

SUBMISSION ON THE PROPOSAL FOR AN IN-SEASON INCREASE IN THE TOTAL ALLOWABLE CATCH FOR RED COD 2 (RCO 2)

Introduction

1. Thank you for the opportunity to comment on the consultation paper regarding an in-season increase to the Total Allowable Catch for Red Cod 2 (RCO 2) released for consultation on 12 May 2017 (MPI Discussion Paper No. 2017/15).
2. Fisheries Inshore NZ Limited (FINZ) represents 80% by value and volume of the inshore finfish, pelagic and tuna fisheries of New Zealand. Its role is to deal with national issues on behalf of the sector and to work directly with and on behalf of its quota owners, fishers and affiliated Commercial Stakeholder Organisations (CSOs). As part of that it works collaboratively with other industry organisations and Sector Representative Entities (SREs), Seafood New Zealand, Ministry for Primary Industries (MPI) and Department of Conservation.
3. FINZ has a mandate from the Area 2 Committee to work directly with and on behalf of its quota owners for the management of fisheries within the region. The Area 2 Committee is a committee representing the interests of Area 2 quota owners and fishers. The focus is on stock-specific and regional issues that impact on the local fisheries they represent.
4. We provide comments on both the proposal to increase RCO 2 in-season catch allowances for the 2016/17 fishing year and provide a general comment on the current in-season catch adjustment process

Proposal to increase red cod 2 in-season catch allowances for the 2016/17 fishing year

5. We support Option 2 (*Preferred option*) which proposes to increase the “in-season” Annual Catch Entitlement (ACE) by 233 t from 500 t to 733 t.
6. Option 2 being that:
 - The TAC be increased from 500 t to 807 t;
 - Allowance be made for the current fishing year for customary fishing (1 t), recreational fishing (36 t) and all other mortality caused by fishing (37 t);
 - Additional ACE of 233 t to be provided, increasing total ACE for the 2016/17 year from 500 t to 733 t (an approximately 47% increase).
7. The 2016/17 Management Procedure for RCO 2 presented to the MPI Working Group process in February 2017 recommended an increase of the RCO 2 TACC from 500 t to 966 t for the 2016/17 fishing year (a 466 t increase above the baseline TACC).
8. Whilst we are supportive of scientific evidence based fisheries management, in this case the Area 2 Committee wish to manage the fishery more conservatively than the Management Procedure indicates.
9. In pre-consultation discussions with MPI the Area 2 Committee promoted a conservative approach, recommending an increase in to the TACC to 733 t (Option 2 of MPI’s discussion paper).
10. This position is consistent with previous industry submissions on the RCO 2 in-season management procedure, whereby the industry preference has been for an increase to the TACC by half of the output of the management procedure.

11. The Management Procedure is based on the first 3 months of the fishing year (October – December) which indicated that in the 2016/17 fishing year there are larger catches than in previous years with 30% of the ACE caught within 3 months.
12. The larger RCO 2 catches have continued to be demonstrated in the current fishing year. In the first 6 months of the 2016/17 fishing year 50% of the ACE has been caught compared to the previous 3 fishing years where 35%, 12% and 19% of the ACE was caught during the same period.
13. Given the RCO 2 catches to date this year, we consider that an in-season increase (Option 2) provides for the sustainable utilisation of RCO 2 fishery whilst ensuring that associated fisheries are not constrained.
14. Catch information from associated fisheries (e.g. GUR, TAR and SNA) is consistent with previous fishing years. The consistency of these species catches in the current year compared to previous years demonstrates that an increased abundance of RCO 2 has not resulted in increased pressure on other fisheries. An increase in RCO 2 will not result in increased effort on associated fisheries or have an adverse effect on these fisheries.
15. We agree with the position in the MPI discussion paper that the in-season increase for RCO 2 recommended by the management procedure is low-risk to the long-term sustainability of the stock.

Comment on In-season catch allowance process

16. As part of this submission we want to take the opportunity to raise concerns about the in-season management procedure.
17. The performance of the management procedure has been severely and significantly compromised by the decision-making processes following the scientific analysis of in-season catch.
18. The current process has taken from over 4 months.
19. The timeframes for the current in-season management procedure results in Ministerial decisions being made so late that industry have reduced time to act on the increased TACCs, thereby reducing the intended benefits of the process.
20. A more timely and efficient process will enable industry to fully benefit from the Management Procedure and prevent unnecessarily constraining the sustainable utilisation of RCO 2.

Summary and position

21. FINZ has prepared this submission on behalf of the Area 2 Committee representing the interests of Area 2 quota owners and fishers.
22. We strongly recommend Option 2 given it:
 - Recognises the results of the Management Procedure whilst accounting for the commercial fishing industry conservative approach to the management of the RCO 2 fishery.
 - Is consistent with both MPI's Our Strategy 2030 long term outcome of increasing sustainable resource use and MPI's Fisheries 2030 strategy Environment Outcome of 'New Zealanders maximising benefits from the use of fisheries within environmental limits'

- Recognises the opportunity to utilise fisheries resources whilst ensuring long-term sustainability.

23. It must be stressed that the timeframe from finalisation of the RCO 2 Management Procedure to consultation on an in-season increase has been extremely drawn out. It is imperative that MPI finalise this process in a timely manner to provide certainty to stakeholders and prevent unnecessarily constraining the sustainable utilisation of RCO 2.



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