

Volume III: Integrated Electronic Monitory and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

No comment

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

No comment

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

No comment

Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment?

Stronger monitoring will give effect to different behaviours that will lead to better outcomes.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

N/A

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

N/A

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

N/A

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

N/A

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

N/A

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

N/A

Do you operate this technology on your own behalf, or as an input into someone else's operations?

N/A

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

N/A

What issues do you currently have with ER?

N/A

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

N/A

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

N/A

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

N/A

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

N/A

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

N/A

Licensed fish receivers

Would problems do you experience with landing data?

N/A

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

No comment

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

The collaborative approach would definitely enable a working together partnership that will have long term benefits.

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

No comment

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

No comment

What do you think should be monitored? To whom should the results be reported?

No comment

- [Not relevant to request]

IRMR

Option	Comment
1	The trust supports information being provided to resolve key management issues, do not agree that information is not need to make these decisions.
2	Preferred Option

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Problem definition

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Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

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|-------------------|-------------------------------------|
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| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

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Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|--------------------------|
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Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

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Do you agree with this option (please tick only one box)?

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| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Note that there may be an unreasonable burden on small local commercial fishers, and this may impact on Maori unfairly. As such a tailored approach to suit size and scale of operation, is preferred, but monitoring should still be in place.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Extension of fisheries officers may be an option, in particular in small communities, and this may involve a combination of roles or part time roles, to be cost effective.

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Do you operate this technology on your own behalf, or as an input into someone else's operations?

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

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| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

Yes, this will be essential if buy in is to occur

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

Address discarding of fish

Tighter regulatory controls to manage discards.

[Not relevant to request]

Would you like to comment?

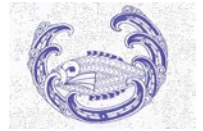
[Not relevant to request]

Approach 2 - [Not relevant to request]

However with approval mechanisms for discarding and the proposed implementation of Integrated Electronic Monitoring and Reporting System (IEMRS) that could support the monitoring for release of live fish we are more comfortable with Approach 2.

Approach 3 - Iwi Authority is more comfortable with retaining all minimum legal sizes. With approval mechanisms for discarding and the proposed implementation of Integrated Electronic Monitoring and Reporting System (IEMRS) that could support the monitoring for release of live fish we are more comfortable with Approach 3.

[Not relevant to request]



[Not relevant to request]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

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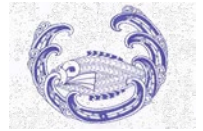
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8. IEMRS: Integrated Electronic Monitoring and Reporting System

The introduction of electronic monitoring and reporting is a concept that Te Tau Ihu Forum support, and removes the necessity of a whole range of equipment and systems to report catch harvests. The difficulty we have with this is the cost to implement such a system. As we have highlighted above in



section 6, this could put undue hardship on small iwi fishing vessels and the impact would see them forced out of the fishing industry.

Te Tau Ihu Forum would want to have input into the calculation of the cost to implement this type of system. It should not be that vessel owners are left encumbered with a system that is too expensive and therefore, at a huge cost that causes a financial burden. The government must provide some financial assistance to implement such a system. We would not support a system that would bring financial hardship, price iwi commercial fishers out of the industry and reduce the total quantum of our quota holdings and fisheries assets.

We would support a reporting system to be applied to recreational fishers and Chartered fishing vessels. This is addressed in the following sections.

[Not relevant to request]

[Redacted text block]

[Not relevant to request]

[Redacted text block]

We propose the following;

- [Not relevant to request]
- Electronic monthly reporting system be developed to provide catch data from licensed recreational boats.
- [Not relevant to request]
- The electronic recreational catch data, assist with the data information to when making decision for the allocation of fish stocks.

4. This submission suggests that the Crown's (MPI) substandard performance in the management of Commercial Fishing has now generated a response canvassed in the review that has the potential of additional costs ranging from \$6m - 21.25m (based on the commercial fleet of 1180 vessels) with new up-front proposed IEMRS costs of \$5k-18k per vessel.

5. [Not relevant to request]
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[Not relevant to request]

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INTEGRATED ELECTRONIC MONITORING AND REPORTING SYSTEM

9. The IEMRS is supported in principle given the absolute loss of confidence in Fisheries Management to control wastage; discarding bycatch and impacts on protected species. Information is critical, as is evidence of breaches of Fisheries Laws, particularly behaviours that compromise stock assessment and sustainability.
10. The deep sea and inshore fisheries require the same attention. The inshore fishery in many respects is more observable because of its near shore location. The cumulative scale between both fisheries is likely comparable given frequency, vessel size and impact of fishing events. The deep sea fishery is more remote so poses a greater risk. What is critical is timely information and active monitoring (read collection of evidence). While only a portion of video footage will be reviewed the amount to be reviewed provides sufficient deterrent to mentor change in practice and attitude.

11. Efficiencies across the board is supported. If the information though is critical for fisheries management then it is equally important in the restoration and rebuilding of public confidence. Some scaffolding is required. The IEMRS provides this in part. Confidence will be reinforced when requests for information provided a new system, then the same information is provided when requested through OIA applications. The current Management (system) is obstructive, introduces barriers and delays. If the new system works for the managers then it must work of the public.
12. The greatest potential value of the system is that it will change the practice towards more targeted fishing effort for those species where ACE is held or can be transferred to the fishing vessel for the species bought aboard. If ACE does exist within the quota holding companies then the public should have the full expectation that caught mixed species will be landed. If commercial fishers choose to discard the catch or part of because of the lower value but equal costs to transport to shore as a higher value cargo, then every effort should be made to observe and prosecute the breach of practice. This assumes that quota holding companies do hold sufficient ACE for mixed species to avoid discarding or dumping.
13. The role of LFR's requires attention. Rather than ordering up a suite of fish to meet their preferred 'income source', there should be modification of the process such that they merely receive the fish that is returned to shore (as it arrives in port to the wharf) and go with the market's highs and lows rather than using the fishery to sustain a preferred consistent high value return.
14. If however all of this is at a company level, then they have the potential to direct the fishing effort to their specific needs and develop in-house the expertise, the knowledge and best possible options for the preferred target species. In short they commit to the development of expertise to target acceptable size, quality and volume, especially in a mixed species fishery. The ability to avoid catching undersized fish, or low valued species in a mixed trawl by expert fishing should be more than possible given some technological (aggregation) and trawl methods. As long as it seem they can 'toss the dice' then select, or bring aboard such volume within the trawl that damage to quality is likely, then there is a propensity to continue to do so. IEMRS has the potential benefit to gain greater evidence (not neutral information) of bad practice, dumping or discarding and techniques used.

15. The Social Licence will consolidate around several dimensions: Adherence to the Laws; Lack of the need for Corrective Actions; Respects cultural values consistent with position and status of Tangata Whenua; (re wastage, damage to the marine environment and respect for the mana and mauri of Tangaroa); Active protection of marine ecosystems – recruitment to population, recruitment to habitat, benthic communities. An international quality assurance ‘mark’ will inform consumers and enable ethical choice. This occurs in a marginal way at the moment, but consumer consciousness is increasing and they want assurance on the chain of custody from the net to the plate.
16. The Treaty Fisheries Settlement envisaged redress, partly by way of access to new and added value alongside new development opportunities. This includes access to new fishing areas, current and future species under QMS, as well as adding value either by entry to new markets, or processing. This potential of new and added value income streams to the original settlement tranches is intrinsic to the Settlement. This is consistent with the development right and the redress principle to improve Maori’s position in the business and activity of fishing. Marginalising this in anyway does not avoid future Treaty breaches. Added costs resulting from Crown inaction is a breach.
17. This though is against the proviso that the Crown in respect to Maori involvement in the business and activity of fishing is premised on the Crown’s active protection of that right and redress quantum. The Crown’s inaction over time has contributed to the current state of affairs that may be fairly posed as a crisis of paradigm. The Crown is now forced by way of this review to propose responses and preferred options that entail new costs, resulting from the paradigmatic shift now required. There are questions about the sustainability of the fishery, the need to improve management confidence and recognition now of something, that has been known by the Crown for some time that catalyses the need for change - with attendant costs.
18. In respect to the Treaty Settlement Quotient the cost impacts are the Crown’s costs to bear. This is the case in the immediate short term. Once the actual cost ramifications on the Treaty Settlement is fully understood, against bottom line reporting, some easing of this new cost onto Maori’s ‘fishing books’ can occur. This could occur around projected savings from paper based processes. This possibility is compromised by the cost recovery of reviewing monitoring data. This matter remains somewhat open ended given the review documents view that ‘it depends on the hours of fishing time to be reviewed’. The quality assurance figure of review of 25% of footage is

commended given a 10% international benchmark quoted. This 'review of footage' cost remains unstated, so remains uncertain.

19. If step change and future proofing is to be achieved then the change to IEMRS should be 'lock stepped' across the sector. Early adopters who volunteer the next step should not subsidize the late or ambivalent adopters. The lag between early adopters and full adoption provides opportunities for those who delay, to potentially continue bad practice of wastage, discarding bycatch and unseen adverse impact on protected species.
20. The largesse of government procurement of equipment to an established, consistent, performance standard against set specifications should be applied. Economies of scale together with appropriate training would introduce to the sector the understanding of the full intention of IERMS. The more accurate assessment of TAC/TACC may lead to fishing opportunities opening up to the commercial sector sooner. Benefits that are defined by experience and actual outcomes are more likely to be adopted sooner and uniformly across the sector. The Crown's facilitative and enabling role in underwriting the establishment of IERMS would exist for a period to demonstrate the added value outcomes for the sector. At this stage the Crown can step out of the frame and return full responsibility for the maintenance and replacement of equipment, on board software management and reporting regime to the sector. In the short term the Crown has supported the step change with high benefits envisaged to the commercial sector, economic activity and public confidence in fisheries management.
21. The exclusion of the Amateur Charter Vessel Fleet from the IEMRS is disappointing. Collectively this activity has high economic returns from recreational fisheries but is essentially commercial in nature. The volume taken probably represents a significant ITQ/ACE equivalent when aggregated to a national figure. Discarding and dumping is probably akin to the commercial sector. The development of expertise by way of fishing methods, equipment used and locations to target specific species and size is akin to the argument that the commercial fishing fleet could apply expertise to selectively target (harvest) fish to avoid wastage.
22. The current state of monitoring does not meet confidence levels, is outdated and past use by date. Uncertainty remains. Moreover wastage and bad practice is enabled where fishers can play the gaps. The system facilitates overfishing whereby ACE balancing carried over to the following year

encourages a 'lets fish and see'. The Electronic Monitoring has the potential to expose bad practice, and review of the same, over time. Where it is habitual or common practice, interventions could include more expensive monitoring options (observers) to move such fishers up to change 'the cost of bad practice'.

23. The benefits of electronic reporting and geospatial position reporting are broad enough with minimal cost to the fisher. The option must have the monitoring component to provide real fisheries management benefit. Public confidence will rely on electronic monitoring. This approach will apply across cultures, where rather than a choice to respect access to the fishery and the adopting of best practice, where fishers adopt an attitude of *'Take it while it's there, take the best; Take it before someone else does.'* The disconnect with sustainable fishing and 'our' values is obvious. Exclusion should be considered or at least the requirement to address corrective actions. Geospatial position enable the tracking of where the fishing events occur, the type of marine environment, vulnerable habitats and likely interface with protected species. This ability to better track 'threats' to these components of the marine ecosystem is valued.

[Not relevant to request]

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[Redacted content]

■

[Redacted content]

deliver better fisheries management outcomes and reduce impacts on the marine environment — many of which are voluntary — including:

- [Not relevant to request]

- [Redacted]

- [Redacted]

- d. early adoption of both electronic reporting - Te Ohu support assisted the development of the application that can work on robust electronic tablets able to be readily used on inshore fishing vessels; this tablet based app is being trialled on vessels fishing into Moana and other LFRs – and electronic positioning and monitoring by Moana NZ as part of the SNX programme.

[Not relevant to request]

- [Redacted]

- [Redacted]

- [Redacted]

- [Redacted]

- [Redacted]

- [Redacted]

- [Redacted]

- [Redacted]

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[Not relevant to request]

[Redacted]

[Redacted]

[Redacted]

97. Te Ohu helped develop and endorses the FINZ 6 point plan :
- a. Management and monitoring plans;
 - b. Better catch information;
 - c. Electronic reporting;
 - d. Improved penalty regime;
 - e. Gear improvement (including when, where and what to deploy)– focus on solutions to minimise catch of unwanted fish; and
 - f. Re-balancing – setting the TACC at correct values.
98. All these limbs have a part to play to successfully minimise discards. While the *FooF* strategic proposals have some elements, they do not include the full set that we consider will be needed.

[Not relevant to request]

[Not
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102. Te Ohu has sponsored trials of different net mesh size and orientation to minimise catch of small fish over 5 years. This has proved very successful for round shaped fish (such as gurnard – a key fishstock in Hawke’s Bay) but much less successful for elliptical shaped fish (such as snapper, trevally and tarakihi- also valuable target fishstocks in Hawke’s Bay and elsewhere). Trials of alternative net settings to better release these fish continue. The Electronic Reporting App that Te Ohu has supported also will routinely record the key aspects of fishing gear that can affect selectivity.

[Not
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est]

Implement Integrated Electronic Monitoring and Reporting System (IEMRS)

130. Te Ohu is supportive of using innovative cost effective tools to improve the management of our fisheries. But that support is dependent on making sure we have the right tools for the right job. There is limited economic surplus in fisheries and care must be taken to invest a share of it in a manner that gives the greatest improvements from a limited budget. Employing improved technology starts with defining what the key management goal is and then collecting the relevant information to inform managers, resources users and the wider public whether the management settings are achieving the goal, or adjustments need to be made. We address this issue more completely under **Regulatory Proposal No 1** below.

[Not relevant to request]

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[Not relevant to request]

156. Te Ohu, through its joint work with Waka Digital, has developed an online recording system (IKANET) for customary authorisations that can automatically provide cumulative totals to each kaitiaki. Where kaitiaki in a region agree to share information, the system can generate regional totals by species and months. The system can also aggregate data and provide it directly to the Ministry where the kaitiaki (or mandated iwi organisation where it is coordinating this activity on behalf of kaitiaki) wish to do this on a regular basis. This approach would quickly lift the quality of data available from customary communal fishing. The aggregate information would be valuable for stock assessment purposes and also to kaitiaki by:
- giving them information on which to base future approvals
 - enabling them to consider developing any other customary tools,
 - informing cross-sector discussions on fisheries management, and
 - informing discussions with MPI on the adequacies or otherwise of fisheries management of taonga species in their region.
157. In addition, IKANET-the electronic online system - also has another part that accurately records the pataka operation.
158. More recently through the SNA1 plan the Crown has agreed to further assist iwi and kaitiaki with improved reporting systems. We look forward to discussing this with MPI and iwi.

[Not relevant to request]

[Not relevant to request]

Regulatory proposals

Integrated Electronic Monitoring and Reporting System

177. As noted in para 130 above, Te Ohu broadly supports MPI's Integrated Electronic Monitoring and Reporting (IEMRS) proposals as set out in Volume III of the *FooF* document to implement electronic monitoring and reporting of commercial fishing operations as a means of gathering better information for fisheries management.
178. Te Ohu's support for IEMRS is however conditional:
 - a) The *FooF* does not provide a substantive analysis of the full costs of IEMRS against expected benefits from improvements in fisheries management and compliance nor is there any indication that MPI has undertaken this analysis. MPI's earlier statements and releases regarding IEMRS indicated that deployment would be scaled to the size and fishing effort of individual vessels. There will clearly be a point at which the marginal cost of deployment outweighs expected benefits. Te Ohu's support for IEMRS will depend on reviewing MPI's full assessment of costs and benefits and a pragmatic approach to scaling IEMRS deployment to likely benefits. Moana does not support deployment of all aspects of the IEMRS on all commercial fishing vessels as appears proposed in *FooF*.
 - b) The primary benefit of IEMRS is the collection of information to improve fisheries management and the utilisation of fisheries resources. Electronic monitoring is not a panacea. The assumption in *FooF* that IEMRS will satisfy most data requirements is incorrect. Simply taking video footage of fishing operation does not result in useable information unless the information requirement, the monitoring, and the vessel's operations are aligned to produce useable data. Te Ohu's support for IEMRS is conditional on the data generated by IEMRS being targeted to, and available to meet, defined data needs, including industry requirements to support fisheries management, supply chain management, fisheries certification and product assurance, marketing, and

other functions. The agreements on access to data will be critical to the success of this programme.

- c) The initial focus of IEMRS from an MPI, political, and public perspective will, inevitably, be on the use of IEMRS for enforcement of fisheries regulations and prosecution of commercial fishers. As has been previously noted Te Ohu has consistently stated that the change in the information regime must be accompanied by a change in the compliance and enforcement regime. Te Ohu's support for IEMRS is conditional on MPI conducting a review of the offences and penalties regime set out in Part 13 of the Fisheries Act 1996 and implementing changes to reflect the greater likelihood of offences being detected and prosecuted.
 - d) Te Ohu's support is also conditional on direct engagement with it in the design and deployment of the system as discussed in this submission. IEMRS will involve a culture change both within industry and the Ministry. Experience elsewhere is that attitude change and a full understanding of the information being delivered and how the most appropriate changes to management setting are will take considerable time. There will be mutual benefit from making sure the design and implementation of IEMRS is done well the first time and at every stage.
179. It is essential for MPI and the commercial fishing industry that deployment of IEMRS is successful. IEMRS will require major expenditure on:
- a) Development of equipment and data standards;
 - b) Acquisition and installation of equipment, equipment maintenance, and replacement;
 - c) Development of new databases and analytical tools;
 - d) Data collection, communication, storage, and destruction;
 - e) Development of reporting applications and observation software;
 - f) Observation of collected camera footage;
 - g) Data access management and reporting;
 - h) Media management; and
 - i) Programme management.
180. MPI has encouraged high media and Government expectations of IEMRS. Deployment will be subject to intense media and political scrutiny adding to execution risk. None of the parties with a vested interest in the successful deployment of IEMRS can afford a Novopay outcome.
181. The IEMRS programme is complex and involves the development and use of technology that has not been used in New Zealand other than on a relatively small scale within the SNA1 trawl fishery, a number of paua fisheries, some explorative work going on with some trawl vessels fishing in Hawke's Bay and some other vessel operators also exploring options.
182. Successful deployment of IEMRS will require close cooperation between service and equipment providers, industry, and various sections of MPI. Successful integration of the components of IEMRS represents a significant challenge.
183. Based on Moana's experience from the deployment and use of electronic monitoring in FMA1 fisheries and Te Ohu experience in developing electronic reporting and then seeking to apply it along with geospatial reporting in Area2, our combined view is that the current IEMRS deployment timetable set out in *FooF* is simply not achievable, and trying to drive towards

these unachievable timetables is likely to reflect badly on industry, the Ministry, the Minister and government.

184. The *FooF* documents do not provide any detailed implementation planning or comprehensive risk assessments. As far as we are aware, MPI has not engaged with industry, or Fisheries Logistics Limited, the only New Zealand business with direct experience in developing electronic reporting systems for small inshore finfish and pelagic vessels (though there is also some experience within the paua and rock lobster sectors in ER), or Trident Systems LP, the only New Zealand business with direct experience with electronic monitoring systems in New Zealand fin fisheries, in any systematic way to assess readiness to deploy IEMRS or to assess the risks associated with deployment. We are aware that as yet the systems for collecting storing and retrieving the full list of information in IERMS
185. Given the likely cost of IEMRS and the risks associated with deployment MPI is unlikely to secure support for IEMRS unless industry and Iwi are fully involved in the design and delivery of the system. We suggest investigation into the formation of a joint MPI / industry / Iwi entity, based on the approved service delivery organisation (ASDO) model set out in Part 15A of the Fisheries Act 1996. This option might provide a suitable vehicle for successful management of IEMRS implementation. The entity would be responsible to the Director General of MPI for deployment of the components of IEMRS. It would not be responsible for the storage and use of IEMRS information for statutory and enforcement purposes. Joint industry / MPI / Iwi accountability for delivery of IEMRS will maximise the opportunity for successful deployment at least cost to industry and Government.
186. Use of IEMRS for the purposes of fisheries monitoring, compliance, enforcement, prosecution and more generally for the purposes of fisheries management constitutes expenditure for the public good as there are no specifically identifiable individuals or groups that derive a benefit from the activity. In our view, it is unreasonable for MPI to propose that the costs of IEMRS be fully absorbed by industry.
187. Te Ohu considers that the same systems that apply to inshore commercial vessels should also be applied to recreational charter vessels in the same timetables. There should be an immediate requirement to provide event reporting on every fishstock using robust electronic tablets and vessel positioning systems. Given that the Crown absorbs the costs for recreational fishers, we consider the Crown should provide charter vessels with the necessary equipment.

[Not relevant to request]

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- b) Te Ohu does not agree with the proposal to monitor the use of newly approved ITT¹⁶. The benefit, if any, of monitoring the interaction of gear type and fishing outcomes is generic and should apply to all gear types not just ITT. Monitoring can be built into the analysis of data collected by the IEMRS system as a subset of routine catch effort reporting.
- c) That data should also collect good information on the various gear components that are likely to affect selectivity of fish in the net. Te Ohu has made sure that, in the development of the Reporting Application it has assisted through funding, appropriate fields will be included that record the particular features of the gear used for each fisheries event eg For the cod-end and lengthener: what is the net mesh size, what orientation is the mesh and what material and details of it so that analysis can readily be undertaken to estimate expected levels of mortalities from the fleet. This will allow researchers to be able to better assess CPUE data knowing what performance levels have changed due to gear innovation.

[Not relevant to
request]

¹⁶ The Future Of Our Fisheries, Volume IV, Enabling Innovative Trawl Technologies, Providing for use of approved gear, page 12

Additional Innovative Measures Implemented by Fisheries Settlement Entities

The additional measures in addition to those set out in paragraphs 15 and 16 include:

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- e. developing and using suitable software that can be used on robust electronic tablets to record far greater amounts of information on fishing activity and catch – including deepening the amount of information for statutory reporting with more precise location, now being trialled on vessels fishing into Moana NZ (and others) and also be used on the trawl fleet operating in Hawke Bay;
- f. developing and using bespoke software (IKANET) to better assist kaitiaki to collaborate with the commercial industry on Pataka / Whata and also reporting of customary non-commercial authorisations to fish;

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- i. installing and using VMS devices on inshore fishing boats; and
- j. camera monitoring on inshore vessels.