fishing vessels. The rights and privacy of fishermen need to be protected.

The cost of the IEMRS will fall ultimately on to the fishermen, who are not in any position to absorb any more costs on their businesses and remain economically viable. Fishermen are struggling as it is to keep up with the high costs of running a fishing operation.

[Not relevant to request]



Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting?

☐
Strongly
disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Problem definition

Do you agree with how we have defined the problem?

☐
Strongly
disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with the objectives of IEMRS?

☐ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☒ Strongly agree

Would you like to comment?

Yes provided that every Commercial Fishman obeys the rules .

Option 1: Current state

Do you agree with this option?

☐

Strongly disagree

☐

Disagree

☐

Neither

☐

Agree

☐

Strongly agree

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

☐

Strongly disagree

☐

Disagree

☐

Neither

☐

Agree

☐

Strongly agree

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option?

☐

Strongly disagree

☐

Disagree

☐

Neither

☐

Agree

☒

Strongly agree

Would you like to comment?

I would rather the time span was pushed out to 1st October 2018 so everything is in place rather than go off half cocked.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

Starting at where the highest density of Commercial fishing boats are based.

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Do you operate this technology on your own behalf, or as an input into someone else's operations?

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

Licensed fish receivers

What problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements?

☐
Strongly
disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements?

☐

Strongly
disagree

☐

Disagree

☐

Neither

☐

Agree

☐

Strongly
agree

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

[Not relevant to request]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Implementation of IEMRS

NZFCF fully support both; fisheries management frameworks that are driven by good information and section 10 of the Fisheries Act.

Given the vast detail and individual components of the IEMRS, NZFCF suggest further discussion take place via the development of a joint working group in early 2017. The terms of reference for such discussions should include the following:

- the specific information needs required by each fishery
- the legislative rationale for gathering such information and how it will deliver better fisheries outcomes
- an assessment of alternative or innovative ways to gather required information and in the case of cameras and electronic reporting, an assessment of their actual utility in achieving better fisheries outcomes and compliance
- cost assessments of IEMRS implementation – including who will bear the cost and whether its recovery would breach cost recovery policy

Cost Recovery of IEMRS

In its current form the IEMRS proposals will exacerbate an already inadequate crown cost recovery system, by forcing the implementation and maintenance costs of cameras and technology onto ITQ owners. In turn, these costs will be passed onto inshore fishermen through higher ACE lease prices. This impacts on their profitability and, counterintuitively to MPIs stated intent, their incentive to discard.

The current cost recovery rules do not compensate or recognise any self-governance initiatives and therefore further erodes the economic incentives of the QMS. MPI must recognise that beyond regulation and allocation of rights, there is potential for rights holders to operate collectively to develop more cost effective monitoring and reporting technologies – such as the investment in VMS and industry enforced sustainability measures, given effect through civil contracts amongst industry participants. NZFCF urges MPI to support the mandating of representative and accountable industry management bodies. This will allow initiatives, like the IEMRS, to be progressed in a logical manner with industry consensus. Failure to enable industry-led initiatives will result in sub-optimal fisheries management outcomes.

Inefficient and poorly executed fisheries management initiatives:

- impose unnecessary costs
- distort the ACE market
- erode incentives to act sustainably and cooperatively
- perpetuate an already poor relationship between industry and MPI

NZFCF recommendations

[Not relevant to request]

- [Not relevant to request]

OFFICIAL INFORMATION ACT


UNDER THE

s 9(2)(a)

FUTURE OF OUR FISHERIES SUBMISSION

I attended the meeting held at Ascot Hotel Invercargill last week called by MPI to present aspects of its Fisheries Management Review "The Future of our Fisheries" and received the four booklet handout. The majority of meeting attendees were from the local commercial fishing industry.

[Not relevant to request]



As you are aware BCO5 and CRA8 quota owners and fishers are pro-active in the sustainability of their fisheries with surveying, monitoring, scientific research, quota reduction/shelving etc., as necessary. I feel that electronic reporting of our Catch, Effort & Landing Return would provide timely data.

At the Invercargill meeting Options 1, 2 and 3 of the Review were presented and MPI presenters stated that their preference was Option 3. Discussion followed regarding the camera surveillance and tracking which the majority present were against. I have no faith in the people that were presenting because one presenter stated that at their Greymouth meeting the people who attended were in favour of camera surveillance and tracking. After phone calls to Greymouth to people who attended that meeting I was told that there was no way that the Greymouth meeting was in favour of camera surveillance and tracking. Because we have been misled in this instance I have no confidence that if the same people are involved in reporting to the Minister that he will receive an accurate account of meeting outcomes and submissions.

I am totally against the compulsory installation of camera surveillance on "*single specie*" lobster/cod pot fishing vessels. The vessels are our home and our workplace and their compact nature makes it impossible to separate the two making the compulsory installation of camera surveillance a breach of privacy and of our human rights. I made an enquiry at the local prison and was informed that even *THEY DO NOT HAVE CAMERAS* in prisoners cells unless the prisoner requires 24hr surveillance due to illness or the like – is this really New Zealand?

COLIN TOPI

s 9(2)(a)

Cell s 9(2)(a)

Email s 9(2)(a)

15 December 2016

To Whom It May Concern:

SUBMISSION ON THE TE HUAPAE MATAORA MO TANGAROA: THE FUTURE OF OUR FISHERIES AND THE SPECIFIC PROPOSALS AND OPTIONS CONTAINED IN VOLUMES II AND III

Thank you for the opportunity to provide written comment on the Te Huapae Mataora Mo Tangaroa: The Future of our Fisheries programme.

Fishery Logistics Ltd (FLL) is a logistics and sales management platform for the seafood industry; for the benefits of global visibility, simplified negotiation and convenience with verifiable, accurate, and traceable data. It has partnered with Astrolab Ltd, an Auckland-based Tech Incubator to help provide commercialisation expertise, financial backing, crucial go-to-market contacts, strategy and other business assets essential for our success.

We understand that pertinent information is critical, and underpins good decision-making. A key part of our offering is the catch reporting application (app) that provides the ability to record and report catch information including "how" and "where" fish is caught, together with species and quantities taken and gear employed in harvesting.

Fishermen catch fish and use our electronic logbook to capture information at the point of harvest and provide estimates of seafood caught. The application creates commercial catch reports with the potential to be directly submitted to FishServe as well as provide accurate records of what was caught to seafood suppliers and fish processors. With our app, fish processing facilities can now receive catch information 24-72hrs (depending on how long the boat is at sea) in advance of the fish being landed.

Our software is also designed to provide both individual catch/landing information as well as aggregated data for all company vessels. It monitors all critical activities for fishing vessels including their current position; what was their last activity; details of catch per tow; what species, grades and quantities they are catching and when they should unload.

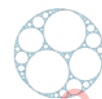
The Fisheries Management System Review

FLL software will help address discarding and improve compliance through better monitoring and recording of day-to-day operations. It will, in conjunction with observers and cameras, provide quality data that can be used to adjust fisheries management settings. The success of the IEMRS objectives will be hinged on utilizing new technologies such as that being developed by FLL. We believe the introduction of new independent monitoring tools such as ours will improve confidence in catch and effort information as well as contribute to the information collected to manage fisheries at finer geographical scales.

Whilst we consider applying our technology to assist the monitoring of fishing activity at sea, through an Integrated Electronic Monitoring and Reporting System (IEMRS) will be critical to help MPI achieve that vision. We recommend that reporting apps require secure hashes of the fishing data to prevent tampering of the data when it passes through our servers. This hash prevents FLL from changing data indiscriminately and helps to meet IEMRS objective of providing verifiable information.

Integrated Electronic Monitoring and Reporting System

FLL believe more precise information is required to help provide for the use of fisheries resources while ensuring sustainability. Whilst this information is currently gathered by commercial fisheries on



paper forms, reporting electronically on our app will reduce error rates and help save fishers time on unnecessary mechanical recording so they can spend some of that time recording more pertinent detail for fisheries management and also get on with the business of fishing.

Fishing vessels that already carry an Automatic Location Communicator (ALC) or other VMS units can be linked to catch-effort information using our app, which we can then be used to help fishing companies analyse fishing patterns and other anomalies. FLL has already made strides to beta test its software with selected fishers and LFRs, and is currently being used to report catch to company owners.

As part of the processes in the design of our software, we worked closely with MPI officials to make sure that our reporting systems reflect MPI's data requirements. We are also trialling geospatial position reporting tools such as the Vessel Monitoring Systems (VMS) with Navicom, and we believe those systems reflects MPI's existing requirements.

Whilst the consultation document does a good job at defining the current state in relation to monitoring and reporting for MPI paid trials, it does not discuss those successful FLL trials that are either getting funded by FLL themselves or by those fishing companies who have paid for those trials. FLL trials are ongoing and have successfully shown the effectiveness of Electronic reporting (ER) to capture real-time data in the inshore trawl and longline fishery in both the south and north island.

FLL believe the fisheries information used for fisheries management would be strengthened significantly by near-real time catch-effort reporting and automated geospatial position reporting (GPR) from its software. However, MPI needs to be sensible in setting standards and specifications to allow for open market and cost-effective solutions. They also need pragmatism around the difficulty of operating in a marine environment.

With new electronic catch-effort systems such as FLL, we could help improve TACC setting at optimum levels, help resolve key management issues such as discarding and protected species bycatch; help build confidence amongst the public with more transparent information about environmental impacts and protected species; support traceability systems and third party sustainability assessments; as well as leveraging off accurate and near-real-time reporting. FLL electronic reporting would increase the speed at which MPI can analyse that information, where necessary.

FLL understand that the current catch-effort system is largely paper-based, and errors occur frequently. In our trials, the error rate detected has been as low as 0.1%. This is because with our software there is an upfront validation of such fields as name and client number, meaning there is little room for basic errors. We also recognise that the process for correcting paper forms is slow and cumbersome. This often means the data is unavailable to end-users for three months or more after it was collected.

FLL believe the costs of integrating our electronic reporting software would reduce the costs of administering paper-based reporting by as much as 95%. We have had several meeting with FishServe who have expressed support for electronic reporting in the commercial sector. We have also done significant market analysis, and our discussions with fishermen suggest they would be happy to use reporting apps loaded onto tablets to record catch.

Many fishing companies are looking to access catch information as early as possible. However, its continued uptake will be slow in the absence of regulation because most companies find having to duplicate their efforts tiresome. With regard to the Options for consultation, FLL support Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017 and a staged introduction of electronic monitoring on commercial fishing vessels from 1 October 2018.

For the industry to see the benefits from using ER and GPR they will need to have access to their own data. If this is the case, then the benefits include:



- report catch information including 'how and where' fish are harvested, together with species and quantities taken
- capture information at the point of harvest and provide estimates of seafood caught
- provides accurate records of what is getting harvested for seafood suppliers and fish processors
- monitor all critical activities for fishing boats including their current position; what was their last activity; details of catch per tow; what species, grades and quantities they are harvesting and when they should unload
- interconnect with other software streams and communicate seamlessly for the purpose of exchanging and using data
- provide notifications and start the processing, packaging and shipping process immediately
- Allow buyers to find out information on the fish, where it was caught, what time and on what vessel
- Aggregate fisherman's catching information and connect buyers and sellers directly, allowing for real-time transactions of seafood products

To provide these benefits to our customers, we ask that the reporting app data is to be routed through the FLL server. Due to the amount of non-IEMRS data passing from the reporting app, we see this as critical.

Given the introduction of IEMRS technologies, FLL supports ER and GPR roll-out across the commercial fishing fleet FLL over a phase-in period. Funding for training, support and installation support would also be recommended. We also see value in an MPI commercial sector and service provider working group to help work on implementation issues.

In summary, we make the following recommendations:

- The data needs to be routed through the FLL server so that we can properly setup out communication functionality with fishers and LFRs
- We recommend that reporting apps require secure hashes of the fishing data to prevent tampering of the data when it passes through our servers. This hash prevents FLL from changing data indiscriminately and helps to meet IEMRS objective of providing verifiable information.
- A working group is formed with industry (that includes FLL) to develop the specifications for data flow and security

Kind Regards

Mark Soboil

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[Not relevant to request]

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Integrated Monitoring and Reporting System (IEMRS)

MPI's proposal to introduce IEMRS consists of three components – Geospatial Position Reporting (**GPR**); Electronic Reporting (**ER**) and Electronic (Camera) Monitoring (**EM**). Due to the nature of Sealord's vessel operations, all vessels have operated with GPR for a considerable period, in 2011 Sealord voluntarily moved all vessels onto ER under the CEDRIC system and have trialled EM.

Sealord supports the whole of industry response to MPI in respect of IEMRS and we agree with the general concept of IEMRS, that being acquisition of better information to improve fisheries management. However we consider the following matters *first* need to be addressed to focus better the development and efficacy of IEMRS¹ ():

- a. More specific objectives for the deployment of IEMRS;
- b. Consideration of wider fisheries management settings that will influence information requirements;
- c. Specification of the information needs for individual fisheries;
- d. Identification of The particular outputs sought and the feasibility of obtaining those in various fisheries;
- e. An evaluation of the options available to obtain the required information;
- f. A detailed cost-benefit analyses of the options available to collect the required data; and
- g. An analysis of risks.

These are reasonable expectations given very little information has been provided on the costs of the proposed IEMRS system and how these costs would be recovered. This comes on the back of the present cost recovery model where there is already a lack of fidelity on assigned costs. It is conceivable that the capital and operating costs of IEMRS would be very considerable and directly impact on the Sealord's shareholders (and the shareholders of other fishing companies) in what is already a low return on asset (**ROA**) business.

Although MPI takes the view that under the Search and Surveillance Act and the Fisheries Act there are powers to introduce IEMRS, we note that there are a large number of technical and legal issues that need to be discussed and addressed. Sealord is willing to discuss these with MPI in greater detail through the proposed working group.

Sealord has expended considerable funds in trialling video surveillance systems on factory vessels in conjunction with Archipelago Marine Research, and the deployment issues with these systems have not in our view been sufficiently resolved to fully implement them across the industry as proposed. With video surveillance there are also legal questions over protection of privacy, release of information under Official Information Act, what constitutes public information, and legal remedies for misuse of data that need to be addressed.

We also note with concern that the offences and penalties regime that underpins the QMS will not be addressed in this review. This regime needs to be addressed as a critical component of FOOF.

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¹As outlined in the Deepwater Group Submission for IEMRS component of FOOF

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Sealord supports the general concept of IEMRS, that being acquisition of better information to improve fisheries management. Very little information has been provided on the costs of the proposed IEMRS system and how these potentially substantial costs would be recovered. We consider that developing a successful 'program framework' for initiating and operating IEMRS is the single biggest challenge – not the technology.

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Issue Five; Electronic report, VMS and cameras on vessels.

We are not opposed in principle to this indeed we are open to it however;

- Costs will fall on Industry and need to be managed reasonably.
- It is frankly unrealistic to have it all done by 1/10/17 so this comes back to higher costs for a rush-job.
- We do not believe there is much if anything to see so actually there will be little benefit
- EECo has trial-ed fishermen-tracking and found the technology insufficient at this time. Unlike ocean boats we are often shielded from satellites due to gorges etc. Quite a bit of fishing is not from a boat but is on-foot working back to a Ute.
- Other options to collect the required data should also be considered eg detailed monitoring of some MPI-selected fishers or by more detailed forms.

Privacy

Fishing spots are often commercially sensitive. We trust that information will be protected.

Reporting all fish taken QMS & non QMS

This is unnecessary. As noted most of our by-catch is pest fish. Many of these pest fish are noxious fish which must be destroyed as soon as possible and they are then rendered unmarketable. However we do acknowledge that reporting by the fisher of pest fish by-catch would be far preferable to having to land it to a LFR which would just create a real hassle and significant costs for no benefits at all.

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We are not opposed in principle to this indeed we are open to it however;

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Fishing spots are often commercially sensitive. We trust that information will be protected.

Reporting all fish taken QMS & non QMS

This is unnecessary. As noted we have little by-catch. However we do acknowledge that reporting by the fisher of by-catch would be far preferable to having to land it to a LFR which would just create a real hassle and significant costs for no benefits at all.

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11. MPI has also sought views on amendments to regulation to enable the use of new fishing technology and to introduce electronic reporting, vessel monitoring systems and video surveillance. The industry supports collection of good information to improve decision quality, but the information needs to be relevant, cost effective and designed to meet clear management objectives. We suggest that more analysis is required to determine how the

³ See *Creating Value Beyond Sustainability*, paragraphs 33-46.

individual components could deliver better fisheries management outcomes through work including information need analyses, comparison of options and a cost benefit analyses.

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Other FOF proposals such as IEMRS and proposals to address discarding rely on regulation rather than enabling stakeholders to achieve desired outcomes. These proposals are therefore more likely to reduce the value that can be obtained from fisheries by not supporting what can be delivered through rights and incentives.

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¹² See *Creating Value Beyond Sustainability*, paragraphs 61-70 and in Appendix 4.

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5.2 Integrated Electronic Monitoring and Reporting System (IEMRS)

83. The Ministry proposes to introduce an Integrated Electronic Monitoring and Reporting System (**IEMRS**) which consists of three components—Geospatial Position Reporting (**GPR**); Electronic Reporting (**ER**) and Electronic (Camera) Monitoring (**EM**). The stated purpose of IEMRS is to provide accurate, integrated and timely reporting and monitoring data on commercial fishing activity.
84. MPI proposes that all permit holders will need to implement all three components of IEMRS, on all commercial vessels, with GPR and ER being active on all vessels from 1 October 2017 and with EM being implemented in a staged process from 1 October 2018. New regulations will be needed to implement the various components of IEMRS from 1 October 2017.

¹⁸ MA Morrison, ML Lowe, DM Parsons, NR Usmar and IM McLeod. 2009. A review of land-based effects on coastal fisheries and supporting biodiversity in New Zealand. NZ Aquatic Environment and Biodiversity Report No. 37.

85. It is not stated in the consultation paper what regulation changes are proposed to implement IEMRS.

5.2.1 Summary of industry position

86. Robust information underpins good decision-making and the industry supports any initiative that seeks to improve decision quality. Consequently, the industry supports acquisition of robust information. However, this support is qualified by the information collected improving management by being relevant, appropriate, cost-effective, and aligned with well-specified management settings and objectives. It is also premised on developing an operating framework where decisions are considered and taken based on that information in a timely and consistent manner.
87. As such, while we can see some potential value in individual components of IEMRS, industry considers that the implementation of each component, severally and jointly, must be expressly targeted to improve management outcomes. We consider that more information and analysis is required to determine where and how the various components of IEMRS can deliver better fisheries management outcomes for the Crown, the seafood industry and the public. This analysis must necessarily include:
- a) specific information needs, i.e. a clear definition of the management issues that require additional information—fishstock by fishstock, sector by sector, for the different catching methods and regions;
 - b) an assessment of the costs and benefits of using each of the three individual components of IEMRS to address the aforementioned management issues—either individually or in combination;
 - c) careful integration with—and adjustment of—wider fisheries management settings.
88. Therefore, while we agree with the general concept of IEMRS, that being the acquisition of better information to improve fisheries management, we consider the following matters *first* need to be addressed to focus better the development and efficacy of IEMRS:
- a) more specific objectives for the deployment of IEMRS, linked to management objectives;
 - b) a clear definition of the information deficiencies, fishstock by fishstock;
 - c) consideration of wider fisheries management and policy settings that will influence information requirements and direct subsequent management based on better information;
 - d) the particular outputs sought and the feasibility of obtaining those in various fisheries;
 - e) an evaluation of the options available to obtain the required information;
 - f) a detailed cost-benefit analyses of the options available to collect the required data; and
 - g) an analysis of risks.
89. Central to this general position is that IEMRS is a tool to assist better fisheries management, and not an end in itself. It is not a single mechanism—it is a collection of three components that may be implemented, separately or collectively, depending on the information needs and the capacity to acquire that information using IEMRS.

90. The need for each IEMRS component, and its value to fisheries management, requires a wider understanding of the information requirements and management regime for specific fisheries. Unfortunately, the consultation material fails to provide that wider contextual setting which precludes any assessment of the value of IEMRS components either individually or collectively.
91. For example, the proposal provides no analysis of the appropriateness or capacity of IEMRS to monitor fisheries compliance, protected species interactions, occupational health and safety or scientific data collection. The ability to meet those information needs varies by fishery, fishing gear and the handling practices on the vessel.
92. By way of illustration, it is acknowledged that IEMRS will not be capable of several core data collection requirements. For example, the collection of length frequency data, stomach content analyses and otoliths. Human observers will still be required.¹⁹ That being the case, one may ask whether IEMRS provides a cost-effective information collection platform in fisheries where observers are present and where these data are necessary. The matters set out above in paragraph 88 provide a framework for making such assessments and we would value the opportunity to work through those considerations with MPI to ensure that IEMRS is an effective tool to complement a robust fisheries management system.
93. It is also clear from the proposals that MPI expects that industry will meet both the full capital costs of the equipment on the boats as well as bearing some proportion of the Ministry's costs in establishing the infrastructure and associated operational costs. As such this must be seen as a joint investment. There must be collaboration in its development and there should be no need for parallel systems. Such collaboration is recognised and reported as an essential prerequisite to a successful EM programme on any scale (see Sylvia et al. Annex One).
94. Given the scale that is proposed, it will be critical for overall system success that agreements are reached early on regarding issues such as immediate access to information supplied by the EM systems to commercial parties and sector representative bodies as agreed with the fisher.
95. The following sections provide additional industry views on the IEMRS proposals including the need for better problems definitions, further analysis and ongoing engagement to develop the IEMRS proposals and support implementation that will improve information and management outcomes in a cost effective manner.

5.2.2 The problem definition

96. A precise problem definition should provide the rationale for IEMRS, drive its development and target the implementation of its various components. However, the problem definition provided by MPI is vague, generalised and does not convincingly bridge the gap between the outcomes being sought and the monitoring system proposed.
97. MPI state as the principal rationale for IEMRS, that there is no sure way to verify catch-effort and protected species reporting by vessels, and that the absence of real-time or near real-time reporting hinders the speed at which MPI can analyse information and taken action where required.²⁰
98. It is said that these problems result in a range of undesirable outcomes such as:

¹⁹ Vol III, page 24.

²⁰ Vol III, page 13.

- a) uncertainty regarding discarding, and other sources of mortality, meaning TACs may not be set correctly;
 - b) constrained progress resolving protected species by-catch;
 - c) undermined confidence that fishers are operating with minimal or acceptable impacts;
 - d) limited opportunities to add value through lack of traceability and third-party certification;
 - e) long turn-around times through paper-based reporting.
99. The problem definition then lists several reasons why Observer coverage is difficult and expensive to obtain in some fisheries. Yet there is no discussion of the need for that Observer coverage, what specific information is required, what level of coverage is necessary and the extent to which IEMRS can collect the information currently obtained by human observers. Again, this demonstrates a lack of specificity about the information needs in various fisheries and the options for obtaining those data.
100. The document then asserts that IEMRS will solve these issues (implying all of them) through increased data collection. While in some instances additional data may be useful, asserting that all three IEMRS components are needed across the whole commercial fleet operating is a very blunt and expensive management response to a complex suite of challenges. Each fishery only has a limited ability to invest more money towards better fisheries management. This means there is a high opportunity cost for expenditure and we need to be sure that the investment proposed represents the greatest joint industry/taxpayer return.
101. It is not apparent that IEMRS will solve the issues identified or that it represents a good investment for industry or the Crown. MPI's assertion to the contrary ignores the reality that these issues are the consequence of a range of management settings and incentives that must all be solved together through active fisheries management as opposed to making changes only to increase monitoring and data collection.²¹
102. Considering some of the above scenarios is instructive in assessing the efficacy of IEMRS in addressing some of the issues identified, for example:
- a) There appears to be little current reason why MPI would require real-time or near real-time reporting when almost all management decisions are based on annual or multi-annual cycles. What is the analysis and action MPI envisage that would justify this information need? For which fishstocks is this potentially needed?
 - b) While IEMRS would provide an incentive to reduce some forms of discarding, how can the various components of IEMRS be used to address the underlying causes of discarding and deliver better fisheries management outcomes? For example, what are the drivers and incentives that result in undesirable discarding? How could all these best be addressed? To what extent does better information assist any or all of them compared with other measures? How should that information be used to improve management settings and

²¹ We are not convinced that the active management required would be delivered through the other initiatives discussed in *The Future of our Fisheries* papers. We consider that New Zealand's fisheries management system is fundamentally sound and significant fisheries management gains can be obtained through more effective management of the existing regime (see *Fisheries Inshore's* submission of 12 December 2015). This does not preclude the view that developing other management options such as those discussed in response to Volume II of *The Future of our Fisheries* should not be progressed to further improve fisheries outcomes.

thereby reduce incentives to discard? What undesirable incentives could IEMRS create and how can these be avoided?

- c) One questions how onboard cameras will verify catch effort reporting? Inshore trawl skippers are required to provide an *estimate* of catch for the top eight species landed. It is unclear how obtaining video footage of that catch being retrieved, sorted and stored would verify the accuracy of the skipper's estimate. What value is there in obtaining a better *estimate* of catch? Similarly for large volumes of catch onboard deepwater vessels where the catch is tipped directly in the pound. In contrast, there may be value in finer-scale spatial data and more detail being collected through GPR and ER.
- d) If there is constrained progress resolving protected species by-catch, in which fisheries is a lack of information the impediment? Can the necessary information be collected using IEMRS, e.g. speciation of seabird captures? Can the required coverage be targeted in time and space to optimise efficacy and cost?

103. These examples, and there are many more, illustrate that if the Ministry and industry are to jointly improve fisheries management by adopting IEMRS in one form or another, a more considered and targeted approach is required. The matters referred to in paragraph 88 above provide a starting point for properly assessing how and where the various components of IEMRS may provide a useful tool—to be used in conjunction with other management measures—to improve fisheries outcomes (see also Sylvia et al. in Annex One). A key recognition must be that for IEMRS to assist in achieving the desired outcomes, it will need to be accompanied by a range of other measures that address the issues in a cost-effective way.

5.2.3 Consultation

104. The submitters appreciate the opportunity to comment on the IEMRS proposal at this early stage of its conceptual development. However, as set out above, there is little provided by way of rationale or the detail of the specific purpose of IEMRS that would allow us to provide a more useful response.
105. In particular there is insufficient information on the costs of the proposed IEMRS system and how these costs would be recovered. It is conceivable that the capital and operating costs of IEMRS would be very considerable indeed.
106. Furthermore, there is no information provided about the particular regulatory changes that are proposed. A non-exhaustive list of regulations is provided that would require amendment but without any further information.²² It is also stated that “new infringements relating to new reporting and monitoring requirements” are within scope of the consultation but are not discussed in the consultation paper at all.²³
107. The courts have considered consultation in some detail. A key component of which is a requirement that the party consulted will be (or will be made) adequately informed to enable it to make an intelligent and useful response.²⁴
108. Similarly, and with particular regard to consultation with Maori, the Court has held that “Those consulting need to impart enough about the proposal that those consulted are able to respond

²² Vol III, page 26.

²³ Vol III, page 8.

²⁴ *Wellington International Airport Ltd v Air NZ* [1991] 1 NZLR 671 (CA).

with appropriate and accurate information on the potential effects on affected Maori, so that it may be considered by the decision maker.”²⁵

109. In considering specific instances regarding the adequacy of consultation, the Regulations Review Committee has stated that a party under a duty to consult must provide a reasonable amount of information, as those consulted must know what is proposed before they can be expected to give their views.²⁶

110. It follows that Volume III of *The Future of our Fisheries* regarding IEMRS is simply an articulation of an idea that may warrant further development. Given the lack of specifics, it is difficult to consider the information provided, and process to date, as consultation in a legal sense.

5.2.4 Further analysis required

111. The Treasury has provided detailed information on preparing Regulatory Impact Statements that must accompany all proposals for regulatory change. The Treasury note the following as required information:²⁷

Identify the full range of practical options (regulatory and non-regulatory) that may wholly or partly achieve the objectives. Within the regulatory options, this includes identifying the full (viable) range of regulatory responses.

For each feasible option:

- *identify the full range of impacts (including economic, fiscal, compliance, social, environmental and cultural) and provide an appropriate level of quantification*
- *describe the incidence of these impacts (i.e., who bears the costs and the benefits) and assess the net benefit compared with the status quo.*

112. The information provided about IEMRS in *The Future of our Fisheries* documents does not contain the analysis required. We consider that this level of analysis should be part of any proper consultation process such that those impacted can understand the proposal and provide a considered response.

113. Given that MPI would be required to conduct this analysis as part of advancing a regulatory process, there should be little impediment to conducting the required analysis and sharing that information publicly.

5.2.5 Other matters

114. In addition to ensuring fisheries management applications are optimised by any IEMRS system, there are peripheral matters that also require attention. These relate to the use of camera monitoring onboard vessels.

Privacy and the Official Information Act 1982

115. Despite the increase in camera monitoring in the workplace, it remains relatively uncommon. It is even more uncommon for that video monitoring to be a compulsory requirement by the Crown and hence subject to release under the *Official Information Act 1982 (OIA)*. In many instances a fishing vessel is not just a crew member’s workplace, but also their home. Many

²⁵ *Beadle v Minister of Corrections* EnvC A74/2002, 8 April 2002 [549].

²⁶ Report of the Regulations Review Committee: *Investigation into the Biosecurity (Ruminant Protein) Regulations 1999*.

²⁷ *Regulatory Impact Analysis Handbook*, Part IV. The Treasury, July 2013.

fishers are understandably concerned about breaches of personal privacy and are wary of the protections afforded by s 9(2)(a) of the OIA.

Penalty regime

116. The ease with which an offence can be detected is a consideration when determining the nature of the resultant penalty. During its consultation in 2011 on *Improvements to Administrative Commercial and Recordkeeping Requirements* the Ministry stated that "... when setting specific penalty levels account must be taken of ... the 'ease' with which the offence can be proved and the level of compliance [resource] required to achieve this."
117. Following the Ministry's principle, it would be consistent to also review the penalty regime under the *Fisheries Act 1996* to take account of the vastly increased ease of detection and ability to prove non-compliance that video monitoring may provide. We would have expected this work to be signalled in *The Future of our Fisheries* documentation as a necessary precursor to that component of IEMRS.

Access to data

118. Industry bodies are already collecting additional information through cooperative arrangements with fishers; this includes detailed information about catch and effort and fine-scale VMS information. The regimes are well-developed and collect high-quality data well in excess of statutory requirements. These arrangements have considerable advantages in that they have the cooperation of participants and thereby incentives to provide good quality data. Participants have ownership of the data and the results that stem from the use of those data (in a literal and figurative sense). There is considerable potential to build on that model, especially with support for collective decision making within industry, and provide the necessary core data to MPI to support assessments.
119. Any IEMRS system should allow that information to continue to be collected and for industry to have access to those data as they require them. In our view it is essential that any version of IEMRS that is progressed complements rather than frustrates those initiatives.

Event-based reporting

120. We would welcome more discussion on event-based reporting. While we have no fundamental issue with moving to event-based reporting, the designation of an "event" needs careful consideration. In some circumstances the nature of fishing activity lends itself well to defining and reporting fishing events. However, this is fishery-specific and the converse is also true.
121. The same considerations also apply to production events. In some fisheries, production is a continuous process and discrete fishing events cannot be linked to a corresponding production event.
122. As with the more substantive matters raised in this paper, the reason(s) for moving to event-based reporting require more detailed rationale and analysis so those objectives can be accommodated in the most appropriate and practical way; having regard to the operational differences among fisheries and individual vessels.

All fish taken to be reported

123. We support better reporting of catch, including by the recreational sector and amateur charter vessels. However, Volume III suggests that rather than providing an estimate of the top five or eight species on catch returns, that all QMS and non-QMS species be recorded. In some

fisheries this may be scores of species and is entirely impractical, in some circumstances impossible, and technically unrealistic for fisher-reporting of non-QMS species.

124. We consider that the catch/effort return is not the correct mechanism to obtain that additional information. At present it provides a simple estimate of catch that allows for general reconciliation with LFR Returns and MHRs.

125. As with other considerations in this submission, the analysis set out in paragraph 88 should be applied to understand the need for that additional information, the precision required and the most appropriate mechanism by which to obtaining it.

5.2.6 Dual process

126. The short discussion above illustrates that the use of EM requires consideration of a number of specific matters including, but not limited to: preservation of personal privacy, information release, and the adaptation of the penalty regime.

127. Given these issues, we consider that any regulatory process should be split with the ER and GPR components progressing first while further consideration is given the more complex legal and policy questions relating to EM. Given the stated intention to progress EM at a later date, this would provide the opportunity to address those questions.

5.2.7 Next steps

128. We consider that the IEMRS concept has significant potential to provide valuable information that could improve fisheries outcomes. The information provided in the *Future of our Fisheries* is limited and further discussion is necessary to develop the IEMRS concept and thereby provide the necessary detail to allow for meaningful consultation in the future.

129. To allow for further development and better understanding, we submit that a joint MPI / industry / Maori working group be established to address the matters raised in the IEMRS discussion paper. Until such time as the substantive questions about IEMRS are addressed and the specifics articulated we are unable to provide a more supportive endorsement of the IEMRS concept.

Annex One

The Environmental Defense Fund, a US-based eNGO, contracted a review of electronic monitoring drawing particularly on North American experiences.²⁸ The learnings from that review, and the various trials that preceded it, should be studied carefully and as we consider the use of similar technology here.

The key findings of the Environmental Defense Fund's Report are summarised below:

The use of EM for fisheries MCS is still uncommon: The use of EM is still rare although significant industry, NGO, and government agency interest exists in exploring its application. In the US EM is still primarily in the "experimental" stage.

EM technology is maturing and operationally robust: EM technology has been tested, utilised, and compared to human observers in many different applications. EM can directly substitute for many human observer functions, can perform some functions to a higher level of accuracy (such as monitoring of sporadic events that occur over long time periods), but is also restricted, as a stand-alone technology, of performing some of the essential tasks performed by human observers (such as biological sampling). Similarly there can be major challenges with EM when individual retained or discarded species need to be identified in mixed fisheries.

EM is part of an integrated fisheries management system and not just a data collection technology: Implementing EM is also about creating new management and information systems with attendant governance regulatory and structural change.

Clearly articulated objectives for EM reduce costs and increase effectiveness: Defining the objectives of a monitoring program that are clearly articulated and developed in conjunction with EM providers, fishermen, and fishery managers can foster cost effectiveness, especially when moving from a trial phase to an implementation phase. Clearly stated objectives should be used to refine monitoring needs, e.g. the necessary precision required.

The structure of EM costs differs from observer costs – scale is critical: The costs of observers to a fishing vessel are normally realised as purely "variable" costs—they are paid for on a "per day" basis. EM, however, requires significant initial investment in equipment, installation, and training as a fixed cost. EM is not necessarily cheaper than observers as it depends on required video review rates, storage costs, number of fishing days and the required level of coverage.

EM and observer costs can differ significantly: The literature review and financial analysis shows that EM may be within 50% to 150% of the costs of observers depending on 1) program objectives, 2) characteristics of the fishery, 3) the scale, diversity and distribution of the fleet, 4) organisation, cooperation, and sophistication of the fleet, and 5) type of resource management system.

Who pays for EM and observers can differ; incentives are important: The implementation of a new, potentially less expensive method of fishery monitoring brings with it the opportunity for change,

²⁸ Sylvia G, Harte M and Cusack C, 2016. *Challenges, Opportunities and Costs of Electronic Fisheries Monitoring*. Environmental Defense Fund, Newport Oregon USA. Last accessed 19 December 2016 and available at: http://www.edf.org/sites/default/files/electronic_monitoring_for_fisheries_report_-_september_2016.pdf?_ga=1.16173875.422670097.1480651050.

innovation, and greater focus on cost effectiveness. There are a variety of potential incentives to drive successful development and adoption of EM including: 1) developing EM in conjunction with experimental fishing permits that provide additional quota to fishermen; 2) using EM to verify logbook data accuracy that can support use of fisheries dependent data in science and management; 3) encouraging fishermen to design efficient systems based on their ideas and transparency in costs and standards, rather than being burdened with costly and inflexible systems designed by others; 4) rewarding good behaviour and record keeping with lower review and video audit costs; and 5) receiving financial remuneration for providing EM data to science centres, universities, and other organisations.

The marketplace for EM and observer services is complex: The marketplace for EM products and services is relatively small but has the potential to grow significantly. EM is not always a substitute for observers but in the future we should expect to find creative combinations of EM and observers to best meet regulatory compliance and data needs at the lowest cost levels.

The presence or absence of clear standards can fundamentally lead to the success or failure of EM initiatives: Standards for EM are complex because they must be applied to many elements of the EM process including data requirements, monitoring equipment, data confidentiality, data ownership, etc. But well-defined and cooperatively developed standards can help provide a coherent framework for building successful EM programs.

Expectations need to be reasonable and aligned with the capacity, regulatory environment, and culture of management agencies and industry: Agency, NGO and industry views about the capabilities of EM as a technology and the ability to integrate EM with existing fishing and agency management practices can often be too optimistic. EM introduction is often hampered by uncertainty caused by changes in costs, overall agency and wider industry commitment to EM programs, and shifting goal posts during introduction. In order to develop cost effective and innovative EM systems, management agencies should support innovation based on understanding markets for monitoring systems, as well as incentives within their own fisheries and agencies to drive down costs and improve performance. A fundamental principle is that poorly managed and financially stressed fisheries cannot support effective EM or observer monitoring.

Collaboration is essential to the implementation of EM: The greater the collaboration between scientists, enforcement officers, managers, technologists, and industry during the trial, implementation and operational phases of an EM project, the greater its chances of success. Each player must strive to understand the perspectives of other team members and realise the trade-offs that may be inherent in balancing the quantity/quality of the data and the costs to achieve different levels of “compliance”. By structuring the program using a collaborative approach, players will discover approaches for aligning incentives and increasing trust among the participating partners.

Learning from the experience of others: There have been many EM experimental programs and pilot projects across U.S. fleets, regions, and fisheries. These programs did and are providing important information, experiences, and ideas. We recommend conducting a national survey of participants in EM programs to determine experiences, lessons learned, approaches for improving programs, and ideas for reducing costs.

[Not relevant to request]

Monitoring and Management could be on a finer scale and this can be done by Lat/Lon currently, but some other information should be collected which might seem insignificant now but could be useful in the future for retrospective catch/effort levels.

Surface longline effort return is the only return that asks for weather information and sea temp.

Do Fisheries Management Team not consider this as important to other fisheries or methods?

Some fishers could be selected on certain merits to assist.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Future of our Fisheries

s 9(2)(a)

Fisheries.review@mpi.govt.nz

I address my responses to Volume III and the subject of Integrated Electronic Monitoring and reporting system.

I registered my interest and concern in these consultations in October, 2016 and have included my letter to the Prime Minister, Minister of Fisheries and the local Invercargill M.P. on 15th December, 2016 with these submissions.

Apart from two replies that was “an operational issue” and my letter being referred on to the Ministry of Fisheries I have had no response to the concerns which were raised at the Invercargill meeting and reflected in my letter and my own concerns

Introduction of Integrated Electronic Monitoring in New Zealand Fisheries

[Not relevant to request]

4. Serious concerns about privacy issues which were raised at the Invercargill “consultation meeting” by a Bluff skipper whose boat is also his home were not addressed. There is no information about the discussions had with the office of the Privacy Commissioner available to those who wish to make submissions and participate in the “conversation.”

5. Bluff Oyster skippers have guarded the marks handed down to them through generations and there is no “social licence” which has emerged from discussions in this community or information provided in sufficient time for such discussions to take place. The skippers’ marks have a marketable

value and the proposals do not include a scheme comparative to the Public Works Act appropriations to recompense them for this loss.

[Not relevant to request]

[REDACTED]

[REDACTED]

[REDACTED]

L.F.Goffin

s 9(2)(a)

[REDACTED]

[REDACTED]

[REDACTED]

I attach a copy of the letter sent to the Minister and local Members of Parliament concerning the brevity of the consultation period and the gross disadvantage South Island Fisheries have had in comparison with North Island Fisheries in the timetabling of these consultations.

s 9(2)(a)

16 December, 2016

Rt Hon. Bill English,
Prime Minister,
Parliament Buildings
WELLINGTON

Hon Nathan Guy,
Parliament Buildings,
WELLINGTON.

Sarah Dowie,
M.P for Invercargill.
Parliament Buildings,
WELLINGTON

Dear Prime Minister and Members of Parliament for Otaki and Invercargill,

Consultation Meeting: Invercargill Thursday December 15th 2016.

I have been following the public debate on "fish dumping" and proposed mandatory surveillance on commercial fishing vessels since it became a public issue and I have kept contact with Parliament through the office of my former MP Hon Peseta Sam Lotu-Iiga and with MFish on the beginning of the public consultation process and will continue my interest through to likely Select Committees hearings.

I am a Member of the Marine Law Association of Australia and NZ and have followed the issues as a lawyer member. My particular concerns include unprecedented mandatory surveillance of the workplaces of just one sector of the population and data collection and data sharing. Some of those concerns were raised by others in the Invercargill meeting last evening and the discussions which followed.

[Not relevant to request]

[Not relevant to request]

Some had travelled considerable distances to attend the meeting and the meeting was quite clear about the disadvantage they were at both in population size and truncated period of consultation and information sharing in presenting their submissions and having them heard.

[Not relevant to request]

Yours faithfully,

Lee Goffin
s 9(2)(a)

CONSULTATION DOCUMENT III

I prefer option two ER and GPR reporting although with some reservations.

The reporting of all bi catch species will take a lot of time especially as the quantities are statistically irrelevant in most cases. I realise the scientists consider that you can never have too much information but you have to be practical, reporting 4undersized flounder, 3brittle stars, 2 hermit crabs, 4 paddle crabs, a meter of bubble kelp and 1 of bull kelp is irrelevant to everyone when monitoring a catch system of over 400,000tons.

My reservation with GPR is based on an incident that occurred in Australia recently where a prawn trawler that had GPR on board went missing, the family and rescue services went to there fisheries people and not only could they not tell them when they lost the signal but they couldn't even tell them the rough area in which to mount a search. So my reservation is is this a management tool or just toys for the boys like new iPhones for the kids?

As for EM my first thought is 'Am I the worst criminal in the land' as not even pedophiles and serial killers have to have video monitoring while going about there daily lives.

As the quota system is working well and all fish stocks are within safe biological limits I see this as just a luxury for empire building managers, a bit like the difference between a high definition TV and an ordinary one. You claim that it will help you more effectively manage the fisheries but I doubt your ability to use it in a relevant way as you don't fully utilise the information you have now in a practicle way, as I stated above the time taken to act is far to slow and is driven I believe by a fear by scientists and managers of having the finger pointed at them for making a mistake.


This paper repeats the phrase 'benefits will accrue' I say this is rubbish in the context of my operation and are just flashy buzz words. Any benefits that may occur will be well buried under the added expense to my operation.

I have a small operation that only makes me a small income and even \$5000.00 is a big hole in my profits. That is as much as my total set of my trawl gear.

Another thing is will we have to send in video data every day as the cell phone data time required to send 20hrs of video every working day will drive me broke.

Next I am concerned about security, as the recent media storm about dumping shows your security isn't worth the breath it takes to mention. At the drop in meeting I went to the other day it was admitted that other agency's like maritime and DOC will have access if they request it. This would then open me to a whole new list of liabilities and possible prosecutions I havnt even imagined yet so between your 8000 plus rules and there's I'll be spending my retirement in jail for just trying to make a living.

[Not relevant to request]



Yours Cyril Lawless

s 9(2)(a)

FUTURE OF OUR FISHERIES SUBMISSION

[Not relevant to request]

My vessel is my work place and my home when at sea. The vessels size prohibits defined areas of work and non-work. Because of this I am totally against the compulsory installation of camera surveillance equipment. I see it as a breach of my basic human rights.

My whanau and I use our vessel for private and recreational use as well as commercial operation. The compulsory camera surveillance monitoring whilst my whanau is on board the vessel is a breach of their basic human rights.

I have no objection to electronic reporting of my Catch, Effort and Landing Reports.

Given the limited areas I fish in I see no need for Geospatial Position Reporting. I am aware that MPI currently use satellite monitoring so can not see the need for GPR.

[Not relevant to request]


We all want a sustainable fishery. As an intergenerational fisher I want my children to be able to become fishers if they desire. I feel the proposal of compulsory camera surveillance treats me as a criminal. I do not consider my type of single specie potting to be a threat to sustainability and this is backed by science. I question how the writers of the document would feel if they had compulsory camera surveillance in their homes or even their workplace. I also have serious issues regarding sharing of information derived by camera surveillance.

Tristan Topi

s 9(2)(a)

Cell s 9(2)(a)

[Not relevant to request]



A large rectangular area of the document is redacted with a solid grey fill. This redaction covers approximately the top half of the page, starting below the first line of text and ending just above the section header. The redacted area is composed of several horizontal bars of varying lengths, suggesting it might be covering multiple lines of text or a list.

IEMRS-Integrated Electronic Management and Reporting System

LCFA are fully in support of gathering good robust information for use in decision making regarding fisheries management. But the information must be relevant, appropriate, cost – effective, and have specific management purposes and objectives.

LCFA support transparency and validation but have some concerns regarding problems relating to cameras on fishing vessels during recent trials. Bad media releases of late and MPI's unhelpful and less than supportive comments, cameras are as yet proving to cause more problems for the fishers on the water, thus having the opposite affect than their intention. Problems have included reliability of cameras working, validation of information with Trident being put under the microscope, release of actual camera footage under the OIA. These issues need to be sorted before any general roll out on fishing vessels. The rights and privacy of fishermen need to be protected.

The cost of the IEMRS will fall ultimately on to the fishermen, who are not in any position to absorb any more costs on their businesses and remain economically viable. Fishermen are struggling as it is to keep up with the high costs of running a fishing operation.

[Not relevant to request]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

Submission on The Future of our Fisheries consultation document 2016.

[Not relevant to request]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

As a consequence of this short time frame the TRLIA will limit comments to the proposal for IEMRS in the CRA 3 fishery.

We are aware of the issues in some mixed species fisheries that have embarrassed the Minister of Primary Industries. We are unable to relate these issues to rock lobster fisheries in general, and in particular, CRA 3. We have not been presented with any evidence, or even conjecture, of any significant issues that would require CRA 3 operators to be compelled to operate with IEMRS.





We specifically object to the expense of IEMRS to operators, being treated as untrustworthy and the personal intrusion of video surveillance.

The MPI estimated cost of \$5,000 to \$18,000 per vessel plus ongoing maintenance and running costs is money that will come from fishermen's share of profits from fishing. In the absence of any evidence based rationale that there is any significant illegal behaviour occurring on rock lobster vessels, this money should stay as wages. This region suffers economically compared to the main centres and commercial fishing is a vital part of the local economy.

It is a natural reaction to proposals such as FOOF for those targeted to question if they are considered criminals who just haven't been caught yet. The vast majority of vessel operators in the CRA 3 fishery understand the principals of the quota management system and endorse the principal of responsibility for sustainability of the fishery into the future. The companies that most fishermen depend on for access to CRA 3 ACE have well known policies of not providing ACE to operators convicted of fisheries offences. Industry and local MPI compliance know the few operators in CRA 3 who may be abusing the fishery but have been frustrated by the lack of a solid conviction. The idea that IEMRS will deter or restrict these offenders is naive.

As a generation who read George Orwell's 1984 in high school english, and were enlightened about the corrupting effects of surveillance, we are disturbed at the prospect of compulsory video monitoring. Perhaps when occupations, with higher conviction rates for professional misconduct, such as teaching, policing, accounting and ministers of religion are required to submit to real time reporting, GPS tracking and video surveillance we could start to have a fair conversation about IEMRS. There seem to be grounds for an enquiry to the Human Rights Commission about unwarranted surveillance.

[Not relevant to request]



Gordon Halley
Chairman TRLIA

Volume II: The Fisheries Management System Review

Strategic priority: Maximising value from our fisheries

Address discarding of fish

Tighter regulatory controls to manage discards

[Not relevant to request]



Would you like to comment?

Current rules along with the use of cameras should be sufficient to ensure discards are properly managed.

[Not relevant to request]

[Not relevant to request]



Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting?

☐ Strongly disagree

☐ Disagree

☐ Neither

☒ Agree

☐ Strongly agree

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

We have been part of the SNAI monitoring and have no issue with cameras being on the vessel. Once this is in place for everyone there needs to be assurances only MPF can view all the data collected & the VMS tracking will not be documented on any sites available for public viewing. If M/S returns are allowed these need to be able to be measured & then released alive not binned, measured & then returned to the sea potentially not alive

Problem definition

Do you agree with how we have defined the problem?

☐ Strongly disagree

☐ Disagree

☒ Neither

☐ Agree

☐ Strongly agree

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with the objectives of IEMRS?

☐

Strongly
disagree

☐

Disagree

☐

Neither

☒

Agree

☐

Strongly
agree

Would you like to comment?

Option 1: Current state

Do you agree with this option?

☐

Strongly disagree

☒

Disagree

☐

Neither

☐

Agree

☐

Strongly agree

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

☐

Strongly disagree

☒

Disagree

☐

Neither

☐

Agree

☐

Strongly agree

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option?

☐

Strongly disagree

☐

Disagree

☐

Neither

☒

Agree

☐

Strongly agree

Would you like to comment?

A staggered implementation to ensure everything is working correctly is the only option to ensure the success of this change

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

Maybe on an area basis, starting in the areas where it is perceived that in the public eye it will be the most beneficial.

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

There should be no issues, as long as the cameras etc are up to scratch & do not stop working on a regular basis, MPF will need to understand some areas of NZ do not have cell phone coverage so daily camera screenshots might not happen

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

There should be no exceptions, all vessels should have EM installed.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

EM & GPR as part of SNAI

Do you operate this technology on your own behalf, or as an input into someone else's operations?

On our behalf

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

No

What issues do you currently have with ER?

The ability to send the information back to Fishserve due to lack of cell phone coverage. Having older skippers who are not comfortable using computers. Having another screen in the wheelhouse and finding a suitable place for it. Reporting all QMS & non-QMS on each tow is just impractical, we can land 20-40 species each tow and too record each one at "best estimate" will

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

Maybe the ability to go back & view historic information to see when you caught species at certain times in prior years to help with your current years fishing plan

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an "early adopter"?

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation? (From a non CSO point of view)

Would not be happy this happening.

Licensed fish receivers

What problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements?

☐ Strongly disagree

☐ Disagree

☒ Neither

☐ Agree

☐ Strongly agree

Would you like to comment?

IF ER is to be implemented 1/10/17 enough notice is given & clear guidelines provided on what is involved & needed to ensure a smooth transition

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

Undecided if this will make any difference

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

The confidentiality of your data to ensure where you work does not become public knowledge or available to other vessels. Protection for the crew in regards to the cameras and who can view & access the footage. Clear rules of what can be obtained under to O.I.A & this documented & approved by each vessel operator. The costs of this implementation needs to be clearly

identified so everyone knows what will be involved & the financial implications of this transition. Costs preferably borne by MPI to cover installation

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements?

☐

Strongly disagree

☐

Disagree

☒

Neither

☐

Agree

☐

Strongly agree

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

Results in a group not individually identified by each vessel could be reported to stakeholder organisations, but individual data is to only be viewed by MPI & the vessel operator. No public access of results unless in generic for & unable to identify individual vessels

Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting?

☐
Strongly disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly agree

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Problem definition

Do you agree with how we have defined the problem?

☐
Strongly disagree

☒
Disagree

☐
Neither

☐
Agree

☐
Strongly agree

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with the objectives of IEMRS?

☐
Strongly
disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment?

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Option 1: Current state

Do you agree with this option?

☐
Strongly
disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

☐
Strongly
disagree

☒
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option?

☐
Strongly
disagree

☒
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment?

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Do you operate this technology on your own behalf, or as an input into someone else's operations?

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

Licensed fish receivers

What problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements?

☐
Strongly
disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements?

☐
Strongly
disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

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Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting?

☐ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☒ Strongly agree

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Strongly Agree

IEMRS should be also mandatory on all charter vessels.

Problem definition

Do you agree with how we have defined the problem?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

I think if it goes to electronic monitoring, there is an issue with intellectual property because it is not secure. And MPI cannot guarantee security.

Also internet or phone coverage is questionable at best around NZ; so that would mean that every vessel would have to install satellite communications, which is not financially feasible for the majority of small operators.

Thirdly, if the reporting cannot be performed on a phone or tablet then it is inefficient. If you are trying to run an online system that doesn't work on mobile devices it is an out dated system!!

Objectives

Do you agree with the objectives of IEMRS?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment?

Strongly Disagree

How are they going to ensure security of information?

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Option 1: Current state

Do you agree with this option?

☐
Strongly
disagree

☐
Disagree

☐
Neither

☒
Agree

☐
Strongly
agree

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

☒
Strongly
disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option?

☒
Strongly
disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment?

I strongly disagree with all electronic monitoring due to the intellectual property which has taken 30+ years to build up, being available to the general public.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Of the 3 options you have described, staying as is, is the only feasible option for all small to mid sized operators.

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

None at all. There is no benefit to the small to mid sized commercial operators; it will in fact put many out of business as it is too expensive to get into. If it does go ahead then the cameras and monitoring equipment need to be supplied to each vessel by MPI, as they have had the financial benefit of having sold most of the Crown quota to the commercial fishermen.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

It shouldn't be implemented until all issues and problems that are relating to intellectual property are solved and the monitoring equipment is affordable available.

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Financial in terms of the costs of the equipment and to their ability to continue to provide for their families (especially any who are only part-time fishing) and security of intellectual property (all marks that have been recorded over the last 30+ years).

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Same way as they currently do and perform random vessel inspections, and balances against licenced fish receiver returns.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Nil - we would use electronic CELR and MHR if it was available and user friendly, for use on phones and tablets; with allowance for being out of phone and data range during a trip.

Do you operate this technology on your own behalf, or as an input into someone else's operations?

On our own behalf

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

No

What issues do you currently have with ER?

It not been user friendly, needs simple, straight forward booklet to explain system login, and data reporting. Many fishermen are not technology savvy.

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

Simple text to say that daily return is received and email detailing the monthly returns.

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

No

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

There is no such thing as confidential, especially with electronic technology and large organisations!!

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

N/A

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

No

Licensed fish receivers

What problems do you experience with landing data?

We don't experience any, simply fill out the paperwork and unload the fish.

Implementation plan

Do you agree with the proposed implementation arrangements?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment?

Strongly Disagree.

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

No

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

COST!!!!!! It's too expensive to be utilised by any small to mid sized operators!!!

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment?

Strongly Disagree!!! Have already spoken to several small operators whom didn't know anything about this submission, or the meetings involved. But are having to consider ceasing operations.

What do you think should be monitored? To whom should the results be reported?

If you are going to monitor fishing it needs to be all fishing vessels, commercial, charter and recreational. Realistically the monitoring you are talking about can only work on the factory or larger trawl boats. The inshore fleets are struggling to make a living as it is, without the extra setup and annual costs of cameras etc.

MPI should be the only recipient of any information collated from fish vessels, unless there are illegal or unsafe activities happening on board.

Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting?

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither
- ☒ Agree
- ☐ Strongly agree

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Problem definition

Do you agree with how we have defined the problem?

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither
- ☒ Agree
- ☐ Strongly agree

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with the objectives of IEMRS?

☐
Strongly
disagree

☐
Disagree

☒
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment?

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Option 1: Current state

Do you agree with this option?

☐ Strongly disagree ☒ Disagree ☐ Neither ☐ Agree ☐ Strongly agree

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

☐ Strongly disagree ☐ Disagree ☐ Neither ☐ Agree ☒ Strongly agree

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option?

☒ Strongly disagree ☐ Disagree ☐ Neither ☐ Agree ☐ Strongly agree

Would you like to comment?

its 2016 now so we need to get into the computer age, but going there and getting set up with cameras is way over the top maybe look into cameras at a later stage. one at a time.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Do you operate this technology on your own behalf, or as an input into someone else's operations?

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

Licensed fish receivers

What problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements?

☐
Strongly
disagree

☐
Disagree

☒
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements?

☐
Strongly
disagree

☐
Disagree

☒
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

The current system works well. Non –compliance can be significantly reduced if there was better education.

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

The “problem” is significantly overstated. Most of the non-compliance which has been observed can be fixed through better education.

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

It is unnecessary for most fisheries. It is impractical for cod potting fishers, who do not have the same environmental or compliance issues that set netting and trawl fisheries have.

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Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

This whole proposed system is unwieldy, expensive and probably not logistically viable for the Chatham Islands. It is not possible to implement this system for all fisheries because many fisheries do not use vessels which can support an electronic monitoring system. The Chatham Islands fishery is an example of this. Some of our fisheries (such as commercial blue cod fishing) have few discards and little environmental impact, and this proposed system is unnecessary for this.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

No.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

There are logistic difficulties in installing, maintaining and operating such systems at sea. What happens if the system breaks down? Does fishing then stop?

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

CIFA supports gathering good information for the use in robust decision making. However, that support is qualified by the information collected improving management by being relevant, appropriate, cost-effective, and aligned with well-specified management settings and objectives.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Individual fishermen use GPS trackers and dataloggers, which take GPS-based catch data. This information is private to the user.

Do you operate this technology on your own behalf, or as an input into someone else's operations?

This technology is operated on behalf of the individual fisherman

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

No

What issues do you currently have with ER?

1. There are logistic difficulties with operating electronic devices in wet environments
2. Software and database development and maintenance is expensive and unwieldy.
3. Data access is private to each individual fisherman, and should not be released without their express permission.

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

None

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

No.

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

CIFA does not gather this information from its members.

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

CIFA does not divulge information on its individual members. Individual fishermen can, however, be contacted by MPI through the normal channels.

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

Strongly disagree	<input checked="" type="checkbox"/>
Disagree	<input checked="" type="checkbox"/>
Neither	<input type="checkbox"/>
Agree	<input type="checkbox"/>
Strongly Agree	<input type="checkbox"/>

Would you like to comment?

CIFA disagrees with the system as proposed. The present system is sufficient for cod potting fishers. Any further surveillance is unnecessary

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

No. Another quango is of no interest to CIFA.

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

The "transition" needs to be abandoned.

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

Strongly disagree	<input type="checkbox"/>
Disagree	<input checked="" type="checkbox"/>
Neither	<input type="checkbox"/>
Agree	<input type="checkbox"/>
Strongly Agree	<input type="checkbox"/>

Would you like to comment?

The proposal is that "... *permit holders will be required to report all fish caught, including non-quota species and fish below minimum legal sizes.*"

Reporting all fish taken is unrealistic. Only the top 5 species, or regular by-catch should need reporting. If all odds-and-sods need reporting then fishermen will become bogged down in paperwork.

What do you think should be monitored? To whom should the results be reported?

See above

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

The current system works well. Non –compliance can be significantly reduced if there was better education.

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

The “problem” is significantly overstated. Most of the non-compliance which has been observed can be fixed through better education.

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

It is unnecessary for most fisheries. It is impractical for eel fishers, who mainly use dinghies and four-wheel drives.

Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

This whole proposed system is unwieldy, expensive and probably not logistically viable. It is not possible to implement this system for all fisheries because many fisheries do not use vessels which can support an electronic monitoring system. Eel fisheries are an example of this. Other fisheries (such as blue cod potting) have few discards and little environmental impact, and this proposed system is unnecessary for this.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

The SIEIA datalogging system is far superior. It is cheaper, more accurate and provides better information.

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

No.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

There are logistic difficulties in installing, maintaining and operating such systems at sea. What happens if the system breaks down? Does fishing then stop?

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

MPI verification systems through LFR's are already comprehensive. Better information would be gathered if there was better education of how the catch-reporting is done.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

SIEIA uses dataloggers, which take a wide range of catch, bycatch and environmental data in freshwater and estuarine eel environments

Do you operate this technology on your own behalf, or as an input into someone else's operations?

This technology is operated on behalf of the individual fisherman and SIEIA

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

The SIEIA datalogging system is similar to that used by PIC.

What issues do you currently have with ER?

1. We currently do not have 100% uptake of the system by all eel fishermen.
2. There are logistic difficulties with operating electronic devices in wet environments
3. Software and database development and maintenance has been expensive and unwieldy. There have been many software "bugs" which needed ironing out.

4. Data access is private to each individual fisherman, and cannot be released without their express permission. This makes data release for management purposes challenging.

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5. What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?
6. SIEIA is not interested in reinventing the wheel and having another expensive ER system imposed upon it

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

SIEIA currently utilises ER.

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

Yes

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

The SIEIA system has the potential to deliver all IEMRS objectives. 100% uptake by all fishermen is needed to do this.

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

SIEIA does not divulge information on its individual members. They can, however, be contacted through the normal channels.

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

SIEIA disagrees with the system as proposed. The present system is sufficient for eel fishers.

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

No. Another quango is of no interest to SIEIA.

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

The “transition” needs to be done voluntarily by the fishermen themselves. SIEIA has demonstrated that this is possible. Although we do not yet have 100% uptake of our datalogging system, we have more than 50% after only two years, and this increases every year. It is inevitable that SIEIA will eventually have 100% uptake. There is no need for MPI to impose a compulsory system.

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Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

The current system works well. Non –compliance can be significantly reduced if there was better education.

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

The “problem” is significantly overstated. Most of the non-compliance which has been observed can be fixed through better education.

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

It is unnecessary for most fisheries. It is impractical for cod potting fishers, who do not have the same environmental or compliance issues that set netting and trawl fisheries have..

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Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

This whole proposed system is unwieldy, expensive and probably not logistically viable. It is not possible to implement this system for all fisheries because many fisheries do not use vessels which can support an electronic monitoring system. The BCO5 fishery is an example of this. Other fisheries (such as commercial eeling) have few discards and little environmental impact, and this proposed system is unnecessary for this.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

No.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

There are logistic difficulties in installing, maintaining and operating such systems at sea. What happens if the system breaks down? Does fishing then stop?

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

BCO5 supports gathering good information for the use in robust decision making. However, that support is qualified by the information collected improving management by being relevant, appropriate, cost-effective, and aligned with well-specified management settings and objectives.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Individual BCO5 fishermen use GPS trackers and dataloggers, which take GPS-based catch data. This information is private to the user.

Do you operate this technology on your own behalf, or as an input into someone else's operations?

This technology is operated on behalf of the individual fisherman

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

No

What issues do you currently have with ER?

1. There are logistic difficulties with operating electronic devices in wet environments
2. Software and database development and maintenance is expensive and unwieldy.
3. Data access is private to each individual fisherman, and should not be released without their express permission.

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

None

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

No.

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

BCO5 does not gather this information from its members.

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

BCO5 does not divulge information on its individual members. They can, however, be contacted by MPI through the normal channels.

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

BCO5 disagrees with the system as proposed. The present system is sufficient for cod potting fishers. Any further surveillance is unnecessary

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

No. Another quango is of no interest to BCO5.

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

The "transition" needs to be abandoned.

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

The proposal is that "... *permit holders will be required to report all fish caught, including non-quota species and fish below minimum legal sizes.*"

Reporting all fish taken is unrealistic. Only the top 5 species, or regular by-catch should need reporting. If all odds-and-sods need reporting then fishermen will become bogged down in paperwork.

What do you think should be monitored? To whom should the results be reported?

See above

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

I agree that better information is required for robust decision making. This however needs to be relevant, appropriate, cost-effective and aligned with well specified management settings and objectives.

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Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

I am concerned that introduction of electronic monitoring will impose excessive additional costs on the harvesting sector. The vessels are a fisherman's home as well as a place of work & the conditions & requirements of the monitoring needs to take into account the need for some privacy.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Do you operate this technology on your own behalf, or as an input into someone else's operations?

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

In regards to complying with reporting to Fishserve in its current state can be very tedious and complicated. Originally it was a lot simpler but as more detail is being required filling out CLR's and TCER's etc has become more difficult particularly when fishing in two different fishing areas and/or landing fish to two or more LFR's.

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

I don't think my view on this matter will be considered, it is inevitable whether we like it or not that MPI will implement IEMRS anyway. And any privacy or the ability to keep good fishing to yourself will be gone.

Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

As above.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

This amounts to more in depth scrutiny of fishing activity in a minefield of legislative potential faux pas and non-compliance. It is nearly impossible to be completely compliant under existing regulations so I think going forward there are interesting times for a lot of inshore fishermen if penalties for all forms of non compliance be they large or small will render the inshore fishing fleet non-existent.

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

I can't see the benefits for me – just more regulation and more likelihood of prosecution for breaking of fisheries law intentionally or unintentionally.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

I think there needs to be some leniency around fisheries compliance as this kind of monitoring gets rolled out. MPI needs to work with the fishing industry for best results. If there is a punitive attitude from MPI we won't have a fishing industry.

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Invasion of privacy and confidentiality , and privacy around intellectual property obtained through your fishing practices.

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Similar to current regulations.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

None

Do you operate this technology on your own behalf, or as an input into someone else's operations?

N/A

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

N/A

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

Access to all the information and data as a matter of course.

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Not particularly

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

N/A

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

N/A

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

N/A

Licensed fish receivers

Would problems do you experience with landing data?

N/A

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

While I agree in principle to electronic reporting and monitoring and see it as the way forward strengthening public perception of the industry I do have reservations regarding privacy. While my boat is a commercial fishing vessel I also consider it to be my home outside of fishing activities. It would be great if cameras could be linked to fishing machinery by sensors to capture required footage and be dormant in times of inactivity. This would also reduce the time it takes to review footage.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

As above.

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

I would hope that all of this intensive monitoring would after a period of checks and balances allow me to be able to return any species alive and likely to survive to the sea.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

The cost of equipment and installation.

Privacy issues

Ownership and accessibility of the footage. I personally would want access to the footage for reviewing of any issues such as balancing my estimates of discards and for health and safety/safe working practices.

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

I sometimes use a GoPro to video our operation and see where we can make changes for safer working and better product handling.

Do you operate this technology on your own behalf, or as an input into someone else's operations?

On my own behalf.

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

As above.

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Yes if I am satisfied with the way it is implemented. I fish in areas where unqualified statements are repeatedly made regarding Maui dolphin presence and welcome the chance to prove that what i am saying is not a lie.

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

A review of the penalties associated. While IEMRS will be a huge step forward I worry about overzealous prosecutions for minor offenses.

What happens if at the end of a big fishing day I forget about the one RSK that I returned alive to the sea and fail to record it?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting?

☐ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☒ Strongly agree

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Strongly Agree

IEMRS should be also mandatory on all charter vessels.

Problem definition

Do you agree with how we have defined the problem?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

I think if it goes to electronic monitoring, there is an issue with intellectual property because it is not secure. And MPI cannot guarantee security.

Also internet or phone coverage is questionable at best around NZ; so that would mean that every vessel would have to install satellite communications, which is not financially feasible for the majority of small operators.

Thirdly, if the reporting cannot be performed on a phone or tablet then it is inefficient. If you are trying to run an online system that doesn't work on mobile devices it is an out dated system!!

Objectives

Do you agree with the objectives of IEMRS?

☐

Strongly
disagree

☐

Disagree

☐

Neither

☐

Agree

☐

Strongly
agree

Would you like to comment?

Strongly Disagree

How are they going to ensure security of information?

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Option 1: Current state

Do you agree with this option?

☐
Strongly disagree

☐
Disagree

☐
Neither

☒
Agree

☐
Strongly agree

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

☒
Strongly disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly agree

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option?

☒
Strongly disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly agree

Would you like to comment?

I strongly disagree with all electronic monitoring due to the intellectual property which has taken 30+ years to build up, being available to the general public.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Of the 3 options you have described, staying as is, is the only feasible option for all small to mid sized operators.

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

None at all. There is no benefit to the small to mid sized commercial operators; it will in fact put many out of business as it is too expensive to get into. If it does go ahead then the cameras and monitoring equipment need to be supplied to each vessel by MPI, as they have had the financial benefit of having sold most of the Crown quota to the commercial fishermen.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

It shouldn't be implemented until all issues and problems that are relating to intellectual property are solved and the monitoring equipment is affordable available.

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Financial in terms of the costs of the equipment and to their ability to continue to provide for their families (especially any who are only part-time fishing) and security of intellectual property (all marks that have been recorded over the last 30+ years).

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Same way as they currently do and perform random vessel inspections, and balances against licenced fish receiver returns.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Nil - we would use electronic CELR and MHR if it was available and user friendly, for use on phones and tablets; with allowance for being out of phone and data range during a trip.

Do you operate this technology on your own behalf, or as an input into someone else's operations?

On our own behalf

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

No

What issues do you currently have with ER?

It not been user friendly, needs simple, straight forward booklet to explain system login, and data reporting. Many fishermen are not technology savvy.

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

Simple text to say that daily return is received and email detailing the monthly returns.

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

No

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

There is no such thing as confidential, especially with electronic technology and large organisations!!

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

N/A

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

No

Licensed fish receivers

What problems do you experience with landing data?

We don't experience any, simply fill out the paperwork and unload the fish.

Implementation plan

Do you agree with the proposed implementation arrangements?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment?

Strongly Disagree.

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

No

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

COST!!!!!! It's too expensive to be utilised by any small to mid sized operators!!!

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements?

☐ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☒ Strongly agree

Would you like to comment?

Strongly Disagree!!! Have already spoken to several small operators whom didn't know anything about this submission, or the meetings involved. But are having to consider ceasing operations.

What do you think should be monitored? To whom should the results be reported?

If you are going to monitor fishing it needs to be all fishing vessels, commercial, charter and recreational. Realistically the monitoring you are talking about can only work on the factory or larger trawl boats. The inshore fleets are struggling to make a living as it is, without the extra setup and annual costs of cameras etc.

MPI should be the only recipient of any information collated from fish vessels, unless there are illegal or unsafe activities happening on board.

Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting?

☐ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☒ Strongly agree

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Strongly Agree

IEMRS should be also mandatory on all charter vessels.

Problem definition

Do you agree with how we have defined the problem?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

I think if it goes to electronic monitoring, there is an issue with intellectual property because it is not secure. And MPI cannot guarantee security.

Also internet or phone coverage is questionable at best around NZ; so that would mean that every vessel would have to install satellite communications, which is not financially feasible for the majority of small operators.

Thirdly, if the reporting cannot be performed on a phone or tablet then it is inefficient. If you are trying to run an online system that doesn't work on mobile devices it is an out dated system!!

Objectives

Do you agree with the objectives of IEMRS?

☐

Strongly
disagree

☐

Disagree

☐

Neither

☐

Agree

☐

Strongly
agree

Would you like to comment?

Strongly Disagree

How are they going to ensure security of information?

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Option 1: Current state

Do you agree with this option?

☐ Strongly disagree

☐ Disagree

☐ Neither

☒ Agree

☐ Strongly agree

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment?

I strongly disagree with all electronic monitoring due to the intellectual property which has taken 30+ years to build up, being available to the general public.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

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Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

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Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

It shouldn't be implemented until all issues and problems that are relating to intellectual property are solved and the monitoring equipment is affordable available.

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Financial in terms of the costs of the equipment and to their ability to continue to provide for their families (especially any who are only part-time fishing) and security of intellectual property (all marks that have been recorded over the last 30+ years).

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Same way as they currently do and perform random vessel inspections, and balances against licenced fish receiver returns.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Nil - we would use electronic CELR and MHR if it was available and user friendly, for use on phones and tablets; with allowance for being out of phone and data range during a trip.

Do you operate this technology on your own behalf, or as an input into someone else's operations?

On our own behalf

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

No

What issues do you currently have with ER?

It not been user friendly, needs simple, straight forward booklet to explain system login, and data reporting. Many fishermen are not technology savvy.

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

Simple text to say that daily return is received and email detailing the monthly returns.

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

No

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

There is no such thing as confidential, especially with electronic technology and large organisations!!

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

N/A

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

No

Licensed fish receivers

What problems do you experience with landing data?

We don't experience any, simply fill out the paperwork and unload the fish.

Implementation plan

Do you agree with the proposed implementation arrangements?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment?

Strongly Disagree.

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

No

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

COST!!!!!! It's too expensive to be utilised by any small to mid sized operators!!!

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment?

Strongly Disagree!!! Have already spoken to several small operators whom didn't know anything about this submission, or the meetings involved. But are having to consider ceasing operations.

What do you think should be monitored? To whom should the results be reported?

If you are going to monitor fishing it needs to be all fishing vessels, commercial, charter and recreational. Realistically the monitoring you are talking about can only work on the factory or larger trawl boats. The inshore fleets are struggling to make a living as it is, without the extra setup and annual costs of cameras etc.

MPI should be the only recipient of any information collated from fish vessels, unless there are illegal or unsafe activities happening on board.

Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting?

☐
Strongly disagree

☐
Disagree

☐
Neither

☐
Agree

☒
Strongly agree

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

Strongly Agree

IEMRS should be also mandatory on all charter vessels.

Problem definition

Do you agree with how we have defined the problem?

☒
Strongly disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly agree

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

I think if it goes to electronic monitoring, there is an issue with intellectual property because it is not secure. And MPI cannot guarantee security.

Also internet or phone coverage is questionable at best around NZ; so that would mean that every vessel would have to install satellite communications, which is not financially feasible for the majority of small operators.

Thirdly, if the reporting cannot be performed on a phone or tablet then it is inefficient. If you are trying to run an online system that doesn't work on mobile devices it is an out dated system!!

Objectives

Do you agree with the objectives of IEMRS?

☐

Strongly
disagree

☐

Disagree

☐

Neither

☐

Agree

☐

Strongly
agree

Would you like to comment?

Strongly Disagree

How are they going to ensure security of information?

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Option 1: Current state

Do you agree with this option?

☐
Strongly
disagree

☐
Disagree

☐
Neither

☒
Agree

☐
Strongly
agree

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

☒
Strongly
disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option?

☒
Strongly
disagree

☐
Disagree

☐
Neither

☐
Agree

☐
Strongly
agree

Would you like to comment?

I strongly disagree with all electronic monitoring due to the intellectual property which has taken 30+ years to build up, being available to the general public.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Of the 3 options you have described, staying as is, is the only feasible option for all small to mid sized operators.

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

None at all. There is no benefit to the small to mid sized commercial operators; it will in fact put many out of business as it is too expensive to get into. If it does go ahead then the cameras and monitoring equipment need to be supplied to each vessel by MPI, as they have had the financial benefit of having sold most of the Crown quota to the commercial fishermen.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

It shouldn't be implemented until all issues and problems that are relating to intellectual property are solved and the monitoring equipment is affordable available.

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Financial in terms of the costs of the equipment and to their ability to continue to provide for their families (especially any who are only part-time fishing) and security of intellectual property (all marks that have been recorded over the last 30+ years).

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Same way as they currently do and perform random vessel inspections, and balances against licenced fish receiver returns.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Nil - we would use electronic CELR and MHR if it was available and user friendly, for use on phones and tablets; with allowance for being out of phone and data range during a trip.

Do you operate this technology on your own behalf, or as an input into someone else's operations?

On our own behalf

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

No

What issues do you currently have with ER?

It not been user friendly, needs simple, straight forward booklet to explain system login, and data reporting. Many fishermen are not technology savvy.

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

Simple text to say that daily return is received and email detailing the monthly returns.

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

No

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

There is no such thing as confidential, especially with electronic technology and large organisations!!

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

N/A

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

No

Licensed fish receivers

What problems do you experience with landing data?

We don't experience any, simply fill out the paperwork and unload the fish.

Implementation plan

Do you agree with the proposed implementation arrangements?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment?

Strongly Disagree.

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

No

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

COST!!!!!! It's too expensive to be utilised by any small to mid sized operators!!!

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements?

☒ Strongly disagree

☐ Disagree

☐ Neither

☐ Agree

☐ Strongly agree

Would you like to comment?

Strongly Disagree!!! Have already spoken to several small operators whom didn't know anything about this submission, or the meetings involved. But are having to consider ceasing operations.

What do you think should be monitored? To whom should the results be reported?

If you are going to monitor fishing it needs to be all fishing vessels, commercial, charter and recreational. Realistically the monitoring you are talking about can only work on the factory or larger trawl boats. The inshore fleets are struggling to make a living as it is, without the extra setup and annual costs of cameras etc.

MPI should be the only recipient of any information collated from fish vessels, unless there are illegal or unsafe activities happening on board.

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- Strongly disagree ☐
Disagree ☐
Neither ☐
Agree ☐ yes
Strongly Agree ☐

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

The big factor is cost.

Trident was formed to develop cost effective EM.It is doing this.

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- Strongly disagree ☐
Disagree ☐
Neither ☐
Agree ☐ yes
Strongly Agree ☐

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> yes |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

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Option 1: Current state

Do you agree with this option (please tick only one box)?

Strongly disagree ☐
Disagree ☐
Neither ☐ yes
Agree ☐

Strongly Agree ☐

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

Strongly disagree ☐
Disagree ☐
Neither ☐ yes
Agree ☐
Strongly Agree ☐

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

Strongly disagree ☐
Disagree ☐
Neither ☐ yes
Agree ☐
Strongly Agree ☐

Would you like to comment?

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

The smaller vessels have issues with increasing electronic current draw down.

One type of IEMRS may not suit all vessels/operators.

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Look at how other countries have managed EM on smaller vessels.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

VMS

Video coverage within the next twelve months.

Do you operate this technology on your own behalf, or as an input into someone else's operations?

I use and support Trident as it is proving cost effective and has the ability to add cameras etc with out reinventing the wheel.

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

Linked to a commercial stakeholder organisation.

What issues do you currently have with ER?

An intrusion into my privacy.

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

I am not a CSO but I have no problem with MPI having access to all my data.

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

The same it delivers now when an add on is required. Simply and cost effectively.

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

That information would not be hard to obtain.

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- | | |
|-------------------|------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> yes |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

It is all about cost. The cost of trashing Trident and the cost of a probable dinosaur delivered by MPI.

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

Yes.

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Don't force a costly inefficient dinosaur upon us if Trident is trashed.

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

Compliance.

Results to MPI and LFR.

[Not relevant to request]

[Redacted]

Do you think it should be permissible to discard some dead fish, as long as they are balanced against ACE?

Every dead fish should be balanced against ACE. Depending on the fishing and gear type, it could be reasonable a variable amount of discards permission to avoid non profitable fishing trips but it could be difficult to maintain a reliable counting of the discarded amounts and reasons. There is a good reason to introduce EM as discards detection and verification.

[Not relevant to request]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Maximise the value of our shared fisheries

Managing fish stocks for increased abundance.

[Not relevant to request]



[Would you like to comment?](#)

Yes, but managing tools (IEMRS) are necessary to carry out a periodical reliable update of status of stocks.

[Not relevant to request]

Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

I miss some more data about number of days or trips monitored, reviewed and efficiency rates. I miss also end users' and fishers' feedback. We all agree there is a huge benefit in the use of this technology but we need to focus solving main issues found until present.

Should also be considered:

- i) Coverage percentage Vs video review percentage
- ii) Time involved in reviewing tasks

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Yes, is a matter of coverage and costs. EM can increase substantially the coverage in a cost-effective way and avoid a lot of data processing costs while there is still a lot of work to do in regards of data reviewing efficiency, there is where Satlink and DOS is doing their most of the efforts.

It is surprising to advise that inshore vessel activity coverage has double cost of hi-seas observer coverage. IEMRS would homogenize and minimize the costs substantially.

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

There is no data of the expected IEMRS coverage. In the Problem definition is mentioned a coverage of approximately a 8.4% of the commercial fishing activity with the actual system and resources but it is not mentioned the expected level of coverage once EM and ER is implemented.

We can see how Fishing Administrations and RFMOs are evolving and considering Australia and New Zealand's cases, it seems that the trend is to give more importance to the ER with real-time information and use the EM as a verification tool for data obtained through crews reports. So ER + VMS coverage will be close to 100%, EM can be variable according to the vessel and gear type, but should be no less than the 80% of the total fishing effort and the review of events in a smaller percentage (20% to 50%). In a near future it could be possible to manage a 100% of monitored data reviewing with such a EM solution as Satlink/DOS EMS which integrates the state of the art of EM and VMS technology and last generation of data reviewing protocols to maximize efficiency and minimize data processing from vessel to final DB.

Recently some governments are looking for solutions in order to be able to know ongoing fishing vessels' activity in real time (ER, EM and VMS information), thus afterwards data and video review can be planned before information arrives and analysis will be less time consuming. By combining these systems with VMS features, RFMOs and authorities are now able to locate vessels and apply real-time monitoring to Effort Zones, Closure Zones, Special Areas of Conservation (SACs), Port Approach Zones and Exclusive Economic Zones (EEZ). Current VMS systems are able to: store huge amounts of data on geo-fencing areas inside onboard VMS equipment, directly from official Mercator chart coordinates; check time periods in real-time, to identify whether a zone should be active or not; monitor speed; change frequency based on location; and generate events to raise alerts about any of these situations. In order to manage the information coming from VMS systems, RFMOs use Fisheries Monitoring Centres, which receive all the information transmitted by the onboard VMS equipment.

The advantage of this new technology is that it provides independent, verified, real and accurate information about fishing and any related activities. All the reports generated by inspection applications follow RFMO guidelines and formats, and can be reviewed, checked and corrected, if necessary. This way it is a new verification tool for seafood and fisheries certifications.

In addition, an extra application of IEMRS and could be also considered an objective as well, is the improvement of Fisheries Observer quality of life. Instead of being forced to live all the year away from home and onboard a fishing boat, in DOS we propose a more various tasks job combining onboard trips and office trips. While a full time dedicated observer has limited occasions to develop land based tasks, a combined work offers multi specific trained observers and more family friendly job, as well as maintains video reviewers updated with periodical embarkments. At the same time coverage has been increased.

Referred to costs: As for off-shore fisheries is estimated \$4.5 million/year for 10% of on-board observer coverage, with SeaTube EM System that coverage will cost (considering only reviewing tasks) around \$700.000 to \$1.400.00 depending on the fishing gear analyzed. And will take from 2.500 to 5.000 days to analyze. In terms of human effort we can consider around 15 to 20 “dry observers”/year to analyze those 10.000 sea days

Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment?

Option 1 does not solve the problem defined above. As Fisheries progress and develops new fishing methods, management systems also needs to evolve.

Option 2 is a first step to obtain more real time and fine data from fishing vessel activity but still depends on the limited onboard observer coverage and data to manage the stocks.

Option 3 is the more complete option in order to obtain the best accurate data for stocks management.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

In general terms, IEMRS would add transparency and reliability to fishers ER declarations. Seafood obtained under this management procedures would be easily be considered sustainable for so many eco-labels and certificates. MPI would have a wider view of the fishing activity in NZ fishing industry, wider observer coverage and much more reliable data which work with.

Particularly, from Digital Observer Services we will have the option to participate showing the data reviewing protocols developed during last years and will also learn a lot seeing how NZ fisheries are managed.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

Even if ER and EM are not scheduled to be implemented at same stage very often required on-board equipment is shared from both EM and ER so I suggest to make the best of an installation and install all the equipment in one intervention. Time from installation to real use of EM can be used for testing each installation. Considering differences in vessel distributions, gear types, etc.. it is necessary as much time in advance as possible to customize EM design to different requirements. So while GPR and ER go ahead with implementation that first year could be installation time for EM implementation in next year time.

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Equipment Maintenance and crew Privacy, but there are comprehensive instructions and user friendly manuals in order to manage maintenance and camera recording doesn't go beyond working areas in regards of privacy.

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

EM is totally customized to all possible fishing activity. From a simple systems with one camera to complex systems with 8 cameras and sensors indicating in real time onboard activity. From 360 cameras to underwater cameras and from a microwave size 3 month storage capacity to 9 month storage capacity bigger systems.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Do you operate this technology on your own behalf, or as an input into someone else's operations?

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

As EM service provider, DOS will share its data reviewing protocols in order to improve the efficiency in fisheries data collection and management as we have been doing the last years. Additionally Satlink has developed a tool package which enables to obtain data in very configurable formats and lastly following WCPFC proposed way in regards of EM.

Satlink/DOS team has been involved in several workshops to participate in the ongoing EM implementation for different RFMOs and fishing administrations, resulting that our experts are totally updated in EM and ER regards.

Satlink is a FFA authorized VMS provider in the WCPO and will be fully disposed to share all the information required.

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Satlink is the main provider of Electronic Monitoring systems in the Pacific Islands leading the implementation of this solution to acquire the 5% observer coverage on board Long liners. Satlink SeaTube is currently the only EM system able to include the information of the electronic Monitoring software in the TUBS database of the SPC. Another key part of our system is the post data analysis. The data collected by the EM systems is analyzed by the land observes, previous trained and assisted by Digital Observer Services (Satlink’s company group) to issue a detailed report about the fishing activity.

Satlink’s existing EM and VMS solutions requires no or only limited update to meet outlined objectives. Satlink ER would need adaptation to meet interface requirements.

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

Satlink is prepared to provide information as long as our clients authorize us to do so.

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

[Not relevant
to request]

[Redacted]

[Redacted]

Would you like to comment?

EM technologies can enforce the reliability of data to develop simple, robust, and testable criteria to allow for the performance of new technologies apart of mesh regulations. EM gives reliable data about fishing effort and captures.

[Not relevant to request]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

-----Original Message-----

From: Dave [mailto:[s 9\(2\)\(a\)](#)]]

Sent: Tuesday, 10 January 2017 6:15 p.m.

To: Fisheries Review <Fisheries.Review@mpi.govt.nz>

Subject: Cameras

I have cameras on my vessel already two on deck two in the engine room as far as I'm concerned I own copy writes to any footage on my vessel. Also drug testing should be done write to the minister not just fishermen.

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Fisheries Review Submission

[Not relevant to request]

Issues from your Future Of Fisheries document that are important to me as a recreational fisher:

2. Intergrated electronic monitoring and reporting system (IEMRS).

I support option 3.

- Electronic monitoring and geospatial position reporting for all permit holders from 1st October 2017 and the introduction of electronic monitoring in stages from 1st October 2018.

However, I question the timing. Why does it take another 20 months to start the introduction of electronic monitoring and what is the completion date of all vessels will have to comply by?

I also question the suitability of Trident to undertake the monitoring. To appoint a company that is partially owned by the fishing companies to effectively police themselves is farcical.





"The poacher is guarding the forest"!

I understand that there were other options available but another international company with extensive experience was overlooked for an unproven, compromised, operator.

A report on why this operator was chosen is being withheld from the public. Hardly transparent management we are promised in Objective 2. "Fisheries management system is widely trusted in New Zealand and Internationally".


[Not relevant to request]

[Not relevant to request]



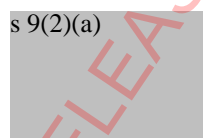
With respect to the regulatory changes proposed: Sanford has already embarked on providing increasing transparency into everything we do and as partners in two PGP's we are very supportive of the need for IEMRS (ideally reaching beyond the commercial industry only) and regulatory change enabling innovative trawl technologies. The latter needs to be geared towards enabling a higher rate of innovation in this sector as this will increasingly be necessary to retain our social license to operate. Notwithstanding recent discussion around questioning industry's involvement in Trident as provider of video observation tools on vessels, we urge you to ensure that the introduction of new technology or regulations has to happen in an affordable and competitive manner and an openminded approach towards involving industry in managing our fisheries.

[Not relevant to request]



With thanks

s 9(2)(a)



We propose that the opportunities offered to return live fish to the sea if an observer is on board be extended to those vessels carrying EM (cameras) under IEMRS.

[Not relevant to request]

[illegible]

[Not relevant to request]

VOLUME III: INTEGRATED ELECTRONIC MONITORY AND REPORTING SYSTEM (IEMRS)

Sanford supports IEMRs.

While New Zealand commercial fisheries are already data rich we acknowledge that IEMRS may assist in giving people more confidence in the data.

Data will not necessarily correlate with better decision making.

IEMRs presents immediate challenges to MPI and we encourage Government to work with us, and with speed to:

- (i) have the regulatory framework in place ASAP in order to manage EM on vessels, to protect fishers and commercial sector privacy rights and to realign the penalty regime so to better reflect risk
- (ii) achieve the efficiencies and increased opportunities the consultation paper envisages, like more rapidly reviewing TACCs, review and update MPI decision making processes to ensure fit for purpose, and
- (iii) review (including auditing) the role and cost-benefits of the MPI human observer programme so that decisions like when to use cameras vs people are planned and not ad hoc.

EM and sustainability, fishers change behaviour and fish more sustainably when they trust and respect the data, understand the consequence of what they are doing and make better decisions off the back of this knowledge. EM has a role in fostering understanding.

The SNA1 fishers agreed to record sub MLS (as code SNX) to quantify the volume of fish returned to the sea by method, and area. It wasn't regulation or the reporting of SNX that changed behaviour it was the Trident analysis that flowed from this, and how this was shared at fisher workshops including each vessel's contribution to the total.

Near-real time reporting is about working smarter and more efficiently. Commercial companies will voluntarily invest in real time reporting when it benefits their customer sales model. From a regulator's perspective having access to more and faster information is only useful (and will inform fisheries management decisions) when Government processes are in place that can rapidly analyse the data and use the information to bring about changes that others have confidence in.

Comprehensive and accurate reporting, agree better reporting leads to better understanding and better managing – this means reporting the entire catch across all sectors including the recreational and customary sector.

How would you describe the current system?

Sanford deepwater vessels use Cedric, it's clunky, but we're now used to it and it's working well. Concept and analysis of data is good. FishServe have been receptive to feedback.

We note our JV vessels use a Korean version of Cedric which appears more streamlined and intuitive. The Trident system is now working well, and we understand is performing well. We note that Trident is committed to growing capability.

Problem definition

Agree that increased monitoring capacity has the potential to assist in building public and stakeholder confidence.

Agree with MPI establishing specifications of data collection and leaving it to service providers to develop products.

Agree that MPI's role is to regulate and oversee not manage individual EM programmes or vessels. Suggest that more cost-benefit analysis is required, including exactly what additional information is collected and why, including the risks of not collecting.

Don't agree that EM will automatically mean faster and better decision making – and enquire whether MPI internal processes have the capacity to handle more data.

Agree that there is a link between EM and integrity of catch reporting data but only if the data is used quickly and effectively.

In our experience the purpose of an EM project needs to be very specific – cameras are unlikely to deliver simultaneously on catch reporting, protected species interactions and fisheries compliance generally. The vessel management plans reflect the EM project.

In principle we agree with the objectives at a broad level, IEMRs will offer opportunities some of which we have not yet thought of. To future proof IERMs needs to be enabling not prescriptive.

Significantly more detail needed around IEMRs (why, how, when, who and what) is needed, and this needs to be worked up collaboratively. IEMRS is not something that Government should progress alone.

IEMRs stands to be very costly on the quota owner and fisher – we urge Government to work with industry on how it can be most efficiently delivered.

The challenge will be to ensure that more information really does lead to better decisions.

The commercial fishing industry has already shown bold leadership in the EM arena and has voluntarily-imposed more rules than what Government would likely have, e.g. in SNA1 requiring 24/7 port to port cover irrespective of where fishing event occurs, 360 full hemisphere cameras etc., fully encrypted data.

Sanford commits to working with Government and other stakeholders to help develop the full potential of IEMRs. Sanford staff have developed good expertise in all elements of EM including both operational and documentation requirements. We are very interested in collaboration opportunities. We need to move away from the politicisation of EM and the constant barrage of OIA requests to a more objective cost-benefit analysis about where an EM programme could offer / replace / add value.

During the process of moving into IEMRs care needs to be taken to enable and encourage innovation, not stifle it.

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Sanford supports this option.

Support for the FishServe model where data is held by a 3rd party and protected by viewing protocols.

Support financial incentives to those who use electronic (paperless) systems for using registry services; and disincentives to those who don't move across.

Equally incentivise those that use cameras over human observers. When a human observer costs \$1250 a day and a camera costs the same a month, it is an unreasonable burden on the quota owner to leave the camera decision entirely voluntary and sitting with the fisher.

Suggest more work is needed around incentives – type and range. For example vessels which carry 24/7 camera cover could be allowed to fish in areas which are otherwise off limits.

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

To progress with confidence Government's first priorities must be to amend the penalty regime, strengthen/guaranteed fisher's rights to privacy and depoliticise EM.

Sanford's preferred option is that MPI contracts FishServe to hold all EM footage, and MPI has access rights. Sanford does not support MPI holding copies of footage because of the OIA implications. Not holding footage is the easiest way to protect fisher's privacy rights.

There is a need to find a way to protect fishers and companies who in good faith agree to greater transparency, but in reality might become victims of politically driven OIA requests.

Sanford supports running simultaneously the cost recovery discussion and roll out of IEMRs. To be affordable cost recovery levies must be reduced in tandem with the implementation of IEMRs.

Support the option to transition vessels into EM starting from October 2018 – but request more consultation as to which vessels, which fleets, for what purpose and at what costs.

Agree with compulsory GPS tracking and note that Sanford voluntarily achieved geospatial positioning on all our vessels, including inshore vessels about 15 years ago.

Note that SNA1 VMS tracking on 70+ vessels was designed and implemented in response to a request of MPI (Dave Turner in 2014). The system was developed by Trident, in full consultation with fishers and Government.

Acknowledge that IEMRs could be used to support external certification of sustainability, but is not a pre-requisite, and would in our view not be used or required.

General questions

In line with the comments above, options missing from this chapter include:

- using a third party intermediary for footage storage i.e. FishServe, and the advantages of not having MPI in a position of owning / holding footage
- consideration of regulatory changes needed and timetable for delivering this
- consideration on role of IEMRs on commercial charter vessels for amateur fishers
- consideration of role and place of IEMRS in delivery of fishery science i.e. as proposed by SNA1 tagging project
- review of existing observer services and costs

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

There is an absolute expectation that IEMRS will deliver cost savings.
Expectation that Government will be more confident and outspoken in support of commercial fishing.

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

Stage one - scoping and implementing required law changes to penalty regime, decisions on how to guarantee fishers' and vessels' rights to privacy, and the development of specifications

Stage two – review of observer programme and fisheries management processes and decision making so as to identify what changes are needed to ensure all are fit for purpose, a review of costs and benefits

Stage three – prioritisation of high interest fisheries and vessels

Stage four – the development of specific EM work projects and CBA

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

Sanford supports enabling regulation that specifies the standards that must be achieved rather than Government endorsing a particular model / approach.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Sanford uses VMS, AIS on all company owned vessels and some ACE fishers. Sanford, and via our partnerships with Plant and Food (PSH), Trident Systems (FishEye) and FishServe (Cedric) has been involved from the start in developing, trialling and rolling out comprehensive electronic monitoring and reporting systems on company vessels for at least the last 10 years.

Sanford has EM (Trident cameras) on all company vessels catching in FMA1, and on several independent set fishers who land into us.

Working with PSH we have also been developing the use of cameras inside the MHS net.

With Trident full hemisphere 360° cameras, vessel tracking systems as stand-alone or built into video camera systems. Recently added to the Trident offering is electronic catch reporting. We have started discussions on how to build an I-Phone / Android app for tracking set net vessel effort, and recording the presence of protected species.

Do you operate this technology on your own behalf, or as an input into someone else's operations?

A mix of company owned, with FishServe, with MPI and with Trident.

It varies depending on who has initiated, coordinated and funded the project.

In terms of electronic cameras the 'oversight' group is either a collective of quota owners/LFRs, SNA1 Commercial or in the case of the west coast of the North Island will be the Maui Solution with Trident Systems employed to coordinate and facilitate discussions with fishers.

The programmes that we have run to date have been voluntary.

Some have been plagued by OIA requests, and as we work through these it has been disappointing to experience MPI not abiding by its own policies, procedures and agreements for dealing with these.

Believe Government's role is to regulate and have an oversight role in EM, not to be involved in the design and delivery of services.

Help in organising/coordinating quota-owner levying would be greatly welcomed, but not where this meant voluntary fisher EM initiatives were taken over by Government.

Industry groups and fishing companies need ability to add on ER information requests that are able to stay outside of the government required catch information – data ownership.

Licensed fish receivers

Would problems do you experience with landing data?

View from LFR Auckland Fish Market

- (i) sometimes it is difficult to get catch and time data from independent fishers even though they understand the LFR needs it and they provide this information on their own landing forms
- (ii) making it electronic should make it easier for example if all data fields are not filled in the form cannot be submitted
- (iii) we assume this will bring efficiencies and cost savings
- (iv) when commercial catch of some species is prohibited in one area but not another i.e. in FMA1 and 8 red moki and silver drummer are protected species, but over the rest of NZ they can be landed, it would be easier as part of the mandatory information that the fisher was required to specify the location of fishing area
- (v) Sanford has implemented a maui protection plan that requires all coastal fishers to have full electronic monitoring and harbour set net vessels to use tracking devices – we are working with Trident to develop a phone app that sends confirmation of vessel tracking compliance to the LFR – ideally this should be done with Government so that we design a multi-purpose software programme

Implementation plan

Putting in place the required regulatory changes needs to be done with urgency – until these are in place some commercial fishing companies will be hesitant to install EM.

There also needs to be a discussion and decision on who holds the footage, viewing access rights and how fishers / company sensitive information is going to be safeguarded. Again it is critical that this happens before cameras are installed.

The data specifications of each of the elements (EM, ER, VMS) is critical – and needs wider discussion than just MPI officials and service providers.

Furthermore the financial business plan, review of costs, incentives and/or disincentives and discussion about when and how human vs EM observers will be utilised also needs to occur before roll out.

The proposed IEMRS roll out also needs discussion, the timetable is very tight and from our experience of being involved in three EM projects involving between 3 and 75 vessels despite the best intentions it takes longer than everyone anticipates.

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

Yes in terms of developing specifications; **No** in terms of implementation around a specific project.

Absolute need for a collaborative approach – Sanford staff have built up significant experience and expertise in this area and we would welcome an opportunity of joining a working group.

In developing a more comprehensive IEMRS programme we would favour the establishment of a dedicated MPI Electronic Monitoring Working Group which could develop specialised skills and expertise, and the establishment of project-specific EM technical groups. Sanford is involved in several EM projects with Government. As part of managing these projects (i.e. EM BPetrel, SNA1 Trawl, SNA1 Commercial) there is a dedicated project EM technical group that consists of representatives from MPI (fisheries management, the Observer programme and MPI compliance), fisher and quota owners, and the service provider. The EM group meets on an asneeded basis to deal with implementation issues. Problems tend to be vessel or programme specific.

Monitoring, evaluation and review

Sanford supports;

- Government managing regulation and projects
- EM being delivered by third parties
- A third party holding the footage, e.g. FishServe
- Monitoring and review protocols to be project specific and undertaken by a 3rd party
- Footage held for minimal time (due to costs), in some cases 6 months should be sufficient and never longer than two years

What do you think should be monitored? To whom should the results be reported?

The decision on what part of the fishing activity is to be monitored and how it is reported will be project dependent. Do not support a one-way-fits-all-situations standard.

Fishers must know from the on-set what is being monitored on their vessel. Support continuation of VADE.

[Not relevant to request]

[Not relevant to request]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Do you agree with the EITT objectives?

Yes, but extend the focus beyond just looking at trawl gear to include a whole vessel approach. It is not only the act of catching that can be innovative – include also vessel design, sorting, grading, etc. And, ensure integration with IEMARs so transformation is seamless and efficient.

[Not relevant to request]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Not relevant to request]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Costs

[Not relevant to request]

[REDACTED]

Ensure via IEMARs that FishServe has the capability and flexibility to accommodate changes in gear codes and reporting requirements – including being flexible enough to manage industry requests for data collection alongside statutory requirements, but keeping industry information separate and outside of Government.

[Not relevant to request]

[REDACTED]

[REDACTED]

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