



**Fisheries New Zealand**

Tini a Tangaroa

## **Review of Sustainability Measures for Sea Cucumber (SCC 7A) for 1 April 2019**

**Appendix 1: Submissions received on the  
Discussion Document**





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# Submission Form

## Review of sustainability measures for 1 April 2019

### Once you have completed this form

Email to: [FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

While we prefer email, you can also post your submission to: 2019 Sustainability Review, Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

### Submissions must be received no later than 5pm on Tuesday 12 February 2019.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

### Submitter details:

Name of submitter or contact person: Clare Pinder, Treasurer	
Organisation (if applicable):	Guardians of the Sounds
Email:	
Fishstock this submission refers to: <i>Rock lobster – CRA 3, CRA 4, CRA 8</i> <i>Sea cucumber – SCC 7A.</i>	<i>Sea cucumber – SCC 7A.</i>
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Other

### Official Information Act 1982

Note, that your submission is public information. Submissions may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

### Submission:<sup>1</sup>

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.



1.0 Your proposal to increase the TACC for Sea Cucumbers from 5 tonnes to 15 tonnes is inadequately researched with little scientific “evidence” to back up claims that it would have a minor impact on the ecosystem. The Guardians of the Sounds does not support an increase in TACC for Sea Cucumber.

1.1 MPI’s discussion document (DD) and the Dive Survey of Sea Cucumber SSC7A 2014 both discuss that biological parameters for sustainable harvest have not been estimated. (page 19 Dive survey), and “currently there is no ....” and on and on it goes about the lack of reliable data. The Dive Survey goes on to say that longer term monitoring is required which was beyond the scope of the survey and suggests that there needs to be future collaboration with Industry and researchers.

1.2 The Guardians would go further and say that there needs to be a working group set up that includes Quota Holders, MPI, the Marlborough District Council, IWI and groups such as the Guardians and Residents Associations to properly understand the implications of the proposal to increase quota.

1.3 A preliminary look at the figures in the DD and Dive Survey show inconsistencies and may present a case to reduce the existing quota. In any case the Minister should not rely on the figures provided in these documents.

### **Comments in regards to the Discussion Document**

2.0 Section 4.1 para 8 Sea cucumbers are free dived in 60 – 140 metres. This is incorrect. They are harvested at approximately 15 metres and I understand that this is now done using an airline rather than free diving. Therefore the numerous references in the document to free diving are exaggerated at best and not guaranteed to continue.

2.1 Section 3 Para 5 “When the QMS was introduced in 2004 little was known about Sea Cucumber and cautious TAC’s were set”.

2.2 Section 3 Para 6 “Scientific surveys indicate there is sufficient biomass to increase TAC and TACC”. I note that here is no proper reference to the NIWA survey 2014 in the document so the Guardians are unable to verify the validity of this “survey”. The survey information in its entirety was requested from Jodi Milne, MPI on Thursday 7<sup>th</sup> February. This was provided on Monday 11<sup>th</sup> February at 4.09pm with an extension of one day to give the Guardians 48 hours to review and test the numbers and assumptions made in the survey. This is clearly inadequate and poor practice from the outset not to provide the relevant information up front.

2.3 The Guardians also requested the scallop by-catch “survey” information in its entirety. This was refused.

2.4 The request was for MPI to provide the reports and to delay the submission deadline until the information was provided and could be analysed by the Guardians (one month minimum for analysis).

2.5 Section 3 Para 7 “limited information on growth rate, reproduction, recruitment and mortality for Sea Cucumber, therefore it is not possible to determine Bmsy (biomass at which maximum sustainable yield is obtained).



2.6 In the previous paragraph you state that there is scientific evidence that there is sufficient biomass to increase the TACC (no proper reference provided). Then in the next paragraph you say that you have limited information on the species. It doesn't look like MPI has done any basic desk research, looked at previous studies commissioned by MPI (and there are some), or reviewed any international research on the species. Frankly, I would have expected better research from a college student not a Ministry responsible for the sustainable harvest of a species and the impact that harvesting has on the wider ecosystem.

2.7 Section 4.3 para 18 "There is some Sea Cucumber fishing in Tory Channel and Queen Charlotte Sound (QCS) but the rest of SCC7A remains largely unfished. Given the developing stage of the fishery no management targets, reference levels, or hard and soft limits have been set. These will be determined as the fishery develops and more scientific Information becomes available". There appears to be no plan for future scientific monitoring, or gaining real data on the impact of harvest volumes and methods on the ecosystem.

2.8 It is 15 years since the original TAC and TACC was set and you have stated in Section 3 para 7 that there is still limited information available. Your rationale to increase the TACC for this species is inadequate at best. The document is full of inconsistencies and statements they contradict each other. It is not the responsibility of the Guardians to provide evidence that this fishery is sustainable and has no more than minor impacts on the ecosystem.

2.9 The Guardians believes that the evidence is to the contrary. Eye witness accounts of harvesting suggest that when taking Sea Cucumber every single one larger than a thumb is taken from the harvest area. No consideration is given to future breeding stock. It has also been witnessed that when all the Sea Cucumber is removed sea lettuce begins to grow in abundance upsetting the ecosystem.

2.10 No information has been provided about the impact on Hector's Dolphins or King Shags if the harvest area encroaches into their feeding grounds.

2.11 The discussion document uses the word "expected" numerous times to refer to harvest methods, environmental impacts and future surveys and the like. The Guardians does not "expect" some loose arrangement to effectively monitor this fishery and its impacts. It is the job of MPI to provide sound and reliable evidence and monitoring with clearly defined harvest methods, percentage takes, and size limits from areas, to allow the species to recuperate and breed.

## Recommendations

3.0 We recommend that the proposal to increase, or decrease, the TACC for Sea Cucumbers is put on hold until a working group is formed. This working group needs to be represented by the fishing industry, MPI, IWI, the Marlborough District Council (in its role as seabed guardian) and community groups.

3.1 The working group needs to assess the evidence to date. Identify gaps in the available research, verify numbers and rationale, and understand the life cycle and impacts that this species has on the environment.

3.2 Once the baseline is established there needs to be a clear and defined plan for managing this fishery.

3.3 We recommend that a working group be set up comprising not only representatives from the Sea Cucumbers Quota Owners Group but also IWI, FNZ, technical advisers and community groups. The Working Group's terms of reference to include the development of a Fisheries Strategy for this resource in SCA7 (effectively the Sounds only).

Please continue on a separate sheet if required.

**From:** [REDACTED]  
**To:** [FMSubmissions](#)  
**Subject:** Submission relating to Sea Cucumber harvesting  
**Date:** Tuesday, 12 February 2019 4:44:14 PM

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**Submission relating to Review of Sustainability Measures for Marlborough Sea cucumber (SCC 7A) for 2019/20**

**Submitters:** John and Judy Hellstrom, Puhikereru, Queen Charlotte Sound

**Contact:** [REDACTED]

**To whom it may concern**

Given the dearth of any information about the effect of harvesting sea cucumbers (ref below) on the sustainability of fisheries resources, this proposal (Option 2) does not meet the purpose of the Act, and should not be supported. Section 10 (information principles) directs the Minister not to make a decision which defeats the purpose of the Act, and the purpose of the Act is to maintain a sustainable fishery.

Principle 1 of the Environmental Principles cannot be addressed in the absence of any robust information about stocks.<sup>[1]</sup>

With reference to Principle 2 of Section 9 (Environmental Principles): (Biological diversity of the aquatic environment should be maintained), there has been no recovery at all within the visible vicinity in our local area of Queen Charlotte Sound, since the sea cucumber stocks were “cleaned out” (“harvested”) about 5 years ago ,

We do not support Option 2 (p. 2, Discussion Document), which is to increase the catch by 225%-300%. In the absence of any verifiable information about stocks, or sustainability of fisheries resources, or the impacts on the whole eco-system and other species, the purposes of the Fisheries Act cannot be met.

<!--[endif]-->

<!--[if !supportFootnotes]--><sup>[1]</sup><!--[endif]--> Because of the limited information on growth rate, reproduction, recruitment, and mortality for sea cucumber it is not possible to determine  $B_{MSY}$ <sup>1</sup>. <sup>[1]</sup> (p.3, Discussion Document)

# Kenepuru & Central Sounds



Kenepuru & Central Sounds Residents Association Inc

Manager, Fisheries New Zealand  
Sustainability Review 2019

**Email: FMsubmissions@mpi.govt.nz**

Andrew Caddie  
President KCSRA  
C/- PO Box 5054  
Springlands  
Blenheim 7241  
email: [REDACTED]  
WWW: kcsra.org.nz

12 February 2019

Dear Sir/Madam

**Kenepuru and Central Sounds Residents' Association  
Submission on Fisheries New Zealand Review of  
Sustainability Measures for Marlborough Sea Cucumber (SCC 7A) for 2019/20**

I write in my capacity as President of the Kenepuru and Central Sounds Residents' Association Inc., (**Association**).

## 1. Introduction

- 1.1 The Association was established in 1991 and currently has approximately 280 household members who live full time or part time in the Kenepuru and Pelorus Sounds. The Association's objects include, among others, to coordinate dealings with central and local government and represent members on matters of interest to them. For an overview of the wide range of issues we represent members on, go to our website – [www.kcsra.org.nz](http://www.kcsra.org.nz)
- 1.2 However, by way of example and given its extreme relevance to the above FNZ Discussion Document (**DD**), we will firstly touch on one matter the Association has been heavily involved in.
- 1.3 In 2014 community groups alerted the Association as to the rapidly declining scallop resource in the Marlborough Sounds. Upon investigation we formed the view that the primary driver behind this alarming state of affairs was due to commercial overfishing. After several years of effort we and other stakeholders were successful in having the fishery closed. A slightly unfortunate outcome, as arguably blameless recreational and customary fishers had to bear the brunt of a failed experiment in industry management of this much-cherished resource. We are now engaged in a collaborative working group looking to establish, among other things, some much needed parameters as to if or when the Sounds scallop resource has recovered to a stage that some level of take is sustainable into the future.

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**Kenepuru & Central Sounds Residents Association Inc.**

President	Andrew Caddie
Vice President	Tom Wright
Secretary	
Treasurer	Stefan Schulz



- 1.4 With the benefit of hindsight we now see the reluctance of industry and FNZ (MPI) to first do the hard yards and set reference biomass levels and hard and soft limits<sup>1</sup> as a primary reason why our struggle to save the Sounds Scallop Fishery has been so long and so contested.
- 1.5 Today, once again, community groups concerned as to what is been proposed for the SCA7 Sea cucumber fishery have approached us. Accordingly, alarm bells rang when on an initial review of the FNZ Discussion Document (DD) we realized no work had been done on reference limits and hard and soft limits<sup>2</sup>. This is so, despite this fishery being in the Quota Management system since 2004.
- 1.6 Finally, it seems clear that a relatively small area of the Sounds – for obvious reasons – is the preferred hunting ground for commercial fishers of this fish species notwithstanding the relatively large area that is SCA7.

## 2. Discussion

- 2.1 **Inadequate Information:** We noted the advice of the authors of the DD that the latest available MPI/FNZ Fisheries Assessment Plenary document <sup>3</sup> for this fish species was the “*best available information*” and reviewed the same. It is a short chapter barely 5 pages (including references) long. It squarely underlines the fact that **little is known** about the commercially targeted sub species - *Stichopus mollis*. Proposing a massive increase in TACC based on this scarcity of information seems, we submit, contrary to the sustainability requirement of Section 8 of the Fisheries Act 1996.
- 2.2 In proposing Option 2 (a massive increase in TACC) the authors of the DD seemingly put much weight on the abundance of the *Stichopus mollis* Sounds resource by reference to by-catch data gathered in conjunction with various scallop biomass surveys. They also refer to a 2014 NIWA dive survey within the current main Sounds fishing ground for this species. The DD suggests this work was assessed by/through a Fisheries Science Working Group process. However **no links are given** or other information provided by the DD authors as to this work or its subsequent peer assessment. This is a most unfortunate departure from good consultation practice and requirements **as it deprives submitters** from carrying out their own assessment of the collated data and associated narrative.
- 2.3 Around 5 pm on the 10<sup>th</sup> of February FNZ suddenly produced what they said was the NIWA report of the 2014 dive survey referred to in the DD and used to substantiate the increase proposed by Option 2. **We protest** at this is too late in the piece “coming clean”. Imagine the horror if we asked FNZ to respond to a research paper we produced within 24 hours!! However, even a quick read of the Executive Summary of the NIWA report highlights disturbing differences as to the maths behind the FNZ claims as to the sustainability of moving from the status quo. We cover that briefly elsewhere.
- 2.4 **The Industry/markets:** Apart from noting the recent formation of a Sea Cucumbers Quota Owners Group<sup>4</sup> no information is given as to the composition of quota holders (e.g., numbers, corporates or individuals) or any market information (eg domestic or export destinations), or where the green catch is processed and so on. This is an

<sup>1</sup> This best practice management strategy is set out in the MPI (now FNZ) 2008 publication “*Harvest Strategy Standard for New Zealand Fisheries*”.

<sup>2</sup> See paragraph 18 of the FNZ DD.

<sup>3</sup> May 2018 Fisheries Assessment Plenary Volume 3 at pages 1293 and 1298 – See paragraph 66 of the FNZ DD.

<sup>4</sup> See paragraph 61 of the FNZ DD.

unfortunate oversight.

- 2.4 **Diver Only?:** The DD is less than reassuring in terms of the fishing methods. It suggests it is diver only (free and assisted) and thus low impact on both habitat and catch mortality compared to say dredging or bottom trawling techniques. However it then goes on to state that it is only “*expected*” that if, as per Option 2, the TACC is **massively increased** from eight to eighteen tonnes then it will continue to be a diver only fishery. Bear in mind that the May 2019 Plenary extract records that once upon a time around 45% of the catch was taken as by catch in bottom trawling!
- 2.6 It is now well accepted in most quarters that the marine area of the Sounds is suffering adverse impacts on its ecosystem and habitats from many activities both marine and land based. Paving the way for additional dredging or bottom trawling in the Sounds is **not, we submit, acceptable**. Regulations need to be put in place as soon as possible requiring that commercial fishing of this species **be diver only**.
- 2.5 **The Maths:** In due course the DD authors attempt to put up some mathematical process/justification for arriving at the suggested TACC and that implicitly it is a sustainable figure. With all due respect we submit their logic seems rather hard to follow.
- 2.7 At paragraphs 19 to 21 of the DD some overview results from the surveys referred to above is given. The biomass estimate derived from the scallop surveys is said to cover a small area (no quantum given or what this area is relatively small in relation to) and a biomass range of 135 tonnes to 237 tonnes given. Presumably this is for the whole sampled area. The mid point is not given. No explanation is given as to why this range is “*likely to be biased low*”.
- 2.7 For the NIWA dive survey results no range is given other than that the mid point biomass figure for the area sampled in the NIWA dive survey is 349 tonnes. The authors then add this figure to the scallop survey figures to arrive at a range of 485 to 585 tonnes. This seems a fundamentally flawed approach.
- 2.8 We submit that a more valid approach is to use the mid point of each set of figures add them together and then divide that by two providing an average. This would seem to arrive at **a figure of about half** that suggested in the DD.
- 2.9 In any event at paragraph 30 of the DD the authors have another go. Here they appear to use the lower limit of the 95 % confidence range (not given) for each survey. They then appear to set an exploitation rate of 5%. They then presumably multiply the lower bound of each survey by 5% producing figures of 3.4 tonnes and 11.1 tonnes respectively. They then add these together and say a sustainable yield of 14.5 tonnes is available from these areas.
- 2.10 I stress we are forced to read between the lines a lot here but this approach seems more than a little hair raising. Further a fair proportion of it comes from an area not currently fished by the industry for this species. Straight away this puts undue fishing pressure on the population in the QC and Tory Channel areas.
- 2.11 As noted FNZ suddenly produced the NIWA report<sup>2</sup> of its 2014 dive biomass survey in

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<sup>1</sup> See the likes of paragraph 32 of the FNZ DD

<sup>2</sup> “*Dive surveys of sea cucumbers in Queen Charlotte Sound (SCC 7A) and Hauraki Gulf (SCC 1B), 2014* New Zealand Fisheries Assessment Report 2016/58 J.R. Williams, C.L. Roberts, C.J. Middleton.

the Queen Charlotte commercial area re Sea Cucumbers at the eleventh hour. Our review of that report has of necessity been confined to the Executive Summary nor have we carried out a committee review. Nevertheless the report suggests a commercial sized biomass of 88 tonnes (95% CI = 58 – 115 tonnes). Using these figures and the approach taken by the authors of the DD as set out above we get a sustainable yield of **2.9 tonnes!!!**

- 2.12 Quite frankly this mismatch with the DD is appalling. We **strongly recommend** the senior NIWA author of the dive survey report be instructed to comment on the claims made in the DD and the findings of the dive report. In the interim we **caution FNZ against** supporting the use of the DD approach by the Minister to assist in his decision. This would be most unfortunate.
- 2.11 We submit the approach used with the data to hand clearly **does not support an increased TACC**.

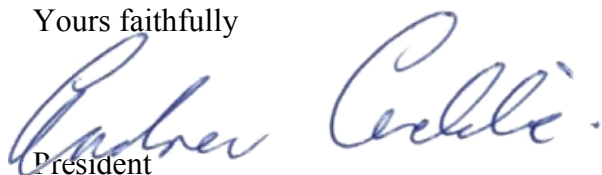
### 3. Conclusion

- 3.1 This is clearly a little known species with a history of fishing effort in SCA 7 being relatively concentrated in an area of the Sounds. The FNZ efforts at using their interpretation of existing data to arrive at the relative size of the resource seem fundamentally flawed as to approach and likely to arrive at a serious over estimate of the sustainability of the resource. Nor are they supported by the NIWA report on the 2014 dive survey. Adoption of Option Two is likely to result in a sustainability issue for an indigenous species whose role and place in the marine system seems very poorly known.
- 3.2 Accordingly the Association believes a precautionary approach is required pursuant to the provisions of the Fisheries Act and submits in favour of **Option One. – Status Quo**.

### 4. Next Steps

- 4.1 We **recommend** that the work streams mentioned in the DD at paragraph 61 of the DD are sound but need to be implemented **BEFORE** the TACC is raised. We submit accordingly. To these work streams we **also recommend** that work begin immediately on ascertaining reasonably defensible reference levels and hard and soft limits.
- 4.2 We **recommend** that a working group be set up comprising not only representatives from the Sea Cucumbers Quota Owners Group but also IWI, FNZ, technical advisers and community groups. The Working Group's terms of reference to include the development of a Fisheries Strategy for this resource in SCA7 (effectively the Sounds only).

Yours faithfully



President

Kenepuru and Central Sounds Residents' Association

Email: [REDACTED]

c/- PO Box 5054 Springlands, Blenheim 7241

From: [REDACTED]  
To: [FMSubmissions](mailto:FMSubmissions@mpi.govt.nz)  
Subject: submission re Sea cucumbers  
Date: Monday, 11 February 2019 9:33:45 PM

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John Leade

## Submission Form

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#### Submitter details:

Name of submitter or contact person: John Peter Leader	
Organisation (if applicable):	Marlborough Recreational Fishers Assn.
Email:	[REDACTED]
Fishstock this submission refers to: <i>Rock lobster – CRA 3, CRA 4, CRA 8</i> <i>Sea cucumber – SCC 7A.</i>	Sea Cucumber SCC7A
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	Option 1 – the status quo

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mission: <sup>[1]</sup>

#### Details supporting your views:

See attached

There is little hard data to support the proposed increase in the TACC for beche-de-mer. The proposal is to permit taking of the animals by free diving or by SCUBA. Evidence for the abundance of the animals is based on bycatch from dredge surveys to investigate scallop abundance. It should be noted that these surveys are carried out in small, localised areas where scallops are thought to be abundant, and are usually in relatively deep water not accessible to free, or Scuba assisted, diving. The Queen Charlotte Sounds, and Tory Sounds, are steep-sided waterways and, with only small regions of shallow water, offer only limited access to free divers. Before permitting a substantial increase in the TACC it would seem advisable to have a more reliable estimate of the abundance of the beasts.

Given the high commercial value of the crop, and the relatively limited areas in which they are accessible, it would seem advisable to be conservative until the stock is better known. This could be achieved relatively easily, for example by

using a visible estimate of population density during diving captures.

This attractive addition to the Chinese gourmet market has been subject to 'boom and bust' exploitation in the past, for example in Hawaii in the early twentieth century. It would be a pity if the desire for a rapid return led to the destruction of an industry which has great potential.

In addition, sea cucumbers are detritus feeders, which can potentially turn solid waste from aquaculture enterprises into soluble material, reverting the ecology of the Sounds back towards something approaching its pristine state. Care to avoid overexploitation of this resource can help to restore the Sounds to its earlier condition.

se continue on a separate sheet if required.

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<sup>[1]</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

r, PhD.



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### Submitter details:

Name of submitter or contact person:	
Organisation (if applicable):	NZ RECREATIONAL FISHING COUNCIL
Email:	
Fishstock this submission refers to: <i>Rock lobster – CRA 3, CRA 4, CRA 8</i> <i>Sea cucumber – SCC 7A.</i>	Rock Lobster - CRA 3, CRA 4, CRA 8, Sea cucumber – SCC 7A
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	<p><b>CRA 3</b> Gisborne Rock Lobster - <u>We support <b>Option 2</b> (CRA3 02) for a decrease TAC A TACC from 1 April 2019, based on the operation of the CRA 3 management procedure</u></p> <p><b>CRA 4</b> Wellington/Hawkes Bay rock lobster – <u>We support <b>Option 1</b> (CRA4 01) to maintain status quo in the region.</u> Our comments supporting this are detailed below</p> <p><b>CRA 8</b> Southern rock lobster – <u>We support <b>Option 2</b> (CRA8 02) for an increase TAC a TACC from 1 April 2019, based on the operation of the CRA 8 management procedure</u></p> <p><b>SCC 7A</b> Marlborough Sea Cucumber – We do not support the recommended increase based on information that current abundance will support increased utilisation. Not our comments below.</p>



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## Submission:<sup>1</sup>

### Details supporting your views

**CRA 4 Wellington/Hawkes Bay rock lobster** – We support **Option 1** (CRA4\_01) to maintain status quo in the region. We do not support an increase in TAC and TACC - the management procedure allows for an increase, however we oppose this for the following reasons:

1. The CPUE is not as good as recently enjoyed;
2. There is too much shifting of quota into areas within CRA4. This shift in effort from statutory areas of CRA4 into Ngawi from other CRA4 sub-stat areas is causing localised depletion. This is an annual trend and is misrepresenting the statistics. We strongly advocate for a change in the allocation methodology that prevents fishers moving within sub-stat areas if they do not catch their full allocation. Anyone unable to catch their full quota in the area they fish (due to weather or depletion) should forfeit and not be permitted to move it to another sub-stat area, which results in two(2) areas of depletion.
3. We continue to advocate for local area management as this trend is causing conflict with other users, including recreational;
4. We agree with commercial users that illegal harvesting is out of control and without an effective compliance regime implemented by MPI, the situation will continue to escalate.

**SCC 7A Marlborough Sea Cucumber** – We do not support the recommended increase based on information that current abundance will support increased utilisation, as we do not feel that there is enough information on sustainability measures versus harvest levels, so support a precautionary approach.

Please continue on a separate sheet if required.

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<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

**From:** [REDACTED]  
**To:** [FMSubmissions](#)  
**Subject:** Sea Cucumber.  
**Date:** Monday, 21 January 2019 8:05:04 PM

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Kia Ora, to whom it may concern,

My name is Pete Beech, I am the founder and patron of "The Guardians Of The Sounds," I have serious reservations about the current quota and proposed increase of Sea Cucumber.

I need to start by saying that I believe your quota management is seriously flawed when it comes to maintaining a healthy ecosystem in the Marlborough Sounds.

I say that because your system focuses solely on individual species and not the Eco system as a whole, you jokers don't give a rat's arse about all the creatures that aren't quota'd even though you are aware that many of these species are symbiotic.

Because you have over quota'd the Snapper and mismanaged the Blue Cod stocks the kina numbers have decimated the kelp beds, the bottom dredging for scallops and kina have destroyed the coral banks, Byzantines, sponge gardens, alga beds.

There are now only 20 Hector dolphins left in Tōtaranui and our King Shag numbers are dropping dramatically. These two species are both bottom feeders and no consideration was given to the survival of these iconic species when you issued quota for Sea Cucumber and Gooey Dug.

[REDACTED] I observe these creatures on a daily basis, I believe that the Eco-System of Tōtaranui is at a tipping point and your mismanagement is going to tip it over the edge.

I am pleased that you have contacted us over the Sea Cucumber quota, I don't recall being contacted before you brought this species under your quota system, nor did you bother to contact MDC, DOC, Te Atiawa or Stake holders before you brought the Gooey dugs into the system.

We have been acting as the ambulance at the bottom of the cliff now for 30 yrs, sad thing is you guys aren't getting better at this game you're getting worse, either you are being misadvised or your close affiliation with the commercial sector has jaundiced your judgment. This preoccupation for short term gain with no regard for the future is very disturbing, what creatures are there left on our seafloor that you can make money out of, about the only creatures left that don't have a bar code on them is the star fish and I don't doubt that before long you and your mates will find a market for them also. Your Submission process gave us no information to assert by what methodology you used to determine whether the Sea Cucumber biomass was healthy enough to enable an increase in the quota.

How long do they live, how old do they need to be before they can reproduce, to my knowledge there are no areas where the taking of these

critters is out of limits, what about the MDC's significant natural areas ? Again have they been consulted ?

What is the recommendation of our local DOC rangers ?

You do realize dont you , that when you issue a qouta for Area Seven for Sea Cucumbers , the divers will harvest the whole lot from the sheltered waters of the Marlborough Sounds, Do you have a size limit ? I doubt it because I have seen the divers strip nearly every last sea sausage from Totaranui, the only ones left are a handful under jetties. I dont know anything about these creatures And I suspect that the only thing you know is how much a pound they are worth on the Asian Market.

What I can tell you is that when our bay was stripped of them, not a single one survived the harvest ! the bay started to get blanketed in Sea lettuce, I have never seen this in living memory, so they obviously feed on sea weed amongst other things, do they help to reduce nitrogen ?

These little creatures will have been designed with a purpose in mind and if you are going to allow the total eradication of them you need to be aware of the consequences.

I have seen both the commercial sector and to a degree the rec fishermen decimate the fragile resources of the Sounds for years, have talked to Maori, old Soundies, studied the oral histories, talked to lots of so called experts and scientists.

I am convinced that the Sounds needs to be taken out of your Area Seven and it needs a management structure comprised of Agencies, Stock holders Iwi and residents who are committed to its long term sustainable management, with trustees who are committed to the sustainable health of the whole ecosystem as opposed to just their slice of the pie. this management structure needs to be in an Integrated, you will be aware of the organisation that has been formed to do just that but has been symied by MPI, We have the Guardians Of Fiordland and the Intergrated management structure in Kaikoura, its time you looked seriously at allowing one for the Marlborough Sounds.

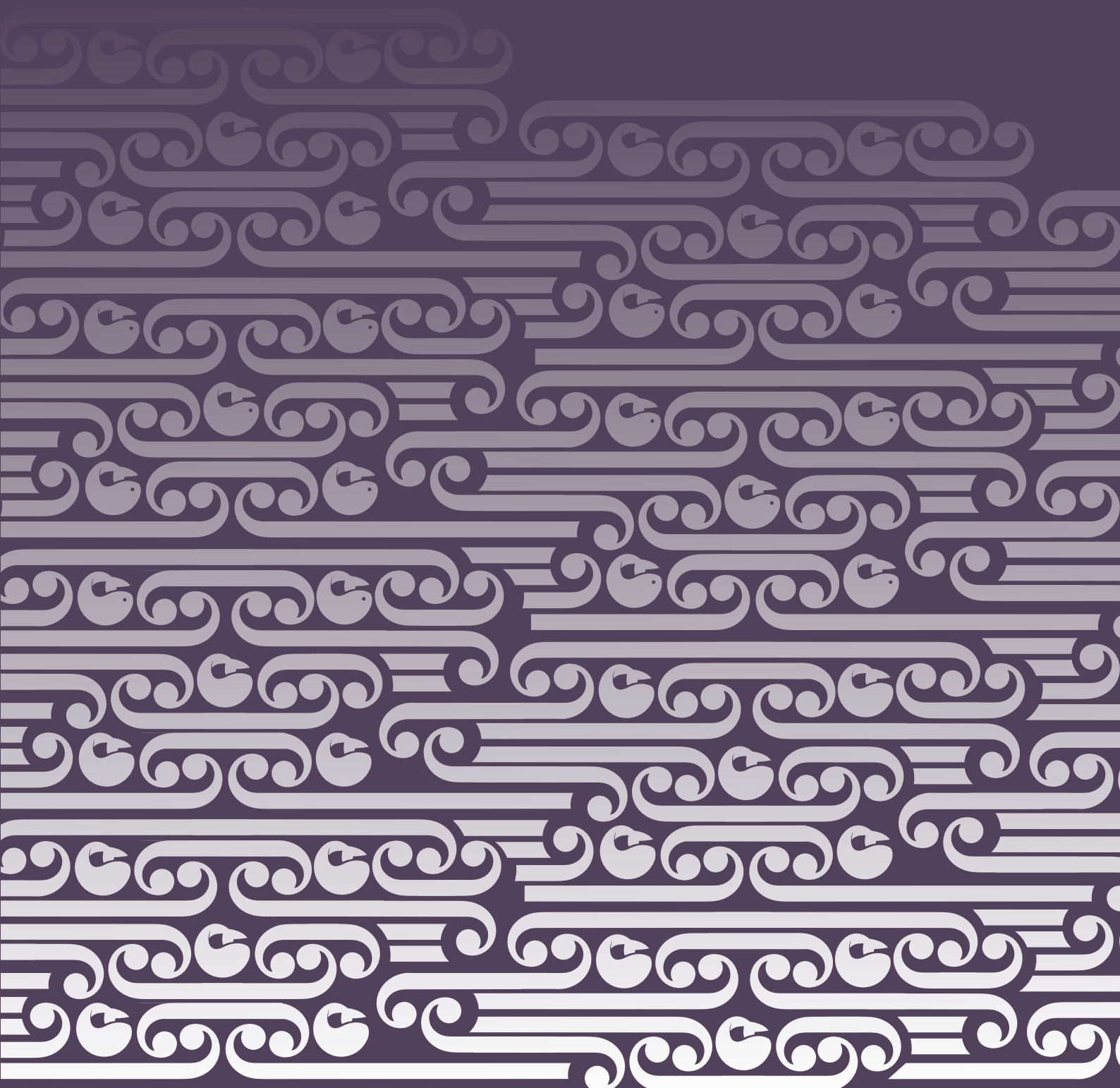
The problem that exists with your commercial sector rape and pillaging the resources of the calm and sheltered waters of the Sounds instead of the exposed open sea coast must be acknowledged by your agency and addressed before the Sounds eco-system collapses completely. The area that is impacted the most of course is Tory Channel, take my word, if the ecology of Tory Channel collapses , the fish & Kaimoana stocks in the whole sounds will die as a result, it is the Womb of the Sounds.

I vote NO to any increase to the Sea Cucumber qouta, and urge you to take a serious look at the impacts of your existing qouta on the overall Eco-system.

Noho Ora Mai,  
Pete Beech.



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**Te Ohu Kaimoana's Response to  
Fisheries New Zealand's Review of  
Sustainability Measures for Rock  
Lobster (CRA3), (CRA4), (CRA8) and  
Malborough Sea Cucumber (SCC7A)  
for 2019/20**

Te Ohu  
**Kaimoana**  




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# Introduction

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1. Te Ohu Kaimoana welcomes the opportunity to provide a response to Fisheries New Zealand (FNZ) on their Review of Sustainability Measures for Rock lobster in Gisborne (CRA3), Hawkes Bay/Wellington (CRA4), Southern (CRA8) and Marlborough Sea Cucumber (SCC7A) for 2019/20.

## About Te Ohu Kaimoana

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2. Te Ohu Kaimoana was established to implement and protect the Fisheries Settlement. Its purpose, set out in section 32 of the Maori Fisheries Act 2004, is to “advance the interests of iwi, individually and collectively, primarily in the development of fisheries, fishing and fisheries-related activities, in order to:
  - ultimately benefit the members of Iwi and Māori generally; and
  - further the agreements made in the Deed of Settlement; and
  - assist the Crown to discharge its obligations under the Deed of Settlement and the Treaty of Waitangi; and
  - contribute to the achievement of an enduring settlement of the claims and grievances referred to in the Deed of Settlement.”
3. Mandated Iwi Organisations (MIOs) have approved a Māori Fisheries Strategy and three-year strategic plan for Te Ohu Kaimoana, which has as its goal “that MIOs collectively lead the development of Aotearoa’s marine and environmental policy affecting fisheries management through Te Ohu Kaimoana as their mandated agent”.
4. The principles guiding our response to the draft report are set out below.

Noho ora mai rā,



**Dion Tuuta**

Te Mātārae - Chief Executive  
Te Ohu Kaimoana

# 1.0 - Guiding Principles

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## 1.1 - Te Hā o Tangaroa kia ora ai tāua

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5. Prior to the colonisation of Aotearoa by the British Crown, Māori enjoyed complete authority over their fisheries resources. Te Ao Māori's relationship with Tangaroa, and ability to benefit from that relationship, was and remains underpinned by whakapapa – descent from Ranginui, Papatūānuku and their children.
6. The signing of Te Tiriti o Waitangi in 1840 affirmed Māori tino rangatiratanga over their taonga including fisheries which was an essential affirmation of the traditional Māori world view. This world view endures in the modern day. Te Tiriti o Waitangi and the 1992 Maori Fisheries Settlement are built on a much deeper foundation of Māori whakapapa connection to and relationship with Tangaroa.
7. In the modern context, when considering or developing fisheries-related policy, Te Ohu Kaimoana is guided by the principle of 'Te Hā o Tangaroa kia ora ai tāua' - the breath of Tangaroa sustains us. In this context Tangaroa is the ocean and everything connected to and within, on and by the ocean. This connection also includes humanity, one of Tangaroa's descendants.
8. Ko 'Te hā o Tangaroa kia ora ai tāua', highlights the importance of an interdependent relationship with Tangaroa, including his breath, rhythm and bounty and how those parts individually and collectively sustain humanity. The guiding principles underpinning 'Te hā o Tangaroa kia ora ai tāua' highlight how we ensure that we foster and maintain our relationship with Tangaroa.

### 1.1.1 - Tangaroa

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9. Tangaroa is the God of the Sea and everything that connects to the sea. He is the divinity represented through Hinemoana (the ocean), Kiwa (the guardian of the Pacific), Rona (the controller of the tides – the moon) and the connection with other personified forms of the Great Divine. For some tribes, he is also the overlord for all forms of water, including freshwater and geothermal as well as saltwater.

## 1.1.2 - Te Hā

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10. Te Hā means, breath and to breathe. Te Hā o Tangaroa represents the breath of Tangaroa, including the roar of the ocean, the crashing of waves on the beach and rocks, the voice of the animals in and above the ocean and of the wind as it blows over the ocean, along the coast and the rocks and through the trees that stand along the shoreline. Through our whakapapa to Tangaroa, we as humanity, we as tangata whenua, are the human voice for Tangaroa.
11. When Tangaroa breathes it is recognised through the ebb and flow of tide and the magnetism of the moon. This magnetism is recognised as the kaha tuamanomano (the multitudinal rope of the heavens). Therefore, we must also be mindful of the lunar calendar when working with Tangaroa and his various modes.

## 1.1.3 - Purpose and Policy Principles

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12. Te hā o Tangaroa ki ora ai taua provides Te Ohu Kaimoana with guidance on key principles which should underpin our consideration of modern fisheries policy.
- **Whakapapa:** Māori descend from Tangaroa and have a reciprocal relationship with our tupuna;
  - **Tiaki:** To care for Tangaroa, his breath, rhythm and bounty, for the betterment of Tangaroa in order to care for humanity as relatives;
  - **Hauhake:** To cultivate Tangaroa, including his bounty, for the betterment of Tangaroa (as a means of managing stocks) and for the sustenance of humanity; and
  - **Kai:** To eat, enjoy and maintain the relationship with Tangaroa as humanity.
13. Whakapapa as a principle recognises that when Māori (and Te Ohu Kaimoana as an extension of Iwi Māori) are considering Tangaroa, we are considering the wellbeing of our tupuna (ancestor) – rather than a thing or inanimate object. Therefore, the obligation and responsibility of Tiaki – caring for Tangaroa – comes from our descent from our Tupuna. Similarly, the responsibility and obligation of Hauhake (cultivation) is underpinned by our Tiaki obligations to Tangaroa in order to Tiaki humanity.
14. Ultimately, humanity's right to Kai – to enjoy the benefits of our whakapapa relationship with Tangaroa – are dependent upon our ability to Tiaki and Hauhake and how we uphold the responsibility and obligation in a modern and meaningful way to maintain legitimacy through practicing Tiaki, Hauhake and Kai.

15. These principles were inherent within the Treaty of Waitangi fisheries settlement and – Te Ohu Kaimoana asserts – the quota management system, which Māori endorsed as part of that historic settlement. This underscores its ongoing relevance and importance in modern New Zealand fisheries management.

## 1.1.4 Duty to act in a manner consistent with the Fisheries Settlement

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16. Section 5 (b) of the Fisheries Act 1996 obliges “all persons exercising or performing functions, duties, or powers conferred or imposed by or under it” to “act in a manner consistent with the provisions of the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992 (TOW(FC)SA)”. The TOW(FC)SA implements the Deed of Settlement between Māori and the Crown, which represented a full and final settlement of Māori claims to fisheries.
17. It follows that whenever a minister makes a decision to implement a sustainability measure or to provide for utilisation, they must ensure their decision is consistent with, and does not undermine, the Fisheries Settlement.
18. When the Interim Fisheries Settlement was agreed between Māori and the Crown in 1988, the Crown undertook to provide Māori with 10% of the quota for all stocks in the Quota Management System (QMS) at that time. When the Deed of Settlement was finalised, it was agreed that all stocks introduced to the QMS from that time would generate a 20% share for Māori. As part of this agreement, Māori agreed that the QMS was an appropriate regime for managing commercial fisheries. At the time of the Settlement the only proportional interests held were by quota owners (who owned a share of the TACC). Allowances for customary and recreational interest were for a fixed amount.
19. This system formed the basis for the commercial part of the settlement and underpins sound management of commercial fishing, in which rights holders take responsibility for managing their share of the overall TAC. The expectation was that the benefits of good stock management would accrue to those who had a proportionate interest in the fishery, notwithstanding the priority right held by customary interests in the event that customary needs increased.
20. As part of the Settlement, it was also agreed that the Minister would develop policies to help recognise use and management practices of Māori in the exercise of non-commercial fishing rights. The Minister was also to recommend the making of regulations to recognise and provide for customary food gathering by Māori and the special relationship between tangata whenua and those places which are of customary food gathering importance to the extent such food gathering is neither commercial in any way nor for pecuniary gain or trade. Within the customary regulations, kaitiaki take responsibility for managing customary fishing, including issuing authorisations and reporting catch.

21. When agreeing to the provisions of the Deed of Settlement, Māori expected the value and integrity of the Settlement to be retained. After all, the Settlement is full and final: any action the Crown takes to undermine the value of settlement quota or fails to recognise customary non-commercial needs is a matter of bad faith.
22. Thus, when allocating the TAC, the Minister must ensure the integrity of Māori fishing rights is maintained. In Te Ohu Kaimoana's view this means:
- a. priority should be given to the customary allowance for stocks that Iwi and hapū require to meet their customary non-commercial needs; and
  - b. the proportion of the TACC that makes up the TAC should not be reduced (but can be increased). Any reallocation to the recreational sector has the effect of reducing the overall value of settlement quota.
23. Te Ohu Kaimoana views recreational fishing as a privilege which should not be exercised at the expense of Māori commercial and non-commercial fishing rights. In recent times the recreational sector has effectively operated within an unconstrained allowance – which provides little incentive for the recreational sector to exercise responsibilities to constrain catch within the recreational limit. Similarly, this provides little incentive for the commercial sector to work collaboratively with recreational bodies to increase stock abundance, given the likelihood that any benefits of a rebuild will be allocated to the recreational sector. We acknowledge there are input controls such as bag limits; however, there is no effective means of keeping the total recreational catch within the allowance set.
24. Te Ohu Kaimoana does not support decisions that increase the recreational allowance at the expense of the TACC. These kinds of re-allocations affect the rights of settlement quota holders and reduce the incentives on the commercial sector to take responsibility and invest in good management.
25. Te Ohu Kaimoana considers that the appropriate way of reflecting the recreational share of the fishery is to set an allowance that as near as possible reflects the catch taken in 1992, when the Deed of Settlement was signed. We note that a recreational allowance did not become part of the TAC until the Fisheries Act 1996 came into effect, and since then it has been the general practice to set allowances when TACCs are varied and TACs are set, or when stocks are introduced into the QMS. We note that the courts have ruled that the Minister has discretion to set the allowance when initially allocating a TAC up to the level of estimated catch. However, we do not support any increases in this allowance after a TAC is set. From a fisheries management perspective, such decisions encourage a "race for fish" – which is what we are seeing in the case of species like Southern Bluefin Tuna. This kind of behaviour should be what responsible fisheries management aims to avoid.

26. If the recreational sector wishes to see a system in which the allowance can be increased above its initial allocation, a full review of the framework for managing the recreational sector is required. This would involve further consideration of options to more tightly manage recreational catch to ensure it stays within the recreational allowance. A system that allows for the recreational sector to increase catches would need to be carefully designed and take explicit account of obligations under the Deed of Settlement.

## 1.1.5 Allocating the TAC

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27. To protect Māori fisheries settlement rights, the following approach should be taken to adjusting the Total Allowable Catch (TAC):
- a. the recreational allowance should not be increased above the level it was first set by the Minister when the TAC was set for any particular stock; and
  - b. all increases to a TAC should be allocated to the commercial sector after providing for non-commercial customary fishing and other fisheries-related sources of mortality;
  - c. if, in order to ensure sustainability, the TAC, Total Allowable Commercial Catch (TACC) and the recreational allowance is reduced, the allowance can be increased back to its initial level when the stock rebuilds;
  - d. the customary allowance is based on customary needs and managed through kaitiaki. In some instances, customary needs may not be fully identified and there may be insufficient capacity to harvest what is needed. Therefore, there can be expected to be increases to the customary allowance over time as both needs are better identified and capacity to harvest is realised;
  - e. in situations where the abundance of a stock drops, kaitiaki will respond appropriately.
28. In our view, the approach above should be adopted as the default option and apply whether the stock is at, above or below any target stock level at the time the TAC is set. Variations on this approach should only be considered by the Minister if all extractive interests reach agreement on an alternative approach.

## 1.1.6 Integrity of the TAC

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29. The process to make regulatory change is slow and cumbersome. The current regulatory process takes 62 weeks whereas 'simple' gazettal and 'complex' gazettal's take 11 and 27 weeks respectively. The time it takes to carry out this process inhibits the ability of fisheries managers to make the appropriate changes to manage fisheries.

30. The Rock Lobster Fisheries are good examples of where more responsive decision making is required. On April 1, 2018, the CRA2 TAC was heavily reduced, with reductions to the TACC and recreational allowance. While the TACC can be managed by industry to ensure that it isn't over caught, however the recreational fishery is managed using a combination of input controls i.e. daily bag limit, pot design and pot limits. The modelling used to estimate the success and rate the fishery rebuilds uses the current recreational allowance. Any recreational catch above the allowance puts the success and rate of rebuild at risk. As the fishery rebuilds and more lobster become available, the inability to manage the recreational sector to their allowance further jeopardises the rebuild. These are key issues which undermine the integrity of the TAC. A 12 to 18-month period for new arrangements to be put into effect is too long to manage the fishery effectively. We support a gazettal process that ensures that the appropriate management measures are in place as soon as possible after decisions are made.

## 2.0 Management measures for CRA3, CRA4 and CRA8

### 2.1 - Context

#### Annual Assessment Results for CRA3, CRA4 and CRA8

31. Fisheries New Zealand (FNZ) has sought submissions on proposals to adjust the total allowable catch (TAC) settings in CRA3, 4, and 8, based on the results of management procedures. The proposals were developed based on recommendations from the National Rock Lobster Management Group (NRLMG). The proposed options are outlined below in Table 1.

**Table 1: Proposed management options (in tonnes) for CRA 3, 4 and 8 from 1 April 2019.**

Stock	Option	TAC	TACC	Allowances		
				Customary Māori	Recreational	Other mortality
CRA 3	CRA3_01: Status quo	366.86	237.86			
	CRA3_02: Based on the operation of the CRA 3 management procedure	351.9 ↓ (4.1%)	222.9 ↓ (6.3%)	20	20	89
CRA 4	CRA4_01: Status quo	513.8	318.8			75
	CRA4_02: Based on the operation of the CRA 4 management procedure	558 ↑ (8.6%)	380 ↑ (19.2%)	35	85	58 ↓ (22.7%)
CRA 8	CRA8_01: Status quo	1,161.7	1,070.7			
	CRA8_02: Based on the operation of the CRA 8 management procedure	1,220.6 ↑ (5.1%)	1,129.6 ↑ (5.5%)	30	33	28

## 2.2 - Proposed options for CRA3

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32. Catch per unit effort (CPUE) has been trending downward since 2012 and has decreased a further 0.25 kg over the 17/18 fishing year. In response to this, the CRA3 management procedure proposes a decrease in the TAC and TACC. FNZ have proposed two options:

- status quo; or
- decrease the TAC and TACC

Under option two, the TAC would decrease from 366.86 t to 351.9 t, and the TACC would decrease from 237.86 t to 222.9 t, while the current settings for customary, recreational and other sources of mortality would remain unchanged.

## 2.3 - Our position on CRA3

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33. Te Ohu Kaimoana supports option two and the operation of the CRA3 management procedure to decrease the TAC and TACC for CRA3.

34. Our policy is to employ a 'shared pain, shared gain' approach to fisheries that have sustainability concerns. As such, we would ordinarily recommend the recreational allowance also be reduced. However, since the recreational catch is set at 20 t, we consider it impractical to reduce it at this point in time.

35. In accepting the decrease to the TACC, the expectation is that when the fishery rebuilds, and the TAC is increased that all increases are allocated to the TACC and not reallocated to the recreational allowance. Any reallocation to the recreational sector would have the effect of reducing the overall value of settlement quota.

## 2.4 - Proposed options for CRA4

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36. CPUE has been trending upward since 2016, and increased by 0.21 kg over the 17/18 fishing year. In response to this, the CRA4 management procedure proposes an increase in the TAC and TACC. FNZ have proposed two options:

- status quo; or
- increase the TAC and TACC and decrease Other Sources of Mortality.

Under option two, the TAC would increase from 513.8 t to 558 t, the TACC would increase from 318.8 t to 380 t and other sources of mortality decrease from 75 t to 58 t. Other sources of mortality would be decreased to better reflect the model estimate used in the stock assessment. The current settings for customary and recreational would remain unchanged.

## 2.5 - Our position on CRA4

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37. Te Ohu Kaimoana supports option two and the operation of the CRA4 management procedure.

38. In the past we have submitted for more realistic quantities to be used in the TAC for other sources of mortality and commend FNZ and the NRLMG for more accurately reflecting the model estimate used in the stock assessment.

## 2.6 - Proposed options for CRA8

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39. CPUE has been trending upward since 2011 and is now at an all-time high. CPUE increased by 0.54 kg over the 17/18 fishing year. In response to this, the CRA8 management procedure proposes an increase in the TAC and TACC. FNZ have proposed two options:

- status quo; or
- Increase the TAC and TACC.

Under option two, the TAC would increase from 1161.7 to 1220.6 t and the TACC would increase from 1070.7 t to 1129.6 t. The current settings for customary, recreational and other sources of mortality would remain unchanged.

## 2.7 - Our position on CRA8

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40. We note tht Ngāi Tahu supports option two. We likewise support option two.

## 2.8 - Commentary

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41. To address the significant levels of illegal take we also suggest the introduction of telson clipping be considered. This measure could assist with reducing the possibility of illegally caught rock lobster entering the commercial supply chain and has been successfully implemented in the Te Whata Kai o Rakihouia i Te Tai o Marokura (the Kaikōura Marine Area) area.

## 3.0 Management measures for SCC7A

### 3.1 - Context

#### Annual Assessment Results for SCCA7A

42. FNZ has sought submissions on proposals to adjust the TAC settings for SCC7A, based on scientific surveys and quota owners' requests. The proposed options are outlined below in Table 2.

Table 2: Proposed management settings (in tonnes) for SCC 7A from 1 April 2019

Option	TAC	TACC	Allowances		
			Customary Māori	Recreational	All other mortality to the stock caused by fishing
Option 1 ( <i>Status quo</i> )	8	5	1	2	0
Option 2	18 ↑ (225%)	15 ↑ (300%)	1	2	0

### 3.2 - Our position on SCCA7A

43. Te Ohu Kaimoana supports option 2, to increase the TAC from 8 t to 17 t, the TACC from 5 t to 14 t, and to maintain the allowances for customary, recreational and other mortality. SCC7A is a relatively high value small scale fishery in a developmental stage.

### 3.3 - Other commentary

44. In developing these positions Te Ohu Kaimoana has engaged with Iwi impacted by the proposed changes and their feedback has been incorporated into this document. We do not intend for this submission to derogate from or override any submissions iwi through their MIOs and/or AHCs may decide to make.

45. We commend the Minister for providing a six-week consultation period. In the past we have responded on how short the four-week consultation period is and how it constrains our ability to communicate with Iwi effectively to build their views in to our response.

**From:** [REDACTED]  
**To:** [FMSubmissions](#)  
**Cc:** [REDACTED]  
**Subject:** Review of Sustainability Measures for Rock Lobster in Hawkes Bay/Wellington (CRA4)  
**Date:** Wednesday, 13 February 2019 9:10:14 AM  
**Attachments:** [image001.png](#)

---

Dear Fisheries New Zealand,

Tuhoe Fish Quota Limited (TFQL) urges Fisheries New Zealand to improve its methods that are used to inform sustainability measures for CRA stocks.

All though the proposed measures for 2019/20 seem fair and reasonable, it appears that there is a lack of up-to-date, accurate information available in some cases, in particular, for Maori Customary catch and Recreational catch. Rather than permanently accepting the lack of accurate data, year after year, TFQL hopes to see some changes in the reporting requirements in these sectors or changes to the way FNZ estimates catch in the absence of accurate reporting.

Na mihi,



**Kevin Hogg**

Business and Infrastructure Analyst

Whairawa Team

**WAEA** [REDACTED] **TAUWAEA** [REDACTED] [www.ngaituhoe.iwi.nz](http://www.ngaituhoe.iwi.nz)  
**WAHI** 12 Tuhoe Street, Taneatua, New Zealand **RETA** PO Box 56, Taneatua  
3163, New Zealand

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Te Ohu  
**Kaimoana**





# Submission Form

## Review of sustainability measures for 1 April 2019

**Once you have completed this form**

Email to: [FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

While we prefer email, you can also post your submission to: 2019 Sustainability Review, Fisheries Management, Fisheries New Zealand, PO Box 2526, Wellington 6140, New Zealand.

**Submissions must be received no later than 5pm on Tuesday 12 February 2019.**

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

---

**Submitter details:**

Name of submitter or contact person: <b>Bill Udy</b>	
Organisation (if applicable):	<b>Ngati Rarua Asset Holding Company Limited</b>
Email:	<b>[REDACTED]</b>
Fishstock this submission refers to: <i>Rock lobster – CRA 3, CRA 4, CRA 8</i> <i>Sea cucumber – SCC 7A.</i>	<b>SCC 7A</b>
Your preferred option as detailed in the discussion paper (write "other" if you do not agree with any of the options presented):	<b>See notes on next page.</b>

**Official Information Act 1982**

Note, that your submission is public information. Submissions may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.



**Submission:<sup>1</sup>**

**Details supporting your views:**

Thank you for your request for submissions on the possibility of increase within this area.

The people of Ngāti Rarua are stakeholders of SCC and as this is within our rohe, it is of interest.

Our observations after talking with our iwi pāua divers who are familiar with this specie from diving and catching pāua alongside the SCC specie, is that it is prolific in abundance within the proposed increase area and in our opinion, the increase will not have any detrimental harm to the sustainability of the specie, or associated species that rely on SCC for food source.

We would though caution that regular and correct area catch reporting is being adhered to and rely on your ministry to ensure this happens.

Please continue on a separate sheet if required.

---

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

**From:** [REDACTED]  
**To:** [FMSubmissions](#)  
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**Subject:** Review of Sustainability Measures for Rock Lobster in Hawkes Bay/Wellington (CRA4)  
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All though the proposed measures for 2019/20 seem fair and reasonable, it appears that there is a lack of up-to-date, accurate information available in some cases, in particular, for Maori Customary catch and Recreational catch. Rather than permanently accepting the lack of accurate data, year after year, TFQL hopes to see some changes in the reporting requirements in these sectors or changes to the way FNZ estimates catch in the absence of accurate reporting.

Na mihi,



**Kevin Hogg**

Business and Infrastructure Analyst

Whairawa Team

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