



**Fisheries New Zealand**

Tini a Tangaroa

# Independent Review of the Sustainability Round Process: Final Report and Action Plan

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## Disclaimer

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**Fisheries New Zealand**

Tini a Tangaroa

20 November 2019

Tēnā koe

**Results of an independent review of Fisheries New Zealand's sustainability round process**

The sustainability round process, run twice a year, enables Fisheries New Zealand to provide advice to the Minister of Fisheries on catch limits, allowances, deemed values, and other management settings for fishstocks in the Quota Management System to provide for their sustainable use. The 2018 October sustainability round covered the largest number of stocks for a number of years, and was challenging in its size and complexity.

As a result, Fisheries New Zealand identified a need to improve this process to provide a more streamlined and efficient approach going forward.

Over time, it is Fisheries New Zealand's goal to deliver more responsive management processes, including reviewing a larger number of fish stocks each year. We expect that electronic reporting will enable more agile and timely analysis of fisheries data, and increasing the flexibility of the sustainability round process will provide greater ability to respond to opportunities or sustainability concerns in the future.

To help start us on this journey, in early 2019 we commissioned True North Business Consulting to analyse our current process and highlight areas where it could be improved, while maintaining its integrity. To support this review, insights were also gathered from our Treaty partners and key stakeholders.

A copy of the "Fisheries New Zealand: October Sustainability Round Process Review" report is attached for your information. Parts of this report have been redacted to protect the privacy of individuals and groups.

Also attached to this letter is Fisheries New Zealand's response to the recommendations provided in this report. Fisheries New Zealand has reviewed the recommendations and advice and has made a number of steps to improve the process. The actions taken in response to the report will inform future sustainability rounds, and enable efficiency gains to be made in the process whilst working towards our longer-term aim of a larger, more responsive and agile sustainability round process.

Thank you to those of you that contributed to this review. We look forward to continuing to work with our Treaty partners and stakeholders to deliver a more responsive and broader annual sustainability review process.

Nāku iti noa, nā

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Summary of the recommendations of the “Fisheries New Zealand: October Sustainability Round Process Review” report produced by True North Business Consulting, and Fisheries New Zealand’s actions in response

Theme: Project Management						
Recommendations					Section in Report	
1	Running the sustainability round as a project with an agile approach				Section 5.1, page 7	
2	Use a project manager, supported by a project co-ordinator					
3	Use a Risk and Issues register and mitigation strategies					
4	Level 3 process flow chart to be maintained and updated to reflect inputs, outputs, and stakeholders					
5	Level 4 operational process flow charts to be developed and maintained					
10	Use a formal change process when making changes to agreed document templates				Section 5.3, page 8	
14	Use Risks and Issues register to identify the potential for conflicting business priorities disrupting author availability, and identify management and mitigation strategies				Section 5.4, page 9	
Fisheries New Zealand Response						
<p>Fisheries New Zealand acknowledges the benefits of a project management approach, including:</p> <ul style="list-style-type: none"><li>• Developing a repeatable and efficient process.</li><li>• A structured approach to<ul style="list-style-type: none"><li>○ identifying and managing risks and issues.</li><li>○ tracking the delivery of the project.</li><li>○ identifying and committing resources appropriately.</li></ul></li><li>• A dedicated project manager and/or co-ordinator driving the project.</li></ul> <p><u>Current Actions</u></p> <p>Fisheries New Zealand used a project management approach (including Recommendations 1, 2, 3, 10 and 14) for the October 2019 sustainability round. A level 3 process chart and a Risks and Issues register (Recommendations 4 and 14) were also developed and implemented. Fisheries New Zealand has found the use of a Risks and Issues register and dashboard reporting particularly useful for managing projects.</p> <p><u>Planned Future Actions</u></p> <p>Fisheries New Zealand sees value in the project management structure. Fisheries New Zealand will continue to refine the use of the project management approach to run the sustainability round process. It is expected that Recommendations 1, 2, 3, 4, 10 and 14 will become embedded and further refined over subsequent rounds. Fisheries New Zealand is working to build project management capabilities amongst staff (Recommendation 2). This will assist in embedding project management principles into the way we work. Fisheries New Zealand will explore the development of a Level 4 process flowchart (Recommendation 5) to the point which is useful to the effective project management of the sustainability round.</p>						
Status		5		1-4, 10, 14		
	Disregarded	Developing	Initiating	Implementing		Embedded

Theme: Fishstock selection and options development						
Recommendations					Section in Report	
6	Use of a formal scoring and weighting process to support the prioritisation of fishstocks (long list to short list)				Section 5.2, page 7	
7	Develop a methodology to determine resource and training required to complete the consultation and decision process based on the complexity of the fishstock					
8	Use analyst availability to determine the number of fishstocks reviewed (ensuring the number is realistic given the available resources)				Section 5.2, page 8	
Fisheries New Zealand Response						
<u>Current Actions</u>						
<p>Fisheries New Zealand trialled the use of a formal scoring system for the identification and prioritisation of fishstocks (Recommendation 6) for the October 2019 sustainability round. This was met with limited success, but Fisheries New Zealand acknowledges that a formal scoring system can provide a useful, agreed, and documented metric for ranking stocks and informing further discussions.</p> <p>Identification of analyst capacity to resource the sustainability round (Recommendation 8) is provided through annual business planning processes and these are being strengthened through Fisheries New Zealand's Fisheries Plans.</p>						
<u>Planned Future Actions</u>						
<p>Fisheries New Zealand will continue to use and refine actions to address the above recommendations moving forward:</p> <ul style="list-style-type: none"><li>• Work planning to identify analyst and stock capacity (Recommendation 8) will become embedded and further refined over subsequent rounds.</li><li>• We will consider developing a methodology to determine training requirements for analysts, based on the complexity of fishstocks being reviewed (Recommendation 7).</li><li>• We are developing fisheries-specific induction and on-boarding packages for new staff, which is expected to help upskill analysts (Recommendation 7).</li></ul> <p>It is Fisheries New Zealand's role to identify priority stocks for the sustainability round, taking into consideration information provided by tangata whenua and stakeholders. Fisheries New Zealand will develop a methodology for prioritising stocks in the future (Recommendation 6).</p> <p>It is Fisheries New Zealand's goal to deliver more responsive management processes, including reviewing a larger number of fish stocks each year.</p> <p>Managers already take fishstock sustainability, fishstock complexity, resource and training requirements, and analyst availability into account when selecting stocks and developing options for the sustainability round, but formalising the report's recommendations (above) is expected to strengthen this, and make it easier to incorporate into future rounds.</p>						
Status		All				
	Disregarded	Developing	Initiating	Implementing	Embedded	

Theme: Document drafting, review, and sign-off						
Recommendations					Section in Report	
9	Use a technical writer to develop fit for purpose consultation and decision document templates				Section 5.3, page 8	
12	Ensure content changes suggested by reviewers are focused on the science, analysis, or legal issues.				Section 5.4, page 8	
13	Use a technical writer to write the final version of the consultation and decision documents.				Section 5.4, page 9	
15	Roles and responsibilities of reviewers be clearly defined in project management documentation					
16	Tier 5 managers used as workstream leads with on-going oversight and opportunities to review documents					
17	Review the requirement for Cabinet sign-off, and remove if possible					
18	Shorten the review process for the Gazette Notice and decision letter.				Section 5.4, page 10	
Fisheries New Zealand Response						
<p>Fisheries New Zealand acknowledges the benefits of streamlining the document drafting, review and sign-off processes, including:</p> <ul style="list-style-type: none"><li>• Using a technical writer for efficient proof-reading and to ensure a consistent voice for the final documents.</li><li>• Streamlining the sign-off process to:<ul style="list-style-type: none"><li>○ Reduce unnecessary workload.</li><li>○ Allow more time for drafting documents and options analysis, enabling higher quality advice.</li></ul></li></ul> <p><u>Current Actions</u></p> <p>Recommendations 9, 12, 13, 15 and 16 were adopted as part of the October 2019 sustainability round. A technical writer was used to draft templates and lead the collation of stock chapters into a coherent single advice paper (Recommendations 9 and 13), which had some benefits but was still hampered by a tight timeframe. Reviewers' roles were clarified in project management documentation and with clear commissioning (Recommendations 12 and 15). Tier 5 managers were involved throughout the drafting process (Recommendation 16), and this has assisted in ensuring management have ongoing oversight of the direction of advice, limiting multiple iterations of advice documents.</p> <p><u>Planned Future Actions</u></p> <p>Fisheries New Zealand plans to continue use of technical writers, clear commissioning for reviewers, and using managers as workstream leads moving forward (Recommendations 9, 12, 13, 15 and 16). It is expected that these recommendations will become embedded and further refined over subsequent rounds.</p> <p>Fisheries New Zealand developed a new template for the most recent sustainability round (Recommendation 9), and will continue to refine and improve this template in future rounds, with the goal of developing a standard template.</p> <p>The process to notify or seek Cabinet approval of consultation options is the Minister of Fisheries' decision (Recommendation 17). Fisheries New Zealand will look to reduce internal sign-off steps for largely administrative documentation such as Gazette Notices where possible in future (Recommendation 18).</p>						
Status		17, 18		9-16		
	Disregarded	Developing	Initiating	Implementing		Embedded

Theme: Relationship management and Communications strategy						
Recommendations					Section in Report	
11	Implement a Customer Relationship Management strategy that includes a contact dataset/database				Section 5.3, page 8	
24	Review communications requirements and messaging, and consider embedding Communications function in Fisheries Management				Section 10, page 18	
Fisheries New Zealand Response						
<p>Fisheries New Zealand acknowledges the potential benefits of a Customer Relationship Management strategy, including having a formalised record of when the last contact with a Treaty partner or stakeholder was, and the topics that were discussed, to inform others within Fisheries New Zealand and provide context prior to future communications.</p> <p><u>Current Actions</u></p> <p>There are already staff dedicated to fisheries matters within the Ministry for Primary Industries' Communications team. Fisheries New Zealand does not consider it necessary to embed communications staff within Fisheries Management (Recommendation 24), when the Communications team already incorporates fisheries-specific staff.</p> <p><u>Planned Future Actions</u></p> <p>A Customer Relationship Management database (Recommendation 11) is not a priority at this time. Fisheries New Zealand is developing a stakeholder engagement strategy that is expected to assist in increasing connectivity and communication with stakeholders.</p> <p>Fisheries New Zealand will continue working with the staff within the Communication team dedicated to Fisheries communications to review relevant fisheries communications, including messaging to Treaty partners and the different stakeholder groups (Recommendation 24).</p>						
Status	11			24		
	Disregarded	Developing	Initiating	Implementing		Embedded



Theme: Research planning and staff capability						
Recommendations						Section in Report
19	Initiate a discussion with Treaty partners and commercial and environmental groups on implementing a medium to long-term strategy for fishstock assessments					Section 10, page 17
20	Identify the research requirements needed for a medium to long-term fishstock assessment strategy					
21	Implement a strategic research plan, removing duplication of research effort and cost					Section 10, page 18
22	Assess fishstock analyst capability, identify any shortcomings, and implement upskilling opportunities					
23	Assign responsibility for specific fishstocks to individual analysts					
Fisheries New Zealand Response						
<u>Current Actions</u>						
<p>Fisheries New Zealand agrees that a research strategy is essential for strategic planning and good fisheries management informed by best available information. The Fisheries Management and Fisheries Science groups have regular research planning discussions, and there is an internal Medium Term Research Plan that is updated regularly.</p> <p>Fisheries Plans provide a five-year framework for management actions for particular fisheries. The Highly Migratory Species, Deepwater, and Customary teams all have well-established plans, and the Inshore Fisheries Plan is currently being revised. These Fisheries Plans provide increased certainty for Treaty partners and stakeholders regarding the medium and long term management and research strategies for key fishstocks (Recommendations 19, 20 and 21).</p> <p>Fisheries New Zealand assigns responsibility of particular stocks to team members, with individual analysts responsible for particular suites of stocks (Recommendation 23). As part of the analyst career pathway, analysts are guided to upskilling opportunities relevant to their role and expertise (Recommendation 22).</p>						
<u>Planned Future Actions</u>						
<p>Fisheries New Zealand will continue to refine the Medium Term Research Plan. We acknowledge the benefits of being increasingly proactive and transparent, and having conversations earlier.</p> <p>We will continue to engage Treaty partners and stakeholders in fisheries management planning processes through Fisheries Plans, including research planning (Recommendations 19, 20 and 21). For example, a Commercial Catch Balancing Forum is being developed, which will assist commercial stakeholders and Fisheries New Zealand to work together to develop a structured strategic approach to the management and review of deemed value rates.</p>						
Status		19-21			22, 23	
	Disregarded	Developing	Initiating	Implementing	Embedded	



## **October Sustainability Round Process Review**

25 June 2019

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# 1 Purpose

The purpose of the October sustainability round process review is to identify potential improvements and associated recommendations for future sustainability rounds, including any additional steps, providing a manageable, scalable and more efficient process to support greater responsiveness and the ability to include more fishstocks in future rounds.

This review is presented in two parts, Part 1 is focused on the review of the Fisheries Management (FM) internal processes, Part 2 provides feedback from external stakeholder groups capturing their view of the consultation and decision processes and other general comments.

## Part 1 – Sustainability Round Process Review

# 2 Overview

Fisheries Management (FM), a Directorate of Fisheries New Zealand (FNZ), undertakes two sustainability rounds aligned to the April and October fishing years. A sustainability round is a process where catch limits, allowances, deemed values, and other management settings are reviewed for selected fishstocks.

The activity is a core business function of FNZ, the output of the sustainability rounds directly impact on the fishing industry, iwi, and recreational fishers, and ultimately, the reputation of FNZ and the Minister of Fisheries (the Minister). Sustainability measures and related requirements, including consultation, are detailed in the Fisheries Act 1996 (the Act).

The sustainability round process has developed and been refined over time. The workload associated with the two sustainability rounds is significantly different, with a lesser number of fishstocks assessed in the April round. The October 2018 sustainability round included 32 fishstocks<sup>1</sup> that resulted in very high workloads for staff to meet legislative deadlines. A review of the process was commissioned to identify potential opportunities to maintain the integrity of the sustainability round while allowing staff to better manage the workload. While the processes for the two sustainability rounds are the same, the review focused specifically on the October rounds given the greater effort required.

# 3 Summary

The opportunity to lengthen the time available for the consultation and decision phases of the sustainability round are constrained at the front end by the availability of data, and at the back end by the need to meet legislative timeframes. There is limited opportunity to bring forward or shorten sub-processes that would allow more time for external stakeholder consultation and/or more time for Ministerial review of the decision document. The process is constrained also by the availability of subject matter experts (SMEs). This is a finite

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<sup>1</sup> Compared with 12 in the October 2017 and 26 in the October 2016 rounds

resource, with limited flexibility for offshore SMEs to undertake the analysis of non-complex inshore stocks.

This review identified 18 recommendations with the potential to improve the overall efficiency of the sustainability round, focused on the programmatics. Ideally the sustainability round should be delivered as a project to manage and deliver the complex processes, and to support the management of the large number of internal and external stakeholders impacted by the process. The recommendations reflect this.

## 4 Constraints and levers

The sustainability round process is complex. As with any process, there are constraints – those requirements and activities that are not able to be changed, and levers – those requirements and activities where change can be achieved that provide benefits. Any changes to the sustainability round process should focus on the levers.

### 4.1 Constraints

The following constraints are noted:

- a. availability of data – data for fishstocks included in the October sustainability rounds is constrained by:
  - > data for the October fishing year is reported by fishers to the ministry on paper forms. The earliest this data is available is mid-December<sup>2</sup>, it then has to be input and undergo data cleansing<sup>3</sup>
  - > age data for fishstocks requires the collection of fish samples from sheds for analysis, the analysis creating further time delay
- b. complexity of selected fishstocks – some selected fishstocks are complex in nature which impact on the time and effort required to identify options, increased stakeholder engagement, and issue resolution
- c. subject matter expert resource – the directorate has a limited number of subject matter experts with the necessary knowledge and skill sets required. While there is some flexibility in the utilisation of inshore and offshore subject matter experts, additional expert resource to surge into the sustainability rounds is not available
- d. legislative requirements – the Act defines the fishing year, the need to consult, and the requirement to gazette decisions. October sustainability round decisions must be published in the Gazette before 1 October

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<sup>2</sup> Monthly Harvest Returns (MHR) are due by the 15<sup>th</sup> day of the next month, i.e. the October reports are required to be submitted by 15 November (<https://www.fishserve.co.nz/information/permits#Obligations>)

<sup>3</sup> As part of the Fisheries Change Programme, catch reports will progressively move to electronic submission during calendar year 2019. An outcome of this is catch data relevant to October sustainability round fishstocks should be available earlier. The delay in analysis of fishstock age data will remain.

## 4.2 Levers

The following levers are noted:

- a. adopt a project management approach for each sustainability round, led by an experienced project manager with appropriate support. The sustainability rounds are a repeatable process, using a project approach will enable re-use of project documentation (Project Initiation Document, project plan, scheduling, consultation and decision documentation), scope, and the identification of resources required – the requirement to scale up or down. There is an opportunity also to reduce the review and re-work time.
- b. adjust the data year – use fish stock data for September 1 to August 31 for the October sustainability round and adjust the Plenary dates and Iwi for a.
- c. number of fish stocks included in a round – the number of included fishstocks in a round can be varied to reflect available resource.
- d. quality of inputs – an up-lift in the quality of inputs through training and the standardisation of consultation and decision document templates could reduce the level and/or time of reviews required.

Improvement in any of the areas noted above will each provide some efficiency gains, implementing changes to all four will result in cumulative rather than exponential gains.

## 5 Review and Recommendations

### 5.1 End-to-End process

The end-to-end process was initially mapped to Level 0 (identifying business activities). This did not show the internal and external stakeholders, inputs and complex process relationships, negating the opportunity to identify process choke points or issues.

A Level 3 (business process flows) process map<sup>4</sup> has been developed that identifies all stakeholders, inputs, and outputs against a high-level time line. This degree of information provides an initial opportunity to identify process choke points and issues, and is used as the starting point for this review.

Table 1 below presents the Level 0 business activity and associated constraints, levers and benefits:

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<sup>4</sup> A copy of the Level 3 process map has not been included in this document, too complex to fit on a page, a copy is available at:  
<https://piritahi.cohesion.net.nz/Sites/WWA/ABS/PI/Projects/Sustainability%20round%20process/Sustainability%20round%20process%20flow%20diagram.xlsx?d=w82719ce2fa644f64810b471aedef3f742>

**Table 1 - Level 0 activities**

<b>Level 0 – business activity</b>	<b>Comment</b>	<b>Constraints</b>	<b>Levers</b>	<b>Benefit</b>
Fishstock selection	<ul style="list-style-type: none"> <li>• Input from internal and external stakeholders</li> <li>• Need data and science information</li> <li>• Longlist to shortlist</li> </ul>	<ul style="list-style-type: none"> <li>• Availability of data</li> </ul>	<ul style="list-style-type: none"> <li>• Shift fishstock data year to September to August</li> <li>• Develop scoring and weighting matrix for shortlisting process</li> <li>• Number of fishstocks included in round</li> </ul>	<ul style="list-style-type: none"> <li>• Time benefit, additional 4 weeks available for the process</li> <li>• Robust, defensible process reduce risk of challenge to included stocks</li> <li>• Available resources aligned with number of fishstocks – manageable analyst workload</li> </ul>
Draft consultation documents	<ul style="list-style-type: none"> <li>• Develop and confirm template</li> <li>• Training for authors</li> <li>• Review and sign out</li> </ul>	<ul style="list-style-type: none"> <li>• Availability of SMEs</li> </ul>	<ul style="list-style-type: none"> <li>• Repeatable process, no change to template unless driven by policy or legislation</li> <li>• Upskill (new) staff</li> <li>• Clear guidelines on purpose of reviewer</li> <li>• Reduce review time</li> </ul>	<ul style="list-style-type: none"> <li>• Analyst familiarity with documentation and process – more focus on analysis, less on process – improved output</li> <li>• Improved output, less review and rework required – analyst released to assist with other fishstocks or business as usual</li> <li>• Reduced time required for review and rework, consultation period opens earlier</li> </ul>
Consultation phase	<ul style="list-style-type: none"> <li>• Stakeholder input</li> <li>• Stakeholder engagement</li> </ul>	<ul style="list-style-type: none"> <li>• Requirement of the Act</li> </ul>	<ul style="list-style-type: none"> <li>• Implement Customer Relationship Strategy and database/dataset</li> <li>• Engagement methods, including – meeting, email, social media</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced time &amp; effort to identify quota and ACE holders, reduced risk of not including commercial interests</li> <li>• Opportunity to semi-automate response analysis, e.g. Excel macros, more time for input into decision document</li> </ul>
Draft decision documents	<ul style="list-style-type: none"> <li>• Develop and confirm template</li> <li>• Process submissions</li> <li>• Review and sign out</li> </ul>	<ul style="list-style-type: none"> <li>• Consideration of submissions requirement of the Act</li> </ul>	<ul style="list-style-type: none"> <li>• Repeatable process, no change to template unless driven by policy or legislation</li> <li>• Upskill (new) staff</li> <li>• Clear guidelines on purpose of reviewer</li> <li>• Reduce review time</li> </ul>	<ul style="list-style-type: none"> <li>• Analyst familiarity with documentation and process – more focus on analysis, less on process – improved output</li> <li>• Improved output, less review and rework required – analyst released to assist with other fishstocks or business as usual</li> <li>• Reduced time required for review and rework, consultation period opens earlier</li> </ul>
Ministerial decision and publication	<ul style="list-style-type: none"> <li>• Accept or amend FNZ recommendation</li> <li>• Draft Gazette notice</li> <li>• Draft other related comms (e.g. web, etc.)</li> <li>• Feedback to selected stakeholders</li> <li>• Review and sign out</li> </ul>	<ul style="list-style-type: none"> <li>• Minister's obligation under the Act</li> <li>• Requirement to Gazette requirement of the Act</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce FNZ review time</li> </ul>	<ul style="list-style-type: none"> <li>• Increased time for officials and Minister to sign-off, or amend options</li> <li>• Manageable analyst workload</li> </ul>

- > **Recommendation 1:**  
*noting the importance of the sustainability rounds and time and resource constraints, each sustainability round be run as a project, using an agile approach to best manage the constraints to successful delivery. The agile approach can include, but is not limited to, daily stand-ups, flexibility on the use of resources, use of sprints to complete consultation and decision documents.*
- > **Recommendation 2:**  
*a project manager with appropriate skills and experience, supported by a project coordinator or administrator, be appointed to manage each sustainability round. In addition to driving the project, a high level of relationship management is required to engage, manage and meet the expectations of the multiple internal and external stakeholders.*
- > **Recommendation 3:**  
*use of a Risk and Issues register and mitigation strategies to support the delivery of complex processes and multiple stakeholder interactions.*
- > **Recommendation 4:**  
*the Level 3 process flow chart be maintained and updated as necessary to reflect any change to the sustainability round inputs, outputs, or stakeholders.*
- > **Recommendation 5:**  
*sustainability round Level 4 (operational process flows) process charts be developed and maintained.*

## 5.2 Fishstock selection and options

An early stage of the consultation process is identification of fishstocks to be included in the round. Inputs into potential stocks for inclusion and options are canvassed from a broad spectrum of internal and external stakeholders. A long list of fishstocks and options is created, then refined by members from the Fisheries Management and Fisheries Science directorates of FNZ into a fishstocks and options short list. The shortlisting appears to be through discussion fora with no formal scoring and weighting evaluation. The lack of a formal scoring and weighting evaluation presents a risk of challenge at a future date.

The shortlist determines the number of fishstocks to be included in the round. This number should be used to identify the people resources required to complete the sustainability round within the time constraints.

- > **Recommendation 6**  
*long list to short list fishstocks and options evaluation use a formal scoring and weighting process. This approach reflects a robust and defensible process which can potentially reduce challenges to the included fishstocks.*
- > **Recommendation 7**  
*develop a methodology based on the complexity of included fishstocks to identify the time (resource) required and any training requirements to complete the consultation process and the decision process.*



> **Recommendation 8**

*sufficient people resources are identified to complete the sustainability round without imposing unrealistic workloads on individuals. If it is not possible to scale up SME resources to meet demand revisit the short list and reprioritise included fishstocks (in which case the variable becomes a constraint).*

## 5.3 Consultation and decision document templates

The process shows a requirement to develop both consultation and decision document templates. There are references in the post-October 2018 sustainability round lessons learned register to late changes to the decision template requiring re-work of completed analyses. Given the repeatable nature of the sustainability rounds there should be little or no requirement to make changes to templates, except of a minor nature, or to accommodate a policy or legislative change.

The lessons learned register contains numerous comments relating to duplication of content in the template, and the length of the documents. Detailed analysis of the format and content of the consultation and decision documents is out of scope activity for this review, FM having initiated this separately. However, the findings of this review would support development and confirmation of an agreed template going forward.

Prior to sending out the consultation and decision documentation there is a requirement to liaise with the data management team for details of quota and ACE holders to ensure the inclusion of all commercial interests. Availability of a Customer Relationship Management (CRM) strategy and access to CRM data could reduce the time and effort required as well as providing other business benefits to FNZ.

> **Recommendation 9**

*an experienced technical writer review the existing consultation and decision templates, and develop fit for purpose consultation and decision templates<sup>5</sup>.*

> **Recommendation 10**

*any requirement for a change to either template be required to go through a formal change process.*

> **Recommendation 11**

*implement a Customer Relationship Management strategy that includes a contact dataset/database*

## 5.4 Consultation and decision document content and sign-off

### 5.4.1 Consultation document content

Anecdotal evidence was presented noting that some reviewers were making textual changes related to an individual reviewers writing style, rather than the underlying science and analysis. Commentary in the lessons learned register noted a lack of consistency in the wording of consultation documents, a result of using multiple authors.

> **Recommendation 12**

*content changes suggested/requested by reviewers be focused on the science and analysis, or legal issues.*

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<sup>5</sup> The Act does not stipulate the format or content of the consultation or decision documents

> **Recommendation 13**

*the final version of the consultation document be written by a single (technical) writer to provide a consistent voice.*

Occasionally, conflicting business priorities disrupt the consultation document process, with authors required to respond to other urgent matters (such as requests from the minister, input into ministerial responses, etc.). In the lessons learned register this was recorded as a “drop everything” approach. This is a sub-optimal approach given the legislative deadlines and importance of the sustainability round to FNZ and the limited timeframe for completion.

> **Recommendation 14**

*identify the potential for this to occur in the Risk and Issues register, identify management and mitigation strategies, e.g. back fill author role if required, etc. (see also Recommendations 7 and 8 – identification and allocation of resource).*

#### **5.4.2 Consultation document review and sign-off**

The process flow details a multi-management tier sign-off process for the consultation document to manage perceived risk, a total of 12 days is allowed for tier 5 through to tier 2 sign-off. It is not possible to remove risk, and the downside to the multi-management tier sign-off process is increased time and potential delays from any re-work identified. Ideally risk should be managed by identification and development of strategies to manage and mitigate the risk (see Recommendation 3). Development of the consultation document is an operational function, the oversight, review and sign off requirements should reflect that. Tier 5 managers should have on-going oversight of the data analysis and the development of the consultation document content, negating the need for their formal review and sign off.

> **Recommendation 15**

*the role and responsibilities of reviewers be clearly defined in the Project Initiation Document and reflected in the project Responsibility Assignment Matrix (RACI).*

> **Recommendation 16**

*tier 5 managers utilised as workstream leads with on-going oversight and opportunity to review the consultation and decision documentation.*

Fisheries analysts noted a delay in receiving Cabinet sign-off for the consultation document, creating another choke point prior to public release. Legal noted that the Act does not require Cabinet sign-off for the consultation document. Anecdotal evidence suggested that the requirement for Cabinet sign-off was implemented in response to a specific event that occurred a “few” years ago, and the requirement has subsequently become the status quo.

> **Recommendation 17**

*the requirement for continued Cabinet sign-off of the consultation document be reviewed by FNZ, officials and the Minister to identify the benefit (risk reduction) versus the dis-benefit (negative impact on time available for consultation). If acceptable, remove the requirement for Cabinet sign-off.*

#### **5.4.3 Decision document content and sign-off**

The development of the decision and briefing document and the decision letter follow similar processes to those for the consultation document. Submissions received from

the consultation process are reviewed and given due consideration through a debrief process. Any identified actions, including the requirement for legal advice, are implemented. Authors draft the relevant papers which then proceed through the multi-tier management sign off process.

- > *Given the similarity of the consultation and decision document processes, recommendations 11 through 15 also apply to the decision and briefing document and the decision letter.*

#### **5.4.4 Legislative requirements**

FNZ submits a decision and briefing document, and a decision letter, to the Minister for his/her decision and to inform Cabinet. Subsequently the decision is promulgated in the Gazette and this must occur no later than 30 September, prior to the start of the October fish year. There are multiple management sign-off steps for the decision briefing document and decision letter, and the Gazette notice – starting at tier 5 line managers, moving up through tier 4, 3 and 2 management (12 days allowed for review, no indication of re-work time) before going to the Minister and officials.

- > **Recommendation 18**  
*the requirement for multi-tier management sign off for the decision and briefing document, decision letter, and Gazette notice be reviewed and rationalised where possible. The purpose of each level of sign-off be identified and documented with a view to, at a minimum, reduce the time required to complete the individual sign-off steps by at least 6 days.*

## **6 Noted issues**

The scope of the review was limited to the overall process; the design of new process flows or re-design of existing process flows, was out of scope. During discussions issues were raised that would require new or re-designed process flows, these are included for completeness as follows:

1. Maori input into consultation and decision documents
2. Internal alignment of timing with Iwi fora
3. Lack of consideration of Maori fisheries science based on accumulated knowledge
4. Limited internal economic capability impacting on the ability to include meaningful economic analysis and commentary

## **7 Other options**

It was suggested that the October sustainability round shift from once a year to once every two years. The Act does not stipulate the sustainability round occur annually, the extended time frame was put forward on the basis that it would allow for improved datasets and analysis.

This option has been discounted for the following reasons:

- a. extending the period between sustainability rounds would result in a requirement to include more fishstocks in each two-year round, the process constraints (resource, time, book ends) would still be in play, exacerbating the current resourcing problem

- b. Fisheries Science noted that fishstock levels are dynamic, using aged data would likely add greater levels of error in any analysis

## Part 2 – External Stakeholder Engagement

### 8 Overview

The purpose of the External Stakeholder Engagement component of the review is to:

“Review the sustainability round documentation and its fit for purpose for relevant audiences”<sup>6</sup>

FNZ had implemented a separate review of the detailed content and format of the sustainability round consultation and decision documentation. The external stakeholder engagement component was intended to take a broader view of the sustainability round processes and stakeholder interactions which were expected to include references to the consultation and decision documents.

The October 2018 sustainability round response list was used as the basis for identifying all stakeholders that submitted responses. The April 2018 sustainability round response list was used also to identify those stakeholders participating in both rounds. The lists were rationalised into four categories to reflect the requirements of the Act s12 (1) (a):

- Commercial
- Environment
- Maori (Tangata Whenua)
- Recreational

FM team leaders reviewed the lists of the commercial and environmental entities and provided recommendations of who should be included. The Customary team noted that for iwi the fora chairs should be the point of contact. Details of organisations contacted is at Appendix A. For the recreational sector the FM “mailchimp” list was used to send out a Survey Monkey questionnaire.

Interviewees switched between references to MPI, FNZ and FM during interviews, for consistency and clarity all references are recorded as FM.

Recommendations based on interviewee feedback is in section 10 below.

### 9 Summary

Primarily the four individual sectors identified different issues of importance to them. However, three of the sectors – commercial, iwi and environmental – want to see a more strategic approach to fishstock assessments to allow them to better plan participation and input and alignment of research activity relevant to the sustainability rounds.

*Commercial:* the sector is looking for a long-term fish plans aligning research with fishstock assessments. Concerns include:

- industry initiating and paying for research that is not able to be used as the fishstock is not included in the sustainability round
- duplication of research by industry and FM
- use of deemed values to manage fishstocks instead of TACC

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<sup>6</sup> FNZ Consulting Services Order with True North

- TACC settings based on science only, lack of consideration of economic impact

*Iwi:* the sector is looking for recognition of its status as a treaty partner. It is looking for a true partnership approach and greater involvement in the sustainability process. To achieve this it believes the sustainability rounds should commence a year out from the decision date, and it should be actively involved with FM from the beginning of the process.

*Environmental:* the overall view is of a process that has been captured by commercial and political interests, and that environmental input is not included in the assessment and option development processes. Ideally the function of FM and the sustainability round process should run independently from commercial interests.

*Recreational:* a number of points of view were presented from recreational fishers. Underlying themes included a lack of faith that the view of recreational fishers would carry any weight, commercial interests were paramount in the decision making process

## 9.1 Commercial

The Commercial group included industry body representatives, fishing companies, licensed fish receivers and quota holders. Input from the commercial sector is summarised in the table below, a graphical presentation aligning the comments to the commercial sub-sector groups is presented at Appendix B: Commercial comments aligned by sub-sector groups

**Table 2 - Summary of commercial sector comments**

Consultation process	<ul style="list-style-type: none"> <li>• Poor baseline data resulting in a cautious approach where there is a lack of information</li> <li>• Too much credibility given to non-fishers, lack of recognition of what is seen at sea and local knowledge. Need a methodology to ensure “at sea” view is included in stock assessment</li> <li>• Perception that input is not included in analysis, seen as not true consultation, may result in shifting focus effort elsewhere</li> <li>• Science can be difficult for non-scientists to understand, a methodology to translate scientific information into a suitable format for non-scientists would be useful</li> <li>• Input from Commercial Stakeholder Organisations given greater recognition than that from individual quota holders or small fishing operators</li> <li>• Research providers driving research contracts, not FM. Need better research management expertise in FM</li> <li>• Need a 10-year science based monitoring plan</li> <li>• Industry driving innovation, FM and the research providers need to be more innovative</li> <li>• Lack of fish plans for inshore stocks</li> <li>• No clear management strategy to manage fishstocks and engagement with stakeholders</li> <li>• FM process is on process management not fisheries management</li> <li>• Duplication of research costs – fishers paying twice through levies and industry body, need strategic alignment between industry and FM</li> </ul>
Decision process	<ul style="list-style-type: none"> <li>• Deemed Values used as a penalty, fishstock management should be TACC, deemed values should reflect actual value of fish</li> <li>• A lot of TACCs have not been reviewed</li> </ul>

	<ul style="list-style-type: none"> <li>• Adjustments to TACC based on science information only, Minister not considering economic impact</li> <li>• Decisions being made for the wrong reasons - driven by emotion or politics not science</li> <li>• Decision makers reluctant to get off-side with recreational fishers (the reverse comment is made by recreational fishers)</li> <li>• Need to ensure decision information gets to all levels of industry in a format that is readily understood</li> <li>• An over reliance on one source of evidence with lack of weight given to other factors (e.g. biodiversity) that results in a less than cautionary approach with too much emphasis on the commercial opportunity</li> </ul>
Other points raised	<ul style="list-style-type: none"> <li>• Capability issue within FM, lack of ownership of specific fishstocks by analysts</li> <li>• High turnover of FM staff results in lack of continuity and a loss of institutional knowledge when engaging, contributing to a loss of confidence in FM</li> <li>• Industry focus on increased value through Marine Stewardship Council (MSC) certification is a driver for industry good practice</li> <li>• Lack of focus on climate change impact on marine environment and fisheries, frustration with government focus on impact and mitigation for terrestrial impact only</li> <li>• Would like to see a medium to long term schedule of fishstock reviews, recognising the need for flexibility to bring reviews forward in response to events or issues as required</li> <li>• Need fisheries plans so that regional councils have to include consideration of the impacts in resource management act applications</li> <li>• Paua specific – single minimum size nationally not reflective of varying growth and maturity rates impacts on industry. Also, commercial and recreational minimum size should be the same</li> <li>• Recreational reporting – don't see a need to count every fish caught as the actual baseline number is not known, it is not appropriate to attempt to manage the recreational and commercial fisheries in the same way</li> <li>• Perception that where there is a lack of information on a fishstock decisions are driven by economic consideration rather than efficient management of the fishstock</li> <li>• Lack of movement in gaining eco-certification for inshore fishstocks (e.g. MSC, World Wide Fund) impacting on export markets</li> <li>• Siloed projects – lack of knowledge transfer between projects, for example learnings from the Black Petrel Electronic Monitoring project and the On-board cameras for commercial fishing vessels operating in the inshore area between Whanganui and Kaitia, home to Maui Dolphin</li> <li>• Use of in-season increases not working, protracted process with no time to catch under the new settings</li> </ul>

## 9.2 Iwi

*Parts of section 9.2 have been withheld pursuant to s9(2)(a) of the Official Information Act 1982*

This section is based on the meeting with [REDACTED], there was no response from [REDACTED]

The key



message from [REDACTED] is that the current process and their involvement does is not representative of their status as a treaty partner and as such the Crown is not meeting its obligations under either the Deed of Settlement, the Maori Fisheries Act, or the Act.

**Table 3 - Summary of treaty partner comments**

Consultation process	<ul style="list-style-type: none"> <li>• Not starting at a partner level – the current process does not recognise [REDACTED] status</li> <li>• The process is seen as an ad hoc process, given the repeatability of the sustainability rounds, the process should be programmed, robust and transparent</li> <li>• The process needs to start a least 12 months out from the implementation of the decision, with [REDACTED] participating as a partner in the determination of which fishstocks will be included (true partner engagement)</li> <li>• [REDACTED] has access to information from the commercial, customary, iwi and recreational sectors, there is no formal process to ensure this is included in fishstock assessments</li> <li>• Lack of transparency on how included fishstocks are selected</li> <li>• Process and timings does not allow adequate time for robust review, analysis and response</li> <li>• FM has adopted a “paint by numbers” approach, information contained in the tangata whenua section is not complete making it impossible to gauge the overall iwi view</li> <li>• Need a research plan strategy, it should not be left to industry as this is a conflict of interest</li> </ul>
Decision process	<ul style="list-style-type: none"> <li>• The output of the sustainability rounds does not support the requirements of the Deed of Settlement (Sealord deal)</li> </ul>
Other points raised	<ul style="list-style-type: none"> <li>• There is sufficient capacity within FM to undertake sustainability rounds, the issue is capability and ownership of fishstocks</li> <li>• FM focus should be on managing the fisheries not managing public perception as is the current practice</li> <li>• Need to define the Act s12 representative interests, the use of form responses from lobby groups should be treated as a single submission and weighted appropriately</li> <li>• The Harvest Strategy Standard is not a valid starting point for fishstock assessment as it only allows for science as an input, there is no consideration of socio-economic or cultural inputs or impacts</li> <li>• Need to move from reactive to proactive management of the fisheries</li> <li>• Deemed values is an inappropriate tool for management of the fishstocks</li> <li>• The aspirational inter-generational view and intent of iwi is not met by the FM year-to-year approach which is lacking in robustness</li> <li>• The Act includes an indigenous view, i.e. there is a reciprocal relationship with, and a responsibility to look after, the environment. It is not possible to meet this responsibility as there is no focus on habitat in the sustainability rounds</li> </ul>



### 9.3 Environmental

Six environmental organisations were contacted to participate in the survey. Three initially agreed to participate, however one withdrew before going to interview, no reason given.

The environmental sector view can be summed up as:

- environmental input is not given sufficient (or any) weight in the stock assessment analysis
- the options provided and the option ultimately selected are driven by political interests
- FM seen as compromised and captured by commercial requirements, it should follow overseas practice where science assessment groups operate independently of the commercial sector
- the process lacks transparency
- FM should better educate the public on the (true) status of the fisheries

**Table 4 - Environmental sector comments**

Consultation process	<ul style="list-style-type: none"> <li>• Consultation process not inclusive enough, focus is on the extractors</li> <li>• Input not included in consultation process</li> <li>• Any reference to environmental provisions appear to be cut and paste, typically from historical, out of date documents/science</li> <li>• Environmental sector not treated the same as other legislated sectors, no 1-on-1 meetings unlike commercial, iwi and recreational</li> <li>• No attempt to address environmental issues in consultation papers</li> <li>• FM should be involved in discussions with the environmental sector before consultation documents are written to ensure inclusion of environmental issues</li> <li>• The consultation process has been captured by commercial and political interests</li> <li>• Not true consultation, just being seen to comply with legislative requirements</li> <li>• Road shows poorly advertised, lack of notice makes it difficult to attend</li> <li>• Plenary delivers a “negotiated” document, driven by the people in the room. It does not deliver a scientific neutral document</li> <li>• Technical information is difficult for community groups and general public to understand</li> </ul>
Decision process	<ul style="list-style-type: none"> <li>• Options considered are too narrow, only minor variations</li> <li>• Options appear to be politically biased to, and driven by, the commercial sector</li> <li>• Needs to be written in plain English, with no political spin</li> <li>• Needs to clearly demonstrate how the decision fits with the Harvest Strategy Standard</li> </ul>
Other points raised	<ul style="list-style-type: none"> <li>• FM should follow overseas practice where science assessment groups operate independently of the commercial sector</li> <li>• No independent oversight of the recommendations, the process is taken behind closed doors. FM is seen as compromised (captured by commercial concerns) with a resultant lack of confidence in FM by the environmental sector</li> <li>• The whole process is managed for the benefit of extractors</li> </ul>

- |   |
|---|
| <ul style="list-style-type: none"> <li>• Scientists are restrained from making their knowledge public</li> <li>• Need to put resources into on-going education of the general public with regard to the on-going sustainability of New Zealand's fisheries</li> </ul> |
|---|

## 9.4 Recreational

The Recreational sector was surveyed using Survey Monkey, sent out to all recreational fishers (2,500 plus) on the FM database. The survey, comprised of nine questions, was live for one week, during this period 438 fishers responded.

Overall, the majority of respondents answered each of the nine questions. The underlying text of the free flow responses referred to a lack of faith that the view of recreational fishers would carry any weight, commercial interests were paramount in the decision making process.

Detail of the questions and responses are at Appendix C, the main points noted were:

- 62 percent of respondents had made a sustainability round submissions. Reasons for not making a submission included:
  - > new to an area/fishing
  - > don't believe their input would be considered/make a difference
  - > too busy/lack of time
  - > don't feel qualified to make a submission
- 280 respondents interacted through an on-line portal, 30 of these also attended a meeting or hui, while 16 only attended a meeting or hui
- 300 of 333 respondents noted that the consultation documentation was either very easy, easy or not easy not difficult, to understand. The other 33 stated that the documentation was either difficult or very difficult to understand
- 285 of 332 respondents noted that it was either very easy, easy or not easy not difficult to provide input and select a preferred option. The other 47 stated that it was either difficult or very difficult to provide input and select a preferred option.
- 227 of 328 respondents noted that it was either very easy, easy or not easy not difficult to understand the Minister's decisions. The other 101 stated that the decisions were either difficult or very difficult to understand

## 10 Recommendations

The following recommendations are constructed to reflect the points identified above, any decision to act or otherwise is at the discretion of FM.

- > **Recommendation 1**  
*initiate a round table discussion with the commercial, iwi and environmental groups on the opportunity and feasibility of implementing a medium to long-term strategy for fishstock assessments*
- > **Recommendation 2**  
*identify the research requirements necessary to align with a medium to long-term fishstock assessment strategy*

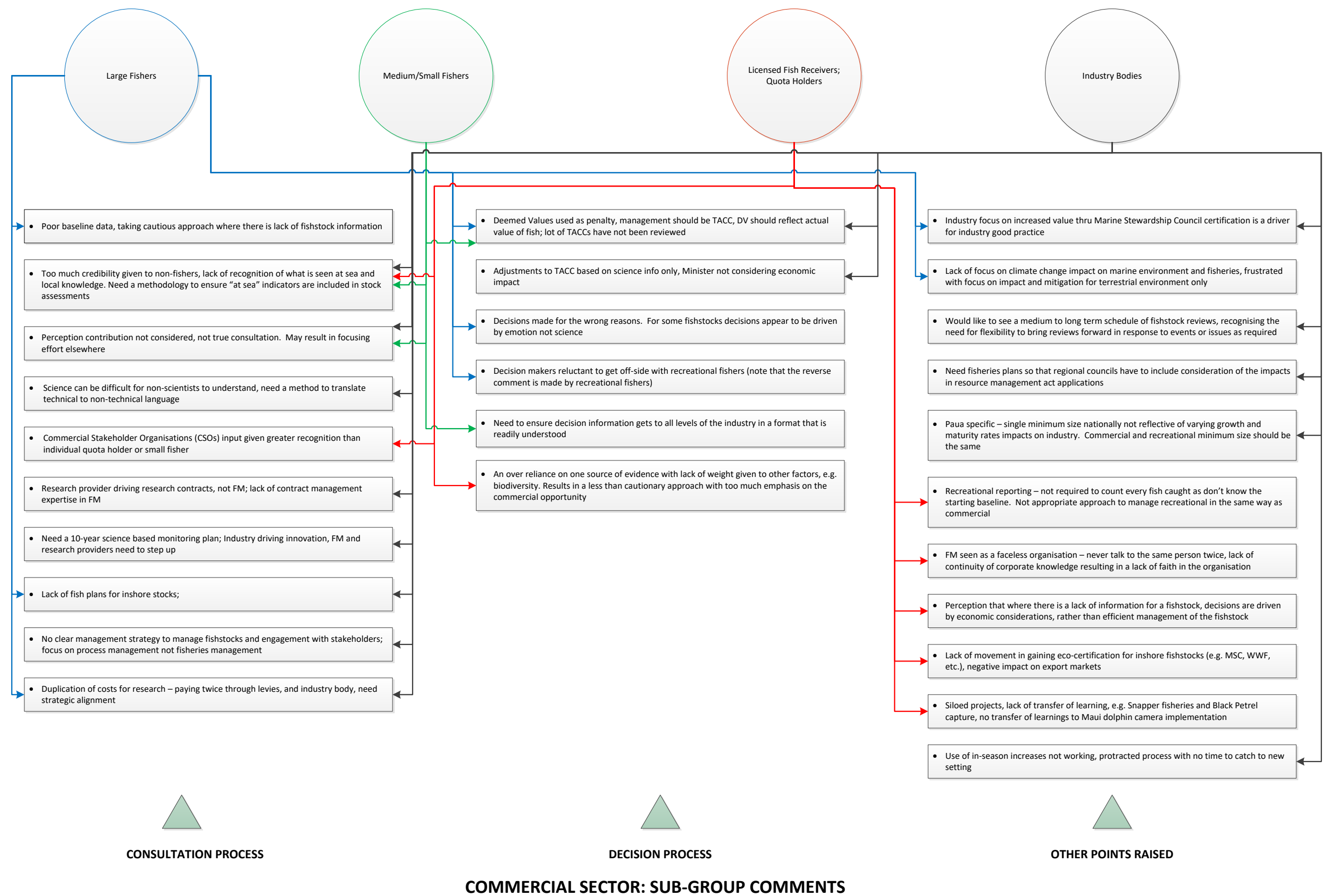
- > **Recommendation 3**  
*Implement a strategic research plan, remove duplication of research effort and cost*
- > **Recommendation 4**  
*assess fishstock analyst capability, identify any shortcomings and implement upskilling opportunities*
- > **Recommendation 5**  
*assign responsibility for specific fishstocks to individual analysts*
- > **Recommendation 6**  
*review communications requirements and messaging, consider embedding communications function in FM*

## Appendix A: Organisations contacted

*Withheld pursuant to s9(2)(a) of the Official Information Act 1982*

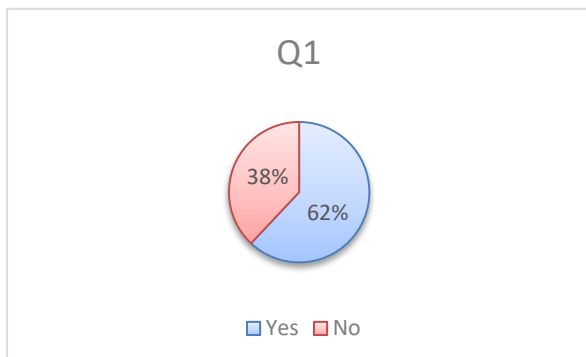
SECTOR	ORGANISATION	AGREE TO PARTICIPATE	PARTICIPATED
Commercial			
Environmental			
Iwi			

Appendix B: Commercial comments aligned by sub-sector groups



## Appendix C: Recreational Sector Survey Detail

Question 1: You are on the Fisheries New Zealand recreational fisheries mailing list. Have you ever made a submission on setting catch limits to Fisheries New Zealand?

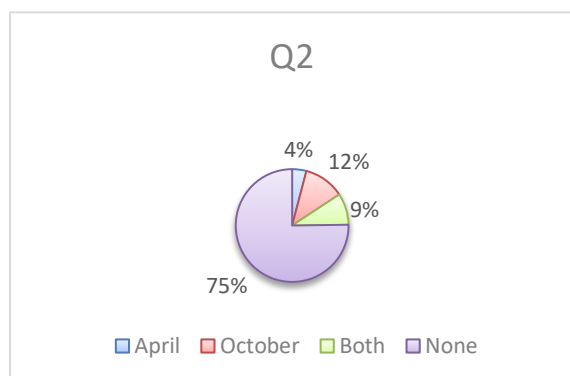


ANSWER CHOICE	RESPONSE #	RESPONSE %
Yes	271	62%
No	166	38%
If "No", why	113	
Total Answered	437	
Total Skipped	1	

Those who answered "No" were given an opportunity to include free-text reason, 113 of the 166 who answered "No" indicated why. Of these responses, 83 were considered valid and categorised as follows:

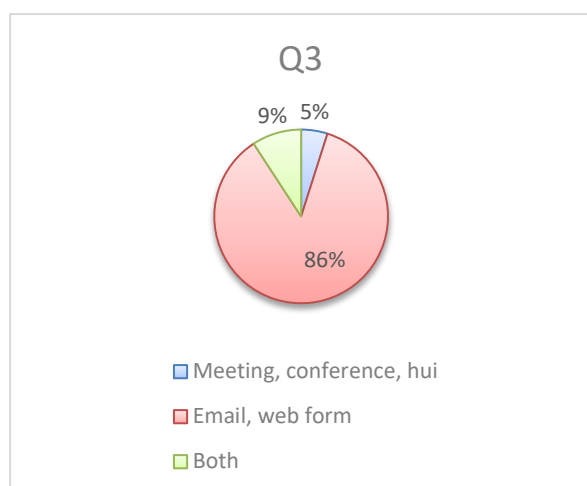
Response	#	%
New to fishing/area	38	34%
My input won't be considered	15	13%
Too busy/no time	14	12%
Lack of relevant knowledge/too difficult	10	9%
Submission thru group, e.g. Legasea	4	4%
Not aware could make a submission	2	2%
<b>TOTAL</b>	<b>83</b>	<b>73%</b>

Question 2: Did you participate in any of the Fisheries New Zealand sustainability rounds in 2018 – April and October?



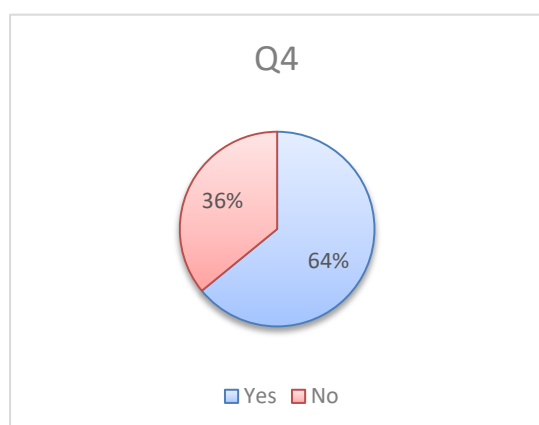
ANSWER CHOICE	RESPONSE #	RESPONSE %
April	14	4%
October	40	12%
Both	31	9%
None	258	75%
Total Answered	343	
Total Skipped	95	

## Question 3: How do you engage during the Fisheries New Zealand consultation?



ANSWER CHOICE	RESPONSE #	RESPONSE %
Meeting, conference Hui	16	5%
Email, web form	280	86%
Both	30	9%
Total Answered	326	
Total Skipped	112	

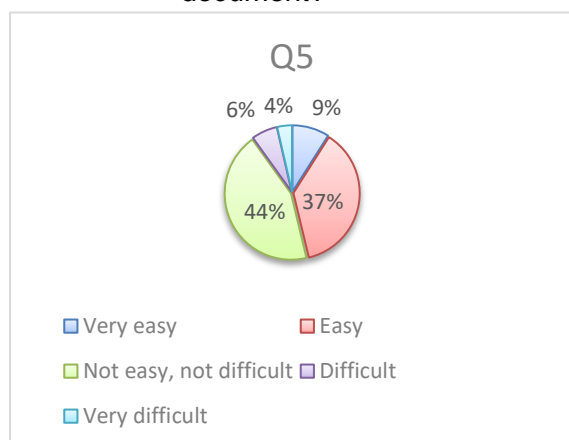
## Question 4: Do you recall receiving any advance notice of the sustainability rounds before consultation opened?



ANSWER CHOICE	RESPONSE #	RESPONSE %
Yes	223	64%
No	125	36%
If "No" would advance notice be useful and why?*	61	
Total Answered	348	
Total Skipped	90	

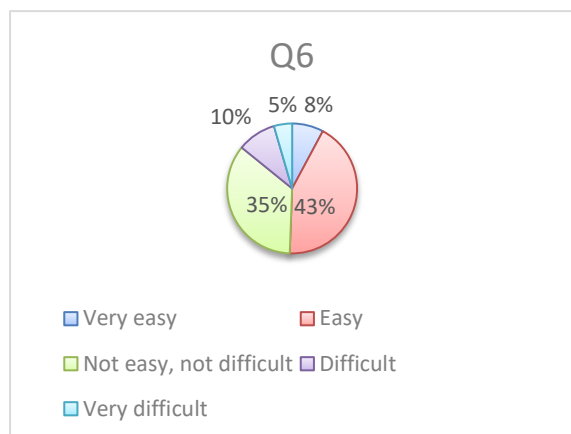
\* Primary reason given was to allow time to prepare a submission/time management

## Question 5: How easy or difficult is it to understand the information in a consultation document?



ANSWER CHOICE	RESPONSE #	RESPONSE %
Very easy	30	9%
Easy	124	37%
Not easy, not difficult	146	44%
Difficult	21	6%
Very difficult	4	4%
Total Answered	333	
Total Skipped	105	

Question 6: How easy or difficult is it to provide input and select a preferred option for catch limits?



ANSWER CHOICE	RESPONSE #	RESPONSE %
Very easy	26	8%
Easy	142	43%
Not easy, not difficult	117	35%
Difficult	32	10%
Very difficult	15	5%
Total Answered	332	
Total Skipped	106	

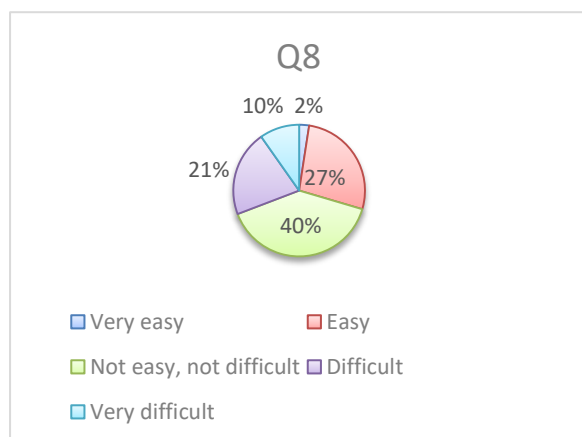
Question 7: Is there anything else you would like to share about the consultation process?

*This is a free-text question, 144 respondents provided input, 294 respondents skipped the question. A summary of the input is presented below, spoiled (abusive/derogatory) responses have been excluded.*

Response	#	%
Nothing to add	63	44%
Pre-determined outcome/commercial bias	22	15%
Need to listen to fishers	6	4%
Too much detail/shorten documents	4	3%
More up to date data/stock information/more region specific data	4	3%
More notice/longer consultation period	3	2%
Time lag between policy and implementation	1	1%
<b>TOTAL</b>	<b>103</b>	<b>72%</b>

### Decision document

Question 8: How easy or difficult is it to understand the Minister's decision?



ANSWER CHOICE	RESPONSE #	RESPONSE %
Very easy	8	2%
Easy	89	27%
Not easy, not difficult	130	40%
Difficult	69	21%
Very difficult	32	10%
Total Answered	328	
Total Skipped	110	



Question 9: Is there any other information you would like to see when the Minister's decisions are announced?

*This is a free-text question, 130 respondents provided input, 300 respondents skipped the question. A summary of the input is presented below, spoiled (abusive/derogatory) responses have been excluded.*

Response	#	%
Nothing to add	45	35%
Fair allocation between commercial, recreational and customary sectors	15	12%
Submission information relating to the selected option - number and sector	12	9%
Transparency of the data and science used	9	7%
Keep it simple/plain English/rationale clearly explained	6	5%
Decisions made in favour of commercial	5	4%
Show how environmental issues addressed in option selection	1	1%
<b>TOTAL</b>	<b>93</b>	<b>73%</b>