

18 June 2015

Mr N Smith
Ministry for Primary Industries
PO Box 10420
Wellington

Dear Neville

**SUBMISSION ON DRAFT RECREATIONAL FISHERIES
RESEARCH PROGRAMME FOR 2015/16**

1. The Ministry for Primary Industries has sought comments on its draft 2015/16 recreational fisheries research programme.
2. This submission has been provided by Fisheries Inshore New Zealand (FINZ). FINZ is the Sector Representative Entity (SRE) for 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 behalf of its quota owners, fishers and affiliated Commercial Stakeholder Organisations (CSOs). Its key outputs are the development of, and agreement to appropriate policy frameworks, processes and tools to assist the sector to more effectively manage inshore, pelagic and tuna fishstocks, to minimise their interactions with the associated ecosystems and work positively with other fishers and users of marine space where we carry out our harvesting activities.
3. Any queries on this submission should be directed to Tom Clark, Fisheries Inshore New Zealand, (04) 802-1514 or tom@inshore.co.nz.

The Consultation

4. We have received the programme through our attendance at the Marine Amateur Fisheries Working Group and note that the programme has been only released on a confidential basis to the Working Group for comment. Given that many inshore fisheries are shared fisheries, a public consultation on the research programme would be appropriate. That is particularly so when the membership at the working groups rarely consists of other than MPI staff, service providers and commercial industry representatives. While the working group is essentially a technical working group, we would encourage MPI to seek greater representation and engagement from the recreational fishing sector with the intent of improving the commitment and ownership of that sector to improving the quality of recreational catch reporting.
5. We understand that the primary purpose of the working group and its research programme is to improve the level and quality of estimates of the recreational catch. The provision of robust estimates of recreational catch is fundamental to the effective and sound management of shared inshore, shellfish and rock lobster fishstocks and we support and endorse that objective. However, we have been unable to find material to confirm that

understanding. Moreover, there appears to be no formal long term strategic plan, policy or management objectives for managing recreational fisheries to provide a context for the research programme. We note that neither the 2008 nor the 2014 draft research plan contains the objectives or the purpose of the programme although it could be extracted from some of the content in the 2008 plan. In particular, the 2008 plan states recreational fishing research has been directed at three main areas:

- a. **Recreational harvest estimates:** research aimed at determining the size of the recreational harvest for all fishstocks, for use in setting the sustainable harvest, and allocating fishstocks between stakeholder groups and within the recreational group. This research is considered to be the highest priority for recreational fisheries research.
 - b. **Managing the recreational harvest:** research to investigate the relationships between bag limits, other management measures and recreational harvest.
 - c. **Recreational fisheries in discrete areas:** research to determine the distribution of fishing effort, methods and harvest of species in discrete areas, to address issues concerning the management of fisheries in discrete areas for reasons of conflict, allocation or sustainability.
6. A draft long term research plan was provided to the working group in September 2014 but has not been discussed or adopted. We consider it would be appropriate if the plan is finalised but it would need to demonstrate its integration with the inshore fisheries plans. That would enable the need for and prioritisation of the research projects to be assessed. In the absence of congruence, we find it difficult to support the proposed projects other than work related to the 2016/17 national panel survey.

Strategic Approach to the Provision of Recreational Catch Estimates

7. It appears the MAFWG has determined that recreational catch should be monitored by:
 - a. national panel surveys undertaken at regular intervals; and
 - b. monitoring of effort during the interregnum.
8. The national panel survey appears from the international peer review to be a methodology of sufficient quality to adopt for the longer term. Its value can be enhanced by addressing issues to improve the reliability of the estimates and quality of the sampling frame. The methodology and initiatives to address recognised deficiencies is endorsed and supported by FINZ.
9. However, we have reservations as to the monitoring of effort between the surveys. New Zealand has invested significantly in the web camera approach in recent years. It is unclear as to the value received from that investment. Before there is any more investment or the introduction of any new cameras, we consider it would be appropriate for MPI to undertake a Post Implementation Review of the project to establish the costs and benefits of the methodology.
10. MPI is contemporaneously investing in the use of electronic self-reporting systems for recreational fishers.
11. We suggest that before MPI continue to invest in the development of the two alternative methodologies it needs to put in place a means to measure the performance of the alternative options and make a strategic decision as to which option it favours. Further investment in both options may not be beneficial in the long run.

Charter Vessel Catch Reporting

12. We find the MPI moves to improve the quality of information on recreational harvest to be somewhat puzzling. While MPI is prepared to invest in new research ostensibly to improve the quality of recreational catch estimates, it has failed to implement its August 2013 proposal to introduce reporting of snapper catch on recreational charter fishing. We supported that proposal in August 2013 and consider it would significantly progress the aim of the Marine Amateur Fishing WG and provide significant benefit to fisheries management. Further we consider MPI should consider extending this additional reporting to other species of importance to recreational fishers. Consideration of new research pales in significance against the immediate benefits available from implementing wider reporting of charter catch. Furthermore, we suggest that the working group should seek to have the level of catch that is returned to the sea from recreational charter operations reported.

Comments on and Prioritisation of the Proposed Projects

MAF 2015-01 Pilot Test for the 2016/17 National Panel Survey

13. We consider this to be the highest priority project for the recreational research programme. We note the favourable nature of the international peer review and would caution the working group from making substantive change to the survey thereby negating any opportunity to establish trends from the surveys. We would have expected to see the objectives for the project refer to the need to address any deficiencies of the 2011/12 survey and to provide more robust estimates rather than the more generalised statements provided.
14. We support this project having the highest priority but note that the project is dependent on the delivery of the output from MAF2014-01 and the provision of a more detailed project proposal. We would hope that the output of MAF2014-01 will be available in sufficient time to allow for MAF2015-01 to be completed in time to undertake the 2016/17 national panel survey.

MAF2015-02 Pilot Test of Indicators for Recreational Fisheries

15. While the current indicators may not be suitable or comprehensive, until the objectives of recreational fishing can be established, alternative or better indicators cannot be established. Since recreational fishing is not an activity that is exclusive of the impacts from or causing impacts to other sectors sharing the fisheries, those objectives need to be integrated in a comprehensive and prioritised manner in all inshore fisheries management plans. Insofar as FINZ is aware, the inshore finfish fishery plans do not provide objectives on which to base indicator analyses.
16. We note that project MAF2014-02 suffers from the same lack of underpinning objectives and is looking to solutions and indicators before specifying the management objectives. We note MAF2014-02 has yet to be completed and its report accepted by the working group.
17. The Ministry is initiating a new fisheries management process that may serve to identify and formalise recreational fishing objectives and performance standards. The indicators should be informed by that process.
18. We cannot support the current proposal.

MAF 2105-03 Pilot Testing of Survey Design for FMA 7

19. It is unclear as to what the objective of this project is and how the project relates to the national panel survey project. If there are deficiencies in the national panel survey that detract from the quality of the FMA7 estimates of recreational harvest, we would expect that deficiency to reflect a systemic issue to be addressed in MAF2014-01.
20. The information on recreational catch in FMA7 presented in the National Panel Survey of Marine Recreational Fishers 2011-12 report 2014/67 indicates that the estimates of fishing harvest in FMA7 were consistent with and no less robust than the estimates in other FMAs. We see no evidence to support the need for additional research on FMA7 relative to other areas.
21. We are concerned that research effort will be diverted from focusing on the National Panel Survey and that the provision of discrete area analyses based on different methodologies will undermine and detract from the overall status and acceptance on the national panel survey.
22. We are unaware of any substantive conflict or concern with recreational catch in FMA7 that might warrant an analysis of the recreational catch of the full FMA. We acknowledge there are concerns as to the situation of the Marlborough Sounds which have been identified as a potential recreational fishing area.
23. If the research was to provide a baseline for recreational fishing in that area for future reviews of fisheries management performance, we could support such a project. However, the project relates to the whole of FMA7 and not just the Sounds and we are unable to find any justification for or support for such a project.

MAF 2015-04 Pilot test of survey design for PAU fisheries

24. Notwithstanding the length of the proposed project, the proposal fails to provide any detail on the alternative survey method that might be used. The proposal firstly states a range of potential survey methods will be considered and alternative survey designs developed but then narrows the scope to the implementation of the 2014/15 design, noting that project MAF2014-06 has yet to be completed. It is unclear whether a particular survey design is to be used or whether a range of designs is contemplated.
25. We acknowledge that commercial fishing for paua is managed on a finer scale than the QMA and that recreational fishing estimates on a comparable scale and with comparable robustness would be beneficial to the management of the stocks and the evaluation of spatial closure methods.
26. Robust estimates of recreational sector catch on a fine scale basis for sedentary stocks, such as paua, are desirable, particularly given the intention to introduce further marine reserves and protected areas.
27. We support the project but consider that any progress with this project cannot proceed until the results of MAF2014-06 are available.

MAF2015-08 Pilot Test of Self-Monitoring Tools

28. We note there is no detailed proposal available in respect of this project. In the absence of a detailed project proposal, we cannot support this project.

29. From a short perusal of the internet offerings, there are a significant number of existing “APPs” available to recreational fishers. The management need is to obtain reliable estimates of recreational catch. We are less concerned with the front-end applications used to capture that data. Our concerns relate more to the storage, analysis and availability of the data for fisheries management.
30. The project should focus on the database aspects of reporting recreational catch and be supported by an MPI initiative to encourage the use of market based APPs to front-end the database. MPI should define the data it wishes APPs to deliver and allow the market place to develop the APPs. It is not the role of MPI to define or develop an appropriate APP – that is the role of the marketplace.
31. We have seen other MPI initiatives to obtain non-core data fail to deliver fisheries management benefits, e.g. Non-Fish Incidental By-Catch and customary fishing authorisations and take returns.

Prioritisation

32. Based on the purpose of the workstream and the assessments of the projects above, FINZ would prioritise the projects as follows:

Priority Ranking	Project	Comment
1	MAF2015-01 Pilot Test of the 2016/17 national panel survey	Focus should be to improve the reliability of the catch estimates
2	MAF2015-08 recreational catch database development	As discussed above
3	MAF2015-04 Pilot Test of survey design for PAU fisheries	Focus should be to improve the reliability of the national panel survey catch estimates in respect of paua and other sedentary stocks
4	FMA 7 Catch analysis	To be focused on providing a baseline for the Marlborough Sounds fishery
5	Indicator Analysis	Needs to be integrated with development of objectives for recreational fishing in inshore fisheries management plans

33. We have proposed earlier in this submission that the MAFWG needs to establish a formal long term plan that identifies the purpose and the rationale for the research. The long term research plan would then arise from the management needs of the management plan.
34. We also propose that MPI needs to consider and adopt one interregnum monitoring framework – investing simultaneously in web camera monitoring and digital self-reporting may not maximise benefits to fisheries management.