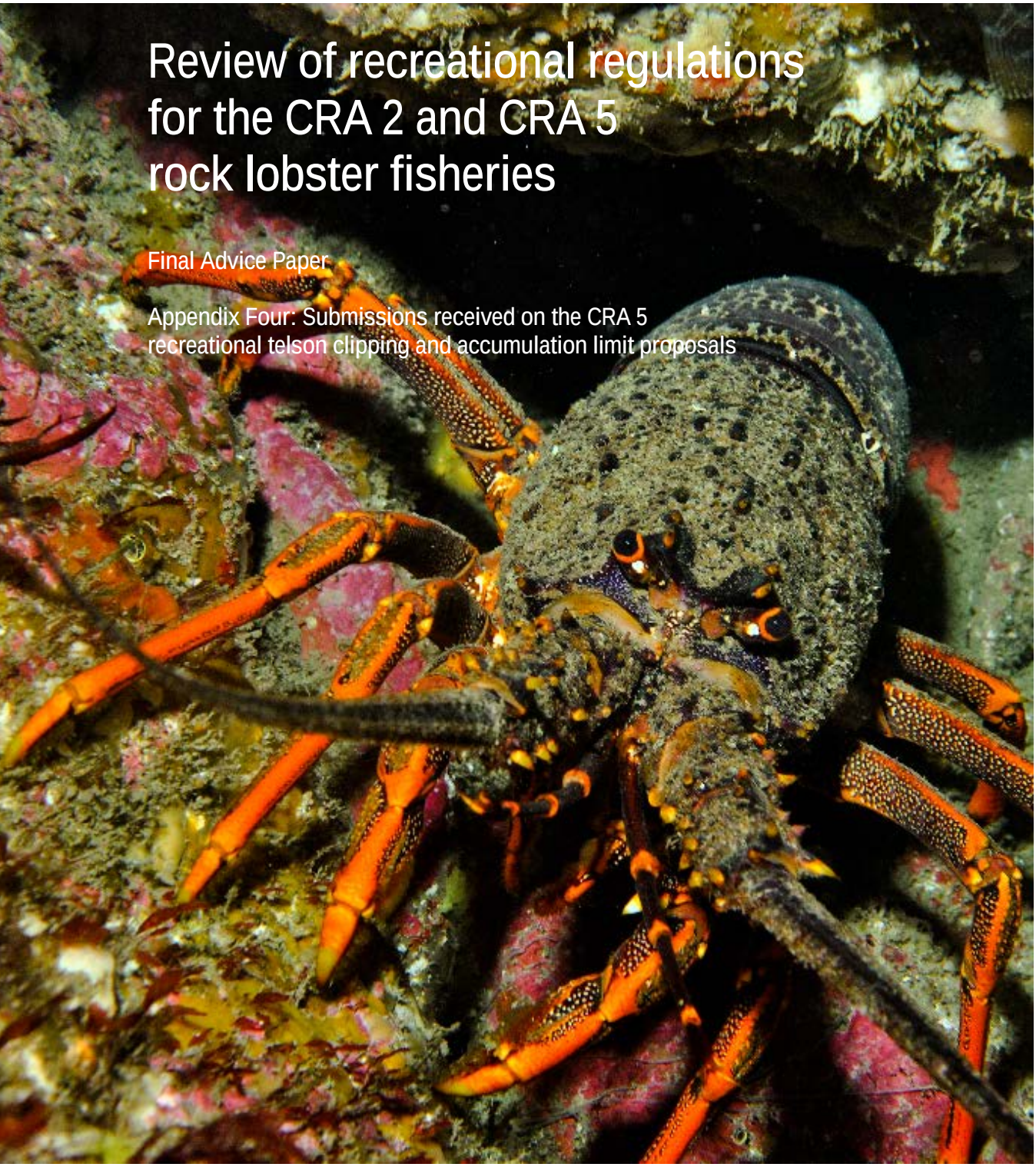
NATIONAL ROCK LOBSTER MANAGEMENT GROUP



Review of recreational regulations for the CRA 2 and CRA 5 rock lobster fisheries

Final Advice Paper

Appendix Four: Submissions received on the CRA 5 recreational telson clipping and accumulation limit proposals

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Sonja Hempel

From: Alan Eastwick <[redacted]>
Sent: Friday, 24 August 2018 6:43 AM
To: FMSubmissions
Subject: Review of paua daily bag limit and accumulation limit

Area 7 Paua
3 per person further cut commercial take and get firmer on illegal take. They do it as it worth the risk.

Area 3 Paua
6 per person, further cut commercial take throughout area 3. 90 ton is to much for this area. And also get harder on illegal take. The penalties seem to be a weeks work for them. I appreciate area 3 commercial owners with their reseeding etc.

Area 3 and 7 lobster. This should stay at 6 as I think this is sustainable. But once again stop the 6 a day people in Kaikoura etc. Like Gerard Dericks doing fishing charters in Kaikoura.

Regards
Alan Eastwick
[redacted]

Sonja Hempel

From: Alan Eastwick <[redacted]>
Sent: Friday, 24 August 2018 6:47 AM
To: FMSubmissions
Subject: Review of crayfish recreational management measures

Rock lobster limits area 3 and 7
Rock lobster limits should stay the same at 6 per person per day as this seems to be sustainable at present. Get harder on illegal takes.

Regards
Alan Eastwick
[redacted]

Submissions:-
Paua 3 & 7 rec.daily bag limits.
Due to the closure to the quake damaged portion of the east coast,we realise the catch effort
has now put pressure on the ajoining areas,& there is a need to temporary lower the daily bag
limits,in these ajoining areas.Our prefered choice,is your option 1,(with a previso,when the current
closed area is reopened,the ajoining areas are reviewed with the possibility of returning basck to
the current limits).

Proposals for cray 5.
We support telson clipping,& accumulation limit of 3 daily bags(18)crays per person.(& bag & labelling
conditions for a single day's catch to support the accumulation limit)

Thanks,Bill(Hartley).

Sonja Hempel

From: brett lees [redacted]
Sent: Thursday, 23 August 2018 2:38 PM
To: FMSubmissions
Subject: RE: Fisheries-NZ-CRA5-consultation

Hi

It should be option 1A and 2A to introduce telson clipping and an accumulation limit.

Thanks

Brett

On 23 August 2018 at 12:24 FMSubmissions <FMSubmissions@mpi.govt.nz> wrote:

Hi Brett

Thanks for your submission.

Just to clarify – do you support Option 1A – introduce telson clipping? And, Option 2B – no accumulation limit?

Your submission suggested support for Option 1A and 1B. Option 1B is no telson clipping.

Thanks

Inshore Fisheries

From: brett lees [redacted]
Sent: Wednesday, 22 August 2018 4:35 PM
To: FMSubmissions <FMSubmissions@mpi.govt.nz>
Subject: Fisheries-NZ-CRA5-consultation

Hi

Please find submission attached

Certified from sustainable fisheries
www.friendofthesea.org

CRAMAC 5

Canterbury Marlborough Rock Lobster Industry Association Inc.

P O Box 4
Ward 7248
Marlborough
New Zealand
[redacted]

3 October 2018

Inshore Fisheries Management
Fisheries New Zealand
P O Box 2526
Wellington 6140.

CRAMAC 5 submits on;

Proposal to introduce recreational telson clipping and an accumulation limit in the CRA 5 rock lobster fishery

Telson fin clipping

1A Telson clipping is mandatory for recreational fishers: Amend the Amateur Regulations to require a recreational fisher to clip the telson of every legal sized rock lobster taken from CRA 5 that they intend to keep.

1. CRAMAC 5 supports the introduction of telson fin clipping, we understand it is hard to measure the success of telson fin clipping but we do understand that the level of offending has decreased within the Kaikoura management area where telson fin clipping has been introduced.

2. We are aware that the recreational vessels go a lot further south to catch lobster, we are led to believe they go beyond the current area where telson fin clipping is a condition on landing, when they arrive back with non-clipped lobster and state they were outside of the management area there is nothing that can be done. It is also hard to understand why fishers would go that far when the resource is good within the current management area. This situation will be managed with the introduction of telson fin clipping across the whole of CRA 5.

3. We also understand the risk which telson fin clipping brings. Recreational fishers that hold a grudge in having to clip the lobster also clip every other lobster that comes up in their pots, that also includes under size lobster. We are told it is to upset commercial lobster fishermen. Currently it happens in three distinct small locations, just north of the Marine reserve and south off

Goose Bay, north of the Peninsula, it is not large-scale clipping. Locals can identify those that do it but very hard to identify when offending takes place.

4. CRAMAC 5 is concerned that any lobster that has been clipped and put back in the water may inadvertently be landed by a commercial fisher, lobster as large as 1.5kg have been found clipped which a fisher would not necessarily check that the lobster has been clipped will now be illegal. 32. 4. We understand why that rule must be in place based on a commercial premise. If the clipped lobster has moulted and still shows a middle telson being shorter than the other fins, discretion should be given. We are not aware of any holding systems where recreational fishers store live lobster which could moult over a period, as long as the clip is seen as old which is easy to identify, it should not be illegal in a live lobster export facility.

5. Rule 32.4. *It would be illegal for owners and operators of commercial premises such as licensed fish receivers or dealers in fish to possess any rock lobsters with a clipped telson.*

6. This rule should allow for a commercial Live Rock Lobster Export premises to export a clipped lobster especially if the telson is an old clip which is easy to recognise. This is supported by the fact that any live lobster fit for export is normally shipped with in a week, if a lobster has a fresh clip it would still look fresh and not healed. This would send a clear signal to the recreational fishers that clip all the lobster that they capture and return to sea that it does not impact on commercial fishers exporting those lobsters alive, the live export facility could not sell these lobsters on the domestic market, that would be illegal as to the current telson fin clipping regulations. If a live lobster exporter received a clipped lobster in a weak condition it would be deemed illegal and stated so on the grading docket and the fisherman's landing grading receipt and put against the landed ACE with no value.

Accumulation limit and bag and tag conditions

2A *An accumulation limit and associated bag and tag conditions are mandatory for recreational fishers: Amend the Amateur Regulations to: i. Limit the number of rock lobsters taken recreationally from CRA 5 to three daily bag limits (i.e. 18 rock lobsters); and, ii. Require a person in CRA 5 to hold each single day's rock lobster catch in a container or bag clearly labelled with the fisher's name, date and place it was taken, fisher's name, and the number held in that container.*

7. CRAMAC 5 supports the accumulation limit and bag and tag conditions. We consider that the conditions should also include the location in which lobsters are stored, the accumulation of lobster should be based on; *in any one location.*

8. It is known that several entities accumulate catch in one freezer. You get aunties, brothers, children all accumulating so numbers can be built up even though they may not have participated in fishing. The philosophy behind this rule is to try and reduce the stockpiling of lobster, Te Korowai Te Tai o Marokura promoted this condition to educate people to take only what they

need for a feed. Stockpiling and holding a number of entities entitlement up to the accumulation level in one location can and should be seen as simply pushing the rules out to suit other objectives.

9. We would like to recommend that the bag and tag condition should only allow two entities to hold their accumulation limit in one location/residential property. 36 lobster in one freezer is a lot of lobster. (Kaikoura 36 lobster equal 23kgs, Motunau could be as high as 108kgs)

Yours sincerely

L Wichman
Executive Officer
CRAMAC 5 Association

Sonja Hempel

From: DAVE GRIFFITHS [redacted]
Sent: Thursday, 23 August 2018 3:52 PM
To: FMSubmissions
Subject: Re: Review of crayfish recreational rules

Sorry, I miss read it.

I thought it was also to reduce the daily take of crayfish to 3.

Yeah I guess tail clipping is a good idea as long as how it's done is thoroughly explained.

On 23/08/2018, at 2:49 PM, FMSubmissions <FMSubmissions@mpi.govt.nz> wrote:

Hi again

The recreational proposals for paua and crayfish are different.

Paua
https://www.mpi.govt.nz/news-and-resources/consultations/paua-3-and-7-fisheries-pau-3-and-pau-7-review-of-daily-bag-limit-and-accumulation-limit-for-recreational-fishers/
Existing limits for both fisheries are:

- a daily bag limit of 10
- an accumulation limit of 20 or 2.5kg (if the pāua are in a state that is unable to be counted).

It's proposed to reduce these limits. Two options are under consideration.

PAU 3 and PAU 7	Daily bag limit	Accumulation limit
Option 1	5	10 or 1.25 kg*
Option 2	3	6 or 0.75 kg*

* If the pāua are in a state that is unable to be counted

Crayfish
https://www.mpi.govt.nz/news-and-resources/consultations/review-of-recreational-management-measures-for-the-cra-5-canterburymarlborough-rock-lobster-fishery/
It is proposed to introduce these measures for rock lobster in the CRA 5 Quota Management Area:
•Telson clipping – recreational fishers are required to clip the last third of the middle part of the tail fan (the "telson") of every legal sized rock lobster that will be kept. This marks a lobster as being recreationally caught, and so is not permitted to be bought, bartered, or traded.
•An accumulation limit – the number of rock lobsters that a recreational fisher can accumulate is limited to 3 daily bag limits (18 lobsters), provided that the catch for any one day does not exceed the current daily limit of 6 rock lobsters per person.
•Bag and labelling conditions for a single day's catch to support the accumulation limit.

-----Original Message-----
From: DAVE GRIFFITHS [redacted]

Sent: Thursday, 23 August 2018 12:47 PM
To: FMSubmissions <FMSubmissions@mpi.govt.nz>
Subject: Re: Review of crayfish recreational rules

Hi,

I thought the submissions were for both, crayfish and Pāua. I would like to see both daily takes decreased for both species.

Thanks

> On 23/08/2018, at 12:19 PM, FMSubmissions <FMSubmissions@mpi.govt.nz> wrote:
>
> Hi Dave
>
> Thanks for your submission. Just to clarify, does your comment below relate to crayfish? Your other email seems to relate to paua?
>
> Kind regards
> Inshore Fisheries
>
>
> Crayfish proposals
> For recreational fishers in the CRA5 (Canterbury/Marlborough) fishery, it is proposed that measures are introduced to discourage the illegal take and sale of rock lobsters. The proposal is to introduce recreational telson clipping, an accumulation limit, and bag and labelling conditions for crayfish caught in the area.
>
> Details of the consultation process and a copy of the full discussion paper are available here:
> www.mpi.govt.nz/news-and-resources/consultations/review-of-recreationa
> l-management-measures-for-the-cra-5-canterburymarlborough-rock-lobster
> -fishery/
>
>
>
> -----Original Message-----
> From: DAVE GRIFFITHS [redacted]
> Sent: Wednesday, 22 August 2018 7:56 PM
> To: FMSubmissions <FMSubmissions@mpi.govt.nz>
> Subject: Review of minimum ACE holding requirements for South Island
> eel stocks
>
> Hi there,
>
> Cut the limit right back, look after it for the future.
>
> Thanks Dave
> _____
> _____
>
> This email message and any attachment(s) is intended solely for the
> addressee(s) named above. The information it contains may be
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The Ministry for Primary Industries accepts no responsibility for changes made to this email or to any attachments after transmission from the office.

Submission Form

Review of recreational management measures for the CRA 5 rock lobster fishery

Fisheries New Zealand
Tini a Tangaroa

Once you have completed this form

Email to: FMsubmissions@mpi.govt.nz

While we prefer email, you can also post your submission to: Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

Submissions must be received no later than 5pm, Wednesday 3 October 2018.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:

Name of submitter or contact person:	Dennis Buurman
Organisation (if applicable):	
Email:	[redacted]
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	

Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

Submission:[1]

Details supporting your views:

I wish to add my support in respect of the review of recreational management measure for the CRA 5 rock lobster fishery.

The introduction of telson clipping in the Kaikoura area has been responsible for a considerable decline in the illegal taking of rock lobster from this area. It is a logical step to have this effective measure introduced on a wider scale as a means of limiting the illegal take of rock lobster within the fishery.

I would also like to support the accumulation limit whereby the number of rock lobsters that a recreational fisher can accumulate is limited to 3 daily bag limits (18 lobsters), provided that the catch for any one day does not exceed the current daily limit of 6 rock lobsters per person.

It is disappointing to see that there is no provision within the review to address the issue of charter fishers and maximum number of rock lobster taken per day and number of trips allowed per day within which they can take their allowable number of rock lobster.

This remains a major issue within the management of the resource in Kaikoura.

This concludes my submission

Please continue on a separate sheet if required.

[1] Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

Submission on Consultation regarding Telson Clipping and Accumulation Limits of Rock Lobster Catch

Doug Hitchon
September 2018

Given the uncontrolled growth in human population, increasing tourism and the advances in technology, there is a strong need for management of the Rock Lobster resource.

Measurement of commercial harvest and non-commercial catch is important for effective and reliable management.

Political problems

It appears that there is little consideration given to community/consumer interests within the Quota Management System, the Fisheries Act, NRLMG or Fisheries NZ. The powerful effect of lobbying by commercial interests, and more recently charter interests, has displaced or will displace community interests; especially since the 1980s. Politicians and government agencies are understandably susceptible to lobbying. Who are the NRLMG members and what is their credibility and which of them is representative of the interests of the community/consumer?

Will this submission reach the ears of the appropriate Minister through NRLMG?

Problems of principle

The natural, ancient and traditional human activity of gathering food and conveying it to a market has been severely distorted by the current regulations in New Zealand. Now, we are told, it is a crime to share seafood in traditional ways and, instead, traditional ways are deemed to be 'Black Market' and fish marketing is a crime; it is deemed to be 'Fish Theft'. And yet the commercial industry has failed to honour the rights of the New Zealand community; arguably the owners of the Rock Lobster resource.

Commercial harvesting owes a significant payback to the community. Firstly, community is what gives value to goods and services so that anything the community/consumer does not want has no value. Secondly, the community provides science, technology, management training, governance and protection so that individuals within a commercial activity can accumulate wealth.

Wealth accumulation is a good thing. A prospective investor will ask how will they get payback and how will they get a return sufficient to justify working in a particular area of gain (to invest in fish harvesting rather than invest in Auckland property for capital gain as an example). Some wealth accumulation is necessary and important but that must be balanced with community gains. That balance has not been brought into the New Zealand QMS. The easiest and most direct way to correct the fault might be to have a local fish market at less than export prices. Alternatively, it might be better to harvest using a public/private partnership structure. In any

case, it appears that the QMS designers were inclined distinctly towards commercial interests.

At the same time we have now legitimised the protection of excessive 'Wealth Enhancement' in our regulations by means of 'Tradeable Quota Rights' and through various regulations that have allowed export prices to be imposed as a commercial 'right', onto the New Zealand community. Not only does the community currently assist with wealth enhancement for a few individuals but, through taxes, the community provides financial assistance to commercial fishers for research.

Commercial fishing provides indirect support to the New Zealand active economy in the form of industry wages, taxes on profits and industry levies paid. Some of these benefits are realistic and fair but it is possible or even likely that some of the wealth enhancement permitted is unfair on the New Zealand economy and community. It appears that the current government agencies do not analyse the economics of any industry in this way although it is notable that the recent emissions consultation process expects to include a full economic analysis of costs and benefits, including social and environmental costs/benefits .

Given nutritional needs (there are significant deficiencies from NZ land based food sources) and historical eating habits, fish as a food is important but, because of price and greater disparity between rich and poor, fish is no longer available to many people in the New Zealand community. It is no longer a readily available food at affordable prices. Rock Lobster is no exception.

If we follow export pricing precedents and allow future prices on the export market to dictate local pricing, it is conceivable that internet sales might raise the export prices of lobster to hundreds of dollars per kilogram. Should we allow sales to New Zealand in that format to continue? Should we have another market system whereby something akin to 'wharf sales' feeds supply to all of the local market?

A better market will remove the need for some regulations, some policing, will decriminalise fisher's activities and will feed New Zealanders at affordable prices.

If I catch legally, why can I not do as I wish with my food? Police behaviour, in any country, can become arrogant, intrusive, bullying and unfair without careful management. In New Zealand we seem to have arrived (subsequent to the introduction of the QMS) at a culture of treating community fishers as potentially and regularly bad people. This is morally wrong especially when it is obvious that commercial harvesters are regularly found to be breaching protection measures and culturally disrespecting sustainable abundance concepts even if only by lining lobster pots up along a marine reserve boundary. The attitudes demonstrated in this proposed change to regulations are bad.

Policing problems

Police behaviour, in any country, can become arrogant, bullying and unfair without careful management. Our Fisheries Officers seem to be guided towards catching any small breach of regulations and issuing fines. Indeed the regulations, including telson clipping, often do little or nothing to achieve sustainable abundance and appear to be constructed only to discredit non-commercial fishers. For example a fishers being fined for using a sensible interpretation of

'immediately' means that they are unable to manage their catch well. A consequence of brutal policing practices is that many more lobster will be Telson clipped than is necessary. Fishers become resentful and uncooperative towards Fisheries Officers. If Officers were primarily educators and engagers with fishers, a more useful outcome is likely.

Unjust regulations and policing activity have singularly created a bad environment. The system needs to change and perhaps the faults of the QMS are now due to be corrected.

Management needs

It is obvious that commercial activity is necessary to maximise utilisation of the Rock Lobster resource but we have yet to achieve a best practice format.

The primary concept should be that any harvest in excess of New Zealand needs may be exported at any and preferably the highest price.

Commerce and industry do many things very well and marketplace activity should be managed by these mechanisms. Other than that, tradeable quota rights have caused serious distortions and should be removed and a more fair system of regulations introduced. Tradeable quota also unfairly raises the cost of the lobster food.

It appears that no useful thought has been put into beach-front recording of non-commercial catch. Again, cooperation is minimal possibly because of the injustices in current regulatory approach and the unprincipled sharing of the resource. Will it be possible to force New Zealanders to cooperate using legislation such as fishing licenses?

Perhaps if Fisheries Officers spent all their time at the high tide mark meeting as many fishers as possible to identify what is being landed a voluntary recording system might prove to be effective, valid and reliable.

Charter fishing is similar to commercial in that it provides boats, skills, and technology to give consumers access to seafood that they might otherwise not have. There is little difference in consumer fishing effort, especially in the lobster harvest, to the normal commercial market system. Charter is not fully 'self resourced' non-commercial fishing. Charter fishing may prove to be more beneficial economically than exporting lobster and should be included in the QMS but not at tradeable quota costs which are unearned capital gain and are a distortion to productivity and the marketplace. Charter should be seen as pressure on the commercial harvest and TACC apportionment should be freely adjusted accordingly. Indeed, current commercial quota holders might like to change to charter.

Within the regulations

And within the current market format:
Existing accumulation catch limits discourage honest fishers from engaging in commercial activity.

Barter should not be seen as black market criminal activity or fish theft.

Feeding family and friends should not be seen as black market criminal activity or fish theft.

Substantial 'Wharf Sales' or 'Local Fish Market' sales should be permitted within regulations to supply retailers , restaurants and community/consumers. Quantity availability onto the local market would need to be controlled to allow a balance between adequate income for the harvester and downward price pressure for the local consumer. We already interfere in the market by providing commercial operators with excessive legitimacy and protection, with guaranteed harvest access, and with minimal compensation for community provided support so only a shift in attitude is needed.

Fishers (not harvesters) will have less incentive to breach bag limits if the market is decriminalised, supply quantities are adequate and prices are lower. They will also provide much more catch quantity support if the regulations are redesigned and become fair.

Unfair regulations, a punishment mentality by fisheries officers, a misguided market construct, all lead to criminalisation and will lead to more black market

Bag and tag

- If I hold lobster live in a tank, bagging is not good – welfare.
- Inconvenient and irrelevant for precooked lobster
- A fisher/diver on holiday has maybe one chance each year to accumulate and will do so shifting anything more than 3 days catch to another location. The catch limit is already low and any arrest is not controlling the catch unless it (unlikely) apprehends a black market operator. Cooperation will not come while there is a perception amongst non-commercial fishers that the regulations are unjust, that the fishers are often being punished unfairly and that the commercial sector has all the official support.
- We must address the question of how much overall tonnage should be allowed to non-commercial fishers and what mechanism should be set to make this determination.

Telson clipping

It is impossible to know if Telson clipping is beneficial because those who want to get lobster onto the local market at an affordable price (or to reduce) cost will still do so albeit with more risk and greater need for care to avoid apprehension.

Many more lobster than necessary will be clipped in order for a fisher to avoid being caught and fined for not clipping.

At least one person has been found to clip too close to the anus, carelessly, by way of resentment for being asked to clip on behalf of commercial interests.

Some clip as many as possible to disrupt the commercial interests who 'hog the resource'.

Why is there not an obligatory system within the commercial sector for managing lobster distribution and identification within New Zealand?

Resentment at heavy handed policing on the boat or on the road when high tide education and policing is an inclusive and cooperative approach.

Better to police restaurant use of loster by menu and supplier invoices.

Comments on the Consultation Document

- 3 These are mostly vague unsubstantiated arguments not supported by evidence and contrary arguments could well be more valid.
- 11 What is the relative importance of commercial versus non-commercial supply to the community? There is no discussion about why non-commercial catch should stop at any particular point in the distribution system. There seems to be a fundamental assumption that commercial activity is the only correct way to distribute lobster. More discussion is needed as the assumptions are weak.
- 12 This item reflects the obvious problems in the QMS but offers no discussion on how to fix them. The problems need to be fixed.
- 13 Confidence in the fisheries management system- fix the problems first
- 14 30 tonnes is likely to be a significant overestimate of non-comm catch given the agencies involved (not arms length) and pressures from commercial interests. The figure is not scientific, is unreliable and statistically invalid.
- 16 What is the level of sales found in CHCH – information should be provided in this consultation.
- 17 Fish theft is wrong and bad terminology – is the export price being imposed onto the local market any less of a theft?
- 22 Fish 'theft' is not the biggest risk to the resource as it is only a small volume compared to the quota allocated to commercial harvest.
- 28 Is there any evidence at all that the statement 'proven effective' is true? What is the evidence?
- 42 Poorly thought out and the gains might be negligible for sustainable abundance.
- 54 Cost – what community money (via general tax collection) is going to marine management and what benefit is the community supposed to be getting from this investment? Should more of this be diverted to ascertain the total catch per annum by non-commercial fishers?
- 59 engage at high tide mark more often pre catch and after catch and forget about fines for the most part. There is currently a poor engagement with fishers and a clandestine sneak approach rather than educational and awareness, apprehension raising that the fisher is being observed.
- Daily ID is not relevant, useful or workable and will not get much support from fishers. They will remove to other storage more often is all that will happen. Cooking and live storage implications are not taken into account.
- 74 same as 54 Make KK same until the major design faults in the regulatory system are fixed.
- 78 Current accumulation limits do educate, as does the 'for a feed' concept, and can easily be changed if stocks deteriorate
  (as can commercial quota). Property rights given away in the QMS could be a problem.
- 79 why bother, concentrate on the beach
- 80 Yes

Submission Form

Review of recreational management measures for the CRA 5 rock lobster fishery

Fisheries New Zealand
Tini a Tangaroa

Once you have completed this form

Email to: FMsubmissions@mpi.govt.nz

While we prefer email, you can also post your submission to: Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

Submissions must be received no later than 5pm, Wednesday 3 October 2018.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:

Name of submitter or contact person:	Geoff Harmon
Organisation (if applicable):	Virgo Fisheries Ltd
Email:	[redacted]
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	As proposed.

Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

Submission:[1]

Details supporting your views:

With regard to Kaikoura the fishing pressure is increasing due to much increased Fishing Charter operations. With the sustained high retail price of Crayfish it is also a temptation to sell/trade ..

Please continue on a separate sheet if required.

[1] Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

Sonja Hempel

From: Geoff White [redacted]
Sent: Thursday, 23 August 2018 8:58 AM
To: FMSubmissions
Subject: Proposed changes to both the Paua and Crayfish fisheries

I would like to submit my feedback to the proposed changes to both the Paua and Crayfish fisheries.

I fully support any change that will help stop people selling a catch, and thus the crayfish changes. I actually feel that this black market needs to be far more heavily policed and far harder dealt with when people are convicted. So anything you can do will have my support and I feel that anyone that is playing within the current rules will feel the same.

On the other hand I feel the earthquakes are being used as a bit of an excuse to make changes to a paua fishery that is not really under threat. There is only a relatively small area of sea bed around Kaikoura that was effected and that has been closed, I fully support that for a period of time, I also realise that this closure will no doubt put added pressure on other areas, but that is in large part a commercial problem and has been dealt with within the quota cuts. Much of the area (coastline) that would see the added pressure is not readily accessible to the general paua gatherer. I personally have not seen any substantial increase in recreational paua gathering or a decline in the paua available. 5 paua is simply not enough for a meal for family and friends. There is often due to sea conditions or time not the opportunity to accumulate more than a days catch at a time. For these reasons I oppose any changes being made to the paua fishery outside those to the commercial limits or those made to protect the area that was physically effected by the Kaikoura earthquakes.

I must add to this I only really have the knowledge to discuss the area you call PAU3 and my comments above only relate to this as I have little experience in gathering paua in PAU7

Thanks for your time and the opportunity to submit feedback, I'm more than happy if you would like to contact me about any of the above and hope you get some valuable feedback from others too.

Kind Regards

Geoff White
Director
Phone : [redacted]
Email : [redacted]
Address: 6 Blake Street
P O Box 4
Rangiora 7440

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Sonja Hempel

From: Grant Fowler [redacted]
Sent: Thursday, 23 August 2018 10:24 AM
To: FMSubmissions
Subject: Paua Quota Review

I wish to submit feedback on the proposed changes to both the Paua and Crayfish fisheries.

Crayfish - I fully support changes that will stop people selling a catch. Black market convictions are far too soft, so anything you can do to prevent this will have my support.

Paua - I fully support that for a period of time the Kaikoura region remain closed, and when reopened tighter measures be in place to aid with its recovery. Perhaps the initial Kaikoura quota be 3 or close Kaikoura harvesting during our main holiday season. No doubt the Kaikoura closure has put added pressure on other areas, but this is largely a commercial problem. Most of the coastline that might see added public pressure is not accessible to the general fisher. The van loads of families that once frequented Kaikoura, easily slipping in from the many roadside access points, and sadly harvesting based on the number of family members present are long gone from that area, and personally have not been seen elsewhere. I have not seen any substantial increase in recreational Paua gathering or decline in Paua numbers outside Kaikoura. It is the sea conditions along many parts of our coastline that protect the fishery, and undoubtably the hard work of our fisheries officers.

For these reasons I oppose any changes being made to the Paua fishery outside those to the commercial limits or those made to protect the area that was physically effected by the Kaikoura earthquakes.

Regards

Grant Fowler
Operations Manager

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[redacted]
www.budpac.co.nz

Sonja Hempel

From: Jason Burkhart [redacted]
Sent: Thursday, 6 September 2018 7:34 AM
To: FMSubmissions
Subject: Review of recreational management measures for the CRA 5 Rock Lobster fishery.

Submission

Review of recreational management measures for the CRA 5 Rock Lobster fishery.

Submitter Details

[redacted]
New Zealand

Email.[redacted]

Phone[redacted]

i am a commercial and also recreational fisher in the Cra5 Management area.

On the matter of Telson Fin clipping I am opposed for this measure on two fronts.

In the discussion document under 32.4

"It would be illegal for owners and operators of commercial premises such as licensed fish receivers or dealers in fish to possess any rock lobsters with a clipped telson."

This one clause creates an obvious incentive for anti Commercial individuals to Telson clip and return to Sea any excess lobster they may have caught, thus in their mind making it impossible for the Commercial sector to be able to harvest this individual lobster..

I have already heard other individuals in the cra5 Kaikoura area mention this has happened.

I have personally already caught a lobster in the Northern Cra5 area that has obviously been Telson fin clipped and returned to sea.. This could possibly have walked from the Kaikoura area where Telson Fin clipping is Already Mandatory, but i can not be certain of that..

Now obviously this issue is not one that most people would consider doing, but by giving the Anti commercial individuals this "TOOL" could create a big problem in the commercial sector.
It only takes a small number of individuals to create big issues by damaging as many lobster as possible and returning them to sea..

The second reason I am opposed is on a possible animal Welfare issue..

In your discussion document it is mentioned.

"45. Nevertheless, if telson clipping is not done properly and a greater proportion than the last third of the telson is clipped (because nervous tissue becomes thinner towards the end of the telson) there is some uncertainty about the level of discomfort. Therefore, Fisheries New Zealand welcomes feedback on any alternative, effective and non-invasive techniques to mark a rock lobster as recreationally caught."

This issue right here also goes towards possibly doing Damage to New Zealands reputation.
IF the the lobster are clipped above the bottom third, there is doubt about the potential for harm to occur to the lobster..

I do believe that some way of identifying recreationl as opposed to commercial catch is required, but i am STRONGLY against the Telson fin clipping..
I would be supportive of some sort of tag system, where tags could be purchased for a very nominal fee, this money could go towards more research of the recreational sectors catch..
Either way,Telson Fin clipping just opens up to big a weapon to the anti commercial brigade.

So as matters stand on this issue i must support option: 1B Status Quo

On the issue of Accumulation limits
I am supportive of this measure so i support option:
2A. An accumulation limit and associated bag and tag conditions are mandatory for recreational fishers:

Regards
Jason Burkhart

Sonja Hempel

From: Jason Hitchens [redacted]
Sent: Thursday, 23 August 2018 6:57 PM
To: FMSubmissions
Subject: Review of paua daily bag limit and accumulation limit

To whom it may concern
I think it's a great idea to use the tellon cutting to reduce the chance of recreationally caught Cray being used for commercial gain.

I however do not agree with reducing the recreational paua quota from what is currently I have not seen any evidence to show that there is a need to reduce the recreational Quota if this was proven then the commercial quota should be reduced to the same equivalent as the recreational For example if the recreational Quota was to be reduced by 50% I would expect the commercial quota to be reduced by 50% also I think it is abhorrent that you would allow people to make a profit off of the paua rather than allow people to feed their families.
The earthquakes have certainly reduced power Stocks but that has been taken care of by the no catch law in those areas, so I see no reason why areas that are not affected by the quakes should be reduced.
With increased rates insurances fuel etc etc etc costs I am shocked that you would take the food off our tables as well!!
Jason hitchens

Sent from my iPhone

Sonja Hempel

From: Jason and Katie Terry[redacted]
Sent: Wednesday, 22 August 2018 8:25 PM
To: FMSubmissions
Subject: Cray7 submission

I would like to put forward my submission of yes to option 1a and yes to option 2b.

Regards,
Jason Terry

Sonja Hempel

From: John Symon [redacted]
Sent: Thursday, 27 September 2018 2:55 PM
To: FMSubmissions
Subject: Review of Recreational Management Measures for the CRA 5 rock lobster fishery

Dear Sir,

I wish to submit that

a. Telson clipping should be mandatory, because:
   1. This will make it clear which crayfish have been caught recreationally

b. There should be NO accumulation limit, because
   1. This unfairly penalises the fisherpeople who comply with all the rules in the taking of their daily allowance
   2. The bag limit is supposedly to help reduce noncompliance. This should not be done at the expense of the law abiding fisherpeople.
   3. No evidence has been presented to show that an accumulation limit reduces non compliance
   4. An accumulation limit enables those with Customary Permits to have even greater benefit over us honest law abiding fisherpeople who need/want to accumulate for an event or family use
   5. The fishery is healthy and does not need further measures to try to limit the number of crayfish being taken; if anything more attention should be focussed on the many tonnes of commercial quota that are taken from the area, particularly when it is able to be shifted from other locations within the area.
   6. Ie I strongly push that their should be no accumulation limit for Crayfish for recreational fishers

Can you please advise if I need to do anything else for my comments to be considered as part of this review

Thanks

John Symon
[redacted]

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Sonja Hempel

From: Lyall Burrows[redacted]
Sent: Wednesday, 3 October 2018 9:18 AM
To: FMSubmissions
Subject: Review of receational regulations in Pau3 and Pau7

Good morning,

I will go for option one. 5 Paua per person per day

It says to have your say ,but looks like with only 2 options, our options are limited.
A bit like if Hitler said,

Option one gas all Polish Jews
Option two gas all Polish Jews under 70 .
Great choice if you are 27and living in Warsaw .

Any way, pleased to see some concern over the fisheries.
I take it the commercial guys will also have same quote cut ??
If not a bit of a waste of time.

I also suggest increase the Paua size limit to 150 mm .
They do not breed until approx. 120 mm and we take them it 125mm ??
This way they will have a far better breeding rate and everyone will actually get more paua meat.
With no paua being take in the last two years they will are getting to this size anyway.
In the old days Maori took only small paua and left the big ones to breed .
My father lived at Maugamanu in the mid 20s, and went to school with local Maori, and this was the practise then.

I was a Kaikoura permit to procurer holder, until I got cut out, when the quota system came in.

Recap go for option One, and increase to legal size for everyone, to 150 mm .

Crayfish. Great idea re middle fin.
This will stop unlicensed catch going to restaurants.

Regards, Lyall

Lyall Burrows
Service Support Specialist
Toll

Toll New Zealand
Blenheim

[redacted]

www.toll.co.nz

Sonja Hempel

From: Mark Preece [redacted]
Sent: Wednesday, 29 August 2018 7:47 PM
To: FMSubmissions
Subject: Proposed measures for the CRA 5 rock lobster fishery

Dear sir

I agree with the proposal to reduce the number of rock lobster taken, as well as the other control measures in your proposed document.

I am happy to be contacted if you need more clarification

Regards

Mark Preece
[redacted]

Sonja Hempel

From: Martin Loach [redacted]
Sent: Wednesday, 22 August 2018 7:59 PM
To: FMSubmissions
Subject: Review of recreational crayfish rules

I Martin Elliot Loach of Blenheim agree with the proposal to tail clip recreational crayfish. I also submit that a maximum of 4 crayfish daily bag limit per Fisher be adopted, with aggregate total of 12 crayfish be accumulated. Also a daily boat limit of 16 crayfish per vessel or landbased fishing group

Sent from my HUAWEI MYA-L02

Sonja Hempel

From: Mitch Parnwell [redacted]
Sent: Thursday, 23 August 2018 6:00 PM
To: FMSubmissions
Subject: Canterbury and Marlborough Crayfish

While I agree of an accumulation limit I think that 18 is being too generous, 6 crayfish is more than enough for a feed for one person. Dropping it to 3 or 4 would still be enough, with an accumulation limit of 9 or 12 Mr Mitch Parnwell

NZ ROCK LOBSTER INDUSTRY COUNCIL

Ka whakapai te kai o te moana

PRIVATE BAG 24-901 WELLINGTON 6142

[redacted]

lobster@seafood.co.nz

September 29th, 2018

PROPOSAL TO INTRODUCE RECREATIONAL TELSON CLIPPING AND AN ACCUMULATION LIMIT IN THE CRA 5 ROCK LOBSTER FISHERY

PROPOSAL TO REDUCE RECREATIONAL DAILY BAG LIMITS AND INTRODUCE AN ACCUMULATION LIMIT IN PAU3 AND PAU7 PĀUA FISHERIES

CRA 5 ROCK LOBSTER FISHERY

The NZ Rock Lobster Industry Council (NZ RLIC) welcomes the opportunity to submit on the *Proposal to introduce recreational telson clipping and an accumulation limit in the CRA 5 rock lobster fishery*

The NZ RLIC is an umbrella organisation for the nine commercial stakeholder organisations, known as CRAMACs, operating in each of the nine rock lobster (CRA) management areas of New Zealand.

CRAMAC membership comprises CRA quota owners, processors, exporters, and fishermen in each region. All nine CRAMACs hold a significant majority mandate of CRA quota shares owned. This submission is made in collaboration with CRAMAC 5.

SUBMISSION

The NZ RLIC <u>supports</u> the Fisheries (Amateur Fishing) Regulations 2013 (Amateur Regulations) being amended to introduce the following measures:

a) **Telson clipping (Option 1A) - Amend the Amateur Regulations to require a recreational fisher to clip the telson of every legal sized rock lobster taken from CRA 5 that they intend to keep:**

i. Recreational fishers are required to clip the last third of the middle part of the tail fan (the "telson") of every legal sized rock lobster that will be kept. This marks a lobster as being recreationally caught, and so is not permitted to be bought, bartered or traded.

b) **Option 2A – An accumulation limit of three daily bag limits and associated bag and tag conditions are mandatory for recreational fishers in CRA**

i. *Accumulation limit:*
The number of rock lobsters that a recreational fisher can accumulate is limited to three times the daily bag limit provided that the catch for any one day does not exceed the current daily limit of six rock lobsters per person.

ii. *Bag and tag' conditions:*
Recreational fishers are required to hold rock lobsters in a container or bag that only contains a single day's catch (i.e. up to six rock lobsters), and is clearly labelled with the individual fisher's name, date it was taken, number held and where it was taken. This provides evidence that accumulated lobsters are taken within the daily limit over three days or more.

DISCUSSION QUESTIONS:

- Do you agree with how we have defined the problem?
- Is the illegal take and sale of rock lobsters in CRA 5 a problem?
- Do you agree that these are the correct options to help minimise illegal take and sale of rock lobster? If not, why not?
- Are you aware of any effective non-invasive techniques that could be used as an alternative to telson clipping?
- Are there any other benefits and impacts of telson clipping in addition to those discussed here?

At present there is no effective limit on the amount of rock lobster people can have in their possession at any one time. The availability of the defence provision in regulation 29(3) of the Amateur Regulations (where a person can be in possession of more than the daily bag limit if they can satisfy the court that the fish were taken over a number of fishing days) is currently exploited by illegal operators in some rock lobster management areas.

An accumulation limit and the associated 'bag and tag' conditions are intended to limit the ability to store and transport large quantities of rock lobster where people deliberately exceed the daily bag limit or where the bag limit is consistently taken for sale or barter.

Telson clipping, an accumulation limit and associated 'bag and tag' conditions are designed to discourage the excessive illegal landings and sales of rock lobsters. Telson clipping is intended to address the illegal sale of rock lobsters.

Poaching and black-market activity (i.e., the theft of rock lobsters for sale or barter) is a significant issue in a number of lobster fisheries. If illegal removals from the CRA 5 rock lobster fishery are not effectively constrained, these removals can contribute to localised depletion, deprive legitimate users of the full benefit of a well-managed fishery, and reallocate catch away from legitimate users.

If left unchecked illegal fishing will also drive additional costs of enforcement and compliance services and will confound the reliability of stock assessments given the lack of certainty about quantities of lobsters being illegally removed from fisheries.

The assumed prevalence and scale of illegal activity in some rock lobster fisheries are significant and are potentially having an impact on stock sustainability. The allowances made in TAC setting for illegal unreported removals also reduce the TACCs that might otherwise be set, and therefore represent a direct and quantifiable economic loss to the nation.

Information provided to the NRLMG by MFish in 2010 indicated that the extent of amateur rock lobster offences around the country was significant. Detected offending against rock lobster rules in 2010 resulted in 195 warnings and 113 infringement notices being issued and 29 prosecutions carried out.

We agree that telson clipping (Option 1A) will provide Fishery Officers with an additional tool in their toolkit to address the illegal take and sale of rock lobsters from the CRA 5 fishery by:

a) Opportunistic non-commercial fishers who sell of barter their catch for financial gain;
   or
b) Dedicated fish thieves who conceal their activity under legitimate non-commercial fishing (i.e. legal sized fish and within the recreational daily bag limit of six rock lobsters).

Compulsory telson clipping for recreational fishers and voluntary specification of telson clipping on customary permits/authorisations could complement enforcement activities carried out by the Ministry and can be relatively easily enforced in the course of normal inspections of amateur fishers. This initiative is all about taking an incremental step to constrain illegal catch.

On the basis that telson clipping is just another 'tool in the toolbox' there will be occasions when it is extremely useful to have, and there will be other occasions when some other item of regulation to constrain illegal catch will be more useful.

The question to ask of telson clipping is "*will it aid enforcement efforts to reduce illegal unreported removals from rock lobster fisheries?*" The answer based on the Kaikoura experience is 'yes', it could, particularly if inspections of catch as they are landed are given some priority in a CRA 5 rock lobster compliance strategy.

Telson clipping has been implemented for the Kaikōura Marine Management Area, a sub-area of the CRA 5 QMA, since August 2014. MPI Compliance personnel have confirmed that implementing telson clipping in the Kaikōura Marine Management Area has successfully reduced the supply of recreationally caught rock lobsters illegally being sold commercially (i.e., by fish dealers and restaurants).

Dealers in fish, and operators in the restaurant and hospitality trade may be deterred from the opportunistic purchase of lobsters with a clipped telson. If these lobsters are found by a fishery officer at commercial premises, this would reveal involvement in illegal trade. This could decrease the potential number of buyers of rock lobster in the commercial sector. Opportunistic customary and recreational fishers and outright fish thieves could find it harder to illegally dispose of lobsters to the retail and hospitality sectors as a consequence.

ANIMAL WELFARE

The NZ RLIC rejects any suggestion that telson clipping raises animal welfare issues of sufficient cause to cancel implementation.

When first evaluating the utility of telson clipping back in 2010 and again in 2014, the NRLMG was mindful of the Animal Welfare Act and also of the possibility of clipped lobsters being returned to the wild fishery. Lobsters are sentient beings and New Zealand legislation obliges relevant care and attention during harvest, transportation and food preparation.

Removing a section of the telson prior to landing legal status rock lobsters has been used in Australian lobster fisheries (WA and South Australia) to identify recreational landings for two decades or longer.

Animal welfare issues have been well canvassed in Australia. In 1995 the Western Rock Lobster Fishery implemented telson clipping to identify recreational landings. The scheme is reviewed at regular intervals as part of the Marine Stewardship Council certification of the fishery. No animal welfare issues associated with telson clipping have been identified by reviewers.

In 2003 a formal review of the telson clipping practice was conducted by the South Australian fisheries management agency and the findings endorsed the continuation of the management initiative as set out in the 2018/19 South Australian Recreational Fishing Regulations.

The proposal for CRA 5 rock lobsters is the same as used in South Australia and Western Australia.

Similar telson clipping schemes have been implemented globally for clawed lobsters (Homarus *spp*) and the longest established, V-notching of reproductive female lobsters, is a fishery management tool widely recognised by both scientific (Gunning 2012) and fishing (Acheson et al. 2010) communities to help sustain lobster fisheries.

i. V-notching of Homarus lobsters commenced in the Gulf of Maine in 1917 and was expanded in 1948 as a fisheries conservation measure by way of a catch buy-back scheme.

ii. In the 1980s Maine fishermen voluntarily implemented a V-notching programme which is now well established across all Canadian Atlantic lobster fisheries.

iii. A similar scheme was implemented in Ireland in 1985 when a MaxLS regime was implemented as a conservation measure.

iv. In 2016 telson clipping was voluntarily implemented by Anegada commercial fishermen (Caribbean) as a conservation measure intended to enhance the resident breeding stock.

Scientific studies (Crustacean Biology 34/1 2014) have shown that for lobsters released to the sea, V-notching (telson clipping) did not affect survival in the wild; did not favour the development of shell disease; and did not affect growth.

Throughout the long history of V-notching and telson clipping programmes globally there have been no animal welfare issues cited as being worthy of abandoning those initiatives. The NZ RLIC supports and strongly encourages proper care and attention of all lobsters throughout the chains of custody.

ALTERNATIVES TO TELSON CLIPPING

As a measure to complement telson clipping the NZ RLIC proposes that all recreational pot fishermen and divers would need to acquire 'lobster tags' before they go fishing and must apply a tag to each lobster they decide to retain and land. This system would mirror one already established in the Victorian lobster fishery.

> https://vfa.vic.gov.au/recreational-fishing/tagging-of-recreationally-caught-rock-lobsters\

Tagging by recreational fishers would have the major advantage of providing a cost-effective way to measure the amount of recreational take. The current plenary document identifies that recreational catch estimates for rock lobster are highly uncertain and a high priority to improve.

Tags could be ordered online or uplifted from accredited fish and dive shops and MPI offices at no cost to the users.

The NZ RLIC preference is to implement a web-based ordering and dispatch system

- amateur rock lobster fishers go online, register their ID (drivers licence for example); order a number of tags which are then delivered to them.
- The number of tags issued in a single order would be restricted to the accumulation limit to minimise tag loss or wastage.
- Tags would be numbered, and the sequence assigned to the person to whom the order was delivered.
- It would be possible to validate or confirm tag use/tag loss before approving subsequent orders.
- Individuals would not be restricted to the number of orders they could make within a fishing year.

Amateur fishers would only use tags when they decide to land a lobster. They can transfer tags across to their mates if they want to but the person who orders the tags accounts for their use if polled.

Tags will have no implicit monetary value because the number of lobsters that can be legally landed is defined by a bag limit; not by the numbers of tags you order. There would be no great incentive for counterfeiting.

Tags would be refreshed (colour and legend) in every fishing year and only be valid for that year.

The tag acquisition register would enable polling of fishers to determine what proportion of tags acquired were deployed to land catches.

IMPLEMENTATION

The NZ RLIC anticipates that amended Regulations will confirm that amateur fishers must identify all legal rock lobsters that are caught and retained by clipping one third of the central telson immediately they have measured the catch and made the decision to retain it.

For packhorse rock lobster (PHC) each of the outer telsons on the tail fan will need to be clipped by at least one third so that the tail length of the PHC catch can still be measured. Additionally,

- it would be an offence for an amateur fisher to store (in holding pots or elsewhere) or possess any legal rock lobsters that do not have the telsons clipped;

- lobsters retained and landed by amateur fishers must be kept and stored whole (i.e. shell/tail intact) until they are being prepared for immediate consumption or being eaten.

ASSOCIATED ISSUES

Commercial stakeholders are still far from satisfied that sufficient is being done to monitor and manage recreational removals of rock lobsters in a timely manner and remain concerned that various MPI compliance and enforcement initiatives, while having some success, have not yet effectively curtailed illegal take. A further issue is the very considerable uncertainty in estimates of illegal take. These poor

estimates of illegal unreported removals compromise assessments of stock status when TACs are set.

The NZ RLIC submits that without more frequent monitoring of recreational rock lobster landings, and much better oversight of the system for reporting of amateur charter vessel catch, the NRLMG should urgently compile recommendations for regulatory interventions to be implemented from April 2020 latest which will actively and effectively constrain non-commercial removals until such time as more and better information is obtained.

PROPOSAL TO REDUCE RECREATIONAL DAILY BAG LIMITS AND INTRODUCE AN ACCUMULATION LIMIT IN PAU3 AND PAU7 PĀUA FISHERIES

The New Zealand Rock Lobster Industry Council (NZ RLIC) supports the Pāua Industry Council (PIC) submissions on the regulatory measures proposed for PAU3 and PAU7.

RECOMMENDATIONS

NZ RLIC recommends that:

i. For PAU3, the recreational daily bag limit should be reduced to **three** pāua and an accumulation limit of six pāua should be introduced; and

ii. For PAU7, the recreational daily bag limit should be reduced to **three** pāua and an accumulation limit of six pāua should be introduced.

We support a daily bag limit of three pāua in PAU3 and PAU7 for the following reasons:

All sectors should share in rebuild:

The NZ RLIC considers that all fishing sectors should share in the effort to rebuild the pāua stocks in PAU3 and PAU7. Over the past two years, commercial harvest has been significantly reduced in both fisheries. These reductions have been implemented with a *high level of certainty* through TACC reductions (in 2017 for PAU3 and in 2016 for PAU7) as well as through High Court-mandated ACE shelving in PAU7 in 2017/18.

Management measures for should be taken to constrain recreational harvest and bag limit changes provide the mechanism with the most certainty.

Effectiveness:

The NZ RLIC agrees the FNZ estimates that a 50% reduction of recreational harvest is required in both PAU3 and PAU7. In order to be achieve a 50% reduction with a high level of certainty, recreational bag limits need to actively constrain the catch taken by the large majority of fishers and for the large majority of fishing trips.

Option 1 (a bag limit of five pāua) will not achieve this level of reduction – in PAU3 it would achieve an estimated reduction of only 38.6% and in PAU7 42%;

Serial depletion:

Serial depletion of pāua stocks is a significant risk in the post-earthquake fisheries of PAU3 and PAU7. This is because the remaining open areas in both QMAs have only a few sites that are readily accessible to recreational fishers, so there is likely to be an ongoing concentration of recreational fishing effort as a result of the catch displaced by the earthquake closures.

Commercial fishers are addressing the risk of serial depletion using a combination of ACE shelving, effort spreading and adjustments to minimum harvest size. There are no equivalent measures to manage the risk of serial depletion by recreational fishers – the bag limit is the only available management tool, so responsible managers need to be very confident that it will provide a significant and meaningful constraint on recreational catch;

Absence of reliable information on recreational harvest:

The consultation material highlights the absence of reliable information on recreational fishing for pāua. The latest estimates for PAU3 and PAU7 are from the 2011/12 National Panel Survey. This survey is out of date, provides data at QMA scale only, and underestimates recreational catch for pāua because shore diving and hand gathering are not well captured in the survey methodology.

Given this significant uncertainty, section 10 of the Fisheries Act (information principles) requires that in order to achieve the purpose of the Act, recreational bag limits should be set conservatively.

Time lag:

The discussion document does not state when the bag limit reductions will come into effect, but NZ RLIC supports PIC's suggestion to make the changes prior to the summer 2018/19 season.

By that time, over two years will have passed since the Kaikōura earthquakes. In contrast, commercial catch was constrained in PAU3 and PAU7 immediately following the earthquakes by a combination of ACE shelving and TACC cuts. These significant reductions in commercial harvest left more pāua in the water for recreational fishers to harvest over the past two years (including two summer fishing seasons).

In the absence of any post-earthquake constraints on recreational harvest, the reductions in commercial catch are likely to have *increased* the level of recreational harvest (since recreational catch levels are closely associated with abundance).

The bag limit reductions must therefore must not only bring estimated recreational catch back within the allowance for the future, but must also rectify the adverse effects on the fishery of the past two years in which recreational catch (in the open areas of the fishery) is likely to have been elevated as a consequence of commercial constraint; and

FNZ has ignored the effect of ACE shelving on stock abundance

PIC is disappointed that industry initiatives to reduce commercial catch following the earthquakes have not been accurately described in the consultation document, even though these initiatives provide important context for the consultation and decision-making process.

FNZ has down-played the fact that the industry put in place significant catch reductions post-earthquake, while recreational fishing remained unconstrained. In particular:

Paragraph 4:

the emergency closure did not "*create a significant risk of commercial... fishing effort shifting into adjacent areas*" because PAU quota owners immediately shelved (i.e., did not harvest) uncaught ACE that would otherwise have been taken from

the closed area. There was no risk of adverse effects on the PAU3 or PAU7 fish stock as a result of commercial displacement;

Paragraph 7:

a. this paragraph implies that commercial catch was not reduced in PAU7 on 1 October 2017. In fact, PAU7 quota owners shelved ACE (in a process that was mandated by the High Court) and the resulting reduction in commercial catch was greater than would have occurred under the Minister's TACC decision; and,

b. the PAU7 ACE shelving is not mentioned in the text of the consultation document at all – it is mentioned only in a footnote on page 8.

CONCLUSION

NZ RLIC supports the reductions in daily bag limits for PAU3 and PAU7. However, we are frustrated that it has taken such a long time for FNZ to consult on bag limit reductions in these fisheries. The delay in implementing controls on recreational harvest highlights the need to develop more timely and responsive mechanisms for adjusting recreational harvest levels such as the gazette notice mechanism suggested by sector representative entities to FNZ in their recent letter.

Supplementary inquiries on each of these consultation issues can be directed to –

NZ Rock Lobster Industry Council

Chief Operating Officer

Bob Gutsell
President
NZ Sport Fishing Council
[redacted]

Inshore Fisheries Management
Fisheries New Zealand
PO Box 2526
Wellington 6140.
FMSubmissions@mpi.govt.nz

3 October 2018

Submission: We **do not support** telson clipping in CRA 5 at this time.

Recommendations

1. The submitters will not support telson clipping in CRA 5 until clear evidence is provided that this technique has been effective in the Kaikōura Marine Area.
2. The submitters support implementation of effective measures such as traceability and identification of commercial rock lobster catch destined for the local market.
3. The submitters support a broad review of section 111 provisions of the Fisheries Act 1996 enabling commercial fishers to take rock lobster and other species for non-commercial purposes.
4. The submitters support the proposal for an accumulation limit of 18 rock lobster to apply to recreational harvest accompanied by bag and tag provisions for daily catch.

The submitters

5. The New Zealand Sport Fishing Council (NZSFC) appreciates the opportunity to submit on the proposal to introduce recreational telson clipping and an accumulation limit in the Crayfish 5 (CRA 5) rock lobster fishery. Fisheries New Zealand (FNZ) advice of consultation was received on 22 August, with submissions due by 3 October 2018.

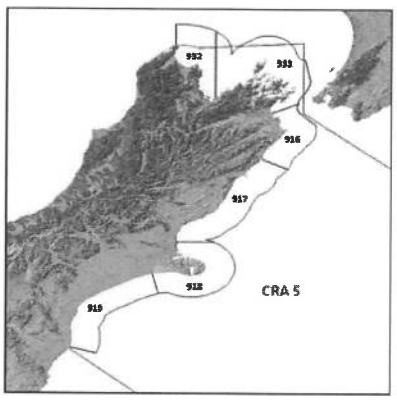
6. The New Zealand Sport Fishing Council is a recognised national sports organisation with over 34,000 affiliated members from 56 clubs nationwide. The Council has initiated LegaSea to generate widespread awareness and support for the need to restore abundance in our inshore marine environment. Also, to broaden NZSFC involvement in marine management advocacy, research, education and alignment on behalf of our members and LegaSea supporters. www.legasea.co.nz. Together we are *'the submitters'*.

7. The submitters are committed to ensuring that sustainability measures and environmental management controls are designed and implemented to achieve the Purpose and Principles of the Fisheries Act 1996, including "maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations..." [s8(2)(a) Fisheries Act 1996].

8. The submitters note and appreciate the consultation timeframe of 30 working days for this process. This is an improvement from the 18 working days that had become standard FNZ practice. This 30-day window has allowed us more time to consult with local recreational interests and the Marlborough Recreational Fishers Association in CRA 5, however, it still constrains our ability to receive adequate feedback from clubs whose members may be affected but who only meet once a month.

9. Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this review and would like to be kept informed of future developments. Our contact is Helen Pastor, secretary@nzsportfishing.org.nz.

Background



10. Rock lobster is an important species and fishery in the Canterbury and Marlborough areas (CRA 5) for all sectors. Since 2014, telson clipping, an accumulation limit, and bag and tag conditions have applied to recreational fishers in a portion of the CRA 5 fishery, known as Te Whata Kai o Rakihouia i Te Tai o Marokura (the Kaikōura Marine Area).

11. Currently the Total Allowable Commercial Catch (TACC) in CRA 5 is 350 tonnes (unchanged since 1999), while the recreational allowance is 87 t and customary allowance 40 t. The allowance for other sources of mortality which includes poaching and release mortality is highly uncertain, but is set at 37 t.

FNZ proposals

12. Fisheries NZ is proposing that the Fisheries (Amateur Fishing) Regulations 2013 (Amateur Regulations) be amended to address concerns about the apparent level of illegal fishing for rock lobster in CRA 5. FNZ propose to introduce the following measures for recreational fishers in the CRA 5 area only (Canterbury/ Marlborough):

a) Telson clipping:

Recreational fishers are required to clip the last third of the middle part of the tail fan (the "telson") of every legal sized rock lobster that will be kept. This marks a lobster as being recreationally caught, and so is not permitted to be bought, bartered or traded.

b) Accumulation limit and associated 'bag and tag' conditions:

i. *Accumulation limit:* The number of rock lobsters that a recreational fisher can accumulate is limited to three daily bag limits (i.e. 18 lobsters), provided that the catch for any one day does not exceed the current daily limit of six rock lobsters per person.

ii. *'Bag and tag' conditions:* Recreational fishers are required to hold rock lobsters in a container or bag that only contains a single day's catch (i.e. up to six rock lobsters), and is clearly labelled with the individual fisher's name, date it was taken, number held and where it was taken. This provides evidence that accumulated lobsters are taken within the daily limit over three days or more.

Submission

13. Stock abundance in CRA 5 is close to the highest it has been in the last 30 years. This is good news considering the major ecological disruption caused by the Kaikoura earthquakes. It is also good for commercial, customary and recreational fishers. The high abundance and reasonable access to rock lobster in CRA 5 is also attractive for poachers intent on profiting from illegal sales. The scale of this problem will be greater in CRA 5 than in other areas where accessibility is low.

14. The submitters support compliance initiatives to stop illegal take by fishers across all sectors. However, we hold doubts about the effectiveness of telson clipping as a deterrent for large-scale poaching. Those responsible are intent on avoiding detection, and a whole tail does not prove that the rock lobster was legally landed by a commercial fisher for sale.

15. The submitters have asked FNZ in several submissions, stakeholder and management forums to provide evidence or compliance reports on the utility of telson clipping in the Kaikōura Marine Area, where it has been in place since 2014. Apart from an unattributed statement in the FNZ discussion document, **no evidence has been provided about the effectiveness on telson clipping in the Kaikōura Marine Area.**

16. In an Australian report, telson clipping was found to be most effective at reducing illegal sales from crew taking rock lobster from commercial vessels. In New Zealand commercial fishers are able under section 111 of the Fisheries Act 1996 to take home their amateur bag limit of six rock lobster per person, per day only if they are taken from designated recreational pots that they set and the weight is reported on their catch landing returns.

17. CRA 5 has the highest section 111 reported catch of any quota management area in New Zealand, at about 6 tonnes per year. We are concerned this may be an underestimate of the total amount of rock lobster being removed. Anecdotal reports suggest there is more crayfish coming off commercial vessels under the guise of recreational catch. Our concern is that even at 6 tonnes per annum this reflects commercial quantities of rock lobster being removed from some vessels rather than reasonable take for personal use.

18. MPI Fisheries Compliance has also commented that on some vessels the catch rate from the designated recreational pots is many times higher than the catch rate from the vessel's commercial pots, given the number of pot lifts and reported weights. **This is indicative of deliberate misreporting on statutory documents.**

19. Given the quantities involved and the high value of rock lobster to all stakeholders **we support a broad review of section 111 provisions for commercial fishers.**

20. There is a cost to introducing telson clipping across the whole CRA 5 Quota Management Area. This includes signage, education, compliance resources, and potential problems for legitimate recreational fishers who forget or are unaware of telson clipping and incur fines of $250. We submit MPI Compliance resources would be better used to target the individuals who are taking, selling or buying illegal rock lobster. We also note that if telson clipping is introduced it will not be a mandatory requirement for customary fishers. **FNZ need to prove that the benefits of telson clipping outweigh the costs in the rest of CRA 5.**

21. What is required to ensure only legal commercial rock lobster are sold and used on commercial premises is traceability and identification of commercial catch destined for local market. This

would be much harder for poachers to get around than telson clipping. Traceability would have the added benefit of giving consumers the assurance of knowing where and when their $130 per kilo rock lobster was caught.

22. The submitters support the proposals for an 18 rock lobster accumulation limit for recreational harvest and the proposed bag and tag provisions for daily catch to support this. We anticipate these provisions will assist in both discouraging large-scale illegal rock lobster fishing and facilitating the detection of illegal crayfish sales operations in CRA 5. The provisions must not be used to hinder legitimate recreational fishing activities, for example if the accumulated catch is six or less rock lobster caught on multiple days.

[redacted]

25/09/2018

Inshore Fisheries Management
Fisheries New Zealand
P O Box 2526
Wellington 6140.

Paul Reinke and family submit on;

Proposal to introduce recreational telson clipping and an accumulation limit in the CRA 5 rock lobster fishery

Telson fin clipping

We are in full support of the introduction of recreational telson clipping to the whole of the CRA5 management area but in our opinion there needs to be a couple of small tweaks made. As we have been in the commercial fishing industry in Kaikoura for many years we have seen a fair amount of goings on regarding recreational black-market fishing and since the introduction of telson fin clipping in the Kaikoura area we have noticed a reduction in what we call (commercial recreational fishers) and we put that down to the telson fin clipping rule change.

In Kaikoura since the introduction of telson fin clipping we straight away starting catching lobsters in the pots that were undersize and oversize that had been caught recreationally and snipped and returned to the sea. After speaking to a number of recreational fishers they said that they would snip every lobster that they caught so that the commercial fishers couldn't take them and that they were their fish, so we strongly recommend the following so that we avoid this pointless practice from some recreational becoming more popular.

1 = Make it illegal to snip a lobster and return it to the sea.

2 = Remove the clause in the CRA5 decision document that says, It would be illegal for owners and operators of commercial premises such as licensed fish receivers or dealers in fish to possess any rock lobsters with a clipped telson.

There is no need to stop commercial fishers from landing clipped lobsters as they are going to be exported any way, and are already not allowed to be sold on the domestic market, it can be very difficult to pick out lobsters that have been clipped when sorting through them during your days fishing trip especially if that lobster has been through a moult while it was back in the sea. It would also send a clear message to the recreational sector that clipping all lobsters they capture and return to sea does not impact on commercial fishers exporting those lobsters.

From a compliance side of things, it would make life a lot easier for the MPI officers if the whole CRA5 area had the same rules as currently in the Kaikoura area because at the moment we have fishers catching lobsters in an area far to the south of Kaikoura that don't require their lobsters to be snipped and then landing them in the Kaikoura area which is confusing.

Accumulation Limit
We support the accumulation limit of 18 per person being put in place for the whole CRA5 area but we personally think the accumulation limit is still too high. Depending upon the place the lobsters are caught the size differential and weight factor e.g. Motunau/banks Peninsula 18 lobsters could weigh up to as much as 50 kgs.

Another example if Dad and Mum and a child went recreationally lobster fishing for three days and each caught their limit per day that family can still accumulate 54 lobsters, it's all about catching a feed 54 lobsters is not a feed, and if you require those sorts of numbers for a function you can simply go and get a customary permit to cover that event.

Regards
The Reinke family

Sonja Hempel

From: rob millar[redacted]
Sent: Monday, 27 August 2018 4:59 PM
To: FMSubmissions
Subject: Submission - Review of recreational management measures for the CRA 5 (Canterbury/Marlborough) rock lobster fishery

Hi,

I am a recreational fisher/diver and have read the document published recently and would like to make a submission in regard to the review of recreational management measures for the CRA 5 (Canterbury/Marlborough) rock lobster fishery. I would like to support the requirement for telson clipping and I would also like to support the proposed accumulation limits. Although I am happy to support "bag and tag" I don't really see the need at present as the accumulation limit should cover it regardless of where/when it was caught you still wouldn't be allowed more than 18 crayfish in the freezer.

Regards,

Rob Millar

[redacted]

Proposal to introduce Recreational Telson Clipping and an Accumulation Limit in the Cra5 Rock Lobster Fishery.

Ross Divett

September 2018

In the executive summary it is stated that :

The proposal is put forward by the National Rock Lobster Management Group for recreational fishers in Cra5....

It then goes on to describe why there is a risk of poaching and sale of crayfish to the commercial market of restaurants etc. in New Zealand.

I have several issues with the premises that these opening statements imply and make.

1. The Cra 5 Quota management area is a Commercial distinction not a recreational distinction. There is no management areas for recreational take which is a major reason why the Quota management system needs a major overhaul to include smaller areas for habitats of fish, accessability etc rather than a vague area of commercial catch take if it is going to be used to manage recreational fishing . The major problem with the Quota management system is its large area reporting management. We need to stop resting on the laurels of the " 1986 Fisheries act " and lead the world again with Scientifically selected smaller QMA 's. If we don't we will lose more fish species and fish species habitats.
2. Cray 5 is a very large area for management of the fishery. This has never been more apparent than with the upheaval of the Kaikoura earthquake sequence.
   The problem that is being highlighted in this proposal relates to Kaikoura North and South , Motunau, and Hurunui. These are all areas accessible by road (see executive summary 2). Kaikoura has also got a resident population of retired people who fish on a daily basis. This group also has good access for smaller sized boats in multiple locations. Nelson the Marlborough Sounds , and Akaroa Christchurch are all limited in access points making compliance easier to enforce and also have a more forbidding coast either by topography or weather to limit access. In effect you have three areas Kaikoura Motunau , North South Island, and Banks Peninsula all requiring different management practices. **This proposal applies only to the Kaikoura Motunau area. If it is applied to the two other areas as well it is like using a Tank to kill a rabbit.**
3. **There is no consultation with recreational fishing**. The NRLMG does not have recreational representation . The members who supposedly represent recreational fishing do not have any support from recreational fishing . The Recreational Fishing council is dysfunctional and not supported by recreational fishing. All recreational representatives for cra5 on the NRLMG are from Nelson an area not known as a great crayfishing area. Consultation has to be with a reasonable number of the

recreational fishers involved . MPI received (note 26) feedback from 20 people or groups and 16 in favour. This is not representative of the crayfishing recreational group when an estimate of take for recreational fishing for Cra5 is 30 tonnes.

Commercial Support:

The NRLMG is heavily represented by Commercial interests . Ultimately the intention of the proposal is to protect the crayfish population from decimation.

As a result of the Kaikoura earthquake greater pressure has come to bear on the Banks Peninsular cray population with Commercial interests from North Kaikoura moving south . Commercial interests have far greater ability to decimate a population (see cause and effect movement of commercial scallop interests from Nelson to Marlborough Sounds and the decimation of the scallop beds as a result) than any recreational interest. They have large boats , are out in all weathers, and can use large scale pots. Commercial take from section 111 allowance is also a significant proportion of so called recreational take. Section 111 allowance needs to be abolished.

Telson Clipping:

I believe that Telson Clipping is inhumane for the treatment of crayfish as an animal. A crayfish has 6 "brains". It is established scientifically that the crayfish tail, is innervated and the crayfish will feel pain if the telson is clipped. I agree that the third of the telson will minimise this effect but poor technique in the heat of the moment and some indifference to the effect on the crayfish will mean more of the telson is clipped.

I don't believe the benefit warrants the damage to the crayfish .

Tangata Whenua:

The proposal makes the statement (Paragraph point 25) that Iwi representatives support the telson clipping proposal but also in paragraph point 36 say that crayfish taken under customary fishing rights will not be required to clip the telson of crayfish At the same time the position paper states (Paragraph 55) " for telson clipping to have the greatest effect ,there needs to be widespread buy in and use of the measure....." . This appears to be an oxymoron . If it means to be effective then it should apply equally across all fishers to protect all their rights equally.

There is another way:

In the proposal there is a statement that (paragraph 12) Rock Lobster is prone to being taken illegally ... because **Rock Lobsters are scarce on the domestic market because commercial fishers receive better returns from exporting their rock lobsters".**

- This implies that the commercial fishers are not interested in the domestic market .

- It also means that the domestic market is poorly supplied.
- Fresh Seafood is an important advertisement to tourists of our clean green fresh New Zealand Image . We are underutilising this aspect of New Zealand. Recently oysters were taken from Bluff out of season to showcase New Zealand during the rugby World Cup which contributes to show the importance seafood is to our reputation to tourists .

My suggestion is to set up a quota for the domestic market only. It could be linked to tourism . It could involve a several small quota holdings that can never be consolidated . This small Non exportable quota holding would supply the local market on a more regular basis.
This may be a way of handling charter boat cray fishing as well.
Section 111 catch needs to be abolished as it is too easily abused.

The effect of this will be to lower the price of domestic crayfish reducing the attractiveness of illegal sale. It would also provide a service not being supplied by the "commercial Fisher"
Show casing of New Zealand seafood is important to our tourism and I know of tourist institutions who could not get crayfish at Christmas because the crayfish caught had all been exported prior to November.
Catch Accumulation:
I agree with catch accumulation for the Kaikoura area due to the access to the fishery being easy and frequent . It doesn't work for Banks Peninsula where weather can limit access.
Also Kaitiaki can be difficult to get hold of to issue customary permits which means that recreational users are limited to accumulation of catch for festival/ wedding type occasions. This is a first hand issue that developed with my sons wedding . Several Kaitiaki were contacted and they all promised to get back to me but didn't . Follow up was very difficult. Weather was also an issue to get out to allow enough opportunities for accumulation under present rules to allow enough crayfish for the wedding.
I disagree with catch accumulation limits for the Christchurch .Banks peninsular area.

Name

Ruth Weine

Email

[redacted]

Page URL

https://www.mpi.govt.nz/news-and-resources/consultations/paua-3-and-7-fisheries-pau-3-and-pau-7-review-of-daily-bag-limit-and-accumulation-limit-for-recreational-fishers/

Did you find what you were looking for?

Yes, some of it

How easy was it to find what you wanted?

Average

Did you have any problems on the site?

Yes

Problem type

Please give us the details of your problem

Regarding Paua quota being reduced form 10 to 5 or 3 is this per person? does that then mean if there are normally 2 people in the house who gather paua we can have double the amount in the freezer. i.e. if the limit goes down to 3 and amount in freezer is reduced to.75kg can we then have 1.5kg for the 2 of us? i am very supportive of limit being dropped. I think your suggestion crayfish tails is an excellent one

IN THE MATTER OF: **CRA 5: PROPOSED TELSON CLIPPING AND ACCUMULATION LIMITS**

SUBMISSION OF SPEARFISHING NEW ZEALAND INCORPORATED

About the Submitter

1. This is the submission of Spearfishing New Zealand (SNZ). We are an Incorporated Society. The committee is authorised by our constitution to represent the interests of freedive spearfishers in New Zealand.

2. Spearfishers are a distinct sub-group of the recreational fishing sector.

3. SNZ reports directly to approximately 5,558 divers nationwide. The wider freedive spearfishing community is approximated by the 13,174 members of the most active (NZ) social media pages in our sport.

4. We have perused the Proposal Document prepared by Fisheries New Zealand. Spearfishers are an active harvesting group in all New Zealand Crayfish fisheries and we have a strong interest in preserving stock abundance in these fisheries. We provide our comments below.

Telson Clipping

5. We support the telson clipping proposal Option 1A.

6. The reasons we support it are because:

7. It is a simple and effective procedure for recreational fishers to undertake which is convenient and has no associated cost.

8. We support FNZ's efforts to enforce the fisheries regulations, catch limits, and to combat illegal harvesting.

9. FNZ reports feedback has been positive from Western Australia and also Kaikoura Marine Area.

Accumulation Limits

10. We support Option 2A, introducing accumulation limits and bag and tag controls.

11. The reasons we support it are because:

12. It is a simple and effective procedure for recreational fishers to undertake which is convenient and has little or no associated cost.

13. We support FNZ's efforts to enforce the fisheries regulations, catch limits, and to combat illegal harvesting.

14. 18 Rock lobsters is sufficiently large. Anyone with more than 18 rock lobsters in one place is unlikely to be using them for private consumption.

Additional Suggestion

15. We consider there is some risk that occasional situations may exist where more than 18 rock lobster may be required to be stored in one location, such as privately catered events, weddings, and other occasions.

16. We submit that an exception should be introduced whereby a fisheries officer can authorise accumulation of more than 18 rock lobster for a specific private event by prior arrangement, and on provision of relevant details such as purpose of the event, location of accumulation, planned event date, and fishers contributing.

We thank FNZ for the opportunity to submit on these important issues, and look forward to assisting in future decision making that affects our members.

Kind Regards,

Reid Quinlan
Secretary
Spearfishing New Zealand
3 September 2018

Contact details:

[redacted]

[redacted]

Phone: [redacted]

Submission Form

Review of recreational management measures for the CRA 5 rock lobster fishery

Fisheries New Zealand
Tini a Tangaroa

Once you have completed this form

Email to: FMsubmissions@mpi.govt.nz

While we prefer email, you can also post your submission to: Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

Submissions must be received no later than 5pm, Wednesday 3 October 2018.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:

Name of submitter or contact person:	Mr Stephen Deane Glass
Organisation (if applicable):	Ikana NZ Ltd
Email:	[redacted]
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	I support both Options 1A and 2A

Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

Sonja Hempel

From: Chrissy Ryan [redacted]
Sent: Sunday, 2 September 2018 3:58 PM
To: FMSubmissions
Subject: Review of recreational management measures for the CRA 5 rock lobster fishery - submission

Submission Form
Review of recreational management measures for the CRA 5 rock lobster fishery
Submission Form
Review of recreational management measures for the CRA 5 rock lobster fishery

Once you have completed this form
Email to: FMsubmissions@mpi.govt.nz
While we prefer email, you can also post your submission to: Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

Submissions must be received no later than 5pm, Wednesday 3 October 2018.
Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Submitter details:
Name of submitter Steve Ryan
ph [redacted]

Organisation (if applicable): N/A

Email: [redacted]

Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented): Option 1A plus other

Official Information Act 1982
All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

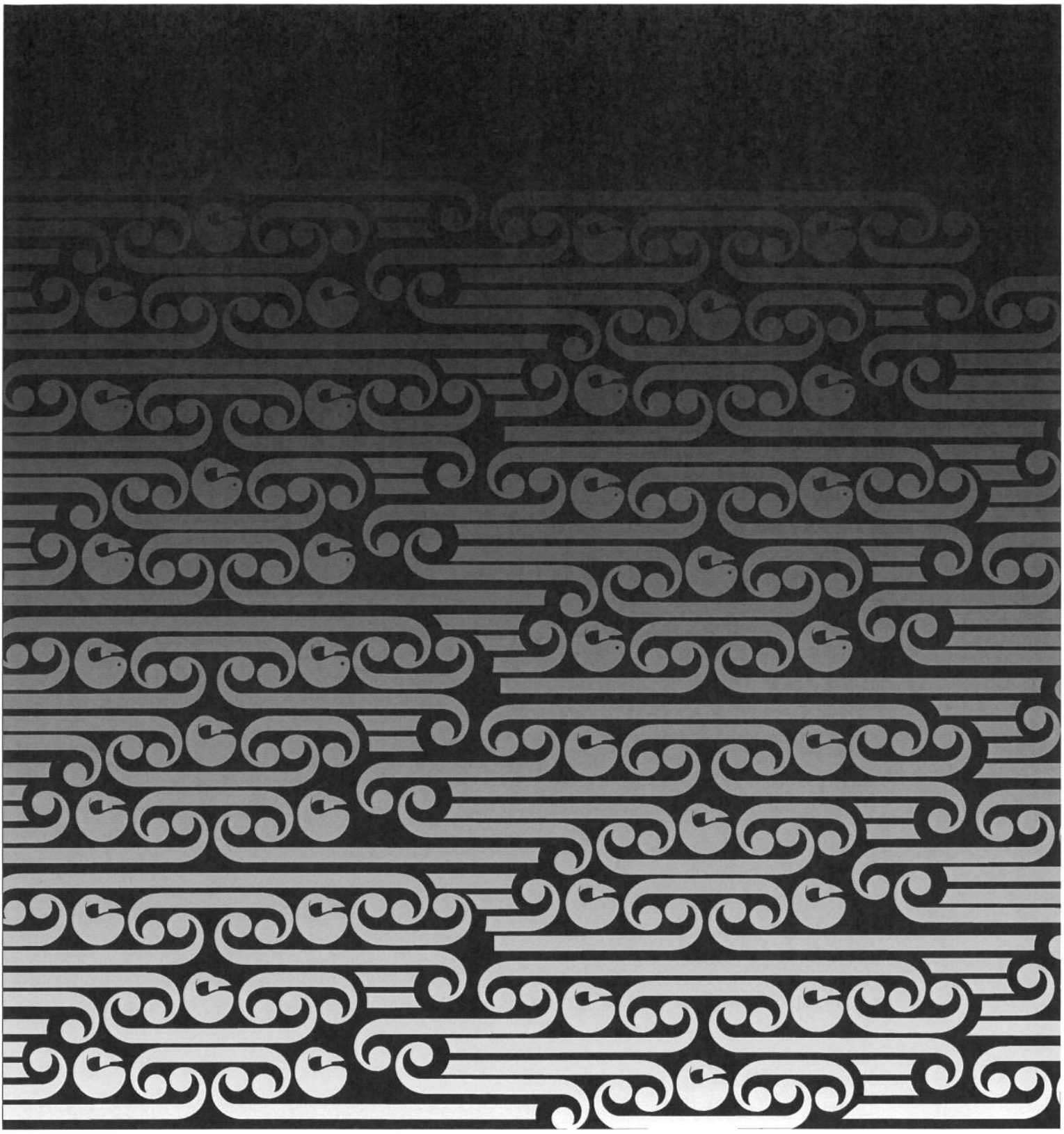
Submission:

Details supporting your views:

I think that we should implement Telson Clipping for all recreationally caught crayfish, not matter where they are caught. Don't just limit this to CRA5, make this a nationwide regulation.

1. Crayfish poaching and black market activity is not just a CRA5 issue
2. One nationwide regulation will be easier to enforce and for the public to understand
3. Any sold crayfish would immediately be able to be identified as recreationally caught, as all recreationally caught crayfish would have the Telson clipped
4. Any groups that are currently illegally targeting crayfish to sell in CRA5 may relocate into other areas and a nationwide regulation would limit their options

Regards Steve Ryan



Te Ohu Kaimoana's Response to Fisheries New Zealand Review of Recreational Management Measures for PAU3, PAU7 & CRA5

Te Ohu Kaimoana

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Introduction

1. Fisheries New Zealand (FNZ) released two consultation papers on 23 August 2018 that review recreational fishing measures for pāua in PAU3 and PAU7, and for rock lobster in CRA5. This document represents the response from Te Ohu Kaimoana. We do not intend for this response to detract from or override any response or feedback provided independently by Iwi, through their Mandated Iwi Organisations (MIOs) and/or Asset Holding Companies (AHCs).

Who we are

2. Te Ohu Kaimoana was established to implement and protect the Fisheries Settlement. Its purpose, set out in section 32 of the Māori Fisheries Act 2004, is to "advance the interests of Iwi, individually and collectively, primarily in the development of fisheries, fishing and fisheries-related activities, in order to;

   - ultimately benefit the members of Iwi and Māori generally; and
   - further the agreements made in the Deed of Settlement; and
   - assist the Crown to discharge its obligations under the Deed of Settlement and the Treaty of Waitangi; and
   - contribute to the achievement of an enduring settlement of the claims and grievances referred to in the Deed of Settlement."

3. Te Ohu Kaimoana works on behalf of 58 MIOs, who in turn represent all Iwi who own the Fisheries Settlement Commercial Assets. AHCs hold Fisheries Settlement Assets on behalf of their MIOs. These include Individual Transferable Quota (ITQ) and shares in Aotearoa Fisheries Limited which, in turn, owns 50% of the Sealord Group.

4. Te Ohu Kaimoana works on priorities agreed by MIOs to protect and enhance the Settlement by providing policy advice for Iwi. Iwi have identified the review of sustainability measures as critically important to their long-term relationship with Tangaroa. MIOs have also have approved a Māori Fisheries Strategy and three-year strategic plan for Te Ohu Kaimoana, which has as its goal "that MIOs collectively lead the development of Aotearoa's marine and environmental policy affecting fisheries management through Te Ohu Kaimoana as their mandated agent."

Noho ora mai rā,

Dion Tuuta
Te Mātārae - Chief Executive
Te Ohu Kaimoana

1 - Guiding Princples

1.1 - Te Hā o Tangaroa kia ora ai tāua

1. Prior to the colonisation of Aotearoa by the British Crown, Māori enjoyed complete authority over their fisheries resources. Te Ao Māori's relationship with Tāngaroa, and ability to benefit from that relationship, was and remains underpinned by whakapapa – descent from Ranginui, Papatūānuku and their children.

2. The signing of Te Tiriti o Waitangi in 1840 affirmed Māori tino rangatiratanga over their taonga including fisheries which was an essential affirmation of the traditional Māori world view. This world view endures in the modern day. Te Tiriti o Waitangi and the 1992 Maori Fisheries Settlement are built on a much deeper foundation of Māori whakapapa connection to and relationship with Tangaroa.

3. In the modern context, when considering or developing fisheries-related policy, Te Ohu Kaimoana is guided by the principle of 'Te Hā o Tangaroa kia ora ai tāua' - the breath of Tangaroa sustains us. In this context Tangaroa is the ocean and everything connected to and within, on and by the ocean. This connection also includes humanity, one of Tangaroa's descendants.

4. Ko 'Te hā o Tangaroa kia ora ai tāua', highlights the importance of an interdependent relationship with Tangaroa, including his breath, rhythm and bounty and how those parts individually and collectively sustain humanity. The guiding principles underpinning 'Te hā o Tangaroa kia ora ai tāua' highlight how we ensure that we foster and maintain our relationship with Tangaroa.

1.1.1 - Tangaroa

5. Tangaroa is the God of the Sea and everything that connects to the sea. He is the divinity represented through Hinemoana (the ocean), Kiwa (the guardian of the Pacific), Rona (the controller of the tides – the moon) and the connection with other personified forms of the Great Divine. For some tribes, he is also the overlord for all forms of water, including freshwater and geothermal as well as saltwater.

1.1.2 - Te Hā

6. Te Hā means, breath and to breathe. Te Hā o Tangaroa represents the breath of Tangaroa, including the roar of the ocean, the crashing of waves on the beach and rocks, the voice of the animals in and above the ocean and of the wind as it blows over the ocean, along the coast and the rocks and through the trees that stand along the shoreline. Through our whakapapa to Tangaroa, we as humanity, we as tangata whenua, are the human voice for Tangaroa.

7. When Tangaroa breathes it is recognised through the ebb and flow of tide and the magnetism of the moon. This magnetism is recognised as the kaha tuamanomano (the multitudinal rope of the heavens). Therefore, we must also be mindful of the lunar calendar when working with Tangaroa and his various modes.

1.1.3 - Purpose and Policy Principles

8. Te hā o Tangaroa ki ora ai taua provides Te Ohu Kaimoana with guidance on key principles which should underpin our consideration of modern fisheries policy.

- **Whakapapa:** Māori descend from Tangaroa and have a reciprocal relationship with our tupuna;
- **Tiaki:** To care for Tangaroa, his breath, rhythm and bounty, for the betterment of Tangaroa in order to care for humanity as relatives;
- **Hauhake:** To cultivate Tangaroa, including his bounty, for the betterment of Tangaroa (as a means of managing stocks) and for the sustenance of humanity; and
- **Kai:** To eat, enjoy and maintain the relationship with Tangaroa as humanity.

9. Whakapapa as a principle recognises that when Māori (and Te Ohu Kaimoana as an extension of Iwi Māori) are considering Tangaroa, we are considering the wellbeing of our tupuna (ancestor) – rather than a thing or inanimate object. Therefore, the obligation and responsibility of Tiaki – caring for Tangaroa – comes from our descent from our Tupuna. Similarly, the responsibility and obligation of Hauhake (cultivation) is underpinned by our Tiaki obligations to Tangaroa in order to Tiaki humanity.

10. Ultimately, humanity's right to Kai – to enjoy the benefits of our whakapapa relationship with Tangaroa – are dependent upon our ability to Tiaki and Hauhake and how we uphold the responsibility and obligation in a modern and meaningful way to maintain legitimacy through practicing Tiaki, Hauhake and Kai.

11. These principles were inherent within the Treaty of Waitangi fisheries settlement and – Te Ohu Kaimoana asserts - the quota management system, which Māori endorsed as part of that historic settlement. This underscores its ongoing relevance and importance in modern New Zealand fisheries management.

1.2 - Duty to act in a manner consistent with the Fisheries Settlement

12. Section 5 (b) of the Fisheries Act 1996 obliges "all persons exercising or performing functions, duties, or powers conferred or imposed by or under it" to "act in a manner consistent with the provisions of the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992 (TOW(FC)SA)". The TOW(FC)SA implements the Deed of Settlement between Māori and the Crown, which represented a full and final settlement of Māori claims to fisheries.

13. It follows that whenever a Minister makes a decision to implement a sustainability measure or to provide for utilisation, they must ensure their decision is consistent with, and does not undermine, the Fisheries Settlement.

2 - Management measures for PAU3 & PAU7

Proposal to reduce recreational daily bag limits and introduce an accumulation limit in PAU3 and PAU7 fisheries

2.1 Context

14. FNZ is reviewing recreational regulations in pāua fisheries PAU3 and PAU7 to ensure sustainability following the Kaikōura earthquakes. FNZ is considering options for reducing the daily bag limit and the accumulation limit in each area.

15. In 2016 the Kaikōura earthquakes caused an uplift of coastline in both PAU3 and PAU7 that had a detrimental impact on pāua populations. To protect the remaining populations, a section 11 closure under the Fisheries Act 1996 (the Act) was introduced in 2017 which prohibited the take of all shellfish and seaweed between Marfell's Beach and the Conway River. This closure will remain in place until scientific evidence supports re-opening the fisheries. The section 11 closure has consequently shifted harvesting efforts to adjacent areas outside the closure, leading to sustainability issues in these areas.

16. In September 2017 the Minister of Fisheries reduced the total allowable commercial catch (TACC) for both PAU3 and PAU7. While the decision for PAU7 is subject to judicial review, the industry have shelved ACE to ensure the catch is reduced in accordance with the Ministers decision. For PAU7 the recreational allowance was also reduced from 15 to 12.6 tonnes. For PAU3 the total allowable catch (TAC) was set for the first time, allowing 8.5 tonnes for recreational take. However, at this point no steps have been taken to ensure the allowances are adhered to. This means the integrity of the TAC is being undermined.

17. Prior to the Kaikōura earthquakes, the recreational take in PAU7 was estimated to be exceeding the allowance. Scientific estimates of recreational harvest have not been updated since 2012 but were estimated to be 14.13 tonnes for PAU3 and 16.98 tonnes for PAU7. These values are assumed by FNZ to be underestimates and anecdotal information suggests recreational take has been increasing since 2011/12[1]. Therefore, there was already a sustainability issue in PAU7 which has been exacerbated by the impact of the earthquakes.

18. Despite reductions in recreational allowances in 2017 for both PAU3 and PAU7, changes did not occur to bag limits or accumulation limits. While the allowance establishes the limits of harvest, the tool for controlling and managing recreational take is through regulatory measures such as bag limits, minimum legal size and seasons. FNZ proposes to reduce the bag and accumulation limits so that harvest is limited to the allowance under the TAC. This requires at least a 50% reduction in recreational harvest in PAU3 and a 50% reduction in PAU7. FNZ does not propose the status quo as an option, as the current bag and accumulation limits are unsustainable.

2.2 Proposed options

19. FNZ have proposed two options for reducing the daily bag limits and introducing accumulation limits for PAU3 and PAU7 (Table 1):

1 *Fisheries New Zealand's science working group assumed they were underestimated due as pāua harvesting methods were not well captured in the New Zealand Panel Survey for Recreational Fishing 2011/12.*

Table 1. FNZ's daily bag limit and accumulation limit proposals for PAU3 and PAU7.

Stock	Option	Measure	
		Daily bag limit	Accumulation limit[2]
PAU 3 (east coast South Island)	*Status quo*	10	20, or 2.5 kg*
	Option 1	5	10, or 1.25 kg*
	Option 2	3	6, or 0.75 kg*
PAU 7 (top of the South Island)	*Status quo*	10	20, or 2.5 kg*
	Option 1	5	10, or 1.25 kg*
	Option 2	3	6, or 0.75 kg*

* If paua are in a state that is unable to be counted.

2.3 Our position

20. Te Ohu Kaimoana supports Option 2 for both PAU3 and PAU7: a daily bag limit of three pāua and accumulation limit of six pāua, or 0.75 kg.

2.4 Commentary

PAU3

21. Te Ohu Kaimoana supports Option 2 for PAU3 to reduce pressure on areas open to pāua harvesting and to ensure recreational harvest remains within the allowance under the TAC. We support the accumulation limit to be twice the daily bag limit to be consistent with pāua accumulation limits across the country. FNZ considers that due to sustainability concerns, recreational harvest needs to be reduced by at least 50%. We support Option 2 as FNZ estimates that a reduction in the bag limit of three pāua and accumulation limit of six pāua will reduce the recreational harvest by 61%.

22. We do not support Option 1 which proposes a daily bag limit of five pāua as this is predicted to reduce the harvest by only 38.6%. This falls short of the 50% reduction needed to ensure sustainability.

23. We note that recreational harvest may have already reduced due to a lower bag limit on pāua in the Kaikōura Marine Area. The most recent National Panel Survey for recreational fishing will publish results in 2019 and will help inform FNZ on whether further measures are required.

PAU7

24. Te Ohu Kaimoana supports Option 2 for PAU7 to reduce pressure on the areas open to pāua harvesting and to ensure recreational harvest remains within the allowance under the TAC. We support the accumulation limit to be twice the daily bag limit to be consistent with pāua accumulation limits across the country. FNZ considers that due to sustainability concerns, recreational harvest needs to be reduced by at least 50%. We support Option 2 as a bag limit of three pāua and an accumulation limit of six pāua is predicted to reduce harvest by 63.8% in PAU7 and will therefore meet sustainability measures.

25. We do not support Option 1 which proposes a daily bag limit of five pāua as it is predicted to reduce recreational harvest by 42%. This falls short of the 50% reduction required to ensure sustainability.

26. We note that there were concerns in PAU7 about recreational catches prior to the Kaikōura earthquakes but no action has been taken until now to address recreational fishers continually exceeding allowances. If there are sustainability issues, a reduction in the recreational allowance is meaningless, unless regulatory controls are also changed. The regulatory measures are a tool to manage the recreational harvest, not the allowance under the TAC.

Lack of information on recreational harvest

27. It is difficult to provide comprehensive feedback on the proposed reductions due to insufficient information on current recreational harvest. This is especially concerning as it is thought that recreational harvest is exceeding the allowance under the TAC. We note that the National Panel Survey 2017/18 is currently underway and will provide information on harvest once the results are published. Nevertheless, the survey will not provide information at a fine scale required to manage pāua fisheries. For example, the survey does not provide data on the extent of recreational harvest within the section 11 closure prior to the Kaikōura earthquakes.

Implementation considerations

28. In the consultation paper FNZ explains that changes to recreational bag limits will be implemented in 2019. Both PAU3 and PAU7 will therefore be subject to overharvesting for another busy summer holiday season. We strongly recommend changes to bag limits are implemented in 2018 to avoid this. We note that a recreational harvester is not constrained to one QMA, and therefore the bag reductions should be the same for both PAU3 and PAU7 to reduce confusion. In addition, an increase in fishery officer presence may be required to guarantee the reductions are complied with.

29. In the consultation paper FNZ explains that there is localised depletion due to a shift in harvesting effort in the areas adjacent to the section 11 closed area. However, the consultation paper focuses on solutions addressed at a QMA scale. While we are strongly supportive of bag reductions in this instance, finer scale management will become increasingly important if sustainability is to be ensured. We commend the fine scale management measures that commercial fishers and the Kaikōura Marine Guardians have developed to mitigate localised depletion.

30. We are supportive of FNZ proposing to reduce recreational catch for PAU3 and PAU7 due to sustainability concerns. However, we consider that the delay to review bag limits after the earthquakes is excessive, even though regulatory amendments can be lengthy processes. Further consideration needs to be given to enabling the allowance and associated bag limit to be set by gazette notice in the way that TACCs are.

31. Given the uncertainty as to whether the adjustments will be sufficient to constrain the recreational catch within the allowance, Te Ohu Kaimoana considers that there needs to be more effective and timely monitoring of the recreational catch in these fisheries. Relying on recreational surveys every five years is not sufficient to monitor high-value shared fisheries that have sustainability concerns. It is important that recreational harvest remains within the allowance set under the TAC.

Managing recreational harvest

32. Sharing a fishery means that sacrifices need to be made by all users with the tides of sustainability. Customary and commercial have undertaken reductions in their harvest level to account for this. It is the responsibility of FNZ as manager of the recreational sector to ensure catch is restrained within the allowance. The commercial sector currently has measures in place in the form of shelving of ACE for PAU7 and accepted a TACC reduction in PAU3. These measures were implemented immediately and reduced commercial harvest that would have usually been taken in the closed area. Kaitiaki within both PAU7 and PAU3 have also been conserving their harvest.

33. The issue of recreational harvest exceeding allowances is not unique to PAU3 and PAU7. The problem exists across several fisheries with recreational interests. In our view, if the reductions in recreational bag limits fail to keep fishers within the allowance, more stringent measures will need to be pursued.

34. We understand that a daily bag limit of three pāua could potentially reduce harvest beyond the 50% reduction that is required (noting that FNZ did not provide an option of a bag limit of four pāua). However, the following considerations require a conservative approach to be taken:

- if bag limit reductions are implemented, there will be a time lag greater than two years since the Kaikōura earthquakes. This means measures will have to reverse the impact of areas being overfished for over two years as recreational harvest levels are considered to be underestimated
- bag limits only manage recreational fishing at an individual level and there is no current tool that ensures the collective harvest is within the allowance,
- the PAU7 fishery had sustainability issues prior to the earthquakes and was below the soft limit, meaning that recovery will likely be long-term,
- if bag limits are reduced, fishers may be incentivised to harvest their daily bag limit more often, countering the effects of bag reductions. We consider that the most conservative option leaves headroom for those that may be incentivised to harvest more frequently, and
- the lack of information on current harvest is concerning and bag limits should be conservative in the absence of sufficient data. Section 10 of the Fisheries Act requires the Minister to be cautious when information is uncertain, unreliable, or inadequate.

35. Finally, we do not support any FNZ review that increases the recreational allowance for any stocks beyond its initial setting under the TAC, unless there is agreement by all extractive users. An increase in allowance to the recreational sector at the expense of Māori commercial and non-commercial fishing rights reduces the value of settlement quota and is inconsistent with section 5b of the Act. In addition, increasing an allowance to align with take encourages a 'race for fish' and disincentivises sectors to manage harvest within their allowance under the TAC.

2.5 Conclusion

36. Te Ohu Kaimoana welcomes the proposal to reduce recreational bag limits in PAU3 and PAU7 due to sustainability concerns. We support a bag limit of three pāua and accumulation of six pāua for both PAU3 and PAU7. It is the Minister and FNZ's responsibility to remain vigilant in limiting recreational harvest to within their allowance. Recreational harvest that exceeds the allowance under the TAC undermines sustainability and reduces the value of quota delivered to iwi under the Deed of Settlement 1992. We are concerned with the delay in reviewing recreational bag limits and urge FNZ to implement controls as soon as possible.

3 - Management measures for CRA5

Proposal to introduce recreational telson clipping and an accumulation limit in the CRA5 rock lobster fishery

3.1 Context

1. Fisheries New Zealand (FNZ), on behalf of the National Rock Lobster Management Group (NRLMG), is consulting on proposals to introduce recreational telson clipping and an accumulation limit for rock lobster in the CRA5 fishery.

2. The objective of this review is to provide Ministry for Primary Industries Fisheries Compliance with additional and cost-effective tools in their toolkit to address the illegal take and sale of rock lobsters from the CRA 5 fishery by opportunistic non-commercial fishers and fish thieves.

3. The risk of poaching and black-market activity (i.e. unauthorised take of rock lobsters for sale or barter) is likely to be high in the CRA5 fishery. This is due to a combination of reasons, including:

    a. Easy access to the fishery because much of the CRA 5 coastline can be reached from the road;

    b. There are generally favourable fishing conditions;

    c. Rock lobster can be taken in isolated areas where the chances of being seen by someone who could report the activity are lower; and

    d. The fishery is currently experiencing high levels of stock abundance providing incentives for illegal take by opportunistic fisheries.

4. Illegal fishing activities threaten to undermine the integrity of the fisheries management regime. This reduces the benefits that legitimate fishers can realise from the use of the resource, contributes to localised depletion, and results in increased non-compliance of legitimate fishers if they lose confidence in the fisheries management regime.

3.2 Proposed options

5. FNZ propose amending the Fisheries (Amateur Fishing) Regulations 2013 (the Amateur Regulations) to introduce the measures outlined in Table 1.

Table 2: FNZ's telson clipping, accumulation limit, and bag and tag condition proposals for CRA5.

Measure	Option	Description
Telson clipping	1A	**Telson clipping is mandatory for recreational fishers:** Amend the Amateur Regulations to require a recreational fisher to clip the telson of every legal sized rock lobster taken from CRA 5 that they intend to keep.
	1B	***Status quo:*** There is **no** mandatory requirement for a recreational fisher to telson clip every legal sized rock lobster that they intend to keep from CRA 5, except in the Kaikōura Marine Area where the measure currently applies. A recreational fisher can currently choose to voluntarily clip a lobster.
Accumulation limit and bag and tag conditions	2A	**An accumulation limit and associated bag and tag conditions are mandatory for recreational fishers:** Amend the Amateur Regulations to: i. Limit the number of rock lobsters taken recreationally from CRA 5 to three daily bag limits (i.e. 18 rock lobsters); and, ii. Require a person in CRA 5 to hold each single day's rock lobster catch in a container or bag clearly labelled with the fisher's name, date and place it was taken, fisher's name, and the number held in that container.
	2B	***Status quo:*** There is **no** accumulation limit for recreationally caught rock lobsters in CRA 5 nor mandatory bag and tag conditions, except in the Kaikōura Marine Area where the two measures currently apply. A recreational fisher can currently choose to voluntarily apply these measures.

3.3 Our position

6. Te Ohu Kaimoana recommends that FNZ adopt Option 1A for mandatory telson clipping for recreational fishers in the CRA 5 area and Option 2A for mandatory accumulation limits and associated bag and tag conditions for recreational fishers in the CRA5 area.

3.4 Commentary

7. Te Ohu Kaimoana welcomes FNZ's efforts to reduce illegal take in the CRA 5 fishery, as this undermines the integrity of the QMS and negatively impacts legitimate fishers. The Minster set out his intentions to reduce illegal take in his April 1 CRA 2 decision letter, so it is encouraging to see this decision now being applied to the CRA 5 fishery. We expect FNZ to apply this approach in all rock lobster quota management areas.

8. In developing the specific regulation, FNZ will need to ensure fishers cannot telson clip rock lobster that are undersized, or high graded when returned to the water. We are aware of reports of this behaviour occurring in the Kaikoura area.

9. Te Ohu Kaimoana also supports the implementation of an accumulation limit and associated bag and tag conditions for recreational fishers in the CRA5 area. This measure will help to reduce the opportunity for illegal fishers to stock pile rock lobster for the commercial market e.g. restaurants and fish dealers.

10. MPI Compliance has advised that telson clipping, an accumulation limit, and bag and tag conditions will assist in reducing rock lobster illegally entering the commercial market.

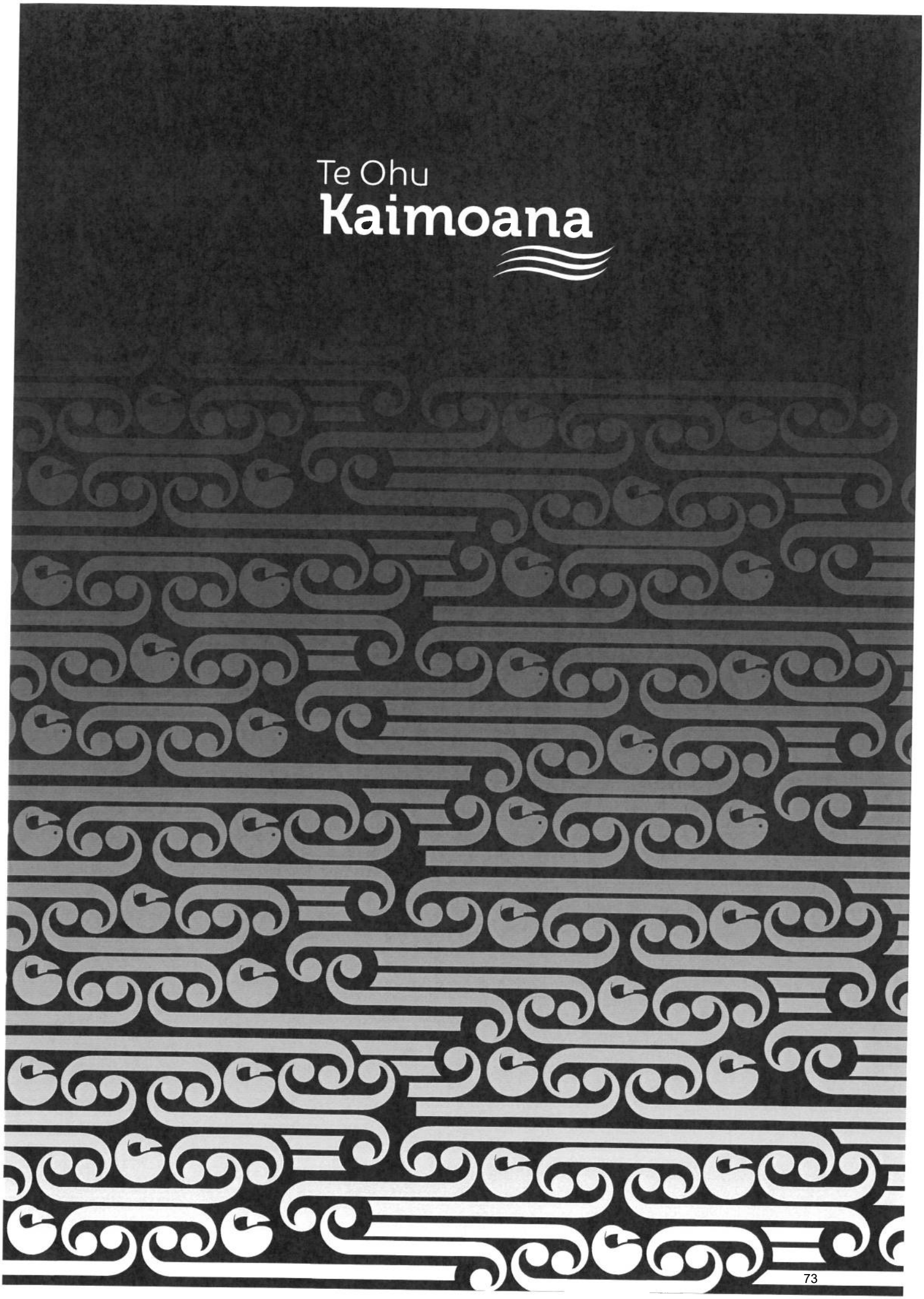
11. To help implement the new regulations we recommend that FNZ develops an education programme aimed at implementing the new regulations. We suggest FNZ uses local media and information boards at marinas and launching sites to make the new regulations known.

12. In addition, to the proposed measures, we recommend FNZ and the National Rock Lobster Management Group investigates the utility of recreational horn-tagging (as used in the Victoria State rock lobster fishery). This is a non-invasive method that identifies rock lobster as having been caught recreationally. This simple measure can also help to reduce illegally caught rock lobster entering the commercial supply chain. Horn tagging also provides the opportunity for recreational fishers to report catches based on the number of tags used.

3.5 Conclusion

13. Te Ohu Kaimoana supports Options 1A and 2A. We welcome the Minster's and FNZ's proposal to introduce recreational telson clipping and accumulation limits for the CRA5 fishery as a promising first step towards reducing illegal take in this fishery. To bolster these efforts, we consider FNZ should increase the monitoring of compliance in the CRA5 fishery as well as provide increased information and education to fishers. In addition, we encourage FNZ to investigate the utility of recreational horn-tagging as an additional method for identifying recreationally caught rock lobster.

Te Ohu Kaimoana



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28 September 2018

Fisheries Management
Fisheries New Zealand
PO Box 2526
Wellington 6140
E FMSubmissions@mpi.govt.nz

Attention: Stuart Anderson
Director Fisheries Management

CRA5 Rock Lobster Fishery Submission

Tena koe Stuart,

I am writing in response to Fisheries New Zealand request for submissions on the proposal to introduce telson clipping and an accumulation limit (CRA 5).

Rangitāne o Wairau Iwi supports the following:

- Option 1A Telson Clipping is made mandatory for recreational fishers.
- Option 2A Impose an accumulation limit for recreational fishers as detailed in the proposal.

Please also note we remain concerned by the decline in other fisheries that were once considered stable. This appears to be a result of government mismanagement and overly ambitious TAC limits. We wish to discuss this further with your organisation at the earliest opportunity.

Please contact the writer if further detail is required.

Ngā mihi

Nicholas Chin
General Manager

Sonja Hempel

From: tim jones [redacted]
Sent: Thursday, 23 August 2018 5:50 PM
To: FMSubmissions
Subject: Review of paua 3 and paua 7 daily bag limit and accumulation limit

My name is Tim Jones and I am an avid recreational fisherman.
I am strongly in favour of the daily bag limit for paua to be reduced down to 3 per person per day in both paua 3 and paua 7. I am also in favour off a reduction of the accumulation limit for paua.

I feel there needs to be a change in attitude of how sea food is collected from around New Zealand. Theres needs to be a bigger enfiset on the aim to collect enough sea food for a feed rather then trying to fill your freezer. I think the recreational bag limits need to be reduced to reflect this changing attitude. It is not just the recreational bag limits that need to be reduced but more importantly the commercial quotas MUST be reduced also and more exclusion zones where commercial fishing shouldn't take place ie, places or stretches of coastline where there is easy access for recreational fishermen.

I am very disappointed that there isn't an option to reduce the daily bag limit of crayfish because I feel the crayfish stocks are under just as much pressure as the paua stocks.

I would rather have an ocean that is teaming with fish life and a feed can be gathered easily even if the conditions are poor compared to an ocean that is not as teaming with fish life but you can take way more seafood then you need but can only collect it when conditions are perfect.

Cheers
Tim Jones[redacted]