

Highly Migratory Species Team
Ministry for Primary Industries
PO Box 2526
Wellington
18 May 2015

Dear Dominic

Implementation of WCPFC Measures on Shark Conservation
MPI Discussion Paper No:2015/10

1. You have asked for comments on the proposal to implement the WCPFC measures on shark conservation.

Fisheries Inshore New Zealand

2. Fisheries Inshore Limited (FINZ) represents the inshore finfish, pelagic and tuna fisheries of New Zealand. It was formed in November 2012 as part of the restructuring of industry organisations. 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). As part of that work it will also work collaboratively with other industry organisations and SREs, Seafood New Zealand, Ministry for Primary Industries (MPI) and Department of Conservation.
3. 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.
4. Fisheries Inshore holds a mandate to represent quota-owners in respect of HMS pelagic tuna and sharks.

Proposal

5. The proposal is to implement the WCPFC measure (CMM2015/05) on shark conservation in the New Zealand longline fisheries targeting tuna and swordfish by banning:
 - a. the use of wire trace as branch lines or leaders; and
 - b. the use of branch lines running directly off long line floats or droplines.

Comment

6. We understand that the shark species caught in the tuna longline fishery were considered in the recent Level 1 Risk Assessment of sharks in New Zealand waters and were assessed not to be of high risk of adverse effect from commercial longline fishing. The assessment includes the pelagic shark species – blue shark, mako and porbeagle - and other sharks such as spiny dogfish, rig and school shark which are also caught by the tuna fleet.
7. We understand wire traces are not used in New Zealand commercial fisheries. We also understand that shark lines are not used in the commercial fleet.

8. We note that WCPFC 2014/05 requires vessels to use at least one of the measures, not both as contained in the MPI proposal. The consultation document argues that *“banning both practices would not only enhance New Zealand’s reputation as a responsible fishing nation but would also better reflect the commitments made as part of its domestic NPOA-Sharks 2013”*.

9. New Zealand’s fisheries management regime is based on sustainable utilisation principles with sustainable catch limits being set and monitored. Issues of sustainability are to be managed by adjustment of the Total Allowable Catch. If there are additional shark species with sustainability issues, then they should be managed under the QMS. New Zealand’s reputation as a responsible fishing nation is indisputably based in its fisheries management regime. Unilaterally imposed input constraints on the ability to catch sharks or other species within those sustainable limits are unnecessary and inappropriate in the New Zealand context.

10. Goal 2 of the NPOA Sharks adopted by New Zealand in 2013 is:

“Encourage the full use of dead sharks, minimise unutilised incidental catches of sharks, and eliminate shark finning in New Zealand”.

Goal 5 is of the NPOA is:

“New Zealand actively engages internationally to promote the conservation of sharks, the management of fisheries that impact upon them, and the long-term sustainable utilisation of sharks”.

11. Where sharks are to be utilised, there is no commitment to:

- a. minimise their incidental by-catch; or
- b. not target sharks,

provided Goal 1 of the NPOA to maintain the biodiversity and long-term viability of shark populations is achieved. Sharks may be targeted where their sustainability is not compromised and they are utilised. Adoption of the proposed CMM 2015/09 measures may unnecessarily constrain New Zealand’s ability to sustainably target and utilise sharks. To that extent, the measures have no place in New Zealand’s fisheries regulations.

12. However we also recognise that New Zealand is a Contracted Convention Member of the WCPFC and, as such, is obligated to implement approved WCPFC conservation measures.

13. On the basis that:

- a. New Zealand is obligated as a CCM to implement the measures; and
- b. quota-holders and fishers are agreeable to the proposals being implemented,

we support the introduction of the MPI proposal but subject to the reservations and views expressed as to the need for and appropriateness of the measures in the context of New Zealand’s fisheries management regime.

Yours sincerely



Tom Clark
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Fisheries Inshore