

3<sup>rd</sup> March 2020

Whitebait Management Consultation  
Department of Conservation  
P. O. Box 10420  
**Wellington 6143**

Via email to: [whitebait@doc.govt.nz](mailto:whitebait@doc.govt.nz)

Dear Minister,

## CONSULTATION ON CHANGES TO WHITEBAIT MANAGEMENT

Please find attached the submission

Thank you for the opportunity to comment on the Improving Whitebait Management Discussion Document, as released by the Department of Conservation (DOC) in January 2020. In making this submission, we have generally limited our response to those aspects of the proposals which overlap with HBRC's regulatory functions. This submission has been informed by technical advice from HBRC staff including Freshwater Ecologists, Biodiversity Scientists, Marine & Coastal Scientists, and Policy Planners.

### Background

Whitebaiting is a popular activity occurring across a number of rivers within the Hawke's Bay region, whereby people either scoop for fish at the mouth, fish from the side of stony rivers with small sock nets and screens, or fish from small stands with larger floating sock nets and screens. Most of the fishing effort is concentrated in the Tukituki, Clive, Ngaruroro and Tutaekuri rivers.

In the past 30 years, much effort has been put into īnanga spawning site identification, protection and enhancement in Hawke's Bay by DOC, the Hawke's Bay Catchment Board and now HBRC. Anecdotally, the whitebait catch per unit of effort has greatly increased in Hawke's Bay over the past few decades. Older fishers tell of consistently poor catch rates in the late 1980's and early 1990's, and of many 'good' and 'excellent' fishing years in the past decade.

### Submission Summary

Whilst HBRC acknowledges the management of whitebait fisheries needs to improve it broadly **does not support** the regulations included in the Improving Whitebait Management Discussion Document due to a lack of supporting science.

HBRC notes without the inclusion of measures to protect and enhance upstream spawning habitats the proposed provisions will prove to be limited in their effectiveness.

HBRC also questions the decision not to introduce a fishing license and catch limit. We set out more detailed responses to the questions identified in the Discussion Document below.

**Question 10.**

**Which of the three proposed options do you support for the timing of whitebait season?**

HBRC considers the proposed timeframe between the 15<sup>th</sup> of August to the 14<sup>th</sup> of October to be the most appropriate, due to it allowing for the smallest overlap between fishing and peak migration. If this timing was to be adopted it is anticipated that a greater number of whitebait would be able to migrate upstream resulting in an increase in the whitebait population, particularly the Koaro and Banded Kokopu in Hawke's Bay

**Question 11.**

***What is your view on introducing upstream limits to whitebait fishing nationwide?***

HBRC does not oppose the introduction of upstream limits, however appropriate consideration would need to be given when setting these limits as upstream sites are known to be fished by local iwi or hapū.

**Question 13.**

***What is your view on the proposed creation of whitebait refuges?***

HBRC disagrees with the creation of whitebait refuges on specified rivers. Currently there is not enough research to show that the creation of refuges would be effective. Many small streams with little or no fishing pressure flow into Hawke's Bay, and contain populations of Inanga, Koaro and Banded Kokopu. These streams are currently acting as 'refuges' and population sources.

Also of concern is the potential negative impact refuges may cause by aggravating local whitebaiters should they lose access to their fishing spot. This could result in them being less likely to comply with regulations.

**Question 17.**

***What are your views on the proposed changes to whitebait fishing practises?***

HBRC disagrees with the proposed changes to fishing practises, including prohibiting the use of screens and sock nets with traps, and the use of nets beyond stand limits. These proposed changes are considered to be unreasonable as they do not allow for the variety in rivers across the country, the different conditions they present, and will greatly reduce the success rate for the average recreational fisher trying to 'catch a feed'. Instead, a daily catch limit would mean that fisher's catch per unit effort is not unfairly reduced, meaning that they can successfully catch enough for a 'feed'.

**Question 18.**

***What is your view on phasing out export of the whitebait species?***

HBRC does not support the phasing out of the export of whitebait, subject to it occurring in a sustainable manner under a quota scheme.

**Question 22.**

***Are there additional management options for whitebait that are not described in the Discussion Document that you think should be considered?***

HBRC considers that it would be far more practical and reasonable to instead manage the fishing of whitebait through a licencing and quota scheme, including commercial

fishing and the export of whitebait. Under such a scheme three categories of licence could be introduced; recreational, commercial and cultural. The fees collected from such a licencing scheme could also fund research, regulation of fishing, as well as whitebait habitat protection and enhancement.

HBRC advocates for the introduction of a quota system which would provide a framework that is already widely understood by fishers, making it straightforward and easier to implement. It would also remove the need for increased enforcement and funding of enforcement around changes to fishing practises, as the focus would be on the quantity of whitebait caught rather than the catch method.

***Question 25.***

***What do you think about the proposed monitoring arrangements?***

HBRC strongly believes that more research and monitoring needs to be undertaken into why adult whitebait populations are declining. Currently there is very little data available surrounding sustainable catch limits, by catch mortality, post settlement mortality, escapement and population recruitment limitations.

Continuous review of any data gathered from monitoring would need to be carried out in order to determine how effective any regulations have been, as well as providing information to make any needed amendments to regulations going forward.

***Question 26.***

***Would you like to provide any other feedback to this consultation?***

HBRC notes that while there is little information currently available on the impact fishing has on local whitebait populations. What has been proven is that protection and enhancement of upstream spawning habitats are crucial to sustaining and improving population numbers. Without the inclusion of measures to protect and enhance these habitats it is considered that the proposed provisions are incomplete and thus will prove to be limited in their effectiveness.

HBRC also disagrees with the approach taken to implement nationwide regulations rather than specified regional regulations, as they are less responsive to regional issues leading to typically poorer outcomes. Regional approaches are used with the management of other types of fisheries such as trout, therefore could be replicated for the management of whitebait.

The Regional Council's address for service in relation to this submission is;

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Should you have any queries with regards to the content of this submission please do not to contact Nichola Nicholson, as above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N. Nicholson', with a long horizontal flourish extending to the right.

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