

From: Future of Our Fisheries Programme
Sent: Thursday, 17 August 2017 4:23 p.m.
To: s 9(2)(a)
Subject: FW: GPR and ER Submission
Attachments: Submission on Electronic Reporting.docx

Follow Up Flag: Follow up
Flag Status: Flagged

From: Brian McMillan s 9(2)(a)
Sent: Thursday, 17 August 2017 3:23 PM
To: Future of Our Fisheries Programme <FutureofOurFisheriesProgramme@mpi.govt.nz>
Subject: GPR and ER Submission

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Submission on Electronic Reporting

I have several points that I wish to make relating to the proposed implementation of GPR and ER.

Some background to my position in the fishing industry

I am Brian McMillan s 9(2)(a) and a fishing permit holder of almost 40 years

At present I operate 3 aluminium dories ranging from 4.6 to 5.3 metres targeting mostly flounder in the s 9(2)(a)

My Points

1. The burden of the financial cost of implementing these systems including the cameras which will be required eventually.
How the conversation I will have with my bank manager will go when I tell him that I require \$20-25 000 to be able to outfit my boats to meet your new regulations with up to another \$6000 in monitoring and maintenance costs annually, while having no surety of having fishing grounds to fish with the proposed establishment of a Recreational Fishing Park still unresolved.

Remedy

I have no easy answer to this problem but note that the lack of a resolution regarding the Rec Fishing Park and our place in it, if any is a major obstacle in being able to justifying the cost of compliance of the new reporting regulations. The cost structure as set out in emails for an operation like mine are prohibitive and while my operation is profitable the burden up to \$25,000 debt for no return and another \$6000 per year also for no return is not sustainable and would likely drive me from the industry and more so for the guys on smaller scale than me.

So if the intention is to drive the operators like me from the industry I think you are on the right track.

2. Having an electronic reporting device onboard larger vessels that have a wheelhouse or protected area is fine, but on under 6 metre vessels generally they are just open boats with the only protection from the elements is your raincoat and leggings and protecting an electronic device any bigger than a cellphone that can be kept on your person is impossible. We are informed that the responsibility for

having a device fit for purpose falls to the operator, however I see that you put us in a position that we can't win as with cellphones they have a very short lifespan in our environment on the boat and any electronic device that you require for EP that life span will be shorter and another financial burden on the fisher.

Remedy

There is dispensation now that allows us to fulfil our reporting obligations before departing our point of landing that makes practical sense and in most cases our returns legible, so allowing us to keep our electronic devices in our vehicles and reporting when we launch and begin our trip and once again when we return makes practical sense and would save our devices from the elements and maybe give them a life span that is acceptable.

3. The flounder fishery mostly operates inside the low water mark so when fishing it is a relatively short time frame and is dynamic in that as the tide moves the fishers need to be proactive and time becomes your adversary, so operating an electronic device with wet gloves an raincoat and leggings in a boat with no shelter in fine and inclement weather is generally impractical an will result in fishers being stranded by falling tides which will result in long days waiting for the return of the tide and often a loss in the quality of the fish.

Remedy

Is same as above, taking practical steps to preserve our electronic devices while still providing the information required in maybe not quite real time but close to it remembering the small scale of our operations

4. The consultation process seems to have been replaced with email correspondence that I along with most fishers of my era find intimidating an lacking in real information relating to how in practice it will affect our daily operation an whether we will be turned from compliant operators into illegal fishers because of our inability to meet our reporting obligations. Once again the one size fits all approach, rather than engaging with the fishers to find what practically will work on a daily operational level and still meet our reporting obligations.

Remedy

Talking directly to the fishers who are affected by these new regulations and explaining in simple terms what is required and reaching a conclusion based on what

is required and what is practical. It is important that everyone grasps what is relevant and emails in language that we don't understand won't be effective.

5. Cameras on our small boats also have implications as the whole boat is effectively a work space as well as our private space while we are at sea, there is nowhere to hide. The cameras will effectively give us no privacy while fishing which is unacceptable when we need to attend matters regarding personal hygiene.

Remedy

The only obvious remedy is dispensation for boats under 6 metres given the that the scale of these operations will generally not support the costs of a camera and monitoring in some cases being more than the vessel itself is worth, and more importantly the invasion of privacy whilst fishing is unacceptable

6. Who will have the ability to access the information gathered by the new regulations as some information will have commercial sensitivity to it regarding fishing location and time of operation and if this is available via Fishserve subscription as some information is already then there are issues associated with that.

Remedy

Information gathered must only be available for monitoring and scientific purposes and not made available to any outside agencies or by subscription through Fishserve.

Overview

I have no issues with the introduction of the GPR and ER as such they just need to be administered in a practical manner that is affordable and possible to work with. The information we have been given so far is confusing and incomplete as far as not even being able to tell us what we require, it appears once again that MPI are acting with much haste and very little thought or consultation. Maybe it is time to take a deep breath and start again consult with fishers and find some solutions rather than dictating and waving a big stick.

Brian McMillan

s 9(2)(a)

From: Dan lovell <s 9(2)(a)>
Sent: Tuesday, 8 August 2017 8:49 a.m.
To: Future of Our Fisheries Programme
Subject: Information on gpr and e-logbooks

Hi my name is Dan Lovell I am a fisher I would like to talk to someone regarding the new system coming into affect.

I collect mussel spat on s 9(2)(a) so am a non vessel fisher but how we operate I need to clarify how this is going to work as quite often we have several vehicles working in different locations

Thanks look forward to speaking to someone

Cheers Dan Lovell

s 9(2)(a)

Sent from my iPad

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10.08.2017

To whom it concerns:

My name is Fin Horder and I've been an inshore commercial fisher since 1997, a skipper since 2005, and a boat owner since 2010.

My father was a fisherman. I am a fisherman. I have had an association and affinity with the sea for most of my life. I have covered over 100,000 nautical miles around New Zealand, 70,000 of those being in my current 48 foot vessel built in Auckland in 1938.

I cross § 9(2)(b)(ii), I work the § 9(2)(b)(ii) and § 9(2)(b)(ii) bars. I have sailed into § 9(2)(b)(ii), I have unloaded in to 8 ports around New Zealand, taught young crew engineering, seamanship, navigation and of course how to fish and work weather at sea. I work in an unpredictable environment that you truly need to understand and appreciate.

I now primarily fish for albacore tuna, along side around 50 other small family owned boats that come together from all over New Zealand. Each trip averages 7 days. We are trolling lures (usually only 10 to 15 per boat). Each fish is pulled in by hand one at a time. Some days we may only catch 2 fish, other days 70. We are not trawling, trolling is very different. Albacore tuna arrive into New Zealand waters at the beginning of December and leave at the end of May. Trolling has very little environmental impact, I love and am very proud of this type of fishing. I even try and reduce my carbon footprint by using sails when I can. I have taken an observer on my boat and I will again if asked, as I have nothing to hide.

My vessel is my home, my work, my crew's home and work and at times my family's home. Having a camera on board my boat would be a total breach of my privacy and totally unnecessary for the fishing I do. To have my boat under 24 hour surveillance would be equivalent to you having a camera on your living room, your front door, office desk and in your back garden. I myself shudder at the distasteful thought. It would take away everything that fishing is and it would never be the same.

Needless to say I strongly oppose any notion of a camera on my boat, living under close surveillance when I haven't done anything wrong and don't intend to. I also have serious concerns regarding the recorded footage, how it may be used and who is going to view it. Again this would be a total breach of my crew, my family and my own personal privacy.

On a positive note, GPS tracking may be an aid to safety and digital reporting of catch may be a good thing if worked well. I do have concerns of costs and the practice workings, ie. Internet reception when working offshore in bad weather and not being able to send my daily reports in time. There is still a lot of communication needed yet on the logistics on how this is all going to work regarding the size of my vessel and the areas we have to work in as they are often remote and when in rough weather when the vessel is rolling and pitching digital communications can be unreliable.

I hope this letter wil help you better understand my concerns regarding MPI's new monitoring regulations they are wanting to implement and the diverse industry we work in.

Thank you for your time, any questions don't hesitate to ask.

Yours faithfully

Fin Horder
Skipper/Owner

§ 9(2)(a)

§ 9(2)(a)

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Glen Patterson

s 9(2)(a)

6 August 2017

To whom it may concern,

My father was a cray fisherman for 28 years out of s 9(2)(a), s 9(2)(a). I have grown up around fishing. I left school and went crewing with s 9(2)(a), s 9(2)(a) and s 9(2)(a), learning the skills.

In 1998 I sat and passed my skippers ticket. At the time I was the youngest person in s 9(2)(a) to be a skipper. I ran a small trawler by myself for 12 years. 2 years ago my wife and I mortgaged our home and purchased a fishing boat and wharf. The first year we spent over s 9(2)(b)(ii) on the vessel doing surveys and maintenance. The monetary returns of a commercial fishing business is minimal.

I think IEMRS is a huge outlay for any small business. Furthermore I think it is a total invasion of privacy and an insult to my honesty and my right to call myself a fisherman.

I respect our resource and take observers every year – what more do you want? This has put a great deal of stress on our family. Even our kids have noticed how we are talking about how we will be able to afford to eat when these extra expenses come in.

There were 8 boats fishing out of s 9(2)(a) when I first started fishing. Now I am the only one left. That is a depressing sign of the times.

At the coal face.

Glen Patterson

s 9(2)(a)

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From: Grant Comer <s 9(2)(a)>
Sent: Thursday, 17 August 2017 2:19 p.m.
To: Future of Our Fisheries Programme
Subject: My submission
Attachments: Letter in response to new MPI legislation in regard to fishing.docx

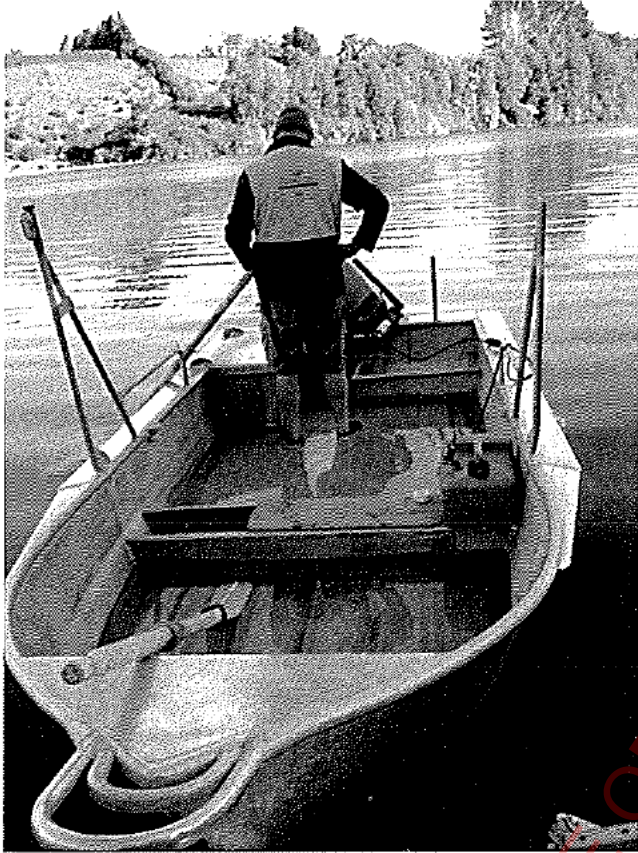
Please find attached my letter of submission.

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My response to the MPI's new legislation rules regarding fishing practices.

My name is Grant Comer, a 66-year-old fisherman. I have 30 years plus fishing in the § 9(2)(a) Harbour. In my 4.6 flat-bottom pontoon dory, it is an open boat with no cabin. It is made for the § 9(2)(a) Harbour conditions. Other fishermen like myself, fish at the back of the harbour in shallow water and try not to fish in winds over 15 knots as it is hard on the gear as all work is done by hand. That really leaves only about a third of the year to fish because of the weather and tide heights (in big tides, nets get filled with rubbish from the water's edge.)

This is a photo of my setup at time of buoyancy test.



§ 9(2)(b)(ii)

I love my fishing, I live for it and there is nothing else I can do or want to do to get by at my age. Learning to fish the small harbour takes a long time. It is not like a large open area like over the bar at sea. § 9(2)(a) Harbour does not produce a big amount of fish and now there is a new fisherman who has started, my income will be reduced. So, with all your new equipment plus yearly fees, plus Maritime Safety's exorbitant fees, and all the maintenance business costs such as accountants, fuel, nets, running costs, FishServe fees etc, it's going to around § 9(2)(b)(ii) mark per year, (about a § 9(2)(b)(ii)) which is a large part of my income, it is going to be an expensive exercise. Why should older fisherman with limited years have to go through all this expense?

Maritime Safety have just let fisherman like myself to fish under their legacy certificates because of the costs and the inability to sit skipper's tickets would put many of us out of business, and now this comes along, and now becomes the same thing, (potential to being put out of business due to the large extra costs). Why should small honest operators in small harbours with my experience pay because of some dishonest fisherman operates on large seagoing vessels way out at sea.

Small open boats like mine will not have any privacy with a camera watching every move. It is an invasion of privacy and all my fishing sets that I have perfected over the years – just how safe is all this information – I don't think this is right?

GPS? Well the harbour is small and I can't go far.

E-logbooks – when it is raining, I fill in my catch book in the truck before I take my boat out of the water as there is no cabin. Can I still do the same with the e-logbook?

Now, the Maui Dolphin is in the mix and they want their cut too. I have never seen a Maui Dolphin in the § 9(2)(a) Harbour in all the years I have been fishing and never heard of anyone seeing one either.

Summary: I question:

1. **Cost** – the cost of all this new equipment comes from the fisherman, not the government who wants the information for research purposes and dodgy fishermen. Plus, the future costs of running the equipment as a levy.

I don't earn a great income and I will never be able to recoup the cost of all the new equipment. As for me, I will have to learn how to operate it all in addition to the cost of the installation. That is why I am a ring-fenced operator because of my age and the fact that I have been fishing for 30+ years.

2. **Practicality** – one size fits all when it comes to MPI. Where am I going to install such a camera? There is no shelter and nowhere to install a camera that will interfere with my running a net.

Also, why are small operators like me being classed alongside the ocean-going trawlers who use different methods of net fishing and multi species of fish, whereas I only have specified flounder nets and target only flounder in the harbour, not outside in the ocean.

3. **Privacy** – there is no privacy in my open dory. My boat is not like an ocean-going trawler with closed in cabin facilities and if I need to answer a call of nature, I will be viewed from the camera (which is where to be installed on my dory?)

I wonder what it to going to come along next?

Regards .

Grant Comer

Client: § 9(2)(a)

My views on small harbour fisheries are:

1. No setting of nets and leaving them overnight, unnecessarily killing a lot of undersized fish).
2. Stay within sight of nets (not go home and return hours later). Also, when your boat is taken out of the water your nets must be on board.
3. Over the holiday periods, nets (mainly recreation) are set all over the harbour and left overnight and is a danger to boats i.e. having ropes wrapped around your prop causing safety issues.

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From: Heath <s 9(2)(a)>
Sent: Friday, 18 August 2017 10:22 a.m.
To: Future of Our Fisheries Programme
Subject: Consultation on draft circulars on digital monitoring of commercial fishing

With regard to the upcoming monitoring proposal.

I'm fishing for cod (using pots) around s 9(2)(a) and s 9(2)(a). I have some real concerns about the costs, workability and benefits of the proposed changes.

1. The cost will cripple small scale operators, who struggle to make a living as it is. I have already heard of several operators (with over 20 years in the industry) who are just unable to carry on if the changes go ahead. All these guys are really important to our small fishing community, and it would be a real shame to see them forced out.
2. The cameras seem totally unnecessary due to the upcoming changes in mesh size (this stops any undersize fish even coming aboard the boat). I have 3 pot with the larger mesh (which will become the regulation size after 1st October 2017), I'm not catching any fish under 36cm, which is 3 cm bigger than the MLS. Obviously any other by-catch are caught live and returned immediately to the sea, and I would invite anyone from MPI to come out on my boat so I can prove this. So if cameras do go ahead, it will be a massive one off cost just to film something no one will ever watch, as there is no room to do anything wrong in the cod fishery. As an industry we have already made many improvements to fishing practice to protect the cod. Voluntary raises in mesh size, (although it will reduce our legal catch) is a step we are willing to take as it will enhance our fishery.
3. Electronic vessel monitoring seems once again totally unnecessary, unworkable and not fisheries specific. A lot more consultation (with fisheries specific scientist) needs to be undertaken to figure out what sort of data is needed, to make this beneficial to the researchers and practical for the fishermen. I would suggest we scrap the electric vessel monitoring and include the extra data of fish caught in the e-log to aid the scientists in their research. The areas I fish are not in cellphone range, so that is going to make e-log book reporting impossible to myself and many others.

So inclusion, scrap the cameras, scrap the electronic vessel monitoring. I do support e log books, as I think this could be used to gather important data, in a way that is feasible for all. Also saving a lot of paper work. To make any of this workable, first the government needs to look into how it can improve cell phone coverage of s 9(2)(a) and s 9(2)(a).

Heath Allen

s 9(2)(a)

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From: kirkandheather <s 9(2)(a)>
Sent: Friday, 11 August 2017 9:41 a.m.
To: Future of Our Fisheries Programme
Subject: Consultation on draft circulars on digital monitoring of commercial fishing

I fish for mullet on a 12ft boat will I need a camera on this?

I also harvest Mussel spat on the s 9(2)(a) will my loader need a tracking device and eventually cameras on this?

Will I be able to use the same device or will I need two?

Sent from my Samsung device

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From: s 9(2)(a)
Sent: Thursday, 27 July 2017 9:24 a.m.
To: Future of Our Fisheries Programme
Subject: Consultation on draft circulars on digital monitoring of commercial fishing

I am a fisherman operating a 4.2 metre dory set netting in the s 9(2)(a). I pick up the nets by hand. Does that constitute hand gathering as defined in the new regulations requiring cameras on board fishing vessels that is to be introduced.

Regards Rex Smith

Sent from Mail for Windows 10

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From: Joseph Dragicevich <s 9(2)(a)>
Sent: Monday, 7 August 2017 7:53 p.m.
To: Future of Our Fisheries Programme
Subject: Electronic reporting etc.

I am an eel fisherman operating in s 9(2)(a). I agree that the electronic collection of catch effort data is a sensible progression. It will be more efficient and probably user friendly.

I am not yet sure how the GPR will work on small boats or especially in eel fishers' case. A lot of my fishing is done from land or with my boat as transport to the fishing ground only, but I am willing to see how this pans out in practice.

I cannot see how cameras will operate on my boat. It is an open boat of only 4.2m with no structure extending above the gunwales. There is no where to mount a camera to gain a vantage point to monitor fishing.

Anything protruding above the gunwales would be a serious health and safety concern. I squeeze under branches and bridges daily and operate in creeks hardly wide enough to fit the boat in. Myself or my gear would become entangled on any "selfie stick". A camera will not work.

I also have a serious privacy concern with this surveillance intention. I wonder if MPI would agree to hanging cameras in their offices to record footage for Fishers' perusal? I have an intensely uneasy feeling about this requirement and it seems to me that no practical consideration has been made here. Perhaps it would just be easier for MPI if small operators would just stop fishing and leave the industry?

My fishing primarily takes place out of the boat anyway. There is no power source in my vessel to power said camera anyway.

Regards,

Joseph Dragicevich

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From: Helson, Jeremy s 9(2)(a) >
Sent: Friday, 18 August 2017 12:16 p.m.
To: Future of Our Fisheries Programme
Subject: Consultation on draft circulars on digital monitoring of commercial fishing
Attachments: 20170818115811806.pdf

Please find attached a submission from a FINZ member. The FINZ submission will be provided on Monday.

J

Dr Jeremy Helson PhD, LLB
Chief Executive
Fisheries Inshore New Zealand Ltd

M: s 9(2)(a)
DDI: s 9(2)(a)
E: s 9(2)(a)
W: www.inshore.co.nz

FISHERIES
INSHORE

This email is intended solely for the use of the addressee and may contain information that is confidential or subject to legal professional privilege. If you are an unintended recipient of this email please immediately notify the sender and delete the email.

10 August 2017

To whom this concerns,

My name is Karl Johnson, and I have been working on the fishing boat [REDACTED] s 9(2)(a) for the last 7 years on [REDACTED] s 9(2)(a) as a crew.

I believe the new regulations MPI are trying to bring in for all commercial fishing is unnecessary, for us, based on the size of the boat, which is only 38 foot long.

I find having cameras on the boat watching us work is an invasion of privacy, especially when the cameras are operating 24/7, the boat is our home as well as our workplace.

No one needs to be under constant surveillance doing their day job. How many other jobs are there that has people on cameras all the time 24/7?

I find it is an unnecessary expense when all we do is codding all year round with pots. We are only a small operation with only 2 working on the boat so we aim to keep expenses down as much as we can. It is hard to justify the expense of cameras I feel we don't need.

Karl Johnson

[REDACTED] s 9(2)(a)

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From: L Matich <s 9(2)(a)>
Sent: Wednesday, 9 August 2017 3:02 p.m.
To: Future of Our Fisheries Programme
Subject: gpr device and electronic reporting.

I am an inshore fisherman working in enclosed waters on the s 9(2)(a) harbour. we are already using a gps for s 9(2)(a) which already shows where we are, time etc. The costs and electronic equipment that MPI is expecting us to use and pay for is unjustified and is not common sense. We have been fishing for close to forty years. The latest upcoming requirements are not workable in a small *open dory*. How about we take the tops of the fisheries' boats, put wet gloves on their hands with mud and jelly fish on them and see if they can work electronic equipment.

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s 9(2)(a)

From: s 9(2)(a)
Sent: Friday, 28 July 2017 5:20 p.m.
To: Fisheries Review
Subject: commercial fishing. kaipara harbour

Hi

I have been fishing on the s 9(2)(a) harbour for 38 years. Fish stocks have been declining for many years now. The new compliance costs are going to be impossible for a small inshore fisherman owner operator. Have a look at the stats yourself... s 9(2)(a) ...and tell me it is affordable for a flounder fisherman on the s 9(2)(a). MPI is about to sink my business.

Lance Matich.

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L Gilmore

§ 9(2)(a)

Friday, 4 August 2017

To whom it may concern;

My name is Laura Gilmore of § 9(2)(a) I have been working on a small commercial fishing vessel over the last 6 years. There are only two of us onboard. The vessel owner/skipper/quota owner and I, and we tend to generally fish fine weather; given this we do not go out for long periods of time.

When we do get out for a few of days, it is often to areas that have no phone or VHF signal, and we don't generally fish the same spot twice in a trip. Fishing like this is like farming paddocks, a farmer doesn't return his cows to the same paddock daily, so we move fishing spots.

My complaint about MPI introducing IMERS is that it is potentially going to be very detrimental to my income and living circumstances. Living in a small town on the § 9(2)(a) where there is no industry to employ people, only other small businesses.

As I understand the implementation of the IMERS system will be at the cost of the guy I work with and his wife; and it will be at no small cost!! With the fact we are outside the range for phones, how is there going to be a system that is affordable? There is going to be the initial expense of cameras, GPS systems, plus budgeting for the system breaking somehow, and the regular maintenance/servicing; if there is no phone/internet connection steaming for hours each day to get back to an area that can transmit the daily information, or investing in incredibly expensive satellite phone and the charges that come with one of these.

If it does go ahead, with the above mentioned expenses § 9(2)(b)(ii) § 9(2)(b)(ii) What do I do then in a town that you can not get any government support/benefit (not that I have ever been on one)?

What I have noticed over the past 6 years is that there are very few small fishing vessels, and those that are out making a living are all employing only a few crew; that is often one or two families that are being supported. Some of these guys have only known fishing in their working lives; by introducing the cameras and GPS these guys have to fork out large sums that will cause them to cut into what income they make and share with their crew; threatening the jobs of more people.

I also feel that by making the vessels have cameras recording 24 hours a day is a gross invasion of our personal space and privacy. On a small fishing vessel, the cabin is often where paperwork is completed; but it is also where we live when we are on the water. How would the rest of the New Zealand population like to have cameras watching their every move at work, and also in their kitchen, lounge and the bedroom/bathroom hall. It is more scrutiny than what criminals are subjected to!!!

Is this the start of the government treating the NZ population all like criminals? Bugging our homes? Having us all under constant surveillance?

The small vessels that are commercial fishing should not be included in the IMERS programme, they are not the ones who are causing damage to the fish stocks. Greater monitoring on charter vessels and the "professional" recreational fisher; who go out fishing daily, stay fishing until they catch their "legal" limit at the same spots day in, and day out, and often doing multiple trips in a day!! Why are these people not monitored? I know of charters vessels that are catching 4 and 5 Hapuka per person per trip; the same can be said for Kingfish and Snapper. Why do people need that much fish?? And what do the guys that go for a recreational fish daily do with all the fish they catch? Are they trading, swapping or bartering it? Is this not a form of payment???

I hope that the government is going to pay all the unemployed fishermen and woman the same as their existing incomes, for as long as they were going to remain in the industry. For some this is a lifelong career!

Regards

Laura Gilmore

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From: Fisheries Review
Sent: Tuesday, 22 August 2017 8:28 a.m.
To: § 9(2)(a)
Subject: FW: feedback to geo spatial position and electronic reporting.

From: Matt Holl [mailto:§ 9(2)(a)]
Sent: Monday, 21 August 2017 3:41 PM
To: Fisheries Review <Fisheries.Review@mpi.govt.nz>
Subject: feedback to geo spatial position and electronic reporting.

Feedback to the Ministry for Primary Industries on the proposed Integrated Electronic Monitoring And Reporting System.

As an operator of an Enclosed Waters Flounder Dory I find it offensive and incongruous yet unsurprising that I have not been consulted on the objectives and alternative implementable options that are driving the Integrated Electronic Monitoring And Reporting System as it relates to the specific fishery I work in. Specifically the failure of the Ministry for Primary Industries to consult me on the objectives and practical management regime options to ensure integrity to the objectives of relevant fisheries legislation and regulations.

Who has trialled the proposed IEMARS in the enclosed water fishery and what systems worked and what systems need further evolution to be viable in a dory?

Is the Geospatial Position Reporting and Electronic Reporting (ebook) to be carried out through the development of a smart phone application or some device that is cumbersome and unsuitable for the abuse of mud, rain, and structural challenges inherent in an open dory. Who has physically gone out in a dory and trialled this?

I note all related regulations stipulate commonsense provisions and exemptions based on either hardship, feasibility or practicality of installation - and the circulars have not carried through this intent.

Is this apparent ambiguity an oversight or intentional further corruption of DUE PROCESS?

Can MPI please address the criteria for the Regulation's common sense provisions and exemptions based on hardship, feasibility or practicality of installation in an enclosed water dory and inform me of practical trials to ascertain that these potential exemption criteria can be overcome.

I currently use a GeoSpatial Position reporting smartphone application in partnership with Trident, Systems and if MPI were to Contract Trident to develop the App.to fulfil the other Electronic Reporting requirements and that was trialed then MPI would have something to consult me on.

If such a system provided cost savings over the current paper Catch Landing reporting regime MPI would have something else to consult me on.

I note MPI have held consultation with big fishing industry representatives but I have been given no opportunity to ensure my practical solutions, interests, spirit of integrity to sustainability, and commercial viability has been represented or consulted on.

I note that there is a scientific working group, which is inclusive of people claiming to be representatives of the fishing industry, exploring supposed scientific management options for the viability of the Mauis dolphin and yet I have never been consulted by MPI, Ministry of Fisheries or anybody else in relation to Mauis Dolphins Management since my submission to the 29th August 2007 consultation document which is a clear and obvious corruption of DUE PROCESS by M.P.I .

It is therefore unsurprising that the implementation of IEMARS should be any different and to date be an abject failure to consult and develop best practice management of the Q.M.S. for the enclosed water fishery.

MPI email advises "This is your opportunity to provide feedback on how geospatial position reporting and e-logbooks will work in practice. Consultation on cameras will begin later this year, to be advised.

Consultation.

Circulars – the legal mechanism that sets out the standards and specifications for the three components of digital monitoring – are being consulted on over the next month, and we would appreciate your feedback. We will be in touch about this soon.

I repeat, who is MPI liasoning with in the enclosed water dory fishery to determine practical solutions or exemption criteria?

How can I have input and ensure I am Consulted?

Can I be involved in trialing and evolving proposed electronic reporting systems. Please inform me how I can have input into the evolution of the Quota Management System so that the fishery is managed, not merely administered, and therefore be given the opportunity to have input into the enhancement and sustainability of the fisheries.

Currently I am not permitted or allowed to release a baby Kahawai or Grey Mullet that is alive but instead I am compelled to land such fish. That is not Sustainability.

Currently the minimum size for Yellow Belly Flounder is 250 millimetres but such small flounder, in my opinion, should be released alive and no flounder smaller than 270 millimetre should be landed.

Some specific consultation with practitioners in specific fisheries would give the management of the Quota Management System the opportunity to evolve by utilising the empirical knowledge of fishing practitioners. In my case the enclosed water yellow belly flounder fishery.

I look forward to the acknowledgement by MPI that there are more players in the industry than Export Lead Big Companies and suggest that MPI develop consultative strategies that would stand the scrutiny of independent audit.

Thank You for the opportunity to provide some basic feedback and would encourage MPI to provide opportunity into the development of sustainable solutions.

Matt Holl

s 9(2)(a)

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From: s 9(2)(a)
Sent: Tuesday, 8 August 2017 2:28 p.m.
To: Future of Our Fisheries Programme
Subject: submission

I Nathan Hines have been fishing in the fishing industry since i left school at 16 and now i'm 35 I don't intend on doing anything else in my working life as fishing is my passion on the sea and off it. After 17 years i brought my first fishing vessel a 40ft trawler to target flats out of s 9(2)(a) plus balance life between work and Family. In just over 2 years of owning my vessel the cost of compliance has risen and just keeps on rising. With the on going costs of MOSS, health and safety and now extra compliance in order to fish i'm being forced to spend more and more time at sea fishing rougher weather away from my family in order to keep on top of the bill's. This is where the new compliance of GPR and electronic reporting plus the video surveillance is going to affect my livelihood. These cost's can be adsorbed by larger operations alot more easily then the small operation i run. As turnover is enough for a reasonable lifestyle but with all the extra cost's that we as small operators have been hit with over the last couple of years it is eating away at that. That is wrong!! As a small inshore trawler it is in my eye's the most sustainable low impact style of trawling there is. I've worked on all the various sized boats in New Zealand to know this. You as a organisation should be encouraging people to get into it not turning them away. We as a industry are just starting to recover from a generation gap caused by over fishing and depleted fish stocks which seen the money full out of it. Now the fish stocks are continuous rising in most areas you are going to make the generation gap not us this time In s 9(2)(a) as well as many other ports around New Zealand we have a few old fellas that are past retirement age but just love being out on the water chasing fish round keeping fit and active doing what they love. with this compliance they are getting forced out it's just not financially viable for them now. It's morally wrong to force someone out of the industry that have been doing it for 40 to 50 plus years it's who they are. I think you should look at allowing exemptions for GPR and video Surveillance for these older fisherman to allow them to finish off there careers as most of them haven't got to long left so let them bow out on there own accord not pushed out Now i fully agree with electronic reporting it's a no brainier that i'm happy to adopt The issue is in some of the information you require the need for me to give. 1. Time of shooting then a time of when it's on the bottom then time i start hauling to when the codend is on the boat is pointless. I can see you want information on when bycatch has occurred but why don't you just add a bit in on the disposal report or non-fish protected species catch return of a estimated time of capture as it's not hard to know if it was caught while shooting or hauling. 2 Wing spread is another pointless thing as 95% of fisherman have no idea how to work that one out you might be better having a overall length of gear sweeps plus bridle plus net atleast all fisherman can work that out. That will give you some solid info not a stab in the dark. 3 The other issue i have is with the disposal report why on earth do you need that info within a hour as that is not practical one bit. Both inshore and coastal boats just do not have that time on regular basis in order to get that to you on time all the time. It needs to be brought in line with the TCER and be within 24 hours. It may sound good in the office but on a hot sunny day when your covered head to toe in blood and guts trying to get your fish cut and on ice or clearing the deck so you have room for the next tow that is due in 10 minutes there just isn't the time in the day to clean up and do office work. GPR i really don't think this is needed though out the whole industry yes in some ways it's good. but is it needed on a day boat that fish's north south or straight off a port what info is that relative. I can see you want it for trucking of fish i would imagine. so why not just make it a requirement of vessels that fish two or more areas and leave the old fella that fish's the same patch day in day out alone. I really do feel small operations should be exempt from GPR and video monitoring in order to make sure they survive Thank you Nathan Hines
President of the Timaru Fishermans CO-OP

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From: nelson Wells s 9(2)(a)
Sent: Monday, 14 August 2017 2:50 p.m.
To: Future of Our Fisheries Programme
Subject: Consultation on draft circulars on digital monitoring of commercial fishing

I have been fishing out of s 9(2)(a) for 40 years and I am struggling now to stay in business. More and more regulations come with more and more costs. I now just troll for tuna as trawling is a minefield of rules, making me land unsalable fish ie small gurnard (no size limit!). I can't see how I can keep trawling at a profit without compromising rules so I have to give it up. The cost of camera and gpr equipment will be the final nail in my fishing career. Mnz just sent me a bill for s 9(2)(b)(iii) for an audit I am still disputing. I realize this is nothing to do with you but it is new regulatory costs I now have to wear. I feel it is just creative accounting and I don't believe you realize how counterproductive these 'improvements' are to small industrys. The inshore fisheries is being strangled by government departments, just look at the drop in fishing vessel registrations over the past 15 years. I was bringing s 9(2)(b)(ii) of overseas money into the country each year now I'm looking at unemployment. There are lots of other fishermen having to make this same choice. These regs are for large operators with million dollar turnovers not small one or two man boats like mine. If tuna trolling was exempted from cameras and gpr it would allow me continue fishing but the rule makers see these new controls as great management tools. They are for you sitting in your office but they do nothing for us. The idea seems great, keep an eye on the boats at the press of a button, but the reality is a cost with no real benefits to anyone. The few left that break rules will avoid the controls and the rest of us just get to wear the cost ,invasion of privacy,or quit. My career fishing has supported my wife and three kids so far and I hoped it would see me out to retirement but instead I'm left with quota and boat of little resale value. We keep seeing the company adds on TV telling us how great the fishing industry is,how they pour money into new boats because they see a good future in it. Reality is they sold their boats because JV's were cheaper and now they must replace them as JV's are banned. I believe the smaller inshore fleet should be managed separate from the bigger boats as we are a lot more vulnerable to increasing costs. Ken Wells

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From: P H s 9(2)(a)
Sent: Tuesday, 8 August 2017 9:35 a.m.
To: Future of Our Fisheries Programme
Subject: Monerting

Just to say that i dont totaly object to the new system but i do have some concerns as to the reliability of reporting catch on a vessel as small as ours, 6.9 mtr, no cover in places, unable to work, any sort of tablet or reporting device with wet hands and an open coput, Just where are we going to put a camera, could it become a health and safty issue. what happens when the boats on the trailer.
and lastly and probaly one of the most import things is, that the information and footage you collect gives away our exact fishing position for all to see, and some of the methods we use to catch flounder, like the setup of our gear is top seacret to us.
Please dont kid yourself that any information collected is confordental etc because we all know that it is not.

I can tell exactly what the compertion is doing from your information right now.

So before you run off and demand all the things you require from our small flounder boat, please have a thought of the impact it will have on our fishery, it could increase the number of vessels in our area to the point that it could collaps our small sustainable fishery to a point wher it may never recover.

Patrick Hibell s 9(2)(a)

Flounder fisherman and his wife Lyn for the past 9 years our of s 9(2)(a).

Myself a fisherman since 1980

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I would like to register my **OPPOSITION** to the recent changes being imposed on commercial fishermen.

The need to protect the future of the fisheries is vital and, as such, is of great importance to the smaller independent vessels and fishing families here in s 9(2)(a). Their lives, and livelihoods, depend on the future of the fisheries. In an industry where errors can cost lives, fishing is a lifestyle, not 'just a job'.

The impact of the regulations will be significant, if not debilitating, on many independent fishers. Many aspects are of concern but the following key issues, I believe, will have far reaching consequences.

Financially

The significant cost of installing the required technology is yet another compliance cost imposed on fishers. Many boats in s 9(2)(a) are owner/operators that provide an income for their families. The Regulatory Impact Statements mentioned 'rationalisation' - this is unacceptable for our family. We are not able to retire or just move on and find something else. Our fishing business is the only income for our family of five. Our government should not be forcing small business operators to give up what they have done for their entire working career.

Privacy

The introduction of cameras is a breach of both my and my crew's privacy. It is of great concern that without doing anything wrong I can be compelled to be under constant surveillance. To be asked to pay for that surveillance is yet another insult. Given the footage, I am asked to film and pay for, and supply to MPI can be used as evidence against me it is an affront to me as a legitimate fisherman and citizen.

Health and Safety

The requirement to track work through GPS will impose a greater workload. The fishing environment is already a hazardous workplace without insisting small boats with few crew members are required to tick boxes/push buttons for MPI. Whilst at sea our priority is, and should remain to be, focussing on the safety and responsibility of ourselves, our crew, and the industry (which includes the long term viability of the fish stock).

Intellectual Property

The outcome of Edminstin v Sanford has set precedence in regard to the ownership of the knowledge the skipper. It is unjust to ask a skipper to provide his wealth of knowledge without recompense or assurances as to the safety and security of that information. The extensive knowledge (matauranga), that has been handed to me through the teachings of tipuna, is taonga to my whanau.

So little usable information has been provided during the 'consultation' that we have been unable to be effectively involved in the process. Many involved in the industry were unaware of the proposed changes until after consultation period. Consultation is defined in *Wellington International Airport Ltd v Air New Zealand* [1993] 1 NZLR 671 as:

"If the party having the power to make a decision after consultation holds meetings with the parties it is required to consult provides those parties with relevant information and with such further information as they request, enters the meetings with an open mind, takes due notice of what is said, and waits until they have had their say before making decision, then the decision is properly described as having been made after consultation."

We have not been appropriately consulted on this issue.

Quinn Fowler

s 9(2)(a)

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From: Future of Our Fisheries Programme
Sent: Monday, 21 August 2017 6:16 p.m.
To: s 9(2)(a)
Subject: FW: IEMRS. GPR

From: Rick Burch [mailto:s 9(2)(a)]
Sent: Monday, 21 August 2017 4:30 PM
To: Future of Our Fisheries Programme <FutureofOurFisheriesProgramme@mpi.govt.nz>
Subject: IEMRS. GPR

I have been using Electronic Reporting of my catch over the last two years and GPR for over a year. The ER device was designed to record the same information as what I am required to submit to Fishserve on my TCER forms. I found the device easy to use and it eliminated the simple errors that we all know are made on these forms. There was other information that we recorded that was of use to me and some of the research work I was involved with. I showed the device to other fishers who were also impressed with the ease of operation and simplicity of recording the information that Fishserve required.

Many of those same fishers have asked for my thoughts on the regulations recently released by MPI concerning ER. I, like them, am totally confused on how this is to be put into practise. What I thought was going to be a brilliant way forward for the future of our fishery has now turned into a series of conflicting regulations which I consider will be impossible to implement without incurring financial loss by way of fines and lost fishing time while we become electronic technicians.

We use a GPR which records our position every five minutes. This model has recently tracked a vessel from Denmark to New Zealand. I recently moved my boat 10 meters at the wharf and the device sent me an email giving its new position. We use it as a MNZ safety device, informing persons who I choose to receive the information of the vessels position. Surely a GPR like this would be acceptable to MPI.

It appears to me that whoever has drawn up these new regulations has never spent time on an inshore vessel, where it is critical that you concentrate on the safe operation of your boat and crew. By complicating the recording of your catch etc, I consider that we will need to review health and safety whilst operating under these new rules.

On the 7th Aug, on the advice of FINZ, I emailed s 9(2)(a), asking him to address the s 9(2)(a) Fishermas Association to discuss compliance with ER and give us a comprehensive understanding of what will be required from us. As yet, we have not received a reply to that request.

I support the submissions made by the Deep Water Group, FINZ and Dave Wakefield.

R. A Burch.
skipper/owner s 9(2)(a).

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From: Future of Our Fisheries Programme
Sent: Monday, 21 August 2017 11:47 a.m.
To: s 9(2)(a)
Subject: FW: digital monitoring of commercial fishing

Follow Up Flag: Follow up
Flag Status: Flagged

From: Robyn Haggerty [mailto:s 9(2)(a)]
Sent: Monday, 21 August 2017 11:43 AM
To: Future of Our Fisheries Programme <FutureofOurFisheriesProgramme@mpi.govt.nz>
Subject: digital monitoring of commercial fishing

To the Ministry of Primary Industries.

Tena Koutou katoa,

I wish to draw your attention to a certain point in the new regulations for the fishing industry. The number of events that are expected to be recorded on a daily basis.

My family own a fishing business in the s 9(2)(a) zone, which we have fished for many years. s 9(2)(a) has been innovative in managing our fish stock. As a group, the fishermen funded scientific research to learn more about our fish and thereby improving our fishing practice.

As a family, we encourage practical industry measures to improve our fishery. We have been part of the tagging program for many years, we support research that promotes the health and welfare of our fishery and any practice that makes the men working on our vessel safer. The waters off s 9(2)(a) are treacherous, as has been witnessed by the loss of lives over recent years.

Asking the captain and crew to stop work to record events throughout the day is a proposal that defies common sense. This would put our crew at risk, something that is not acceptable to me. To record events at night, when safely moored would be a far better solution. It is a logical step to move into an updated reporting system, as opposed the log books which are currently used.

Consultation with the fishers and families would produce a far better outcome for the welfare of our seas and fish stocks. The majority of fishers are wanting to promote the best practice, scientific research and safety on their boats. Working together with them would enable logical workable regulations to be put in place. A far better solution than trying to enforce unworkable systems by people with little or no knowledge of fishing, sea conditions and how our fishing community works.

In summary, the proposed event reporting is not feasible in the current format. Reporting is not opposed by fishermen, but use some logic and have it changed to once a day, when boats are safely moored. Use consultation with fishermen to promote best practice, research and safety. We all want our industry to be successful, to understand good scientific research to promote the quality of our fish and to have our fishing men and women return home safely.

Regards

Robyn Haggerty

August 2017

To whom it concerns

I am an owner/operator of a commercial fishing boat. I have been in the fishing industry for about 36 years.

I am writing this about AIS, Electronic Monitoring and Cameras.

Theres a lot of reasons I don't want these on my privately owned boat. Privacy is a big one. Our fishing grounds are varied around the ^{s 9(2)(a)} [REDACTED] There are quite a few boats from ^{s 9(2)(a)} [REDACTED] ^{s 9(2)(a)} [REDACTED] that fish these grounds at times. I have areas that I fish close to rocks (reefs) and AIS tracking will give these areas and more to who ever is watching it. MPI have proven last year that their information is not secret as there was a leak of information to the public which embarrassed them big time. Why are they dictating this stuff on the commercial sector?

Cameras are very invasive and definitely intrude on my and my crews privacy. My boat is 44 feet long and a camrea will see everything we do. This is our home and work place for up to 5 days in a trip and we definitely don't want cameras watching us. My crew has been with my business in excess of 20 years and he is thinking of leaving if cameras are forced on us. If they bring these systems in the way MPI are pushing them there will be a lot of fishers leaving the industry.

Ross Jenkins

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2nd August 2017

§ 9(2)(a)

To whom it may concern:

I would like to address this letter on behalf of myself and my father Denis Nyhon. I would like to put our opinion forward regarding the new IEMRS regulations for cray fishing. We collectively own D P Nyhon Holdings Ltd, we are quota owners and fishing permit holders.

These new regulations will affect my company and my crew members in many areas. Firstly is safety, we often fish amongst rocks and in shallow water and if I as the skipper have to log in daily events, this will take my attention away from the job at hand and risk the safety of my crew. We also are clearly at sea with all sorts of weather conditions daily. We can have big waves, gale force winds and unforecasted weather. In maritime law it clearly states that as a skipper we must maintain a proper watch and lookout at all times. Again these things compromise all of our safety if having to continually log in data on top of our already busy job.

Privacy is another issue for us, I don't like the idea of people knowing exactly where we are all of the time. I have spent many years and hours mapping out all of our fishing areas, I do not want the general public or other fisherman to be able to find out this information with the click of a button, even though you assure me it will be all confidential, nothing in this day and age is confidential. My compromise on this would be to have GSP tracking but it would have to be my information and data and you would have to contact me for it.

Clearly our speed and efficiency will be hugely compromised, our boat and setup is designed for exactly these things. If we have to spend most of our day inputting information that you want will cost us dearly. We fish a vast area, from § 9(2)(a) to § 9(2)(a), we have one of the longest runs in the § 9(2) area, so time for us is critical.

Communication is another factor we are concerned about, the Iridium network has been known to be out for days at a time. In § 9(2)(a) and along some areas of the coast we lose satellite service for hours on end, you have stated that your IT men have said that the data getting sent is not like making a phone call, however we can often not get text messages out for hours at a time either.

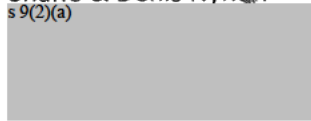
This is our lively hood, our businesses and our passion, obviously one of our biggest reasons is this will cost us a lot of time, and I am sure you can appreciate time is money. If any of the new equipment breaks down, including the cameras then legally we will have to stop fishing immediately. Therefore we would have to travel back to shore, then travel about five hour's drive to find somewhere to have this fixed, this could end up costing us a week's worth of fishing. On another point if our pots are inshore and the weather is turning bad, we wouldn't legally be able to move them to safety, therefore if our pots are lost it could cost us over § 9(2)(b)(iii) to replace them. If you didn't realise already, our prices for cray fish can range a lot throughout the year, we often have big highs and big lows, so if any equipment broke down over the big high prices, it could end up costing us greatly.

In my opinion I feel that why should we as fisherman, have to log all our information as we go, no helicopter pilot is required to log his information as he fly's, no truck driver is required to log his information as he drives and it is illegal to drive a car and text. It is dangerous and could cause some serious implications for us fisherman.

I do feel that the IEMRS regulations could be a positive thing, however there needs to be a lot of work done before it reaches this point.

Yours Sincerely

Shane & Denis Nyhon
s 9(2)(a)



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From: Future of Our Fisheries Programme
Sent: Monday, 21 August 2017 6:17 p.m.
To: s 9(2)(a)
Subject: FW: Consultation on draft circulars on digital monitoring of commercial fishing

From: s 9(2)(a) [mailto:s 9(2)(a)]
Sent: Monday, 21 August 2017 4:30 PM
To: Future of Our Fisheries Programme <FutureofOurFisheriesProgramme@mpi.govt.nz>
Subject: Consultation on draft circulars on digital monitoring of commercial fishing

21 August 2017

To whom it may concern,

My name is Shannon Hawkless I have been fishing since I was 15 (25 years). I have a 13 metre Blue Cod and Cray fishing boat out of s 9(2)(a). My concern about IMERS is that I have work very hard over the years to get all MY own marks for fishing and I am not prepared to share them with anyone. Every one knows hackers are at large and we can't be guaranteed that our information will be safe. Not to mention the cost.

As for the camera's I feel they are an invasion of my privacy as the boat is our home while at sea, and why should we have camera's on when we are not working. NO ONE has cameras on them when they go home from work.

Last but not least My Family and I use the boat for our holidays. There is noway we will be able to have an enjoyable holiday while being monitored and camera's running.

Regards
Shannon Hawkless

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12 August 2017

To whom this concerns,

My name is Trevor Johnson, s 9(2)(a). I am a blue cod area s 9(2)(a) quota holder and owner/skipper of the s 9(2)(a)", fishing out of s 9(2)(a). We are a 38 foot boat and employ 1 crew.

I have been fishing for 45 years. I oppose the compulsory introduction of monitoring equipment and surveillance cameras on all fishing vessels, as proposed by the Ministry for Primary Industries (MPI).

Blue cod fishing does not have a huge profit margin, with many hidden costs, and with the extra costs that MPI are implementing, this will put many small operators out of business. We know of 3 other fishermen at s 9(2)(a) who will not be continuing due to the costs involved, which means more crew unemployed as well.

All fishing from our boat is by potting, so all fish are alive. No endangered species can be caught in our cod pots ie. Penguins, seals or birds.

We work very close to shore, sometimes in bad weather, and feel with the new regulations it is a health and safety issue, with the crew being on deck and the skipper in the wheelhouse. Surveillance cameras on such a small boat is an invasion of privacy. We live on board, this is our home away from home and to be watched 24/7 – not even criminals have this.

Many fishermen are stressing with the added pressure they are under, fishermen go out to their workplace in good weather, but conditions can change very fast, making their job one of the most dangerous jobs out there.

Unfortunately Nathan Guy has more empathy for farmers "mental well being" than the fishing community.

Trevor Johnson

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From: John Hadfield § 9(2)(a)
Sent: Saturday, 12 August 2017 9:10 a.m.
To: Fisheries Review
Subject: Digital Monitoring

Sirs,

My commercial fishing vessel § 9(2)(a) is a unlockable 9 metre trailer boat, a Naiad, which is stored in a public motor camp at § 9(2)(a).

This vessel is used for day trips only in § 9(2)(a) for mainly Albacore tuna and a few paddle crabs. The § 9(2)(a) is surveyed out to 12NM and when we are catching fish, I employ up two crew.

As it's a open trailer boat, after a days fishing, everything of value, eg GPS, sounder, fishing gear etc is taken out of her before she is parked up for the night.

For the last 50 odd years, I have worked on or under the water and this is something that I love doing. Due to my age, family and health reasons, I have slowed down and I'm only a very small player but it's something I love doing.

The cost of buying and running this digital monitoring equipment will simply

PUT ME OUTA BUSINESS as the boat does not earn enough to cover this extra cost.

QUESTIONS

1/ E-logbook reporting, As we only do day trips, surely I'm able to use my home computer at the end of the day to send in reports??

2/ GPR This vessel is only surveyed to 12NM, in all this area of operation there is good cell phone coverage. Anyone can track my iPhone.

3/ Camera, What is hand gathering?? We fish for albacore and paddle crab, both these species have no size limit and all gear is pulled in by hand, the same as a eel fisherman. Is this hand gathering??

I can see how this system will work for the big boats who are out for weeks at a time catching all species of fish in the deep water but feel this is a overkill on the small inshore vessels who are just hanging in there, for them it will be the last nail in the coffin.

Please could someone take the time to read this and answer the questions so I can plan my future.

Cheers

W.J. Hadfield

§ 9(2)(a)