22 June 2014

Deepwater Fisheries Management
Ministry for Primary Industries
Po Box 2526
Wellington 6011
Email: fmsubmissions@mpi.govt.nz

Dear MPI,

Review of management controls for hoki, orange roughy and hagfish (2014-15)

1. Deepwater Group Ltd (DWG) appreciates the opportunity to submit on the *Review of management controls for hoki, orange roughy and hagfish* – Initial position papers. *MPI Discussion Paper Nos: 2014/18 – 21.*

Background

2. DWG is a non-profit organisation that works in partnership with the Ministry for Primary Industries (MPI) to ensure that New Zealand gains the maximum economic yields from our deepwater fisheries resources, managed within a long-term sustainable framework. DWG represents participants in New Zealand's major deepwater fisheries, including hake, hoki, jack mackerel, ling, orange roughy, oreos, scampi and southern blue whiting and squid. Shareholders in DWG hold around 95% of the entire deepwater quota in New Zealand.

3. Deepwater Group provides the vision and leadership needed to ensure New Zealand's deepwater fisheries are profitable, sustainable, and managed in an environmentally and socially responsible way:
   - Our mission is to optimise the sustainable economic value of our deepwater fisheries.
   - Our vision is to be recognised as the best managed deepwater fisheries in the world.

4. One of the mechanisms by which the DWG vision is realised, is through a structured collaborative partnership agreement with the MPI. Some of the benefits of this partnership include:
   - Incorporating commercial expertise and operational know-how, with government resources;
   - Ensuring Industry support and commitment to management approaches, through the processes of consultation, engagement and co-operation;
   - Enabling the MPI to base decisions on consistent and agreed advice from the Industry, as well as set clear and agreed objectives for deepwater fisheries, management measures to support these objectives, and assurance that these objectives will be efficiently delivered.

5. This culture of collaboration goes both ways. Not only does DWG actively support MPI measures that are founded on the collaborative relationship. MPI also often actively provides support to DWG for a number of non-regulatory sustainability initiatives.

6. DWG fully supports the MPI 10 year Science Programme and fund additional science, including a 2014 management strategy evaluation for orange roughy to better determine management targets and reference points.

DWG Submissions

Hoki Fisheries

7. The hoki IPP notes that the 2014 hoki stock assessment estimates both the eastern and western stocks to be above the biomass that will produce the maximum sustainable yield (B_{MSY}) and above the hoki management target range of 35-50% B_0. The 2014 hoki stock assessment estimates the current status of the western hoki stock to be 59% B_0 and the eastern stock 60% B_0.

8. Five year projections based on the 2014 stock assessment model show that both hoki stocks are likely to remain above BMSY and to remain within or above the management target range at increased catch levels. This suggests that a higher catch limit could be sustainable.

9. On this basis MPI has proposed the following TACC options for HOK1 in 2014-15 (see Table 1):

Table 1: Proposed TACCs for 2014-15 (HOK1)

Option	TACC (t)	Western Stock Limit (t)	Eastern Stock Limit (t)
Option 1: Status Quo	150,000	90,000	60,000
Option 2:	160,000	95,000	65,000
Option 3:	170,000	100,000	70,000

10. With regard to recommending a position with respect to a TACC change, DWG needs a mandate of 75% HOK1 quota ownership.

11. DWG advises that in a poll of DWG Shareholders, based on tonnages of HOK1 owned a mandate was not achieved.

12. There were two propositions:
    - 26.58% support for the status quo (Option 1)
    - 68.91% support for 160,000 t increase with10,000 t from the Western Stock (a variant of MPI's Option 2)
    - There is no support for Option 3

13. It was agreed that Shareholders would make their own submissions.

Orange Roughy (ORH MEC)

14. The ORH MEC IPP notes that the base model run of the 2014 stock assessment for ORH MEC estimates the current biomass to be 14% B_0. This is below a level that can produce the maximum sustainable yield (B_{MSY}) and below the Soft Limit (20% B_0),. Accordingly MPI proposes three options to rebuild the stock to the lower bound of the target range (30% B_0).

15. On this basis MPI proposed the following options for the 2014-15 fishing year for ORH MEC (see Table 2):

Table 2: Proposed TACCs & Catch Limits for 2014-15 (ORH MEC)

Option	Proposed MEC Catch Limit(t)	TACC 2ASouth (t)	TACC 2B (t)	TACC 3A (t)	Estimated Rebuild Time (Years)
Option 1:	840	460	95	285	42
Option 2:	525	288	60	177	32
Option 3:	200	110	25	65	25

16. DWG notes that the 2014 stock assessment was based on a survey that found half as much fish as was found in the previous year's survey which assessed the stock to be between 12-33% B_0 (with a mean of 21% B_0).

17. DWG notes that with this uncertainty any precautionary management measure imposed this year needs to be followed up with a survey in 2015 and a stock assessment in 2016. Following the results of this stock assessment, this stock will need to be reviewed.

18. DWG advises that in a poll of DWG Shareholders, based on tonnages of ORH MEC owned:
    - There was unanimous support for a TACC of 840 t (Option 1)
    - It was also agreed that this TACC of 840 t could include research quota for a Survey.

Orange Roughy (ORH3B (NWCR))

19. The ORH3B IPP notes that the 2014 stock assessment estimates the ORH3B Northwest Chatham Rise (NWCR) sub-stock to be 37% B_0 and to be increasing. This places the stock's status near the upper bound of the management target range (30-40% B0).

20. Deepwater Group agrees with the implementation of a TACC that shoots for 40%B_0

21. On this basis MPI has proposed the following catch limits options for ORH3B NWCR in 2014-15 (see Table 3)

Table 3: Proposed Catch Limits for 2014-15 (ORH3B (NWCR))	
Option	**Proposed Catch Limit (t)**
Option 1:	750
Option 2:	900
Option 3:	1,250

22. DWG advises that in a poll of DWG Shareholders, based on tonnages of ORH3B (NWCR) owned:
    - There was unanimous support for a catch limit of 1250 t (Option 3)

ORH3B (ESCR)

23. The ORH3B IPP notes that the 2014 ORH3B (ESCR) stock assessment estimates the ESCR stock to be 30% B_0, which is above the biomass that will produce the maximum sustainable yield (B_{MSY}) and at the lower bound of the orange roughy management target range of 30-40% B_0.

24. MPI notes that this stock is projected to continue to increase in size at the current catch and is also projected to increase, but at a slower rate, if catches were increased.

25. DWG Agrees with MPI's decision not to propose a change to the catch limit for ORH3B(ESCR) as "*the status of this [stock] should increase further into the current management range before the harvest level is increased*."

Orange Roughy (ORH7A)

26. The ORH7A IPP notes that the 2014 stock assessment estimates the ORH7A stock to be 42% B_0, which is above the biomass that will produce the maximum sustainable yield (B_{MSY}) and above the upper bound of the orange roughy management target range of 30-40% B_0.

27. Deepwater Group agrees with the implementation of a TACC that shoots for 40%B_0.

28. On this basis MPI has proposed the following TACC options for ORH7A in 2014-15 (see Table 4 below)

Table 3: Proposed TACC for 2014-15 (ORH7A)	
Option	**Proposed TACC (t)**
Option 1: *Status quo*	500
Option 2:	900
Option 3:	1,600

29. DWG advises that in a poll of DWG Shareholders, based on tonnages of ORH7A owned:
    - There was unanimous support for a Catch Limit of 1,600 t (Option 3)

Hagfish

30. The Hagfish IPP proposes that the common hagfish (*Eptatretus cirrhatus*) will enter the Quota Management System (QMS) on 1 October 2014. DWG supports this proposal on the basis that entry into the QMS will ensure its sustainable utilisation.

31. DWG notes that although hagfish is mostly targeted by inshore potting vessels; hagfish is also taken as an incidental bycatch in a number of deepwater trawl and bottom long line fisheries.

TACC

32. DWG supports setting the setting of the TACC pursuant to the Fisheries Act 1996 s13(2A), as "*the maximum sustainable yield is not able to be estimated reliably using the best available information*".

33. DWG supports the following TACC options:
    - HAG1, 2, 3, 4, 5, 8 at 100 t and HAG6, HAG10 at 10 t and HAG7 at 150 t (Option 1)

Deemed Values

34. DWG does not fully support any of the deemed value options provided by MPI.

35. DWG supports a deemed value structured that is based on harvest method. In a structure that is based on method of harvest the deemed value for 'fish taken by potting' could be $12.00 and all other fish taken with other methods being $1.20. This way deemed values equitably distinguish between a high value 'potted' target fishery and a zero value trawl and long line by-catch fishery. We recognise the problems incurred in other fisheries with species of similar characteristics (eg GSC, incidentally caught in trawls and of nil value) and note that we do not wish to have this repeated with HAG.

36. In the event that the imposition of a differential deemed value structured based on fishing method, is not feasible, then DWG's position is that a deemed value structure that does not unduly penalise fisheries who take hagfish as an incidental by-catch in other target fisheries should be imposed. This deemed value should be lower than the deemed value options provided and consistent across all FMAs.
37.

Other consequences

38. DWG notes that section 13(2A) of the Fisheries Act 1996 also requires the Minister to have regard to the social, cultural and economic consequences of their decision to enter hagfish into the QMS.

39. Entry into the QMS requires the landing of all QMS species. Where the Fisheries Act 1996 section 72 (1) requires that *[n]o commercial fisher shall return to or abandon in the sea or any other waters any fish, aquatic life, or seaweed of legal size, or for which no legal size is set, that is subject to the quota management system*; Section 72(2) provides an exemption from the requirements of subsection 1, should "*the stock is listed in Schedule 6 and the commercial fisher complies with the requirements set out in that schedule*."

40. Hagfish are renowned for their propensity to exude slime (as a defence mechanism or when under stress). This slime, though non-toxic, contaminates fishing gear (especially longlines) and requires the cleaning of deck/processing surfaces. Due to this, and the inherent low value of hagfish (unless specially handled and processed), all fishers, commercial and recreational alike, strive to avoid their capture; and in the limited times that incidental captures occur, seek to return such catch of hagfish to the sea with a minimum of handling and as quickly as possible. All the incentives exist for the safe release of HAG by-caught by non-target fisheries.

41. The HAG IPP notes the following:
    - *77. Common hagfish are reported as bycatch in a number of other target fisheries. A requirement to land common hagfish and balance catches with ACE (a default requirement under the QMS) will impose an unnecessary cost on these fishers.*
    - *78. There is little information to inform the survival rate of hagfish returned to the sea. Limited observer information suggests that hagfish brought up in trawls (for example, in the scampi fishery), may survive when returned to the ocean. Information from fishers and observers suggests that hagfish brought up in pots are likely to survive if they have not become stressed and started sliming. MPI considers that hagfish taken as a bycatch in other target fisheries will be brought up in low numbers, and are less likely to produce amounts of slime that may be more detrimental to them than hagfish brought up in pots in the target fishery.*

42. On this basis DWG proposes that HAG be added to Schedule 6 of the Fisheries Act 1996 so that they can be returned to the sea lawfully without having to be landed and balanced against ACE.

Contact Details

To discuss any of the matters raised in this submission, please contact me.

Yours sincerely

Aaron Irving

Senior Policy Advisor

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From:	FMSubmissions
To:	
Subject:	FW: Submission on the 2014 Review of Sustainability measures and management controls for fishstocks
Date:	Friday, 27 June 2014 10:01:39 a.m.

From: Barry [mailto:baz.weeber@gmail.com]
Sent: Wednesday, 25 June 2014 5:09 p.m.
To: FMSubmissions
Cc: Cath at home; ECO Office
Subject: Submission on the 2014 Review of Sustainability measures and management controls for fishstocks

See the following summary and attached background submission from ECO.

Regards

Barry Weeber

ENVIRONMENT AND CONSERVATION ORGANISATIONS OF NZ INC.

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24 June 2014

Submission on the 2014 Review of Sustainability measures and management controls for fishstocks

The Environment and Conservation Organisations of NZ (ECO) is the national alliance of 55 groups with a concern for the environment. ECO has been concerned at the state of marine management and the impacts of fishing on threatened species for over 20 years.

Thank you for the opportunity to make submissions on these proposals.

B. SUMMARY

1. **Hoki (HOK 1)**:

A proposal to increase the total allowable catch and total allowable commercial catch

ECO does not support a change in the TACC for 2014-15.

ECO considers the status quo TACC should continue to:

- Avoid increase in bycatch of seabirds as there are currently no targets or limits set under the NPOA Seabirds;
- Avoid an increase on fur seal populations on the West Coast of the South Island which have been declining over many years;
- Recognise the ecological importance of hoki in the New Zealand EEZ;
- Increase the size and number of year classes in the fishery and reduce the catch of small fish on the Chatham Rise.
- Avoid exceeding the catch limit of other species caught as a bycatch of hoki.
- Ensure there is no increase in bottom trawling in this fishery and associated benthic impacts.

2. **Orange Roughy (ORH MEC, ORH 3B, ORH 7A)**

ORH MEC

A proposal to decrease the total allowable catch and total allowable commercial catch for ORH 2A, 2B, and 3A

ECO supports a reduction in the TACC for 2014-15 to a level which would rebuild the

stock within 20 years. ECO notes the current assessment showing the stock is depleted and would reduce

ECO is concerned that orange roughy fisheries are managed at lower levels than should be the case given the age and low productivity of the species involved.

ECO considers a rebuild time of 25 years is too long and would prefer a catch limit that recovered the stock within 20 years.

ECO notes:

- That there are currently no targets or limits set under the NPOA Seabirds;

- That the reduction in catch will reduce bottom trawling in this fishery and associated benthic impacts and noting the BPAs were not designed to protect diversity on seamounts, hills and other features.

ORH 3B:
A proposal to increase the total allowable catch, total allowable commercial catch and catch limits

ECO does not support a change in the TACC for 2014-15.

ECO is concerned at the uncertainty in the assessment and the contradictory signals in the assessment. ECO considers the further research should be undertaken.

ECO considers the status quo TACC should continue to:

- Avoid increase in bycatch of seabirds as there are currently no targets or limits set under the NPOA Seabirds;

- Ensure there is no increase in bottom trawling in this fishery and associated benthic impacts and noting the BPAs were not designed to protect diversity on seamounts, hills and other features.

ORH 7A:
A proposal to increase the total allowable catch, total allowable commercial catch, and deemed values

ECO does not support a change in the TACC for 2014-15.

ECO is concerned at the uncertainty in the assessment and the contradictory signals in the assessment. ECO considers the further research should be undertaken.

ECO considers the status quo TACC should continue to:

- Avoid increase in bycatch of seabirds as there are currently no targets or limits set under the NPOA Seabirds;

- Ensure there is no increase in bottom trawling in this fishery and associated benthic impacts and noting the BPAs were not designed to protect diversity on seamounts, hills and other features.

3. **Moki (MOK 3)**:

A proposal to set a total allowable catch and increase the total allowable commercial catch.

ECO does not support a change in the TACC for 2014-15.

Deemed Values

4. **Bluenose (BNS 3)**:

- a proposal to amend deemed value rates for bluenose in the Chatham Islands

ECO support the proposal to increase the deemed value rates for bluenose in the Chatham Islands so as to reduce the incentive to overfish catches for stocks that meet the review criteria and stocks under review.

ECO notes that the TACC is being exceeded and the Minister did not cut the catch last year which should have been the third year of catch cuts to rebuild the fishery.

Hagfish measures

5. **Hagfish (HAG – All)**: setting the total allowable catch and allowances for hagfish

ECO Supports:

Catch Limits:

- the catch limits being set using catch limits proposed in Option 2 given the uncertainty associated with hagfish sustainability.

Sixth Schedule:

- Agree to adding hagfish to the sixth schedule if they can be release to the water in a state that has a high likelihood that they will survive.

Deemed Values

- Set deemed values at a level to reduce the incentive to overfish catches for stocks that meet the review criteria.

Reporting Codes

- Amend the reporting codes.

Yours sincerely,

Barry Weeber

Co-Chairperson

Environment and Conservation Organisations

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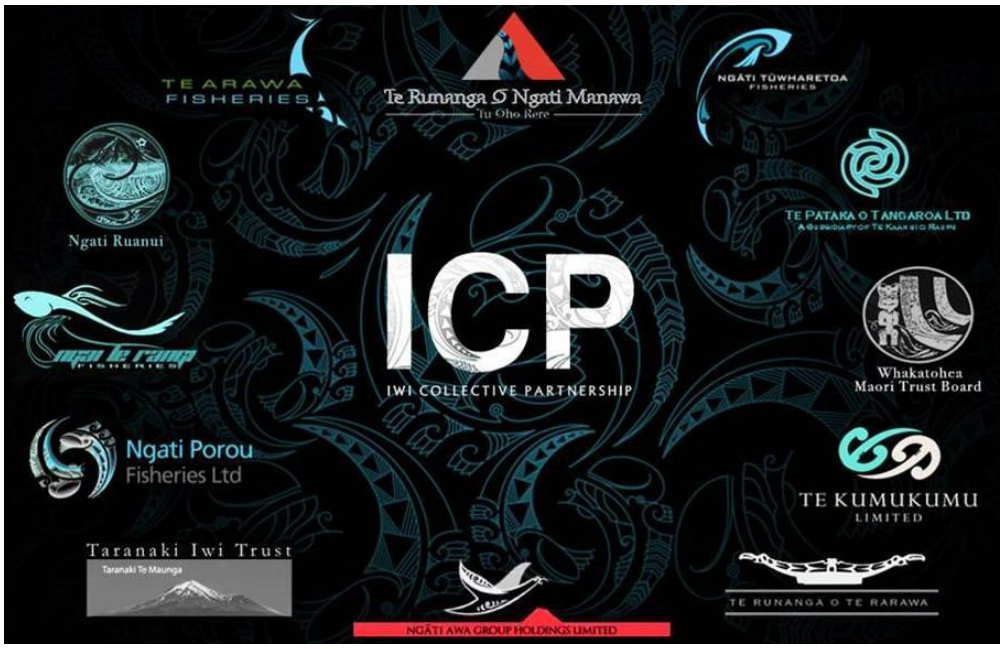

SUBMISSION ON

2014 REVIEW OF SUSTAINABILITY MEASURES AND CONTROLS FOR FISH STOCKS

Maru Samuels
Manager
Iwi Collective Partnership
Auckland

26 June 2014

Ministry of Primary Industries
Fisheries Management
Ministry for Primary Industries
P O Box 2526
Wellington 6011 **Email:** FMsubmissions@mpi.govt.nz

Tena koe / Tena koutou,

Re: 2014 REVIEW OF SUSTAINABILITY MEASURES AND MANAGEMENT CONTROLS FOR FISHSTOCKS

1. Introduction

In opening, we understand that submissions formally closed 5pm, Wednesday 25 June but that the Deewater Group Ltd and constituent members were granted an extension in light of a combined Board / shareholders meeting on this review held 26 June in Wellington. The Iwi Collective was represented at that meeting and the discussions and agreements flowing from that meeting form an integral part of our submission this morning.

This submission is presented on behalf of the Iwi Collective Partnership (Iwi Collective). The Iwi Collective was formed in 2010 as a fisheries partnership consisting of 14 iwi partners located throughout the North Island (refer Table 1) and incorporated in our logo (refer cover page). The Iwi Collective also shares ownership and joint venture interests with other iwi located in the South Island and Chatham Island. Our iwi partners collectively own quota in all of the stocks that are the subject of this review.

No.	Iwi	Region
1	Te Arawa	Bay of Plenty
2	Ngati Tuwharetoa	Bay of Plenty
3	Ngai Te Rangi	Bay of Plenty
4	Whakatohea	Bay of Plenty
5	Ngati Awa	Bay of Plenty
6	Ngai Tai	Bay of Plenty
7	Ngati Manawa	Bay of Plenty
8	Ngati Ruanui	Taranaki
9	Nga Rauru	Taranaki
10	Taranaki Iwi	Taranaki
11	Te Rarawa	Northland
12	Ngati Porou	Gisborne
13	Te Aitanga a Mahaki	Gisborne
14	Rongowhakaata	Gisborne

Table 1: List of ICP Iwi Partners

The Iwi Collective prides itself on being an active participant in the management of our New Zealand fisheries. Our participation stems not only from our commercial ownership of quota but more importantly from the unique position of our iwi partners as the original inhabitants and fisheries managers of Aotearoa New Zealand. Our beliefs are embodied in our purpose to, "*share sustainable Maori seafood with the world*".[1]

We begin by agreeing with the Minister of Fisheries statements pertaining to the importance of fisheries to New Zealand's economy, heritage, culture and national identity.

2. Hoki (HOK 1)

Of the options proposed, the Iwi Collective is open to consider both options 1 and 2 which are to retain a TACC of 150,000 mt or increase to 160,000 mt respectively. We understand that the science might support an increase to 160,000 mt and that it perhaps becomes a question of best utilisation. We are neutral on the utilisation question and therefore differ to other submitters who are more experienced in the harvest, processing and marketing of this fishery.

3. Orange Roughy MEC (ORH 2A, 2B and 3A)

Of the options proposed, the Iwi Collective supports Option 1 which is a reduced TACC of 840 mt. We oppose all other options.

In considering our view we are mindful that all options are considered to meet the minimum HSS rebuilding plan guidelines while accepting that increased reductions would bring higher certainty to meeting the HSS guidelines and desired timeframes. What is not considered is the economic and social impact of massive change on the communities of our iwi partners, particularly Maori communities and those living in rural New Zealand, where this fishery contributes as a strong source of employment (refer submission of Ngati Porou Seafoods Ltd) but also in the case of Te Arawa who owns and operates two fish processing/retail outlets in Rotorua.

We are not saying that sustainability of the fishery is less important that employment that facilitates social change but we are saying that the social and economic factors within the context of rural Maori communities, ought to have considerable value in this equation. In this case of ORH MEC, our iwi partner communities simply need time to adjust to the change, where change is required. Our understanding is that the recent science is not fully certain and we would commit to a research programme for 2015 that would then drive any change in the October 2016 season – whatever the results of that research. There would be little difference between taking dramatic action this season versus 2016 except to the recovery timeframe. Let's prove it to a greater degree of certainty than current, and take dramatic action at the time, if and where required.

[1] The Iwi Collective's commercial aspirations to supply sustainable seafood to the world is consistent with our ethical value of manakitanga – that is to present the best of our kaimoana (seafood) to our manuhiri (visitors but customers in widest context) as the responsibility of tangata whenua (hosts). Manakitanga or sharing is not a choice, it is a culturally essential practice of being Maori as predetermined by the tikanga (practices) of our tupuna (ancestors). These things are what distinguish us as being unique in the world as Maori yet similar to the practices of other international first nations peoples. Coupled within this is the obligation for the kaimahi (workers) in this process to come from the host area. This later point leads into the importance of employment and sustainable job creation within rural Maori communities such as Gisborne (Ngati Porou) and Rotorua (Te Arawa).

Conversely we would expect a scheme that review any improvements in the fishery over time so that if recovery rates are quicker than originally expected, TACC increases should automatically follow.

4. Orange Roughy (ORH 3B)

Of the options proposed, the Iwi Collective supports Option 3 which is to increase the TACC from TACC from 4,500 to 5,000 mt via a sub ORH3B NWCR increase from 750 to 1,250 mt.

All options tabled are consistent with the harvest strategy for Orange Roughy fisheries but option 3 allow for the best utilisation opportunity that the stock assessment indicates is sustainable. The Review of Management Controls for Orange Roughy 3B showed results from stock assessments completed in 2014 for the two largest sub-stocks in ORH 3B: Northwest Chatham Rise and East and South Chatham Rise. The NWCR stock was estimated to be 37% B0 and the ESCR at 30 % B0 both within the management target range (30-40% B0). These stocks are forecasted to continue to increase at current levels, but at a slower rate if catch levels increased. As a result MPI propose 3 management options in their discussion document.

5. Orange Roughy (ORH 7A)

Of the options proposed, the Iwi Collective supports Option 3 which is to increase the TACC from 500 to 1,600 mt in a staged management regime.

All options tabled are consistent with the harvest strategy for Orange Roughy fisheries but option 3 allows better utilisation opportunity that the stock assessment indicates is available and sustainable. Due to the results from the stock assessment and modeling, we believe an increase of the TACC to 1,600 mt over 3 year timeframe is sustainable.

The Iwi Collective supports the development of management, monitoring and assessment plans that includes research surveys to estimate biomass and updated stock assessments. If future results indicate the fishery is not improving enough then we support reductions. Conversely if research shows improvements, then we would expect an increase.

6. Conclusion

The Iwi Collective is an active member of the Deepwater Group Ltd and supports their final submission, as we do one of our iwi partners, Ngati Porou Seafoods Ltd.

Thank you for your consideration and I would be happy to answer any queries you might have.

Nga mihi,

Maru Samuels
Manager
Iwi Collective Partnership

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From:	Mark Allison
To:	
Cc:	Charles Shadbolt; Grant Prinsep; Stephen Bishop
Subject:	Independent Fisheries Hoki 1 TACC position 2014-15 Year
Date:	Friday, 27 June 2014 8:39:08 a.m.

Good Morning Vicky, Further to our DWG meeting and discussion yesterday I would like to submit Independent Fisheries position on Hoki 1 TACC for 2014-15 Fishing year.

IFL position is to remain a status quo TACC. We strongly apose a TACC this year for the following reasons;

1. Industry received an increase of 20,000 MT in 2013-14. (*yet to be caught*).

2. We also strongly apose any further increases to the Eastern stock as this is juvenile grounds and should not be increased at all.

3. Submissions need to take into account supporting science and an increased TACC for 2013-14 Hoki season (*again at the time of submission to be submitted TACC has not been caught*).

4. Whilst science does support an increase, equally there is doubt by scientists on some of the future year classes. Meaning that if an increase is granted there is every likelihood the fishery could face a reduction in future years as a result.

We feel a continued conservative approach to the fishery that is trending upwards still be adapted demonstrating good management practices.

An assessments of Hoki fishery at the conclusion of the 2013-14 and 2014-15 is required with the intention of an increase for the **2015-16 fishing year**.

Government and Industry have demonstrated taking into account sound research, industry knowledge of the fishery and maintaining a cautious approach has been the successful formula to rebuilding this fish stock.

It is IFL strong belief the Government and Industry continue this approach with the intention of further TACC increases in 2015-2016 fishing years.

Regards

Mark Allison
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Ngati Porou Seafoods Ltd

SUBMISSION

2014 Review of Sustainability Measures and Controls for Fish Stocks

Submission Compiled by: Ken Houkamau (Quota and Resource Manager - NPSL)

Date Completed: 25/05/2014

Foreword

This submission is presented on behalf of Ngati Porou Seafoods Limited, the commercial asset holding company established under the Maori Fisheries Act settlement process to receive and manage the quota assets allocated to Ngati Porou.

Ngati Porou Seafoods Limited welcomes the opportunity to write in response to the 2014 Review of Sustainability Measures and Controls for Fish Stocks and would like to reaffirm our commitment to effective fisheries management and sustainability which has been an intergenerational part of our core values and culture.

We are descendants of Tangaroa (God of the sea). The relationship is recorded in our history and in our lifestyles. From fishing in the Pacific, trapping crayfish in whanau allotted pools, travelling the Tasman trading goods gathered in Ngati Porou, to enforcing rahui for the conservation of our kapata kai by sheer force of mana. We are part of the sea and other fisheries, and they are part of us.

This philosophy is further embodied in our company vision statement and purpose for its existence;

Me tieki i te moana me ona rawa, ka taea te whakahiato nga kai moana tokomaha rawa atu ma Ngati Porou me ona hapu mo ake tonu atu.

'To manage, protect and enhance Ngati Porou's seafood resources and environment in a profitable and sustainable manner for the future'

The onset of colonial contact brought the Treaty of Waitangi and its guarantee of our rangatiratanga and other tikanga. They form the basis of the rights now metamorphosized into a bundle of assets allocated under the Maori Fisheries Act to Ngati Porou on agreement with the Crown.

In making this submission Ngati Porou Seafoods Limited, which (through our ultimate parent, Te Runanganui o Ngati Porou) represents more than 70,000 registered members as well Nga Hapu o Ngati Porou, indicates its strong desire to ensure our resources are managed in a responsible manner and agreements with the Crown as well as our tikanga are maintained and honoured.

We agree with the Minister of Fisheries statements pertaining to the importance of fisheries to New Zealand's economy, heritage, culture and national identity.

We also bring to the attention that Ngati Porou Seafoods Limited is a member of the Iwi Collective Partnership which is a collective of fourteen iwi across the North Island that have pooled their annual catch entitlement together, including Hoki and Orange Roughy to improve management decisions, returns, and opportunities within the fisheries sector.

Executive Summary

This submission is in response to the 2014 Review of Sustainability Measures and Management Controls for Fish Stocks discussions papers released by the Ministry for Primary Industries. It is presented on behalf of Ngati Porou Seafoods Limited (NPSL), the commercial asset holding company established under the Maori Fisheries Act settlement process to receive and manage the quota assets allocated to Ngati Porou.

This submission focuses on the following discussion documents and supports the following recommendations;

- Review of Management Controls for Hoki 1 (HOK1) in 2014
    - Support option 1 (status quo): Retain the TAC at 151,540 tonnes and the TACC at 150,000 tonnes.

- Review of Management Controls for Mid-East Coast Orange Roughy (ORH 2A,2B, 3A)
    - Support option 1: Decrease the ORH MEC catch limit from 1,230 tonnes to 840 tonnes and decrease the TACs for ORH 2A, 2B and 3A on a pro rata basis.

- Review of Management Controls for Orange Roughy 3B
    - Support Option 2: To increase the TAC for ORH 3B from 4,725 tonnes to 4,883 tonnes and the TACC from 4,500 tonnes to 4,650 tonnes increasing the NWCR limit from 750 tonnes to 900 tonnes and no change to the catch limit for any other sub-stock in ORH 3B.

- Review of Management Controls for Orange Roughy on the Southwest Challenger Plateau (ORH 7A)
    - Support Option 3: To increase the TAC from 525 tonnes to 1680 tonnes, increasing the TACC from 500 tonnes to 1600 tonnes.

NPSL support these options as we believe that they are the best options at present to utilise the Hoki and Orange Roughy fishstocks in a manner that is sustainable.

Hoki (HOK 1)

Within the Ministry of Primary Industries Review of Management Controls for Hoki 1 (HOK1) in 2014 discussion paper, MPI propose 3 options:

Option 1 (Status Quo)
The TAC would remain at 151,540 tonnes and the TACC would remain at 150,000 tonnes. The current catch split arrangement would also remain unchanged.

Option 2
Increase the TAC from 151,540 tonnes to 161,640 tonnes, increasing the TACC from 150,000 tonnes to 160,000 tonnes allocating the increase evenly between the eastern and western stocks. The allowance for other sources of fishing related mortality would be increased from 1500 tonnes to 1600 tonnes. There is no proposed change to customary or recreational allowances.

Option 3
Increase the TAC from 151,540 tonnes to 171,740 tonnes, increasing the TACC from 150,000 tonnes to 170,000 tonnes allocating the increase evenly between the eastern and western stocks. The allowance for other sources of fishing related mortality would be increased from 1500 tonnes to 1700 tonnes. There is no proposed change to customary or recreational allowances.

These options come about as results from the 2014 stock assessments were positive. The stock assessment estimated the current stock status of both eastern and western stocks as being above the management target range of 35-50% B0 (eastern stock 60% B0 & western stock 59% B0). These results suggest a TAC increase could be investigated.

Current projections indicate that options 2 and 3 (TACC increases) will not have sustainability risks and will remain stocks within the target management range over the next 5 years.

NPSL Position and comments

We have had steady increases in the Hoki TACC since the 2008/09 season. These increases have come about by the best available information indicating that increases were sustainable and the fishery being in an improving state.

Whilst NPSL usually support TACC increases if the science suggests it is sustainable, in this case, we think a precautionary approach should be taken. Retaining the current catch allowances is the best way to ensure a long term sustainable fishery and therefore NPSL:

Support Option 1 (Status Quo) – The TAC to remain at 151,540 tonnes and the TACC at 150,000 tonnes.

Orange Roughy MEC (ORH 2A, 2B and 3A)

The Review of Management Controls for Mid-East Coast Orange Roughy (ORH 2A, 2 and 3A) discussion paper highlights the ORH MEC stocks are below desirable levels. Results estimate that the current biomass of the ORH MEC biological stock is below a level that can produce the maximum sustainable yield (BMSY) and estimates the current biomass to be 14% B0 below the soft limit of 20% B0.

As a result, a rebuilding plan must be implemented and have stock reaching the Orange Roughy harvest strategy requirements to fluctuate within the target range of 30-40% B0. MPI propose 3 catch reduction options:

Option 1
Decrease the ORH MEC catch limit from 1,230 tonnes to 840 tonnes, decreasing the TACs for ORH 2A, 2B and 3A on a pro rata basis. The allowances for the other sources of fishing related mortality will be reduced to maintain them at 5% of the TACC for each stock with no change to customary or recreational allowances.

Option 2
Decrease the ORH MEC catch limit from 1,230 tonnes to 525 tonnes, decreasing the TACs for ORH 2A, 2B and 3A on a pro rata basis. The allowances for the other sources of fishing related mortality to will be reduced to maintain them at 5% of the TACC for each stock with no change to customary or recreational allowances.

Option 3

Decrease the ORH MEC catch limit from 1,230 tonnes to 200 tonnes, decreasing the TACs for ORH 2A, 2B and 3A on a pro rata basis. The allowances for the other sources of fishing related mortality to will be reduced to maintain them at 5% of the TACC for each stock with no change to customary or recreational allowances.

NPSL Position and comments

All options meet minimum HSS rebuilding plan guidelines but we note increased reductions bring higher certainty to meeting the HSS guidelines and desired timeframes but have a greater consequential impacts on companies like ourselves.

We are cognizant of the fact that the fishery is not where we would like it and support a rebuild strategy. We agree with MPI's statement that "Option 1 provides more catch in the short-term and could be considered as a first step in a staged reduction over several years. This approach would provide additional time for industry to adjust to the reduced catch limit and shift fishing effort elsewhere" as more severe TACC cuts would have major impacts on our business through quota ownership, joint venture arrangements and fish processing throughout.

We are supportive of developing a management, monitoring and assessment plans that includes research surveys to estimate biomass and updated stock assessments. If future results indicate the fishery is not improving enough then we support further reductions. At present however NPSL:

Support Option 1 - Decrease the ORH MEC catch limit from 1,230 tonnes to 840 tonnes conditional of it being reviewed after consideration of the results of a further biomass survey in 2015 and stock assessment in 2016, or earlier if new information becomes available.

Orange Roughy (ORH 3B)

The Review of Management Controls for Orange Roughy 3B showed results from stock assessments completed in 2014 for the two largest sub-stocks in ORH 3B: Northwest Chatham Rise and East and South Chatham Rise. The NWCR stock was estimated to be 37% B0 and the ESCR at 30 % B0 both within the management target range (30-40% B0).

These stocks are forecasted to continue to increase at current levels, but at a slower rate if catch levels increased. As a result MPI propose 3 management options in their discussion document:

Option 1 (Status Quo)
Under this option the overall ORH 3B TAC, Total Allowable Commercial Catch (TACC) and all sub-stock catch limits would remain at the current levels.

Option 2

- To increase the TAC for ORH 3B from 4,725 tonnes to 4,883 tonnes and the TACC from 4,500 tonnes to 4,650 tonnes.
- Increase the Northwest Chatham Rise catch limit from 750 tonnes to 900 tonnes
- No change to the catch limit for any other sub-stock in ORH 3B
- To increase the allowance for other sources of fishing related mortality from 225 tonnes to 233 tonnes (maintaining it at 5% of the TACC)
- No change to customary or recreational allowances.

Option 3

- To increase the TAC for ORH 3B from 4,725 tonnes to 5,250 tonnes and the TACC from 4,500 tonnes to 5,000 tonnes
- To increase the Northwest Chatham Rise catch limit from 750 tonnes to 1,250 tonnes.
- No change to the catch limit for any other sub-stock in ORH 3B
- To increase the allowance for other sources of fishing related mortality from 225
- tonnes to 250 tonnes (maintaining it at 5% of the TACC)
- No change to customary or recreational allowances.

All options are consistent with the harvest strategy for Orange Roughy fisheries but options 2 and 3 allow for a better utilisation opportunity that the stock assessment indicates is available and sustainable.

NPSL Position and comments

We are supportive of developing a management, monitoring and assessment plans that includes research surveys to estimate biomass and updated stock assessments. If future results indicate the fishery is not improving enough then we support catch reductions.

As indicated in the discussion paper there is a little uncertainty associated with the stock assessment, but modeling suggests all catch options will still result in improving stocks and they will be within or above management target range.

These results influence our decision in favor of an increase but because of the slight uncertainty of the stock assessment we think a cautious approach should be adopted, therefore NPSL:

Support Option 2 - To increase the TAC for ORH 3B from 4,725 tonnes to 4,883 tonnes and the TACC from 4,500 tonnes to 4,650 tonnes, increasing the Northwest Chatham Rise catch limit from 750 tonnes to 900 tonnes.

Orange Roughy (ORH 7A)

The Review of Management Controls for Orange Roughy 7A showed results from stock assessments completed in 2014 estimated the stock status as being above BMSY at 42% B0, above the upper bound of the current management target range for this stock of (30-40% B0).

The stock assessment indicates that a TAC increase is likely to be sustainable, thus resulting in the following 3 management options being proposed by MPI for the fishery:

Option 1 (Status Quo)
The TAC would remain at 525 tonnes and the TACC would remain at 500 tonnes.

Option 2

- To increase the TAC from 525 tonnes to 945 tonnes
- To increase the TACC from 500 tonnes to 900 tonnes
- To increase the allowance for other sources of fishing related mortality from 25 tonnes to 45 tonnes (maintaining it at 5% of the TACC)
- No changes to customary or recreational allowances.

Option 3

- To increase the TAC from 525 tonnes to 1680 tonnes
- To increase the TACC from 500 tonnes to 1600 tonnes
- To increase the allowance for other sources of fishing related mortality from 25 tonnes to 80 tonnes (maintaining it at 5% of the TACC)
- No changes to customary or recreational allowances.

All options are consistent with the harvest strategy for Orange Roughy fisheries but options 2 and 3 allow for a better utilisation opportunity that the stock assessment indicates is available and sustainable.

NPSL Position and comments

Modeling these options all result in a high probability that the stock will remain above management target range and the stock can support increased utilisation.

We are supportive of developing a management, monitoring and assessment plans that includes research surveys to estimate biomass and updated stock assessments. If future results indicate the fishery is not improving enough then we support reductions.

Due to the results from the stock assessment and modeling, NPSL believe an increase of the TACC to 1600 tonnes over 3 years is sustainable and therefore:

Support Option 3 – To increase the TAC from 525 tonnes to 1680 tonnes, increasing the TACC from 500 to 1600 tonnes.

Noho ora mai koe

Kenneth Houkamau
Ngati Porou Seafoods Ltd
Quota and Resources

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Re: 2014 Review of Sustainability measures and management controls for fishstocks.

The following is a submission on behalf of 'Our Seas, Our Future' marine conservation group.

1. **Hoki** (HOK 1)

- OSOF recommends Option 1 (point 49).
- Option 1 will best limit related by-catch (point 61).
- Option 1 limits risk to protected marine species, e.g. seabirds (point 67) and sea lions (point 78).
- OSOF agrees with having management efforts in place to prevent seabird mortality (points 75, 76).
- OSOF agrees with the risk assessment for marine mammals (point 80).
- Option 1 also limits effects on the benthic habitats (point 81).
- OSOF agrees with the recommendation to independently review the hoki stock assessment model (point 86).

2. **Orange Roughy** (ORH MEC, ORH 3B, ORH 7A)

- ***ORH MEC:***
- OSOF recommends Option 3 (point 45).
- Option 3 allows for fastest rebuild rate of Orange roughy (point 47).
- Option 3 will best limit related by-catch (point 52).
- Option 3 will best limit interaction with protected marine species such as sharks, fur seals and seabirds (points 53, 57, 58).
- OSOF agrees with the efforts of MPI to work with stakeholders to reduce risks to seabirds (point 61).
- Option 3 also limits effects on benthic habitats (point 65).
- OSOF agrees with the monitoring plan for ORH MEC (point 69).

- ***ORH 3B:***
- OSOF recommends Option 1 (point 46).
- Option 1 will best limit related by-catch (point 60).
- Option 1 will best limit interaction with protected marine species such as sharks, fur seals and seabirds (points 61, 65, 66).
- OSOF agrees with the efforts of MPI to work with stakeholders to reduce risks to seabirds (point 69).
- Option 1 limits effects on benthic habitats (point 72).
- OSOF agrees with future surveys and assessments (point 77).

- ***ORH 7A:***
- OSOF recommends Option 1 (point 34).
- Option 1 will best limit related by-catch (point 47).
- Option 1 will best limit interaction with protected marine species such as sharks, fur seals and seabirds (points 48, 53, 54).
- OSOF agrees with the efforts of MPI to work with stakeholders to reduce risks to seabirds (point 57).
- Option 1 limits effects on benthic habitats (point 59).
- OSOF agrees with multi-frequency acoustic surveys for stock assessments (point 70).

3. **Moki** (MOK 3)

- OSOF recommends Option 1 (point 57).
- Option 1 will best limit related by-catch (point 29).
- OSOF agrees with the need for better information regarding moki returned to the sea (point 69).

5. **Hagfish** (HAG – All)

- OSOF agrees with MPI in its preferred option of Option 2 (point 5).
- OSOF recommends the option of a set annual deemed value rate of $12.00 per kg, and set interim deemed value rate of $10.80 per kg (point 7 b ii, point 86).
- Option 2 best limits impacts to other associated species, and best limits impact on the benthic ecosystem (point 55).

Yours Sincerely,

Christian Hardy
On behalf of OSOF
www.osof.org
info@osof.org

All suggestions given are based on information found in the reviews of sustainability measures and management controls for fishstocks supplied by the Ministry for Primary Industries 26 May 2014. (http://www.fish.govt.nz/en-nz/Consultations/2014+Review+of+Sustainability+measures+and+management+controls.htm)

SANFORD LIMITED
SUSTAINABLE SEAFOOD

2014 Review of Sustainability measures and management controls for fish stocks

SANFORD LIMITED SUBMISSION

30 June 2014

Sanford Limited (**Sanford**) welcomes this opportunity to comment on the Ministry's Review of Sustainability measures and management controls for fish stocks.

Sanford is a large and long established fishing company and New Zealand's largest quota owner. Where possible Sanford has developed its position in consultation with others. Thank your for the extension provided, which has given us an opportunity to align our submission with others in the industry.

Sanford is committed to sustainably providing innovative, quality seafood and marine products.

Hoki (HOK 1)

Sanford supports the TAC remaining at status quo, Option 1.

Hoki 1 has had four catch increases over the last five years, while we have no concerns about the sustainability of this fishery we believe that a conservative longer approach to TAC setting is warranted. There is no conclusive evidence to suggest that the fishery can sustain an increased level of catch and we advocate for a slower, more cautious approach.

Orange Roughy

Sanford supports the Deepwater Group's submission across all ORH stocks.

Bluenose (BNS 3)

Sanford supports instating a $2.00 differential on Chatham Island landed fish up to a 120% over catch. Catches landed in excess of 120% over catch should incur the same deemed value charge as fish landed on Mainland New Zealand. Sanford is committed to the BNS 3 rebuild plan and believes that all fishers have a role to play. Every fisher has the option to move-on. Sanford is a member of Fisheries Inshore New Zealand who we understand are still working towards gaining a consensus view on BNS 3 deemed value. We remain open to this discussion and signal our willingness to relook at the issue.

Hagfish (HAG – All) please refer to our separate submission that was lodged on this stock.

This submission was prepared by Ali Undorf-Lay, Industry Liaison Manager at Sanford on behalf of **Volker Kuntzsch**, Chief Executive Officer, and **Greg Johansson**, General Manager Operations. All can be contacted on (09 379 4720).

SEALORD

27 June 2014
Deepwater Fisheries Management
Ministry for Primary Industries
PO Box 2526
Wellington 6011

Revision to Written Submisssion on MPI Discussion Paper on Review of Management Controls 2014-2015

Kia ora and thank you for the Discussion Paper on management controls for the 2014-15 Fishing year.

Following discussions between stakeholders on 26 June, and a consensus being reached for Option 1as the preferred option, Sealord now wish to revise our position on the Mid East Coast Orange Roughy stock.

We recommend that Option 1be selected for 2014, which would reduce the catch limit to 840 tonnes for MEC. Stakeholders have agreed to undertake a full survey program in 2015, and Sealord intend to make available necessary techhology to undertake this work.

Yours sincerely
SEALORD GROUP LTD

Doug Paulin
General Manager
Sealord Fishing

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SEALORD

23 June 2014
Deepwater Fisheries Management
Ministry for Primary Industries
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Written Submisssion on MPI Discussion Paper on Review of Management Controls 2014-2015

Kia ora and thank you for the Discussion Paper on management controls for the 2014-15 Fishing year. Sealord has the following commentary in regard TACC changes for Orange Roughy and Hoki stocks.

ORH MEC

We strongly recommend that Option 2 be selected for 2014, which would reduce the catch limit to 725 tonnes.

This is the second largest orange roughy stock in the world, after the East and South Chatham Rise stock, but the stock status is still not well understood. Two things are abundantly clear, the stock was heavily fished down in the early years of the fishery, and the stock has evidence of rebuilding since management action was first taken. The latter is clear because acoustic surveys in 2001, 2003 did not locate any signficant aggregations, and an AOS survey in 2013 found a significant spawning plume, but not enough biomass to take the stock index over 20%.

However the most recent assessment model, in contrast to the 2013 model, suggests that recruitment has been poor for many years and that the stock has not rebuilt as fast as expected with the reduction in catch levels. Also the predicted recruitment over the next 30 years is also well below average, which results in a much longer time to rebuild to the long term yield biomass, even at zero catch.

This recruitment pattern for MEC is in sharp contrast to that of other New Zealand orange roughy stocks, and this raises concern. It was highlighted in the discussion paper that these patterns were a major uncertainty because they were only based on 5 years of age compostion data. Figure 1 shows the recruitment for MEC, with low recruitment since 1940, and Figure 2 those for Northwest Chatham Rise with average recruitment over the same period and Figure 3 is ORH7A with good recruitment during the 1970's.

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Figure 1 Recruitment Patern Mid East Coast Orange Roughy

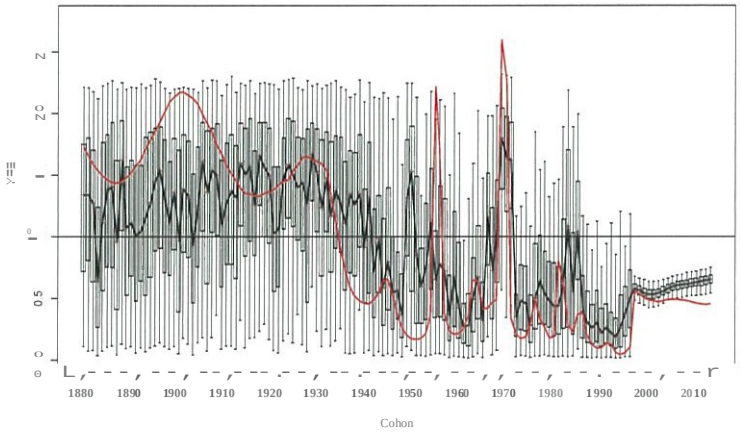


Figure 2 Recruitment Pattern Northwest Clwtluun Rise Orange Roughy

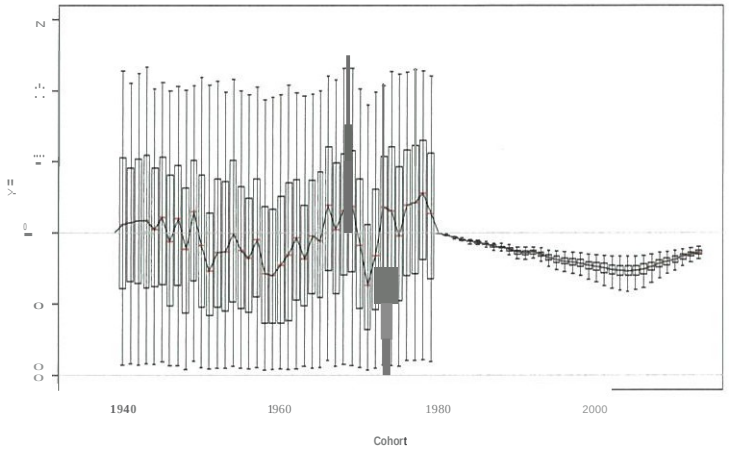
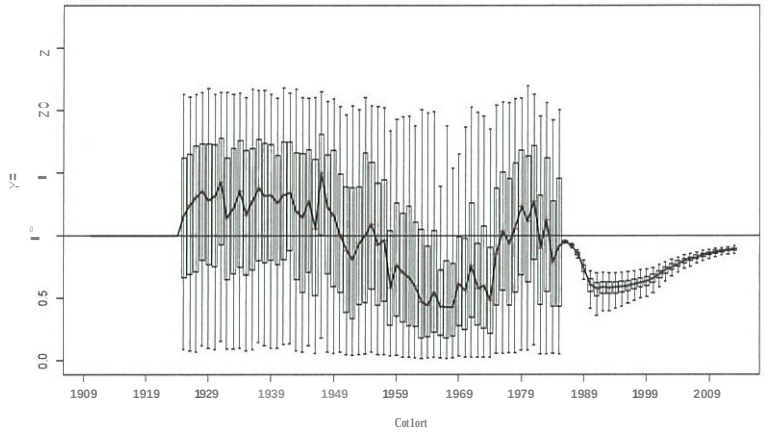


Figure 3 Recruitment Pattern Challenger Plateau Orange Roughy



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The MEC fishery is a very important fresh vessel fishery that provides signficant regional employment. In particular,orange roughy from this area is being targeted at high end markets, both fresh fillets and whole frozen roughy. These are new developments requiring fisheries close to processing plants, which would be severely impacted with the projected reductions under the various options.

The 2013 survey report, and the assessment, indicated that more research is required to fully assess the spawning biomass in the area; better age data are clearly required, and samples collected in the 2013 survey need to be analysed. We are concerned that an age sample taken from the *FV Thomas Harrison* in 2010 was biased towards older fish, as the assessment report suggested.

If the 2014 Real Time Acoustic Optical System **(AOS)** trials are successful on *FV Thomas Harrison,* Sealord will look to provide an operational multifrequency AOS system for a more dedicated MEC survey in 2015, extending from early June to at least 28th June, including 2A North. This could then combine with a proposed ORH3B survey at Puysegur duing mid-July.

ORH7A

Sealord supports management option 3 with an increase in TACC to 1,600 tonnes.

This is a very important fishery into which we have made substantial investments in research since 2005 to verify the rebuild, and is now a testament to success of the New Zealand QMS. Although the long term catch to maintain the stock in the middle of the management target range would be 1,740 tonnes, we prefer to wait until the results from the 2014 AOS survey become available. We expect that this additional biomass will change the model significantly and lend support to the higher yield of 2,100 tonnes that should be available long term from this stock. We see the 1,600 tonnes catch limit as an interim step up from the 500 tonne limit. However as this is the 'poster boy' stock for advocacy groups, it is important to take the most conservative options at every point. The damage to New Zealand's reputation was substantial when this stock was 'estimated' to have been reduced to only 3% of its original size. We would note that Sealord strongly argued to have a moratorium on fishing this stock in 1999, but were opposed by other stakeholders.

However it is also important to send a strong message to SPRFMO and other states that have previously exploited ORH7A on the high seas. Fish from Westpac Bank move inside the NZ EEZ over summer months and have always been regarded as part of a straddle stock. New Zealand is capable of fully exploiting this stock under UNCLOS and there is no surplus available for other states. We note that Australia, Norway, Korea and Japan have previously acknowledged New Zealand management rights to this stock when the Westpac Bank was closed to fishing by all nations in 2000.

We note that as with the surveys in 2005, 2006 and 2009 on Challenger Plateau where Sealord had to take the lead, in 2014 this company again is taking leadership with an AOS survey to be carried out on Westpac Bank.

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ORH3B

Sealord supports management option 3 which increases the ORH3B TACC to *5,000* tonnes.

We believe this is another important message, signalling that the major reductions in TACC that occurred from 2007 are being reversed on the basis of improved and quality science. The increase in TACC will come from a revision of the yield from the Northwest stock to 1,250 tonnes, but even this is a conservative increase. We note that this yield does not include any of the biomass from the Morgue knoll on the Chatham Rise.

However we also support a revision of the ESCR catch limit towards the long term yield, and would have preferred this option to be offered by MPI. This stock has many years of substantial industry investment in research, both under the cost recovery model and industry direct purchase of science, and is one of the most heavily studied fisheries in New Zealand.

In 2011 Sealord pointed out some of the major flaws in the assessments being carried out that were leading to reductions in TACC. Once again Sealord took a leadership role to bring in research programs to help deliver quality science to underpin management of our deepwater fisheries. We are indeed fortunate that New Zealand has a partnership between MPI and Deepwater Group that facilitates such cooperation.

HOKI

Sealord supports Option 2, with amendment over the catch split arrangements.

This species plays a key role within the Sealord portfolio, and for many years this company has taken a precautionary approach, arguiing for and against both industry and government about management controls. In most *cases,* Sealord has argued against increasing TACC's for hoki to ensure that we have a long term sustainable fishery. The decline in yields during 2000-2005 that led to virtual destruction of our modern factory trawler fleet is something that we never want to see again.

However we also cannot rebuild this fleet until we show confidence in the assessment of stock status for both western and eastern hoki.

The 2014 assessment of hoki stocks is robust, and we are seeing the results of more stable recruitment over the past decade, something we have actually not seen before in the history of the fishery. It is unfortunate that some misunderstanding of the current assesment is circulating within industry, but this review of management controls clearly clarifies the assessment for all parties. The western stock is not reliant on a single 2011 year class to support it, but has a large spread of year classes now. This is in direct contrast to five years ago when there were few year classes in the population. In 2013 almost half (49%) of the catch was fish 7 years or older.

Again in the winter of 2014 we are seeing our vessels achieving high catch rates of very large hoki from late May off the west coast South Island. These fish were not available 5-10 years *ago,* and it gives us

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confidence that the current assessment is highly conservative.

Sealord strongly supports another increase in Hoki TACC for the 2014 year to send another signal that the fishery has rebuilt as a result of strong management action being taken. Utilisation underpins our fishery management system, and it is clear the stocks are well above the agreed management target range. We are capable of harvesting any additional quota, and as all export companies are struggling with the high exchange rate, any additional product will assist us.

However this increase should only be on the western stock. We do not believe that it is appropriate to allow increased pressure on the 2011 year class by increasing catches on Chatham Rise. We believe that one major gain of the management strategy to restrict catches of juvenile hoki on Chatham Rise to maximise yield per recruit,has been the rapid rebuild of the western hoki stock.

The Deepwater Group originally proposed a status quo for 2014, but Sealord no longer supports this position. However we are prepared to shelve this additional tonnage until early 2015, as the catch would not be taken until after March 2015. This is to allow all parties to review the winter 2014 fishery success and to take into account any Hoki Working Group review of the 2014 fishery. There are concerns about the status of the hoki stocks from some industry participants, which we believe are not justified by science. However, a shelving proposal may help to allieviate some of their concerns.

Yours sincerely
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TE OHU KAIMOANA

MĀORI FISHERIES TRUST

27 June 2014

Ministry for Primary Industries
Fisheries Management
PO Box 2526
Wellington

Email: FMsubmissions@mpi.govt.nz

Tena koe

RE: REVIEW OF SUSTAINABILITY MEASURES AND MANAGEMENT CONTROLS FOR FISHSTOCKS

This submissions clarifies Te Ohu Kaimoana's views on management options for HOK1 and ORH MEC, ORH 3B NWCR and ESCR and ORH 7B.

Te Ohu Kaimoana considers that TAC/TACCs should be set within the agreed management strategy framework and based on sound science. The options we support are consistent with that view.

HOK1

Te Ohu supports an increase in the TACC of 10,000 tonnes. As MPI's Initial Position Paper (IPP) notes, both the eastern and western stocks are well above the size that will produce the maximum sustainable yield and above the hoki management target range of 35 – 50% B0. The eastern stock is estimated to be 59% B_0 and the western stock 60% B_0. We support the increase being applied to the western stock.

Orange Roughy

Te Ohu endorses the submission made by the Deepwater Group on the orange roughy stocks under review – and supported their mandate to submit on behalf of shareholders. Our brief comments are summarised below.

ORH MEC

Te Ohu supports MPI's Option 1: a reduction in the TACC for this stock from 1,230 tonnes to 840 tonnes. While Options 2 and 3 involved greater reductions, we consider that Option 1 still heads in the right direction within the Harvest Strategy Standard, and continues to provide for the stock to increase. As part of their support for Option 1, quota holders have made a commitment to carry out another survey in 2015 towards a stock assessment in 2016.

TE OHU KAI MOANA TRUSTEE LIMITED
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Protecting Māori fisheries assets for future generations

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ORH 3A
Te Ohu supports MPI's option 3: an increase in the TACC for this fishery from 4,500 to 5,000 tonnes, based on an increase in the North West Chatham Rise catch limit from 750 tonnes to 1,250 tonnes.

We note that MPI considers that this option is consistent with the orange roughy harvest strategy and will maintain the stocks at or above B_{msy} and within the management target range with a high probability in the short term.

ORH 7A
Te Ohu supports MPI's Option 3, to increase the TACC from 500 to 1,600 tonnes. As MPI notes this option would cause the stock to fluctuate around the upper bound of the management target range (40% B_0). While the increase is greater than Option 2, it provides greater utilisation opportunities while remaining within the accepted management regime.

Naku noa, na

Kirsty Woods
Manager, Fisheries Leadership