

23rd December, 2016

To whom it may concern,

Please find attached a submission on the Ministry for Primary Industry's consultation document 'The Future of our Fisheries' by Hawke's Bay Regional Council (HBRC). HBRC has submitted on this document for several reasons.

Firstly some of the proposed changes to fisheries management, such as ecosystem-based management, and the concept of healthy aquatic environments, have a clear overlap with HBRC's responsibilities in the coastal marine area (CMA) under the Resource Management Act (1991). HBRC have a clear remit to manage coastal and marine habitats in a sustainable manner, and many of these habitats, estuaries in particular, are of vital importance to fisheries productivity and are impacted by fishing activity. 'Healthy aquatic environments' also rely on good water quality which HBRC is also responsible for through effective land management. HBRC supports this holistic approach to fisheries management however it is vital to recognise, and work with, the other organisations and groups with jurisdiction and interests in the marine area.

HBRC endorse the consideration given within the document to finer-scale management. Quota management areas are currently very large and there is no alignment with regional boundaries. This means that it is not possible to analyse fisheries data at a regional level and therefore not possible to synthesize this data with council held environmental data. This low resolution management does not lend itself to managing in shore fisheries resources in a manner that reflect localised patterns of use and community specific expectations. At a finer scale this would mean that causal links could be drawn between fisheries management and land management leading to a true 'mountains to sea' approach. HBRC would endorse any move toward finer-scale management which would facilitate sharing data in comparable geographic spaces.

Within the Hawke's Bay community there has been robust discussion around fisheries management over the past few years. This has resulted in the recognition of potential localised depletion of fish stocks within Hawke Bay by MPI. These discussions have also lead to the formation of a multi-stakeholder group chaired by HBRC which is focused on understanding the influences on marine habitats and fisheries abundance. HBRC is showing regional leadership in the marine space by convening this collaborative group. HBRC believes that it is only through building partnerships and enabling this kind of multi-stakeholder collaboration that we can effectively understand and manage marine resources. Furthermore, this kind of collaboration will increase the ability to mobilise funding in order to pay for the step change in monitoring and research required to inform more targeted and finer scale spatial management.

HBRC is showing leadership in the CMA of Hawke's Bay. HBRC has shown a willingness to invest and a commitment to work with others towards the sustainable management of the CMA. HBRC believes this collaboration with others, including MPI, is vital to the sustainable management of the CMA, including fisheries. The importance of collaboration and partnerships, including with regional government, to meet management objectives should be clearly identified in the findings of the 'Future of our Fisheries' review. Consistent with this HBRC would like to record its desire to work

more closely with MPI and other Crown agencies to manage our regional marine environment in order to achieve better environmental performance and value derived from our marine resources.

Yours sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'O' followed by 'liver' and 'Wade' written in a cursive script.

Oliver Wade

Scientist – Coastal Quality



TE HUAPAE MATAORA MO TANGAROA
THE FUTURE OF OUR FISHERIES



SUBMISSION FORM
CONSULTATION DOCUMENT 2016

Future of our Fisheries – Submission Form

Submissions must be lodged by 5pm on Friday 23 December 2016.

Submissions can be:

- emailed to fisheries.review@mpi.govt.nz
- posted to *Future of our Fisheries Consultation*
Ministry for Primary Industries
PO Box 2526
Wellington 6140

Consultation Questions

The questions are designed to stimulate your thinking and help us report back clearly on people's feedback. There are also spaces after each question on the submission form for additional comments.

If you would like further information regarding the submission process:

- Ask the *Future of our Fisheries* team at fisheries.review@mpi.govt.nz
- Attend one of the public meetings/hui being held around the country.

We will consider all relevant material made in submissions, so you are welcome to provide information supporting your comments. Please make sure you include the following information in your submission:

- the title of this consultation document;
- your name and title;
- your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it;
- your contact details (such as, phone number, address, and email).

Submissions are public information

Please note that your submission is public information. Submissions may be the subject of requests for information under the Official Information Act 1982. The Official Information Act specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the Official Information Act. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as if the information is commercially sensitive or if they wish personal information to be withheld. MPI will take such indications into account when determining whether or not to release the information.

General questions: Volume I

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

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

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

How strongly do you agree with this vision for our fisheries?

Strongly disagree Disagree Neither Agree Strongly agree

How strongly do you agree with our objectives?

Strongly disagree Disagree Neither Agree Strongly agree

Would you like to comment?

What vision would you propose, and why?

Volume II: The Fisheries Management System Review

Strategic priority: Maximising value from our fisheries

Address discarding of fish

Tighter regulatory controls to manage discards

Approach 1: Allow minimal discarding

How strongly do you agree with this approach?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Approach 2: Allow the approved release of live fish if they are likely to survive

How strongly do you agree with this approach?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Approach 3: Allow the approved release of live fish if they are likely to survive and approved discarding of dead fish of low commercial value

How strongly do you agree with this approach?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

Do you think it should be permissible to release live fish if they are likely to survive?

Do you think it should be permissible to discard some dead fish, as long as they are balanced against ACE?

Additional economic incentives to reduce discarding

Do you think that adjusting a TACC to take account of discarding would provide an incentive for quota owners to ensure commercial fishers reduce discarding?

Do you think quota owners should be accountable for fishing behaviour?

What measures do you think would help in discouraging catches of small fish? Is minimum legal size needed?

Maximise the value of our shared fisheries

Managing fish stocks for increased abundance.

Do you agree with the objective of managing fish stocks for abundance, to achieve higher catch rates for all fishing sectors?

Strongly
disagree

Disagree

Neither

Agree

Strongly
agree

Would you like to comment?

What principles do you think should guide decisions on allocating the relative share of the TAC between non-commercial and commercial fishers?

Build the market position of New Zealand seafood

New Zealand's seafood market position is secured through improved transparency and quality of fisheries.

Do you agree that government should provide certification of the environmental performance of New Zealand's fisheries?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

Do you prefer a non-governmental certification scheme such as that provided by the Marine Stewardship Council?

Deliver value from new or underdeveloped fisheries

Value from low-information stocks is delivered, and incentives to develop fisheries is created.

Do you agree that investment in better information on new and underdeveloped fish stocks is needed?

Strongly
disagree

Disagree

Neither

Agree

Strongly
agree

Would you like to comment?

Who do you think should invest in such research: government or the private sector?

Should quota holders' investment in research be reflected in the value individual quota holders get from any consequent increase in the TACC?

Key area: Better Fisheries Information

Option 2: Gather more information to support decision-making and value-adding

Monitoring of non-commercial fisheries (recreational and customary fisheries): MPI and stakeholders have access to information of non-commercial fishing activities at a QMA level and a range of finer scales.

Do you agree that MPI should do more to collect information on non-commercial fisheries (for example, undertaking more aerial overflights, boat ramp surveys or reviewing Amateur Charter Vessel reporting)?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

What steps could you and other non-commercial fishers take to provide better estimates of harvest for better management of fish stocks?

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

Do you agree that monitoring and management of fisheries should take place at a finer geographical scale than the current quota management areas?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

Who should contribute to the additional costs associated with monitoring and managing at finer geographical scales?

Socioeconomic information: Scale and quality of available information on the socio-economic aspects of fisheries is appropriate to inform fisheries management decisions.

Do you agree that MPI should invest in more socioeconomic information?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

How would you describe value for non-commercial fishers and for people who do not fish?

Option 3: Investment in ecosystem-based management

An integrated management approach that considers fisheries management in the broader context of the ecosystem, and recognises the social, economic, cultural and environment needs of New Zealanders is developed.

Do you agree that an ecosystem approach is needed for fisheries management?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

What principles and values would you like to see underpin an ecosystem-based approach?

Who should pay for the additional costs of implementing ecosystem-based fisheries management?

Option 4: Use more externally commissioned research

MPI and all stakeholders trust and can rely on the science and research information used to inform fisheries management decisions.

Do you agree that MPI should make more use of externally commissioned research?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

**Should the principles of the Research and Science Information Standard be applied to all research?
Should any additional principles apply to externally commissioned research?**

Key area: Agile and Responsive Decision-Making

Option 1: Shift decisions to a level of accountability that reflects the level of risk to achieving clearly identified management objectives

Monitoring of non-commercial fisheries (recreational and customary fisheries): MPI and stakeholders have access to information of non-commercial fishing activities at a QMA level and a range of finer scales.

Do you agree with a risk-based approach to determining what decisions could be delegated and to whom?

Strongly
disagree

Disagree

Neither

Agree

Strongly
agree

Would you like to comment?

What do you think about the approach we have suggested to guide delegation decisions?

Option 2. Establish a National Fisheries Advisory Council

A National Fisheries Advisory Council provides advice to Ministers and the Director-General, reflecting community, tangata whenua and stakeholder aspirations.

Do you agree with the establishment of a National Fisheries Advisory Council?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

What do you think should be the purpose of a National Fisheries Advisory Council, and what skills should its members have?

Option 3: Develop a more flexible decision-making framework

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

Do you agree that a more flexible and responsive decision-making framework is needed?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

What do you think would make the decision-making process more efficient?

What do you think the role of standards and decision rules should be in guiding decisions in fisheries management?

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

Current state

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

Strongly disagree

Disagree

Neither

Agree

Strongly agree

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

Problem definition

Do you agree with how we have defined the problem?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

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

Objectives

Do you agree with the objectives of IEMRS?

Strongly
disagree

Disagree

Neither

Agree

Strongly
agree

Would you like to comment?

Option 1: Current state

Do you agree with this option?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

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

Do you agree with this option?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

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

Do you agree with this option?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

General questions

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

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

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

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

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

Permit holders

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

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

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

What issues do you currently have with ER?

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

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

Commercial stakeholder organisations (CSOs)

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

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

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

Licensed fish receivers

What problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

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

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

Monitoring, evaluation and review

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

Strongly
disagree

Disagree

Neither

Agree

Strongly
agree

Would you like to comment?

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

Volume IV: Enabling Innovative Trawl Technologies (IEMRS)

Current state

Do you agree with the description of the EITT current state?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

Problem definition

Do you agree with the description of the EITT problem?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

Objectives

Do you agree with the EITT objectives?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

Options and impact analysis

Do you agree with the range of options addressed?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Would you like to comment?

Are there other options that we have not considered? If so, what are the potential costs and benefits of these options?

Do you agree with MPI's assessment of each option's contribution to achieving the EITT objectives?

Preferred Option – Amend existing regulations

Have the correct EITT assessment criteria been identified?

Strongly
disagree

Disagree

Neither

Agree

Strongly
agree

Would you like to comment?

Are there other EITT assessment criteria that should be considered?

Costs

Do you agree with the EITT application process and costs set out in Annex II?

Strongly
disagree

Disagree

Neither

Agree

Strongly
agree

Would you like to comment?

Risks

Do you agree with the EITT identified risks?

Strongly
disagree

Disagree

Neither

Agree

Strongly
agree

Would you like to comment?