

3rd November 2012

David and Denise Anderson

Rock Lobster Submissions

Fisheries management-Inshore Fisheries

Ministry for Primary Industries

P.O.Box 2526

Wellington 6140

Submission on

2012 REVIEW OF ROCKLOBSTER CONCESSION AREA REGULATIONS

I strongly support options 2A to 2H to change the Concession Regulations in CRA7

2A Remove the CRA7 Closed Season

The closed season significantly impacts on my ability to catch the ACE I hold and buy in each year. The effect of poor weather, lobster not potting after storms, variable moult times and females becoming berried all impact on our access during the short season.

I started Cray fishing this year on the 25/06/2012 and by the 25/10/2012 we have worked 66 days and had 61 days off due to bad weather and a rough bar at Taieri Mouth. This year there was a big storm in early June that drove a lot of our smaller fish away. A lot of our rough weather this year has been easterly which makes the crayfish go dormant in our area. Fishermen of 50 years' experience have told me this is the case.

In late June early July fish go into the moult, depending on the weather conditions this could happen early or late. A lot of our inshore reefs are in 9 fathoms of water. When we get a big storm these reefs sand up, some have been sanded up for 4 seasons. This gives the crayfish less habitat; along with the mataitai this disadvantages us dramatically. Our outside reefs

don't start potting until labour weekend, leaving only 5 weeks around weather to fish these areas.

I believe even though the ACE for the season isn't all caught, this isn't a true indication of the state of the fishery. We need a 12month season to work around the weather, and other seasonal variations in crayfish availability. The amount of ACE available relates to CPUE through the CRA7 management procedure. A longer season won't increase the TAC, but it will give us the flexibility to catch the ACE we have available.

2B Remove the Buffer Zone

If this was opened it would let us spread our fishing effort on limited grounds. It would let us take more 3A's leaving more 4A's on the ground. The buffer zone area is deeper water, extending the weather we can fish with the advantage of having gear at less risk. While we wait for the outer reefs to open we would have an extended area to fish. Our coast has very limited foul ground, with the Mataitai closure the addition of the Buffer Zone would redress our loss of productive fishing.

With the increase in fuel costs, having access to launch from the Catlins river rather than Taieri Mouth would assist in keeping running costs down.

We are not asking for a TAC increase, just a chance to catch what we have when there is a hell of a lot of obstacles put in front of us.

Dave and Denise Anderson

Tairāwhiti Rock Lobster Industry Association Inc.

CRAMAC 3

Private Bag 24-901 Wellington 6142

December 13th 2012

Rock Lobster Submissions
Fisheries Management-Inshore Fisheries
Ministry for Primary Industries
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SUBMISSION ON THE REVIEW OF ROCK LOBSTER CONCESSION AREA REGULATIONS

The Tairāwhiti Rock Lobster Industry Association [TRLIA] is the mandated industry organisation in CRA 3 for quota owners, processors, exporters and fishermen.

TRLIA supports the IPP submission from the NZ Rock Lobster Industry Council (NZ RLIC).

CRA 3 May closure.

TRLIA supports the removal of the May closure, [Option 2]

The issue that this regulation was supposed to control, holding over <54mm male lobsters caught in May to be landed in June, is redundant. The use of holding pots for more than a few days in this area is risky and reduces the quality of lobster for live export.

With the CRA 3 Management Procedure operating since 2010 the commercial harvest is well within the total available stock and is focused on quality and price.

The quota year starts on April 1st. With some fishermen recently fishing in April it can be awkward to manage removing lobster pots before May 1st.

A Gisborne fisherman was heavily fined this year for having some pots in the water after bad weather prevented their removal. This is not a sustainability issue.

CRA 3 Landing requirements.

TRLIA supports no change to this regulation. [Option 1]

This has not been an issue. The few prior approvals that have been needed since 1993 have caused no problems.

Domestic sales.

TRLIA supports allowing CRA 3 domestic sales. [Option 2]

As noted above, the focus of CRA 3 fishermen, processors and exporters is on producing a high quality product that fetches the highest price. The high value of CRA 3 ACE is a strong incentive to only land and process high quality lobsters. Inevitably, a very small amount of <54mm TW lobsters become 2nd grade and unsuitable for live export. At present these are exported as frozen whole or tails for little or no return.

In having the ability to sell <54mm lobsters on the domestic market, CRA 3 processors would be well aware of some negative public perception and would take appropriate steps to identify the product as legitimate.

The TRLIA supports the NZ RLIC contention that the record keeping and reporting requirements of the QMS gives all the assurance that compliance requires.

Export container labeling and packaging requirements.

TRLIA supports amending container labeling requirements to "CRA 3 rock lobsters". [Option 2]

Export requirements.

TRLIA supports amending CRA 3 export requirements to equate with the existing CRA 8 requirements. [Option 2]

Export notification and records.

TRLIA supports no change to current CRA 3 situation, that no export notification or records be required.

Allow Recreational access to the CRA 3 commercial MLS

The TRLIA has always supported the recreational sectors access to the 52-54mm TW male lobsters in June, July and August. This provision was in the original proposal that the CRA 3 User Group, [customary, commercial and recreational] submitted to the Minister of Fisheries in 1993.

The refusal of the Ministry of Fisheries to allow recreational access has blighted what has otherwise been a very successful fisheries management initiative by a united multi-user group.

So much angst, time, paper and money has been wasted over this issue since some recreational representatives ignited it in the early 2000's. The CRA 3 Forum that formed in 2006, at the Ministers request, spent almost four years trying to resolve the recreational complaint. The Forum chose to work towards a "*sustainable, informed and healthy fishery for all sectors*".

The principal achievement of the Forum was the development and implementation of a CRA 3 Management Procedure that ensured that the commercial catch would be adjusted promptly in response to observed changes in stock abundance. The management procedure uses the settings that reflect the level of stock abundance observed in the 1970s. This should ensure that quantities of lobster available for non-commercial fishing remain healthy.

Allowing recreational access to the CRA 3 commercial MLS would help remove the accusations of inequity and remove the implied slur on the characters of Gisborne s recreational lobster fishing public by the MPI.

Yours sincerely

Gordon Halley

Chairman, TRLIA



The Otago Rock Lobster Industry Assoc.Inc.

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12 December 2012

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OTAGO ROCK LOBSTER INDUSTRY ASSOCIATION [ORLIA]

Submission on

2012 REVIEW OF ROCK LOBSTER CONCESSION AREA REGULATIONS

The ORLIA supports options 2A to H. To change the current set of Concession Area Regulations for CRA7

2A. Remove the CRA7 closed Season.

2B. Remove the CRA7 'Buffer Zone'

2C Remove the CRA7 home port and vessel registration requirements

2D Amend the CRA7 landing requirements; must be landed within CRA7[or elsewhere subject to prior approval and conditions] and be delivered and sold to a licensed fish receiver[LFR]

2E Remove requirement for consumer pack on CRA7 domestic sales. Industry to establish and maintain a horn tag identification program in consultation with MPI for lobster less than 54/60 TW sold on the domestic market.

2F Amend CRA7 Export Container labelling for lobster less than 54/60TW to; must be held in containers marked CRA7 rock lobster.

2G Remove export notification and record requirements for CRA7.

The Otago Rock lobster Industry Associations members hold 95% of quota shares and are 80% of CRA7 fishers. The association welcomes the opportunity to present this submission on the review of Otago concession regulations.

The CRA7 fishery is unique among New Zealand lobster fisheries in having a significantly smaller MLS. This regional difference being in recognition of the predominantly recruitment habitat of the Otago Coast, and the regular southern migration of 4 to 6 year old lobster.

REMOVE THE CRA7 CLOSED SEASON

The closed season was established in place of a TAC cut pre QMS. This made sense at the time as TAC's could remain unchanged for more than a decade. For a fishery with a cyclical level of abundance a drop in TAC would mean severe limitations on catch when the fishery bounced back. Today's fishery is managed through 5 yearly stock assessments built on independent catch data and catch effort information. This stock assessment establishes a management procedure based on annual abundance. The abundance being derived from catch per unit effort data [CPUE]. Closures to limit fishing are no longer relevant when the TAC is adjusted annually based on abundance.

The closed season has significant impact both on the water and in the market place. In a season such as this year, half the potential fishing days have been lost to bad weather. Variability in when lobster moult, berry and pot all make a short season a lottery. The last 2 seasons we have had fishers placing themselves at considerable risk in extended periods of bad weather. In response to a closure which is no longer relevant to the management of the CRA7 fishery.

The smaller lobster is ideal in the domestic market. The lower cost per Kg and per unit brings Otago Lobster into the market at a food costing sustainable for the hospitality industry. The domestic market wants live lobster 12 months of the year. The Otago fish can make lobster affordable and available to the NZ public.

The export market for small live lobster exists in China as a niche within the hotel sector. The returns to date have been double the traditional returns for frozen product. This market is looking for a 12 month supply and has the potential for the returns to grow. The smaller unit size hence lower unit cost will definitely grow demand.

The question for recreational fishers is one of abundance. During periods of high abundance on the Otago coast we observe a significant increase in recreational fishers targeting lobster. The closed season doesn't increase abundance. Support for projects to enhance recruitment, and re-establish settlement habitat through rebuilding of lost coastal kelp forests is the answer to increased abundance. All stakeholders need to be proactive in enhancing this fishery. We acknowledge the investment will have to come from the commercial sector. In order for this to progress historical limitations on the industry need to be removed.

REMOVE THE CRA7 BUFFER ZONE

As a compliance tool the buffer zone is redundant. The price advantage in moving lobster north from CRA8 is in 54/60 TW fish. Why truck smaller grades into Otago when they return half the money. The buffer zone in no way prevents this from happening. In reality it is the reporting of

illegal activity by fishers and the public which makes trucking of lobster too risky, not a buffer zone.

Again access to the fishery is about abundance not exclusive areas. We don't observe large numbers of recreational fishers taking advantage of the commercial exclusion the buffer zone creates. In a migratory fishery, regular recruitment and settlement habitat are what count. The re-establishment of the kelp forest at the Nuggets is the answer to local abundance. The Kelp forest was lost in the late 1970's through fine sediment build up through repeated flooding in the adjacent catchment. As the town of Kelso was abandoned, so to the coastal kelp forests were destroyed.

LANDING PROCESSING AND DOCUMENTATION REQUIREMENTS

These regulations were introduced before today's paper trail for all fish species became universal. These regulations and requirements are now redundant. Allowing the packing of CRA7 lobster in Christchurch will significantly shorten export transport times and increase export returns from CRA7.

IDENTIFICATION OF OTAGO MLS LOBSTER ON THE DOMESTIC MARKET

The present consumer pack as defined by the concession regulations, limits sale of Otago lobster to frozen or fresh cooked on the domestic market. The New Zealand market has undergone a dramatic shift in its preferences for seafood. With the finfish species very fresh is king. With shellfish and lobster the demand is for live product.

The small Otago lobster have at times raised concerns from the public that undersized fish are being sold. The Otago Rock lobster Industry Association undertakes to develop a horn tag program in consultation with MPI to identify Otago lobster smaller than 54/60 TW. To both promote sustainably sourced lobster and identify their origins. We believe this will give the NZ public confidence in their purchase of an affordable smaller lobster and prevent the potential for smaller lobster being sold illegally. To this end we have sourced sequentially numbered horn tag from Australia which are tamper proof. We are in a position to establish distribution and record keeping protocols to ensure a robust identification process.

Simon Gilmour
Executive Officer



10 December 2012

Rock Lobster Submissions
Fisheries Management-Inshore Fisheries
Ministry for Primary Industries
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SUBMISSION

Review of Rock Lobster Concession Area Regulations

This submission is made by the CRA8 Management Committee Inc. ("the Committee"). This organisation is a fully constituted and incorporated society that is recognised as the commercial stakeholder organisation representing the interests of the commercial rock lobster industry in the southern South Island including South Westland, Fiordland, Stewart Island, Foveaux Strait and adjacent islands.

The decision by the Minister for Primary Industries earlier this year to continue with the various minimum legal sizes within the three rock lobster fisheries (CRA3, CRA7 and CRA8) means that there is no nationally consistent MLS and as such the MLS in each area simply is what it is. The Committee submits that once this situation is accepted (and it now must be) the opportunity arises to "normalise" the various concession area regulations.

There is no doubt that the current regulations have not kept pace with the dynamics or operation of modern commercial rock lobster fisheries and represent a mind-set of a different time. As acknowledged in the IPP, more comprehensive recordkeeping and reporting regulations have been introduced since many of the concession area regulations. Further, they impede on business and impose unnecessary costs. This submission is based on these facts.

This submission will firstly address the issues raised in Table 1.1 on pages 2 and 3 of the Initial Position Paper that are applicable to CRA8.

The term "CRA8 lobsters" is used to refer to female lobsters between 57mm and 60mm in tail width.

B. Remove the CRA7 Commercial ‘Buffer Zone’

The Committee supports the removal of the CRA7 “buffer zone” between the boundaries of CRA7 and CRA8.

The ‘buffer zone’ is an historical artefact that serves no useful purpose in the context of current fisheries management. This was introduced to address a perceived compliance risk of “trucking” catch from one management area to another. The IPP correctly notes that any risk of its removal is mitigated by the minimum ACE holding requirements¹. Further, the requirement proposed under Option 2D also mitigates any opportunity for this to occur.

The Committee does not support any other additional measures proposed. The measure proposed by bullet point 3² is unnecessary and any perceived risk is also addressed through Option 2D.

D. Landing Requirements

The Committee supports the continuation of the option to allow CRA8 lobsters to be landed within the CRA8 area or elsewhere subject to prior approval and conditions.

The Committee does not agree that there needs to be a requirement that all landings must be to a LFR. Wharf sales are a legitimate option for disposal of lobsters to maximise economic return and recordkeeping requirements provide sufficient documentary evidence.

E. Domestic Sales

The Committee is fully supportive of the option to allow domestic sales of CRA8 lobsters. This is an issue that the Committee has pursued for more than six years.

The reality of the live lobster trade is that at various times of the year CRA8 exporters can take advantage of windows of opportunity in the market to achieve best prices. These opportunities arise from competing countries still retaining closed season provisions in the management of their lobster fisheries. Therefore demand outweighs supply. However when the competing countries are supplying the markets the opposite applies. It is at this time that better prices may be achieved on domestic markets.

The current situation where CRA7 lobsters may be sold on the domestic market illustrates the inconsistency and irrationality of the prohibition.

A large part of the reluctance to allow domestic sales arises from some long-held perception of an increase in compliance risk. However this has never been substantiated. When this issue was previously assessed by way of an IPP in 2006 that IPP stated that “*Allowing Southland Concession Area lobsters to be sold in NZ would most likely increase illegal take of undersize lobster by providing more opportunities for fish thieves to hide trafficking in illegal, undersize lobster.*” It then went on to say, “*...MFish has little information to inform a judgement about the size of the compliance risk*”.

The lack of detailed information in the current IPP indicates that this situation has not changed.

¹ IPP Page 12

² IPP Page 11

There will always only be a limited number of outlets (wholesale and retail) that will deal in rock lobster. This number is unlikely to increase substantially due to the opportunity for CRA8 lobsters to be sold domestically. MPI is assuming that a considerable number of outlets have a propensity to deal in illegal fish. By making these assumptions MPI is effectively admitting that it is not and cannot create an effective deterrent against fish thieving.

CRA8 quota share owners pay substantial compliance levies and the Committee has an expectation that in the event of an increase in perceived compliance risk that some of this money would be used to:

- (i) mitigate any compliance risk; and
- (ii) protect the value of the property right held by CRA8 quota share owners.

The Committee does not support any new regulation that would require the labelling or tagging of rock lobsters. Adequate opportunity for compliance monitoring is provided through the current recordkeeping and reporting regulations.

The Committee submits that if the individual marking of lobsters is deemed necessary, the responsibility should fall on the sector causing the compliance risk through the taking and selling of illegal lobsters. That is, telson clipping should become mandatory for the recreational sector.

F. Export Container Labelling and Packaging Requirements

The Committee supports the removal of all requirements for additional container labelling or packaging.

Again, current recordkeeping and reporting regulations are sufficient to allow the audit of product flow between LFRs and their various premises prior to export. The IPP is unclear as to whether the suggested option would apply to all lobsters from a particular fishery or only those that are less than 54/60 in tail width. The purpose of such labelling is also unclear. If it is to provide some form of identification once product is packed for export then the required export documentation does this. In either case the suggestion achieves little of value and simply adds cost and time impositions.

Many species of fish are bought and sold by LFRs and brokers within New Zealand prior to export. No additional requirements are imposed.

G. Export Requirements

The Committee supports the continuation of the current requirement. The continuation of this requirement in relation to the export of CRA8 lobsters provides an additional audit trail and strengthens our position in relation to the removal of additional labelling or packaging needs.

H. Export Notification and Record Requirements

The Committee supports the removal of these requirements. Again, the current recordkeeping regime provides this information.

Other Management Measures for CRA3, CRA7 and CRA8

Allow Recreational Fishers Access to the CRA3, CRA7 and CRA8 Commercial MLS

The Committee supports this option. Stock assessment models already assume this, therefore there are no sustainability concerns with such an initiative.

Fisheries offences are strict liability offences in law. Therefore the burden of proof lies with the person in possession of and fish to prove that it was taken within the prescribed regulations. This will also be the case in this instance for any lobsters that may be of a different MLS to the area in which they are found.

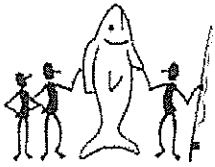
The Committee does not agree that there is a need to carry out research to investigate whether the CRA8 commercial MLS is negatively impacting on recreational benefits. All anecdotal evidence from recreational fishers in CRA8 is to the contrary. The CRA8 fishery is managed through the CRA8 Management Procedure at a very conservative level that allows for high abundance within the fishery. Further, commercial fishing is prohibited within large areas (inner waters of Fiordland and Paterson Inlet, Stewart Island) where recreational fishing is concentrated.

Summary

The CRA8 Management Committee Inc.:

- Supports Option 2B;
- Does not support any additional requirements specific to the removal of the “buffer zone”;
- Supports Option 2D in part;
- Supports allowing the sale of CRA8 lobsters via wharf sales;
- Supports Option 2E;
- Does not support a requirement for additional labelling or tagging of CRA8 lobsters;
- Supports Option 2F in part;
- Does not support any requirement for additional labelling;
- Supports Option 2G;
- Supports Option 2H;
- Supports access by recreational fishers to rock lobsters at or above the CRA8 commercial MLS;
- Does not support the recreational sector view that additional research be carried out into the impact of the CRA8 commercial MLS on recreational benefits.

Malcolm Lawson
Chief Executive Officer



Crayfish Submission On Behalf of The Southern FMA3 and 5 Recreational Forum **December 2012**

We would like the concession for fish removed from Cra3 and Cra7.

We realise that this is not on the table for discussion as the decision is made with respect to concessions . It now means that there is a MLS that is now a lot smaller . The principle is wrong to have these concessions as it goes against the biology of crayfish. Cra7 exists as an area supporting the surrounding areas with small immature crayfish. A concerted effort to catch MLS crays in cray7 will have a major detrimental effect on the surrounding areas that will have a reliance on CRA7 for stock replenishment. More research is required on this with the possibility of combining the two areas CRA7and CRA8.

As there is a new MLS for Cray 3 and Cray 7 it should apply to all sectors.

This is only fair. For standardization the MLS should be tail Width.

We do not support the removal of the Buffer zone between Cra 7 and Cra 8

There were very good reasons for closing the zone and these reasons still exist.

The removal of this zone will open up the area to the potential of more abuse of the commercial regulations as has happened recently with trucking. This is a rugged piece of coast that is difficult to assess how many crayfish come out of the zone but it is valuable to recreational while the concession is in place to have a buffer zone which separates 7 and 8 distinctly.

We do not support the opening of the commercial season for CRA7 beyond what it is now.

The fish are under pressure now.

The Recreational groups have a window when commercial are not on the water . This allows a special separation for recreational that we do not want to lose.

We do not support any change to domicile port or landing requirements .

Commercial are already stretching the regulation boundaries as evidenced by the recent court cases in respect of trucking which emphasizes their disregard of the reasons for the regulations and the respect of the fishery. The proposed changes will also make policing of commercial take more difficult.

We support the use of plastic ties when crays are held in Coff/holding potsfor the Fiordland Cray area.

This is a simple and effective way of identifying each persons take.


We don't support the Fiordland Fishery having to provide data on recreational catches .

We do not support keeping log books. Fiordland does not make it easy to fill out log books because of wind and rain. The whole idea of recreational fishing is to get away from filling out forms and paper work. Recreational fishing is recreational, not office work.

Crayfish Submission On Behalf of The Southern FMA3 and 5 Recreational
Forum December 2012

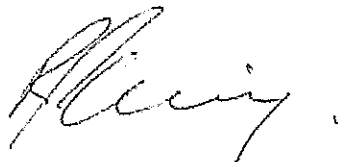
Signed by Forum Members for FMA3&5 Recreational Forum

Alan Key 

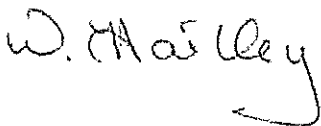
Mark Conner 

Gerald O'rourke 

Ross Divett 

Richard Craig 

Nelson Cross 

Bill Hartley 

Submission to the Ministry of Primary Industries on the 2012 Review of Rock Lobster Regulatory Controls

This submission is presented on behalf of the FMA2 and FMA8 Combined Recreational Forums.

The area covered by these forums is from New Plymouth in the West to East Cape in the East - the total bottom half of the North Island.

Why is it so hard for the Ministry of Primary Industries to understand the frustrations of Recreational fishers over the concession fisheries?

It is because a privileged minority have access to concession fish and now want to remove all restrictive regulations to pollute the New Zealand domestic market with small crayfish to increase value derived from the fishery.

This equates to nothing more than Commercial greed with no regard to Recreational fishers.

Why are Recreational fishers denied value from a concession fishery.

All science indicates that the removal of the concession fish has no effect on sustainability but it is still measured in tonnes and not individual fish.

There is no mandatory requirement to report percentage of concession fish landed.

If this is the case, **WHY** is it not possible to allow Recreational fishers the same access to concession fish as Commercial and Customary.

The Forum rejects any change to existing regulations until equal access is granted to Recreational fishers.

There is no support for concession sales within New Zealand.

The FMA2 and FMA8 combined Forums support the following options:

A. CRA 3 and CRA 7 closed seasons	Option 1	Status Quo
B. CRA 7 closed season	Option 1	Status Quo
C. CRA 7 vessel requirements	Option 1	Status Quo
D. Landing requirements - CRA 3	Option 1	Status Quo
- CRA 7	Option 1	Status Quo
- CRA 8	Option 1	Status Quo
E. Domestic sales - CRA 7	Option 1	Status Quo
- CRA 3 & 8	Option 1	Status Quo
F. Export container labelling & packaging requirements		
- CRA 3	Option 1	Status Quo
- CRA 7	Option I	Status Quo
- CRA 8	Option 1	Status Quo
G. Export requirements - CRA 3	Option 1	Status Quo
- CRA 7	Option 1	Status Quo
- CRA 8	Option 1	Status Quo
H. Export notification & records		
- CRA 3	Option 1	Status Quo
- CRA 7 & 8	Option 1	Status Quo

Customary should not be part of this conversation as they sit in a privileged position and can

harvest any sized fish as they see fit.

If equal access is not granted a compliance nightmare will evolve and a civil disobedience will be justified.

Industry has already stated that there will be no negotiation with regards to this IPP paper, so does this mean we are yet again being consulted on a predetermined outcome.

*For and on behalf of the FMA2 and FMA8 combined forum members.
George Zander*



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Submission to Ministry of Primary Industries
2012 Review of Rock Lobster Regulatory Controls

11/12/12

GTSFC support the following for CRA 3:

- A- Option 1
- D-Option 1
- E-Option1
- F- Option 1
- G-Option 1
- H- We would like to see the same mandatory requirements as CRA 7 and 8 regarding notification of export and amount (including size i.e. concession or legal 54mm)

We ask the minister to consider the following:

1. Fishing undersized CRA3 fish does not support sustainability.
2. The CRA3 TACC has been increased yet MPI have no data on how many concession fish are being landed.
3. It is irresponsible of the Minister to support an increase in the TACC when the CPUE is measured off concession take as well as legal 54mm catches.
4. A four year period of mandatory reporting must be completed on CLR's for concession cray and of 54mm+ cray in order to determine true CPUE of legal cray . Meanwhile take of concession cray must be halted.
5. We are not aware of any mandate MPI has to support fishing undersized crayfish. We ask MPI to provide the basis that they think they have for allowing undersized cray to be taken without knowing how much is undersized.
6. We totally oppose the sale of concession CRA3 fish on the domestic New Zealand marketplace as it opens potential for trucking and illegal catch.

Hilton Webb/Linda Coulston
GTSFC



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12 December 2012

NEW ZEALAND RECREATIONAL FISHING COUNCIL

Submission on

Review of Rock Lobster Regulatory Controls

The Council and its Representation

1: The national organisations represented by this body are N.Z. Angling & Casting Association, N.Z. Trailer Boat Federation, N.Z. Marine Transport Association, N.Z. Sports Industry Association and N.Z. Underwater Association. We also support the Ministry led and funded recreational forums of which many of these regional members are now members as individuals.

2: The Council maintains close contact with a number of Iwi representatives. While every effort has been made to consult we do not suggest that this submission is representative of their views.

3: This Council represents over 76,000 recreational and sustenance amateur fishers. In addition by default we represent the public interest in the fishery and those amateur fishers who are non-members. We say by default because we are the only constituted representative body that has been recognised by Government and the Courts of doing so.

4: Over one million people or by recent Ministry of Fisheries figures 20% of New Zealanders fish for sport or sustenance. This does not include those elderly or infirmed amateur fishers who can no longer actively participate in catching seafood for the table. The 1996 research to provide estimates of Recreational and Sustenance Harvest Estimates found that there are approx 1.35 million and increasing recreational and sustenance amateur fishers in New

Zealand and therefore we effectively, through our associated member groups, and lack of any other democratically elected or statutory recognised group represent this number also.

5: The Council has been recognised in three court cases as representing the recreational and amateur fishers of New Zealand. The Council was attached to two of these cases without its prior knowledge and the court papers show it was ordered, "to represent the recreational fishing public of New Zealand". The first of these was the order of attachment to the High Court Action on the Manukau, Taiapure application. The second relates to the SNA1 challenge of the Minister's decision that was heard by the High Court. The Council also holds "Approved Party Status" for consultations with the Ministry of Fisheries and is recognised by them and the Minister of Fisheries as a stakeholder group. In the third case this Council along with the NZ Big Game Fishing Council were the applicants in the recent Kahawai case.

6: The Council has a Board of democratically elected officers and members. The Council consults with its members and the public using various means. These include newsletters, both written and electronic, its web site and various press releases. In addition it consults through the various fishing media and meetings it holds and receives input through those forums.

7: This submission has been prepared and presented after consultation via email and our web site to our members and board members.

8: As previously stated, we are aware that many of our National Affiliates and Regional Members are submitting their own submissions and in most cases we have seen and support these submissions where they are not in direct conflict with this submissions intent or requested outcome.

9: In the submission we talk of both recreational and amateur fishers as these two descriptions are so intertwined. For sake of some clarity recreational fishers referred to are generally those who have an interest in supporting recreational fishing interests while amateur refers to all fishers who exercise their rights to fish under the amateur fishing regulations.

10: Introduction

The NZRFC is very disappointed in the way MPI and the former Mfish have gone about conducting the review(s) of regulatory controls in the Rock Lobster fisheries referred to as "concession fisheries".

11: By splitting the review of the differential minimum size issue off from the other regulatory controls MPI have minimized any chance of trade off between sectors. There is no doubt the package of regulations included in this paper and the size issues are linked but by "locking" in the size there is little chance of addressing recreational concerns with this IPP.

12: This whole process has taken years and it looks as if all that will happen is commercial will be given even more relaxed rules put in place for their inequitable fishing to continue.

13: The recreational sector opposes any relaxation of the regulations pertaining to commercial exploitation of, what are to us, illegal undersized fish.

14: We do not agree with statements in the paper made by MPI that the changes will have no impact on recreational fishers. There is no explanation given and none has been provided at the NRLMG. We question whether MPI is qualified to give an opinion on how we will be affected, as it isn't them who will be impacted upon and no research has been done on this matter so that MPI can make an informed decision. This is a very dangerous assumption.

15: The Options.

- A. The NZRFC opposes the removal of the closed seasons in CRA3 & 7. These closures are one of the few things that provide a ray of hope for the rec sector. They are there for good reasons where in CRA3 it stops the accumulation of undersize leading up to the winter fishing of undersize fish. If MPI doesn't think holding pots are being abused in several of our fisheries by holding fish for long periods resulting in poor quality and increased mortality then you are blind. Removing the CRA3 season will increase mortality. In CRA7 the closure gives some respite to inshore fish during summer when calmer weather allows recreational fishers to access the pockets of fish inshore. Removal of the season will see commercial target these areas and clean out the lot. Once they have got them they will then "top up" with the excessively undersize fish they catch during their present season. Net result for recreational fishers will be an even greater reduction in access.

The NZRFC supports the Status Quo (Option 1)

- B. With there being several prosecutions for trucking in other species in the South Island removal of the buffer zone will result in a far greater chance of CRA8 being abused with tiny lobsters being taken and landed as CRA7 fish. We know fishers have to carry a reasonable tonnage but with the proposals to remove other identifier regulations at the LFR level abuse will occur. All vessels must carry real time position reporting before any consideration could be given to removing the buffer zone.

The NZRFC supports the Status Quo (Option 1)

- C. The NZRFC opposes the removal of this requirement as per the reasons above.

The NZRFC supports the Status Quo (Option 1)

- D. Given the large allowance for illegal removals the NZRFC submits the present relaxed rule in CRA3 re landing requirements isn't doing the job. Surely the experience here combined with the changes in (B) indicates how foolhardy it would be to relax the rules in CRA7 or CRA8. Abuse is bound to occur.

The NZRFC supports the Status Quo (Option 1)

- E. The NZRFC submits there should be no domestic sales of undersize rock lobsters from any fishery let alone relax those in place. With the combined totals of the illegal removals already exceeding the recreational allowance in these fisheries several times over, allowing unfettered domestic sales will be an invitation the fish thieves won't be able to resist. We oppose these entirely.

The NZRFC supports the Status Quo (Option 1)

- F. Although we accept the fisheries in question may have had name changes we don't accept the undersize fish shouldn't be marked as such. Use CRA3, 7 & 8 but they should still be marked as concession fish and the tail width displayed.

The NZRFC supports the Status Quo (Option 1)

- G. The NZRFC doesn't support any relaxation of the export rules.

The NZRFC supports the Status Quo (Option 1)

- H. All concession fish should be notified to MPI prior to shipping. Additionally MPI should be supplied with totals of concession fish both by number and weight for each fishery. It is a piece of information that would be useful at the NRLMG table and despite it being asked for, the numbers aren't forthcoming. Why not?

The NZRFC supports the Status Quo (Option 1)

16: Recreational representatives at the NRLMG have spent countless hours trying to put some equity into the size and access issues in these fisheries and see no reason to support any of these changes that will only see more fish disappear from our plates.

17: Fiordland Review.

- A. The abundance in CRA8 coupled with the extensive areas closed to commercial fishing indicates there will be no sustainability issues from this change. Recreational fishers have taken the pain and should now get the gain.

The NZRFC supports Option 2

- B. For the same reasons as in A.

The NZRFC supports Option 2

- C. The second option is neither workable nor necessary. The obsession by some to want to measure removals by rec fishers is stupid especially in this fishery where abundance is so high. Far better to measure what is in the water and if any significant decline shows up in the future, take action then. The NZRFC feels secure that the Fiordland Guardians will give the NRLMG plenty of warning if they see a problem starting to develop.

The NZRFC supports Option 1

- D. The NZRFC supports the recommendation by the Guardians to prohibit the use of pots in the waters adjacent to Seymour Island, Doubtful Sound.

The NZRFC supports Option 2

18: Other Management Measures.

The NZRFC sees some merit in the use of colored tags where multiple fishers are holding fish in the same pot but asks if this really is an issue worthy of all the work it will create. We believe a code of practice or an indication that all concerned may be prosecuted if any irregularities are detected within a holding pot would encourage individual fishers to better identify their catch. If tag use is introduced it must only apply to fish in the pot and they can be removed immediately upon removal from the holding pot.

19: The NZRFC doesn't support any mandatory written records having to be kept by recreational fishers.

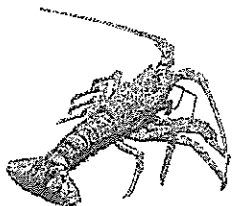
20: Conclusion.

The NZRFC submits that until recreational fishers are given equal access rights in terms of size to Spiny Red Rock Lobster then no relaxation of any regulations pertaining to commercial ought to be granted. The concession access presently enjoyed by commercial is a re-allocation of our fish by a denial of access and opening up local sales will result in more illegal activity in all the Rock Lobster quota management areas.

21: The NZRFC appreciates to opportunity to submit on the review of Review of Rock Lobster Regulatory Controls. We are available to discuss this submission in more detail if needed. We look forward to Mfish addressing our concerns and would like to be kept informed of any future developments.

Yours faithfully,
NEW ZEALAND RECREATIONAL FISHING COUNCIL

Sheryl Hart
Secretary



NZ ROCK LOBSTER INDUSTRY COUNCIL

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December 13th 2012

Rock Lobster Submissions
Fisheries Management-Inshore Fisheries
Ministry for Primary Industries
PO Box 2526
Wellington 6140

NZ Rock Lobster Industry Council

Submission on

2012 REVIEW OF ROCK LOBSTER CONCESSION AREA REGULATIONS

**REVIEW OF FIORDLAND (TE MOANA O ATAWHENUA) MARINE AREA
ROCK LOBSTER AMATEUR REGULATIONS**

SUMMARY

The NZ Rock Lobster Industry Council (NZ RLIC) supports a range of proposed amendments to Concession Area Regulations.

The NZ RLIC submits that the opportunity to “normalise” the Concession Area Regulations arises from previous Ministerial decisions to retain differential minimum legal sizes in rock lobster fisheries.

The decisions are absolutely consistent with the management approach applied to rock lobster stocks – individual assessments and TAC/TACC setting procedures regularly reviewed and updated.

Those decisions confirm that there is no national standard MLS.

The NZ RLIC therefore has a fundamental objection to the designations of “Concession Areas” and/or “concession rock lobsters”. We understand that the references arise from historical limitations to the structure of regulations but we submit there is no longer any reason to perpetuate the notion of concession and/or privilege that is implicit in the designation “Concession Area Regulations”.

Our submission is that proposed amendments should include the incorporation of any regulations pertaining to differential MLS into general Fisheries Commercial Fishing Regulations and the removal of the Concession Area Regulations as a sub-set of the same.

The NZ RLIC does not support mandatory labelling or tagging of rock lobsters from areas covered by Concession Area Regulations.

The NZ RLIC will facilitate industry initiatives to identify catches offered for sale where deemed necessary and/or appropriate.

The NZ RLIC has a commitment to support MPI efforts to constrain illegal unreported removals and illegal sales of rock lobsters.

The NZ RLIC supports amendment recommended by the Fiordland Marine Guardians.

Introduction

1. The NZ Rock Lobster Industry Council (NZ RLIC) welcomes the opportunity to submit on the 2012 review of rock lobster regulatory controls
2. NZ RLIC is an umbrella organisation for the nine commercial stakeholder organisations, known as CRAMACs, operating in each of the rock lobster (CRA) management areas of New Zealand. CRAMAC membership

comprises CRA quota owners, processors, exporters, and fishermen in each region. All nine CRAMACs hold a significant majority mandate of CRA quota shares owned in the regions.

3. The rock lobster industry organisational structure places strong emphasis of regional autonomy and self-determination which in itself is a reflection of the important move away from a “one stock all NZ waters” management approach for the rock lobster fisheries in favour of separate and discrete stock assessment and TAC/TACC setting processes where possible.
4. There is no doubt that various regulations pertaining to commercial rock lobster fishing have not kept pace with the business of rock lobster fishing under the auspices of the QMS. As other submitters have noted, the Concession Area Regulations represent a mind-set of a different time but now the regulatory requirements impede the efficiency and cost-effectiveness of catch receipt, processing, transportation and export routines.
5. As acknowledged in the IPP, more comprehensive recordkeeping and reporting regulations have been introduced since many of the concession area regulations were implemented. Further, they impede on business and impose unnecessary costs. Adequate opportunity for the audit and monitoring of all commercial product flow of QMS stocks including rock lobsters is provided through the current QMS recordkeeping and reporting regulations.
6. The NZ RLIC has a fundamental objection to the designations of “Concession Areas” and/or “concession rock lobsters”. We understand that the references arise from historical limitations to the structure of fisheries regulations but we submit there is no longer any reason to perpetuate the notion of concession and/or privilege that is implicit in the designation “Concession Area Regulations”.
7. MLS differentials are long established for all the right reasons. There are no grounds for consideration of a national standard MLS for rock lobsters; there is nothing particularly ‘sacred’ about the 54/60 TW measure used for commercial fishing in some CRA areas and by recreational users nationally. That measure could just as easily be different, either smaller or larger and whatever MLS might be selected for a lobster stock there will always be a requirement for users to be compliant with that MLS.
8. In the current IPP the Ministry notes in relation to differential MLS that – *“compliance implications ... could be mitigated through a requirement that recreational fishers must not possess rock lobsters below 54/60 TW MLS outside of the ... (Otago or Southern) area...”* The NZ RLIC contends that the suggested requirement is just a simple extension of the status quo that applies to recreational and commercial users.

Compliance and enforcement issues

9. It has long been the industry view that fish thieving is a major problem so we are not taking the matter lightly in our appraisal of the MPI Compliance risk assessment of differential MLS.
10. The MPI stance on MLS differentials appears to be that despite all of the record and reporting requirements associated with rock lobster landings, differential MLS creates an opportunity for fish thieves to trade illegal undersized rock lobster from any management area where a larger size limit applies.

11. Those observations may well reflect an MPI perspective but they are not demonstrably correct; yet they are fundamentally the reason why differential MLS lobsters from audited commercial product flow are still encumbered with additional landing and labelling requirements that are not applicable to lobsters landed at 54/60 TW MLS, nor applicable to other QMS stocks where MLS differentials exist.
12. The current IPP seems at odds with its intended outcomes when MPI previews an expectation of “*new requirements*”. With regards to the CRA 7 fishery MPI considers there is minimal compliance risk associated with removing the ‘Buffer Zone’ as long as requirements are implemented to restrict movements of rock lobsters from one management area to another prior to landing to an LFR. These include:
- *Prohibiting any person from being in possession of any CRA 7 and CRA 8 rock lobster catch together at the same time (e.g. on board any vessel or vehicle)*
 - *A mandatory requirement for any rock lobster taken in accordance with the CRA 7 and CRA 8 Concession Area Regulations to be landed only to an LFR within the respective management area that they were caught (or landed elsewhere subject to prior approval and conditions).*
 - *Prohibiting any person from removing rock lobster (taken in accordance with the CRA 7 and CRA 8 Concession Area Regulations) from one management area and then possessing the same rock lobster in another management area, by prohibiting the transport, transfer, holding and storage of rock lobsters between CRA 7 and CRA 8.*
13. These new ‘operating conditions’ impose as much restraint and inefficiency as the proposed regulatory amendments seek to alleviate. They are unnecessary in our view. There is adequate opportunity to audit and monitor commercial product flow. The movement of catches – ‘trucking’ – is not contingent upon or a consequence of MLS differentials. It is our observation and experience that catches landed by fish thieves find their way into the domestic economy independently of commercial fishing.
14. In our view fish thieving is effectively a stand-alone enterprise which capitalises on the combinations of stock abundance, socio-economic circumstances and any perceived risk of detection and prosecution. To our knowledge there is no evidence of fish thieves leveraging any commercial quantities of product off any existing MLS differentials – not only for lobsters, but for any QMS stock. If we had even a snippet of information suggesting that was happening it would immediately be passed to MPI Compliance officers.
15. The NZ RLIC again notes that the QMS has resulted in long-term investment in the business of rock lobster fishing, from vessels to processing facilities, which in turn has significantly reduced incentives for illegal activity. We note again that irrespective of any MLS the transshipment of lobsters caught in one QMA to be landed in any other QMA is illegal and has been since October 1990; yet there are no examples of prosecutions for any significant breaches by lobster fishermen offered in support of the MPI considerations in the IPP.
16. The MPI Compliance perceptions and preferred remedies are further weakened by limiting the constraints and prohibitions to lobsters ‘*taken in accordance with Concession Area Regulations*’ – that is, only to lobsters that are less than 54/60 TW (that size being the benchmark for determining *differentials*). We submit that the priority consideration in the QMS context is that catch taken in CRA 7 is balanced with CRA 7 ACE; catch in CRA 8 with CRA 8 ACE etc.
17. We submit that in terms of real risks to sustainability and utilisation ‘values’ MLS hardly rates but we note that it is accorded a primacy in the MPI analyses which impedes the opportunity to properly recognise the biological/morphology/behaviour and productivity differences between CRA management areas and to

establish a regulatory framework for standardised business compliance routines. A framework which focuses on the primacy of output controls. It is those which principally determine sustainability thresholds and the quality of the recreational, customary and commercial fishing experiences.

18. The NZ RLIC has no wish to enter into protracted arguments with MPI Compliance personnel on these matters. The NZ RLIC acknowledges that regulations and the 'partnership' with MPI to enforce them are necessary to preserve the integrity of the QMS and of the TACs and TACCs set for rock lobster stocks. However, most if not all of the MPI concerns in relation to MLS differentials are immediately negated at the point where Ministers make explicit allowances for illegal unreported removals when setting TACs. There are no sustainability risks associated with fish thieving in those circumstances unless MPI has underestimated the quantity of being fish thieved. The NZ RLIC would be very surprised if that turned out to be the case.
19. Importantly, MPI Compliance teams have every opportunity to determine the origin and size of lobsters from point of commercial landing through to the end of the commercial product flow chain. The NZ RLIC notes that there is an acknowledged 'gap' in the final links of the product chain to consumers (domestic or international) that is not unique to rock lobsters; but MLS differentials are less 'risk' in MPI compliance and enforcement terms than any quantity of illegal, unreported landing of any QMS stock that finds its way into that gap.
20. As an aside we note that the quantities of lobsters deemed to be "Concession Area" landings which move to the domestic market over the course of a season are relatively small in the context of the combined CRA and PHC TACCs.
21. Information made available to the NZ RLIC suggests that the CRA 3 industry does not see any major business opportunities arising from the proposed domestic sales of differential MLS fish. Their focus is directed at the streamlining and standardising of record keeping and reporting requirements and transshipment protocols so that all CRA 3 lobsters can be CRA 3 lobsters and not have to be distinguished by MLS.
22. Likewise in regards to the CRA 8 industry. Their case is bolstered by the reality of the so-called CRA 8 'concession size' – it is a differential that would be undetectable to domestic consumers unless they carefully measured each lobster offered for sale. We argue that any requirements to distinguish 57 TW females from 60 TW females offered to the domestic market are just overkill. Again we contend that CRA 8 fish is CRA 8 fish; and that the MLS differential is inconsequential in terms of any sustainability or utilisation risks.
23. The domestic market has been of importance to the CRA 7 industry and may continue to be if that industry can successfully manage the negative public perceptions of 'small' and/or 'undersized' lobsters being offered for sale.
24. It is our view that such perceptions are over-stated by a small minority of recreational interests using the differential MLS as an issue to promote their complaints of "inequity". The facts are that Otago Concession Area rock lobsters meet a market demand at a price that the market is prepared to pay. They are legal rock lobsters – as are all rock lobsters coming through the commercial product chain – and in our view can if necessary be tracked from LFR to wholesalers/retailers using existing audit and monitoring provisions.

25. CRA 7 lobster producers and producers elsewhere are smart enough to know that they may need to take action to refute the negative perceptions as promoted by some in the recreational sector and if and when that becomes necessary they have the means to do so.
26. It is for those reasons the NZ RLIC will not support mandatory tagging or marking of lobster destined for markets as suggested by MPI. The NZ RLIC will however facilitate lobster producers using product identification in conjunction with domestic market promotions and/or to consolidate domestic or export market access and reputation.
27. MPI is already aware of 'security tag' trials being run in collaboration with MPI regional Compliance personnel. The NZ RLIC is very willing to facilitate further collaborations with MPI Compliance personnel that might lead to the identification and prosecution of illegal traders but there is no evidence presented to industry representatives at the NRLMG or elsewhere that has yet persuaded us to agree with mandatory catch identification for lobsters of 'different' MLS.
28. It is our strongly held view that all QMS stocks would need to be similarly treated if the logic of the MPI risk assessment is carried through to its conclusion. It seems to us that there would be even greater priority for the QMS stocks for which no explicit allowance for fish thieving had been made when setting TACs.
29. For the purposes of this IPP submission the final word from the NZ RLIC on the risks as perceived by MPI is that they highlight the absolute priority for sector representatives and MPI to sit down and purposefully grapple with the ongoing issues of fish thieving and associated black-market activities. It is an embarrassment to the NRLMG that after twenty years of reports and recommendations, Ministers are still called upon to make significantly large allowances for illegal unreported removals when setting TACs.

CRA 7 MLS

30. The NZ RLIC submits that there is no urgency and no immediate advantage in changing the current CRA 7 MLS from a tail length to a tail width measure.

Allow Recreational access to the CRA 3, CRA 7 and CRA 8 Commercial MLS

31. The NZ RLIC supports this option in principle. Stock assessment models already assume this, therefore there are no sustainability concerns with such an initiative unless aggregate recreational removals exceed the allowances currently made for them.
32. In our view the Ministry must be mindful of such consequences and ensure that part of the 'package' of information and advice that goes to a Minister specifically mentions the possibility that aggregate removals may need to be constrained if recreational fishing success is confirmed to be greater than allowed for. [In the same way that TACCs are adjusted in response to observed declines in stock abundance.]
33. There is a mention in the IPP (S 1.1) of a recreational sector representative requirement "*for research to be carried out to investigate whether the regulations pertaining to the commercial MLS in CRA 3, CRA 7 and CRA 8 are negatively impacting recreational benefits*". The NZ RLIC considers that to be a pointless and unnecessary project in circumstances where stock abundance could not be constraining aggregate

recreational catches in CRA 3 and CRA 8; where exclusive access to fishing grounds over the Spring/Summer period rests with recreational users in CRA 3 and for the time being in CRA 7; but more importantly where no credible measure of “benefit” can even be established for or by the sector.

The Proposed Regulatory Amendments

34. The NZ RLIC supports amendments to current Regulations as shown in the table below

Regulation type		Proposed Change (Option 2)
A. CRA 3 and CRA 7 closed seasons		Remove the CRA 3 May closure
		Remove the CRA 7 closed season
B. CRA 7 closed area		Remove the CRA 7 'Buffer Zone'
C. CRA 7 vessel requirements		Remove the CRA 7 vessel requirement
D. Landing requirements	CRA 3, must be landed within the area (or elsewhere subject to prior approval and conditions) and be delivered and sold to a licensed fish receiver (LFR)	No change
		Amend the CRA 7 landing requirements to equate with the existing CRA 3 requirements.
		Amend the CRA 8 landing requirements to equate with the existing CRA 3 requirements
E. Domestic sales		Allow CRA 7 domestic sales outside of a 'consumer pack'
		Allow CRA 3 & 8 domestic sales
F. Export container labelling and packaging requirements		Amend container labelling requirements to 'CRA 3 rock lobsters'
		Amend CRA 7 requirements to: must be held in containers marked 'CRA 7 rock lobsters'
		Amend CRA 8 requirements to: must be held in containers marked 'CRA 8 rock lobsters'
G. Export requirements		Amend the CRA 3 & 7 export requirements to equate with the existing CRA 8 requirements
	CRA 8 export must be direct from LFR, or through export transshipment point subject to prior approval and conditions	No change
H. Export notification & records	CRA 3, no export notification or records required	No change
		Remove export notification and record requirements for CRA 7 & 8

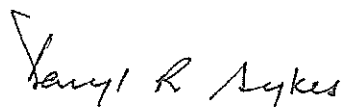
REVIEW OF FIORDLAND (TE MOANA O ATAWHENUA) MARINE AREA ROCK LOBSTER AMATEUR REGULATIONS

The NZ RLIC takes it lead on these proposals from the Fiordland Marine Guardians and supports amendments as shown.

Regulation		Proposed Change (Option 2)
A. Daily Bag Limit		Increase the maximum daily number of rock lobster that may be taken or possessed by amateur fishers from 3 to 6 per day in the internal waters of Fiordland, except for Milford Sound, which is to remain at 3.
B. Accumulation Limit		Amend the rock lobster accumulation defence provisions by removing the accumulation limit of 3 rock lobsters in the internal waters of Fiordland, except for Milford Sound, to allow for an accumulation of up to 15 rock lobsters.
C. Written Records		Amend the rock lobster accumulation defence provision conditions by requiring Fiordland amateur fishers to maintain a written record of all live rock lobsters stored in and removed from holding pots
D. Potting Prohibition		Prohibit the use of amateur rock lobsters pots in the internal waters of Fiordland adjacent to Seymour Island, in Pendulo Reach, Doubtful Sound.

Yours sincerely

NZ Rock Lobster Industry Council



Executive Officer

Mark Connor
President
NZ Sport Fishing Council
PO Box 93
Whangarei
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Rock Lobster submissions
Fisheries Management – Inshore Fisheries
Ministry of Primary Industries
PO Box 2526
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16 December 2012

NZ Sport Fishing Council submission on the review of Rock Lobster Regulatory Controls

NZ Sport Fishing Council

1. The New Zealand Sport Fishing Council appreciates the opportunity to submit feedback on the review of Rock Lobster Regulatory Controls. The Ministry of Primary Industries (MPI) released their proposals on 8 November with submissions due by 13 December 2012.
2. NZSFC representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this review and would like to be kept informed of future developments. Our contact is Roz Nelson, secretary@nzsportfishing.org.nz.
3. The NZ Sport Fishing Council is a national sports organisation with over 33,000 affiliated members from 58 clubs nationwide.
4. The New Zealand Sport Fishing Council is committed to ensuring that sustainability measures and management controls are designed and implemented to achieve the Purpose and Principles of the Fisheries Act 1996.

NZSFC recommendation

- That the Minister revokes all Concessions applying in the Rock Lobster fisheries.

Until revocation the NZSFC recommends -

For Concession Area review, Regulations A to H:

- That all Concession-landed male fish be recorded separately, at 52mm, 53mm and 54 and above.
- Regulation A, CRA 3 & 7 closed seasons – status quo, Option 1.
- Regulation B, CRA 7 buffer zone removal – status quo, Option 1.
- Regulation C & D, domicile port and landing requirements – status quo, Option 1.
- Regulation E, domestic sales – status quo, Option 1.
- Regulation F, G & H, packaging & export requirements – status quo, Option 1.

For Fiordland amateur regulation review:

- Regulation A, daily bag limit change – proposed change, Option 2.
- Regulation B, accumulation limits – proposed change, Option 2.
- Regulation C, written records – status quo, Option 1.
- Regulation D, potting prohibition – status quo, Option 1.

Summary of proposals

5. The MPI proposals seek to remove regulations supporting the Minimum Legal Size (MLS) for Rock Lobster where Concessions exist. This year the Minister decided to continue with the Concessions, despite the clear view that none of the conditions giving rise to the Concessions currently exist.
6. There now exists a MLS regime that allows the landing of Rock Lobster in one Quota Management Area (QMA) when that is illegal in an adjacent QMA.
7. Within the MPI proposals the Total Allowable Catch/Total Allowable Commercial Catch reverts to the theoretical role of ensuring sustainability; the where, when, how, of catching Rock Lobster is considered immaterial, provided the TAC/TACC is not exceeded.
8. No consideration of non-commercial catch, in respect of allowances and participation, is included. The Initial Position Paper again shelters behind bland statements of ‘no knowledge’.

Summary of NZSFC Submission

9. The Minimum Legal Size (MLS) regime for Rock Lobster has been corrupted by the recent decisions arising from this year’s Concession review.
10. MLS regimes are introduced to achieve biological targets; commonly ensuring immature fish do not enter the vulnerable biomass before breeding. The current MLS regime needs resetting to ensure that immature fish are not included in the vulnerable biomass.
11. The current MLS is supported by claims of commercial benefit, not biological benefit, and the two are often in conflict.
12. If the complexity and imposition of regulations is to be avoided then a prerequisite is a properly set, effective, and simple Minimum Legal Size regime.
13. The status quo must remain until a full and comprehensive review of the MLS regime provides assurance that the Minimum Legal Sizes are set to achieve the stated biological targets.

NZSFC Submission

Unbalanced management advice

14. The National Rock Lobster Management Group (NRLMG) occupies a unique position in NZ fisheries management, in being the primary source of Ministerial advice on Rock Lobster fisheries. Given that the Minister most often accepts the management option favoured by advisors, this places the NRLMG in an extremely influential position.
15. The Ministry for Primary Industries (MPI) is relying on the NRLMG to perform a role as if they are an extension, an additional department, within MPI. In practice, the NRLMG seems to act as a ‘benefit laundering’ service for the NZ Rock Lobster Industry Council (NZRLIC), the industry organisation that funds and manages the National Rock Lobster Management Group.

16. It seems clear that TACC or regulatory reviews, such as this one, are selected and prioritised on commercial grounds, seeking to enhance 'benefits'. For example, if the NRLMG was providing a balanced operational review then we wouldn't have CRA2 in its current state - a fishery decimated by the NRLMG's refusal to address the obviously unsustainable TACC, solely because any such review would decrease, not increase, commercial benefits.
17. MPI must not blindly accept the verbose and excessively contrived advice from NRLMG as if it comprised balance.
18. Within the Initial Position Paper there is an unnecessary raft of comment that serves to confuse, for example, that a regulation was in place before Rock Lobster entered the Quota Management System. This suggests that the regulation is now unnecessary and it ought to be dismissed. The truth is, each regulation must be credible and measureable.
19. The NRLMG argue that the lack of data on recreational harvest in all areas limits the ability of managers to assess any detrimental impact from these proposed changes on recreational interests. The NZSFC highlight that the lack of data on the amount of fish taken under Concessions also limits the ability of managers to assess any detrimental impact from these proposed changes on recreational interests.

Taking of Concession fish

20. Despite implications to the contrary, there has been no new Minimum Legal Sizes set for Rock Lobster. The reality - fish smaller than the standard MLS can only be landed by commercial fishers because a Concession is in place.
21. Stakeholders and managers need to know the amount (weight) of fish being taken under the Concession regime, and trends in proportion of catch over time.
22. It is important to monitor fishery performance and the value derived from the Concessions. Currently there is no clear data on the proportion of the landed catch that is comprised of Concession fish. This leads to speculation about the size of the total Concession catch. Licensed Fish Receivers must be required to record and report the weight of landed Concession fish.

High risk strategy of Concessions

23. Reporting of landed Concession catch would also help to address some of the concerns that MPI has already identified—
"MPI considers the compliance risks related to Options 2B, C, E, G and H could be mitigated by implementing new measures to track movements of Rock Lobster taken in accordance with the Concession Area Regulations (e.g. Unique labeling or tagging or Rock Lobster to be sold on the domestic market."
24. The Minimum Legal Size (MLS) for Rock Lobster must be set at a size that has 90% of recruits breeding at least once before becoming available for catch. Once this is established then there is no need for a raft of ancillary regulations. While there is a MLS that permits large catches of immature fish, compliance will require ancillary regulations to contain the harvest of small fish.

Review proposals

25. The New Zealand Sport Fishing Council supports the Gisborne Tatapouri Sports Fishing Club and the Southern FMA 3 & 5 Regional Recreational Fisheries Forum submissions advocating for the removal of Concessions.
26. The NZSFC reiterate the need to revoke all Concessions applying in the Rock Lobster fisheries so that these stocks are sufficiently abundant to enable people to provide for their social, economic and cultural wellbeing, pursuant to the Purpose (s8) of the Fisheries Act 1996.

From: Rodney Tribe
Sent: Monday, 10 December 2012 2:34 p.m.
To: Alicia McKinnon; FMSubmissions
Cc: Allen Frazer; Bill Udy; Nigel Scott; Brett Ellison; Brian Moriarty
Subject: Concession Review Submission on Behalf of Ngai Tahu Seafood and Toitū Te Whenua

Good afternoon Alicia,

I am aware that Bill Udy has already touched base with you in relation to the proposed review of regulatory controls as they relate to the CRA7 Fishery regulations.

This email is to act as the submission from Ngāi Tahu Seafoods (NTS) and Toitū Te Whenua (TTW) in relation to the full 2012 Review of Regulatory Controls, disc paper No2012/24 with the exception of CRA3 to which this submission only applies to NTS

NTS and TTW submit in support of option 1.6.2 (options 2A through H) to introduce changes to the Current set of Concession Area Regulations, our support is as per the document for "All" concession areas identified.

As discussed during earlier meetings and correspondence, We have the strong view that the alignment of concession regulations and removal of what it deems as barriers to efficiency are paramount if these fisheries are to not only be utilised appropriately but also to yield the maximum commercial benefit available to all commercial participants within the TACC allowances. We believe that the alignment identified within the options gives the commercial sector the ability and flexibility to not only manage the fisheries more effectively, but also to take advantage of key markets and timing to ensure that extractive users and the local economies are achieving maximum benefit from these fisheries.

We also see potential positives in relation to the ability to shift effort in some instances between current closed areas or times, that in turn could well lead to benefits for other non commercial users, these benefits are unable to be quantified or realised under the current regime.

In terms of the allowing of sale of Concession Lobster and removal of Concession Packs for CRA7, NTS and TTW support any proposal of Labelling or Tagging to clearly identify domestic sales of lobster what they deem to be below National Size.

In relation to other Management Measures Proposed, 1.8 (1&2) we submit that they have no objection to the measures being proposed in these points.

In relation to the Review of Fiordland (Te Moana o Atawhenua) Marine Area Rock Lobster Amateur Regulations, we submit that they have no objection to the proposed changes (Option 2: A through D) as recommended by the Fiordland Marine Guardians.

Should you have any Queries in relation to our submission, please do not hesitate in contacting me directly.

Kind Regards

Rodney Tribe

Rodney Tribe
Quota and Compliance Manager



From: Nikki Searancke
Sent: Thursday, 13 December 2012 12:20 p.m.
To: FMSubmissions
Subject: REVIEW ROCK LOBSTER MPI NO 2012/24

SUBMISSION: FROM NGATI ONEONE HAPU

Kaumatua - Temple Isaacs & Ingrid Searancke

TANGATA WHENUA CRA 3 (910) POUAWA RIVER TO TURANGANUI
RIVER/GISBORNE HARBOUR

This submission supports the Recreational Members of the NRLMG position (laid out in the MPI Discussion Paper No: 2012/24) at 1.1 page 4 - in respect of the CRA3 area only and in particular our boundaries set out above.

"Recreational members do not support any amendments to the Concession Area CRA3 Regulations until: the MLS inequity in CRA3 is removed; and research is carried out to investigate whether the regulations pertaining to the commercial MLS in CRA3 are negatively impacting recreational benefits."

Ngati Oneone Hapu support this statement above and further seek the removal of the Concession Regulation in CRA3.

Signed: Ingrid Searancke & Temple Isaacs
N Searancke
13 December 2012. 12:17pm



Ngati Porou Seafoods Ltd

SUBMISSION

Initial Position Paper - Review Rock Lobster Minimum Legal Size Area Regulations associated with the taking, landing, transport, processing and sale of rock lobsters 2012.

Submission Compiled by: Ken Houkamau (Resource Controller – NPSL)
Date Completed: 10th December 2012

2. BACKGROUND

The CRA3 Minimum Legal Size (MLS) was implemented through discussion between regional stakeholders and the Ministry of Fisheries, now the Ministry of Primary Industries.

The agreed harvest strategy comprised of a reduction of the minimum legal size (MLS) of male Rock Lobster Tail Width (TW) from 54 mm to 52 mm in the months of June, July and August. This was initiated for a number of reasons, namely;

- The value of the Commercial catch being higher in winter.
- Enables greater flexibility to match rock Lobster grades to market demand
- An attempt to reduce the illegal take which was thought to be mostly from Commercial pots in spring/summer.
- The Commercial closure from Sept 1 to January 31 allowed recreational and customary fishers exclusive access to the fishery, reducing stakeholder spatial conflict.
- The MLS was also seen as a compromise of sorts for the perceived tougher catching conditions for commercial fishers during these winter months.

In Section 1.5: The Problem Definition of the IPP, it highlights that the current regulations in these differential MLS concession areas impose limitations on industry's ability to maximize the benefits from the use of the resource, introduce unnecessary costs, time and that many of the regulations are outdated and are no longer required in our current times.

In acknowledging these points NPSL would like to highlight that our first priority in any fisheries management decision is sustaining a healthy and flourishing resource.

Rock Lobster is known to have a very high compliance risk especially in regard to illegal take. If at any point we think that the sustainability of the resource is going to be compromised or the risk to compliance is going to increase substantially then to us the proposal is short sighted and the status quo would be supported.

NPSL is a proponent of the CRA3 multi-stakeholder forum which developed the Cra3 Fishery Plan which initiated the current management procedure as one of its objectives. We believe at this time the procedure is the best available tool to effectively manage the resource which is showing positive signs. This is evident by the highly productive catch rates seen over the past few years. Using this as a guide and the TAC as the primary sustainability tool, we do not believe that changes to any of the differential MLS regulatory controls will impact on stock sustainability, comments within the IPP also tautoko this view.

With that in mind we review the proposed CRA3 regulatory amendments in the IPP.

The NRLMG is seeking tangata whenua and stakeholder views on proposals to amend the following differential MLS Area Regulations. Options 2A to H would result in changes to the current MLS Area Regulations for CRA 3, CRA 7 and CRA 8:

Regulation type	The Status Quo (Option 1)	Proposed Change (Option 2)
A. CRA 3 and CRA 7 closed seasons	CRA 3 is closed to commercial fishing during May	Remove the CRA 3 May closure
	CRA 7 is closed to commercial fishing from 20 November to 31 May	Remove the CRA 7 closed season
B. CRA 7 closed area	CRA 7 commercial fishing is prohibited in the 'Otago Concession Area Buffer Zone'	Remove the CRA 7 'Buffer Zone'
C. CRA 7 vessel requirements	CRA 7 commercial fishers must register their fishing vessel at Dunedin and domicile it within the area	Remove the CRA 7 vessel requirement
D. Landing requirements	CRA 3, must be landed within the area (or elsewhere subject to prior approval and conditions) and be delivered and sold to a licensed fish receiver (LFR)	No change
	CRA 7, must be landed within the area at port of domicile for the vessel and to a LFR in CRA 7 only	Amend the CRA 7 landing requirements to equate with the existing CRA 3 requirements.
	CRA 8, must be landed within CRA 8 and to a LFR in the area, or fish can be moved to an LFR outside subject to written approval	Amend the CRA 8 landing requirements to equate with the existing CRA 3 requirements
E. Domestic sales	CRA 7 domestic sales allowed subject to 'consumer pack' packaging requirements.	Allow CRA 7 domestic sales outside of a 'consumer pack'
	CRA 3 & 8 domestic sales are prohibited	Allow CRA 3 & 8 domestic sales
F. Export container labelling and packaging requirements	CRA 3, must be held in containers marked 'Gisborne rock lobsters'	Amend container labeling requirements to 'CRA 3 rock lobsters'
	CRA 7, must be packed in a sealed container under the direction of a Fishery Officer	Amend CRA 7 requirements to: must be held in containers marked 'CRA 7 rock lobsters'
	CRA 8, must be packed in a sealed and marked 'Southland concession pack'	Amend CRA 8 requirements to: must be held in containers marked 'CRA 8 rock lobsters'
G. Export requirements	CRA 3 export must be from LFR only	Amend the CRA 3 & 7 export requirements to equate with the existing CRA 8 requirements
	CRA 7 export must be direct from CRA 7 LFR	
	CRA 8 export must be direct from LFR, or through export transshipment point subject to prior approval and conditions	No change
H. Export notification & records	CRA 3, no export notification or records required	No change
	CRA 7 & 8, LFR must notify export particulars to MPI prior to shipping. In addition for CRA 8, specific LFR records are required	Remove export notification and record requirements for CRA 7 & 8

3. RECCOMENDATIONS

Recommendation 2A - Remove the CRA3 'May' closure:

The IPP highlights several areas of interest that arise from the closure of commercial fishing in May, these include;

- Operational difficulties
- Removal could lead to industry being able to better meet fishing and market opportunities.
- Reduce MPI compliance costs
- The month of May typically has little recreational fishing; this reduces spatial conflict among sectors.

Considering these points it seems obvious that removal of the closed 'May' fishery is justifiable both from an operational and financially viable perspective. NPSL believes the original intent of the closure was to provide a mechanism to stop fishers holding minim legal size (MLS) sized fish (52-54mm) from the prohibited February to April months into the MLS start date of June. We believe this is an outdated tool due to the current dynamics of the CRA3 fishery, and is no longer needed.

Therefore, we support recommendation 2A – the removal the CRA3 'May' closure.

Recommendation 2E - Allow CRA3 domestic sales:

We are a seafood retailer who specializes in fresh chilled fish, live and cooked lobster, as well as frozen consumer products in Gisborne. Availability of product is an issue for us primarily through the summer months when demand is higher. Because Cra3 has a voluntary closure for commercial fishing during Sep - mid Jan regional product is not available.

The domestic sale of MLS Rock Lobster could lead to market driven benefits. We, like MPI however, believe there is potentially compliance risks associated with allowing the sale of MLS fish locally especially considering illegal catch is considered a major problem in CRA3 although there is no evidence to suggest a linkage.

MPI propose using new measures to track movements to mitigate the problem. The example used is applying a unique labeling or tag to all rock lobsters to be sold on the domestic market.

We do not support tagging all lobster to be sold on the domestic market as we believe this will be just another onerous requirement on LFR's of which we are one. We do see benefits in this approach for MLS lobster and on a voluntarily basis as a marketing tool, not another regulatory constraint. We believe that current audit procedures in terms of following lobster through the supply chain are sufficient, and the compliance risks will

not significantly increase especially if we use the labeling tool suggested. We also see great benefit in ensuring the message on tags used expresses that these lobster are 'Legal Lobster'.

Considering these points, we take a conservative view and support Recommendation 2E - Allow CRA3 domestic sales **conditional** to a planned tagging/labeling strategy devised by industry for MLS lobster only.

Recommendation 2F - Amend container labeling requirements from 'Gisborne Rock Lobsters' to 'CRA 3 rock lobsters':

Changing the labeling requirements for export containers to be marked with fish stock codes i.e. CRA 3. This highlights the fact that the Lobsters are taken from a much broader area than the impression given by the label Gisborne Rock Lobster.

We support this change as many lobster landed within the boundary of CRA3 do not exit the region via Gisborne and therefore the change provides better coverage of the CRA3 region.

Therefore, we support recommendation 2F – Amend container labeling requirements from 'Gisborne Rock Lobsters' to 'CRA 3 rock lobsters'.

Recommendation 2G - Amend CRA 3 export requirements to equate with the existing CRA 8 requirements (CRA 8 exports must be direct from LFR, or through export Trans shipment point subject to prior approval and conditions):

Currently, CRA 3 regulations state that you can only export rock lobster from an LFR. The amendment aims to ensure consistency between all concession areas by following the CRA 8 procedure which allows female rock lobsters to be delivered to an export trans-shipment point which is subject to approval by MPI. The amendment could provide greater flexibility to export and reduce operational constraints.

We, like the NRLMG industry representatives, do not consider that this proposal will increase the compliance risk of illegal undersized rock lobsters entering the supply chain in comparison to rock lobsters of any MLS.

We believe this will provide more flexibility for operators who run multiple depots, LFR's, and export facilities.

Therefore, we support recommendation 2G - Amend CRA 3 export requirements to equate with the existing CRA 8 requirements.

Non Regulatory options - NPSL promote voluntary measures to manage the CRA3 fishery:

As responsible, proactive fisheries managers, we believe in using the best information and tools to manage stock abundance, growth and annual TAC / TACC changes to provide increased certainty to all users.

NPSL are supportive of more voluntary systems of compliance and regulation. We see regulations like closed seasons and MLS, as tools that go into a box and can be voluntarily used when they are needed and put back in the box when they are not, but still available as required at some future date.

This increased flexibility will benefit all stake-holders more adequately. We think issues and management procedures are best dealt with by the CRA3 multi-stakeholder management group in real time using the information and tools available, and can be adjusted to best meet the needs of the resource.

Other Management Measures for CRA 3, CRA 7 AND CRA 8

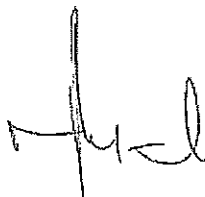
Allow recreational fisher's access to the CRA3 commercial MLS.

NPSL support recreational fishers accessing the CRA3 commercial MLS in June ,July and August in principal. This allowance will help alleviate the perceived inequity issue between Commercial and Recreational sectors.

- With this view we highlight some potential consequences that may arise; mentioned earlier, the voluntary closure to commercial fishing during the spring summer months reduces illegal catch and spatial conflict among sectors. Allowing recreational fishers to access the commercial MLS will mean that industry therefore has no incentive to maintain the winter fishery and would drop the voluntary spring/summer closure. Problems like illegal catch and spatial conflict could potentially arise again.
- Recreational allowances in the TAC could potentially be exceeded due to an increase in fishing success. This could pose stock sustainability issues.

In making these recommendations NPSL is supportive of further research that analyses the long term affects these regulatory changes will have on the fishery.

Noho ora mai koe



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Submission: 2012 Review of Rock Lobster Regulatory Controls.

The following submission relates to Cray 3 only as this is the area where I fish personally and this is my personal submission only.

I have serious concerns about the balance shown by MPI in their input into the IPP, the most telling concern being that MPI do not support Recreational anglers being allowed concession crayfish because of the fear that this will make it easier for the fish thieves to thrive. If MPI is correct and the fish thieves currently take up to 30% of the crayfish removed from Cray 3 then MPI is not doing their job (refer sec 1.8.1 of IPP). To stop the possibility of legitimate take by the average Recreational angler because of fear of fish thieves is the wrong way to regulate a fishery. MPI needs to throw more resources at getting the fish thieves out of action.

The majority of recreational anglers in NZ are good considerate people who appreciate what NZ has to offer. The thought that they would be deprived of the opportunity to get a feed because MPI are worried about fish thieves makes me very sad and I will become very cynical if I continue to see this defence used by MPI. Recreational anglers should have the first right to any fish/crayfish caught anywhere in NZ.

My submission is that Recreational anglers should be able to:

- Take 52mm male Crayfish from the waters in Cray 3 at any time of the year.
- 52mm crayfish should be consumed within the greater Cray 3 area, similar to what happens with Paua on the Taranaki coast.

I have no problem with 52mm commercially caught Crayfish sold within NZ but they have to be in sealed "consumer packs" and the Crayfish tagged/chipped.

If you have any queries about the above please do not hesitate to contact the writer

Yours Sincerely

Brent Rolston

President NZACA
Board Member NZRFC
Financial member NZSFC
Member MPI Rec forum FMA 8

From: Bob Rosemergy
Sent: Thursday, 13 December 2012 4:00 p.m.
To: FMSubmissions
Subject: Rock Lobster Submission



Following feedback from divers in the Hawke's Bay area, Spearfishing NZ makes this submission principally in relation to area CRA 3.

We feel that the Minister's decision to exclude commercial MLS regulations in the current proposal effectively stymies recreational input to one of the most contentious of recreational fishing issues. By so neutering the discussion we have a Clayton's consultation where we suspect few of the presented alternatives will be acceptable to recreational fishers when the final decision is made.

We note 1.4.2 that "rock lobster has a high priority for MPI compliance and enforcement services." Yet "MPI reports... CRA 3 illegal take is currently estimated at 30% of the TAC." That is an astounding figure! It begs the question as to how high the priority is for MPI compliance and enforcement when almost a third of the TAC is able to be 'siphoned off' and not available as catch for commercial and bona fide recreational and customary fishers.

Divers spoken to who fish in and around CRA 3 do not agree to the domestic sale of CRA 3 smaller sized crays. (1.1.E) In this context, the following was received from some Hawkes Bay divers.

"... definitely oppose ...smaller legal size limits done for the Poverty Bay area...when ever we dived the northern side of Mahia or anywhere off Gisborne we never managed to get our limit of 6 crays, actually most times none of the crays were legal.

Lowering the size limit is a great way to increase illegal fishing and would put more pressure on the already pressured resource."

Those are comments from some with many years of diving experience in the area. As they point out, since the commercial take of crayfish on many inshore reefs in Hawke's Bay has reduced, the crayfish have not only multiplied in number but they have also got bigger. Moving further up the coast, the numbers of small crayfish in CRA 3 could be influenced by heavy fishing pressure, including commercial, customary, and illegal. Stock assessments should factor in all 'take.' At a minimum that would suggest a return to MPI of what is taken under 'customary.'

We are concerned that the trend throughout the review is for change to smaller sized crays. We recognise that it is in commercial's interest to do that and it is promoted with buzz words and phrases like "flexibility," "market demand," "available in NZ at lower price than export grade." The Tui phrase, "Yeah right!" comes to mind. As suggested in relation to CRA 3, the crays do not need to be fished to a smaller and smaller size. The dynamics within government and commercial that are helping promote this should be highlighted.

Bob Rosemergy
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Could you please acknowledge receipt. Thanks