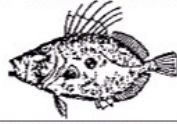


WELLINGTON
RECREATIONAL MARINE FISHERS'
ASSOCIATION (Inc)



WE RECOGNISE MANAGED FISHERIES

Mailing address

3 Ruskin Rd
Newlands
Wellington
New Zealand

27th February 2007

SUBMISSION ON THE MINISTRY OF FISHERIES SHARED FISHING PROPOSAL

From

Jim Mikoz
SECRETARY
Wellington Recreational Marine Fishers Association
Wellington Surfcasting and Angling Club
Honorary Vice President New Zealand Angling Association
Phone 04 938 4692
E mail j-mikoz@paradise.net.nz

To:-

Shared Fisheries consultation
Ministry of Fisheries
P O Box 1020
WELLINGTON
Shared.fisheries@fish.govt.nz

Dear Sir/Madam

The Wellington Recreational Marine Fishers Association (WRMFA) has discussed the proposed shared fishery concept. The WRMFA fully supports the submission on Shared Fisheries produced by the New Zealand Recreational Fishing Council. Please refer to the NZRFC submission.

The wording in The Fisheries Act requires the Minister of Fishing to “allow for” non-commercial fishing interests and this section of the Fisheries Act must remain.

As Secretary of both the Wellington Surfcasting and Angling Club, the WRMFA and the New Zealand Angling and Casting Association (NZACA), I have represented recreational fishers for over twenty one years through a number of Mfish committees, namely Fishing Liaison,

Recreational Policy Advisory committees, Minister of Fisheries quota setting meetings, and for five years I represented the NZ Recreation Fishing Council on the mid water stock assessment committee. I have also represented the region's marine recreational fishers on the Oceans Policy stage two working group and I am currently the sole marine recreational fisher on the DOC NGO committee representing the NZACA.

While the concept of a shared fishery sounds logical in my experience it will cause difficulties for a number of reasons. First of all for years the Government has been demonstrating that it has no respect for the views of recreational fishers. For example a number of marine reserves have been placed where we know they will be in the wrong place and we have presented logical reasoning behind our objections. We have tried to stop the destruction of our beaches, harbours and streams by Government allowing sewage heavily contaminated with chemicals to be discharged, to no avail.

A shared fishery also has to be built around reasonable access to the sea and after writing a submission to the Ackland report on access I identified fifty six areas in the Wellington region where access to the sea is denied, access has not been improved. The threat of Mātaitai marine reserves is a major issue that has not been identified in the Shared Fishery concept paper. The belief that Maori have some understanding and respect for the marine environment is continually being exposed as not true where there is money involved. Yet they stand through Government legislation as a major stakeholder competing for a share of the fishery with their sixty percent share of the fishery quota, while they become active in destroying the inter tidal zone which is twenty percent more productive than the open sea.

We are being asked to share a fishery in which most if not all of our recognised recreational fish stocks are at or below sustainable levels. A figure quoted by Statistics NZ in the document *Monitoring Progress towards a Sustainable New Zealand* notes that we have forty of our marine specie stocks at or below sustainable levels. Having been involved in the stock assessment process as a completely neutral observer it is obvious the TAC is being corrupted by false information. Information always supports the commercial. Their scientific assessments are being produced to support whatever commercial interests want them to say; after all they would be foolish to bite the hand that feeds them. History backs that up as orange rouhy and now crayfish, hoki, tarakihi, snapper and kahawai are being harvested by commercial at unsustainable levels.

I believe the Quota management system is being used to fool the public that it is a leader in fish management but with fish stocks decreasing it is obviously inadequate, yet the TAC catch figures remain unaltered. I have been on committees where commercial plead with Ministry to change the deem value or describe how some fish landed in one area have been caught in another, distorting catch statistics, yet nothing changes. The Shared fishery proposal will be another system where faulty marine science or none at all will be used to corrupt the Ministry of Fisheries' policy decisions.

There are a number of examples that prove misinformation is destroying a fishery and tarakihi is an example as the Ministry thinks from Napier around to New Plymouth it is one stock and now commercial boats, after depleting their tradition grounds, are systematically destroying grounds well out of their area. I obtained the commercial catch figures for the Wellington region and even then the sub area within this QMA is still too large to see what is happening. The blue cod fishery is another where misinformation is being used by the Ministry of

Fisheries as they believe blue cod remain all their lives in one area. In 1939 this was scientifically proven to be false yet the fishery is managed as if they are resident fish.

Another example of the Ministry of Fisheries producing policy with no scientific information is the harvesting of beach cast seaweed. Years ago the Ministry of Fishery could not produce any information on beach cast seaweed's value to marine specie to a Parliamentary select committee leading to a major clause (Clause 22 in section 93 of the principle Act) in the Fisheries Act being deleted. This clause had been inserted by our forefathers who obviously had a great deal more marine knowledge than those who proposed the deletion. Years later a research project was funded by the Ministry that identifies there was no scientific information available as to the value of beach cast seaweed to marine specie. Next we find an \$800 million dollar industry has been formed that will have local Iwi strip beaches of seaweed and still no research is available. Now with still no research material available other than my stories in the NZ Fishing Coast to Coast magazine *Bad Luck Hector you are dead meat* and *They are killing our beaches everything is connected*, the Ministry is writing policy.

By coincidence I have co-written a paper describing the value of beach cast seaweed to marine specie that was presented to the NZ Journal of Marine and Freshwater Research. Unfortunately the management of this journal selected two people to peer review the paper who from their comments back had not the marine inter tidal knowledge to understand the paper's value. The Ministry has been provided with a copy of the paper as it is the only research that describes the value of beach cast seaweed to marine specie. At the Shared Fisheries public meeting in Wellington senior Ministry of Fisheries staff dismissed beach cast seaweed as having any value.

The dismissing of scientific discoveries based on the Journals policy of only accepting two thirds of what is presented to them is a major concern to this proposed Shared Fishery proposal as we are continually being advised that the Ministry of Fisheries is not interested in the environment that provides life and food to the fishery. The Ministry of Fisheries management of the fishery has to start at the beginning of the food chain not just where a fish or shellfish can be measured against a prejudged legal size, after all they did not arrive at that size from outer space.

The biggest threat to the Shared Fishery plan is either Ministry of Fisheries policy or the lack of man management skills. What is also obvious is the difficulty they experience in accepting that recreational fishers who participate in providing input into Ministry of Fisheries decisions have a great deal of marine knowledge. The Regional Fishing Forums have a format that is failing to communicate with those who give their time to participate or address the concerns raised. Material is not being mailed out to all members, letters are being presented at meetings known by the Ministry to contain false statements and those most affected are served up the rubbish without being pre advised it is coming. This is man management at its worst and demonstrates the Ministry of Fisheries have not trained their staff in communication skills or how to run meetings. We see meaningful discussion cut short while previously valuable time is used obtaining information as to what is being caught in the region.

Those attending these forums are very experienced fishers who have their own communication system and would know what was being caught anyway. Yet when we ask what commercial is catching in our region, discussion is stopped. The Ministry of Fisheries could read our club newsletters if they really wanted to know what is being caught but it is all

irrelevant as seasonal and climate changes impact on what can be caught in any one year. Trying to obtain a picture of what is being caught in the region by using the recreational forum members' marine knowledge will cause more misinformation to be used by the Ministry to confuse themselves. As a club we have catch records going back fifty years so there is no point in reinventing the wheel as some fish, like warehou, return to their traditional spawning areas in seven year cycles and other fish move around depending on water temperatures. Unfortunately the Ministry has never been interested in the marine environment as a fishery tool as they have not once presented information to a resource consent hearing

A perception by the Ministry of Fisheries that we are all meat hunters completely ignores the research carried out by Walshe and Akroyd in March 2000 commissioned by the Ministry of Fisheries as to why we go fishing. Entitled *Motivations and Perceptions of seawater Recreational Fishers in New Zealand (REC9802)* it identified only eighteen percent went fishing for a food supply while forty six percent stated the purpose of fishing was enjoyment. Any thought the Ministry of Fisheries has of cutting back the recreational bag limit will be based on misinformation as in our club we have run a seven a year boat competition since 1987 and no one has ever caught a bag limit and total fish caught continue to drop. Some have caught twenty fin fish or five hapuku but no one has caught ten snapper as well or presented three kingfish and two hapuku. Our catch history records that fish caught has decreased since the seasons of 1999 to 2001. The impact of recreational charter boats operators fishing the same reefs day after day is a serious issue that is having a noticeable impact on local fish stocks. This if correctly researched will be found to be a major contributing factor when discussing localised depletion.

Communication takes on a whole new meaning in fishery management. When the Fishery Standards paper on how the Government expects the Ministry to manage the fishery was presented at the Forum we found not all had received a copy prior to the meeting, and then we were expected to make meaningful comments to a PDF presentation. This seriously questions if the Ministry of Fisheries is interested in our views or not. Submissions to the Fishing Standards paper is required by the 31st March 2007, which is a bit longer than the three days the Ministry gave me to advise our Association, WSAC club members, readers of NZ Fishing Coast to Coast and NZ Fishing news magazines that they too were invited to describe how a marine reserve off the Wellington South Coast would impact on their recreation.

Writing submissions takes time and money as recreational fishers have real jobs through the day so communication of issues that impact on marine fishers has to reach a far greater standard of delivery than the Ministry of Fishery has been demonstrating. Fishery management of the Wellington region leaves a lot to be desired. Take for example the Pukerua Bay closure being lifted in December 2006. I raised this as an agenda item as Iwi had descended on the bay and removed huge quantities of paua knowing the Ministry of Fisheries had let the closure lapse on a fishery that had been protected for four years. At the meeting we were advised the closure will be reinstated, without any explanation as to what had changed the Ministry's position other than Iwi wanted it back on. A very strange way to handle an agenda item was again demonstrated when we were advised a public notice would appear in the paper on Saturday. We had raised this issue as an agenda item, so where was our copy of the notice and where was the written response to the agenda item, after all the item had been presented weeks before?

A Shared Fishery will not work with this level of communication from the Ministry of Fisheries. The Ministry of Fisheries should look at how the Department of Conservation conduct their meetings and handle agenda items, as from them we receive written replies to our agenda items prior to the meeting and important information is allocated time to be discussed and we definitely do not have time to discuss issues that are not relevant. There is a suggestion that we need Forum meetings on a Saturday as we do not have enough time on a week day. It is all to do with management as DOC cover a huge amount of material in two hours.

The reluctance of the Ministry of Fisheries to accept recreational marine knowledge is proven in the specie bag for our region as common specie are not included and others such as snapper included when very few are caught off the South coast. We wrote a submission describing this error but it was dismissed. In 1990 I wrote a submission describing the proposed increase in kahawai would not be sustainable and I was proven to be correct. While on the Mfish Mid Water Stock assessment committee I predicted and advised Mfish that at the current level of catch and misinformation presented to the stock assessment committee it would not be long before gemfish fishery would collapse. While I was severely criticized by NIWA scientists for that report, two years later the NZ Seafood magazine ran a story describing the collapse.

While attending the Minister of Fisheries quota setting meeting I used my experience gained from the Mid water Stock assessment committee to support commercial who were opposing a Ministry of Fisheries proposal to increase the quota of the hoki quota through the Cook Strait, I was proven correct again as the stock continues to fall. I wrote a submission in detail describing the environmental damage fast ferries were causing to the food source of blue cod in the Marlborough Sounds and today that information is still being dismissed by senior Ministry of Fisheries staff. I have been proven correct as since the fast ferries have gone the blue cod numbers have returned.

The just completed Review of the NZ Biodiversity Strategy Themes identifies a serious lack of marine information yet Government since 1998 has been blocking any funding into the most productive area of the marine environment, the inter tidal zone. I was invited to work on a project by FRST called Natural Ecosystems with a budget of thirty two million dollars which was identifying areas where there was little scientific information. However they stated there will be no funding into the inter tidal zone unless a commercial end user is found. With councils and Government flat out destroying this zone and not one database describing or naming a native inter tidal wetland plant it follows that very few will know their function as science has no funding. This raises serious issues that will have to be addressed in a Shared Fishery management structure as informal marine knowledge will often be all that is available. The errors and omissions in the databases of NIWA and the Ministry of Fisheries are so obvious to experienced recreational fishers that caution will have to be exercised in stating something from a database is fact. The lack of inter tidal knowledge became obvious when the Greater Wellington Regional Council asked NIWA, DOC and the Ministry of Fisheries what specie if any would be effected by the realignment of the Hutt River and not one Government department could provide them with any information, however I could.

With marine discoveries co discovered by recreational marine fishers, DOC senior scientists and leading university scientists experts being blocked from being published and marine science funding almost cut off, it was quite easy to discover that New Zealand has four out of eight nationally recognised databases carrying major errors and omissions. The NIWA and Mfish databases contain very serious errors and omissions that will corrupt any meaningful

discussion relating to a Shared Fishery. With these errors it will be impossible to make any assumptions on any stock mass as the basic information on even ocean currents, sea level heights and reef positions are in error from these Government science providers.

Another major problem is within the Ministry of Fisheries policy as two basic errors have been allowed to carry on far too long. First is the belief that the Ministry thinks it can manage fish stocks without taking into account the impact of man's destructive disregard for the marine environment. It was very obvious at the Wellington public meeting on Shared Fishery that Senior Ministry staff do not believe that adverse environmental factors could impact on our fish stocks.

This meeting brought home the fact that the Ministry staff has no respect for the marine knowledge of recreational marine fishers as our input was reluctantly written up. I cannot remember how many times I have been asked by Ministry of Fisheries staff how I knew something as if they alone should have the marine knowledge. Since I wrote a submission predicting the demise of the kahawai fishery in 1990, I have written many others including a number on blue cod. While on the Mfish Fishing Liaison Committee I asked for five years for a copy of the Victoria University trawler permit until I finally obtained a copy to discover the permit was illegal, while the Ministry of Fisheries refused to give out the information. While other times Mfish staff openly both verbally and by body language show no respect for the marine knowledge of recreational fishers. For years I thought it strange but I have now been attending DOC NGO meetings and a number of Oceans Policy meetings run by the Ministry of the Environment and it is obviously an attitude peculiar to Mfish that if not turned around will spill over into a wider mistrust of the motives within Mfish. I do not believe the Ministry has the staff with the will and motivation to make a Shared Fishery work, unless they already know that it will not work.

In summary

It will be almost impossible to make a Shared Fishery work with quota management areas and sub areas being far too large. A fishery will never be able to be managed correctly without a shared knowledge of both recreational and commercial take. The uninformed belief the inshore fish specie are always in dense schools when in fact the quantity caught may have been the last remaining school of any size along that coast line. Fishery management requires big changes which would not have been necessary if the Ministry of Fisheries had kept the Quota management system up with the changes in technology. It is extremely naive of the Ministry of Fisheries to think they can manage a fishery without understanding the impacts that a mismanaged inter tidal zone would have on fish stocks. Communication of fish stocks and matters relating to recreational fishers has to be more open and honest. Ministry of Fisheries has to train their staff to recognise the value of the marine knowledge that recreational fishers will bring to fishery management. The number of recreational fishers willing to participate in fishery management is decreasing as the financial burden is considerable. Unless meaningful funding is made available through Government that will enable recreational fishers to give their time then attracting experienced recreational fishers onto these working groups in the future will be increasingly difficult. The youth of today are seldom seen fishing in the numbers we did as there are far greater opportunities to experience life today than we did forty years ago.

The Ministry of Fisheries has to change its management structure immediately to make the Shared Fishery concept work and the Government expectations delivered in the Fisheries Standards Summary is not strong enough to make the changes necessary. For years we have

seen the Ministry of Fisheries ignoring the marine knowledge given freely by recreational fishers through submissions. The industry that supports recreational fishers injects millions of dollars into the New Zealand economy so it would be totally unacceptable to ask recreational fishers to fund those who would be willing to represent recreational fishers in Local Area Management. Localised depletion of fish stocks is not a local issue but a national issue that would never have arisen if the quota management areas were realistic, sub sections managed correctly and adjustments made as a result of technology advances.

Thank you

Yours Sincerely

Jim Mikoz

SECRETARY

Wellington Recreational Marine Fishers Association

Wellington Surfcasting and Angling Club

Honorary Vice President New Zealand Angling Association

Phone 04 938 4692

E mail j-mikoz@paradise.net.nz