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Submission: CRA 2 Review

The Whangamata Ocean Sports Club (**WOSC**) appreciates the opportunity to submit on the review of CRA2. We agree that the quotas for Rock Lobster (referred to here as **crayfish**), is critical and needs to be reviewed but the level of total allowable catch must be precautionary in the face of many unknowns about the species, stock size and ecological interactions.

Introduction and background

The submitters

We, Whangamata Ocean Sports Club (WOSC), the submitters, are a New Zealand Sports Fishing Council (NZSFC) Affiliated Club, with over 7500 members from New Zealand and abroad. We are situated at the southern end of the Coromandel Peninsula. Our members and supporters have a strong interest in restoring marine biodiversity by increasing the abundance of fish in inshore waters, while protecting the marine environment and ensuring a fair go for all Kiwis so they can provide for their whanau's social, economic, and cultural wellbeing from fishing.

While the area off Whangamata is our primary interest we are all concerned about the falling fish and crayfish populations, the lack of biodiversity and the scarcity of indicator species such as seabirds throughout New Zealand, including the Hauraki Gulf Marine Park (HGMP) and other parts of the New Zealand coastline.

Crayfish stocks and proposals

Estimated landings for commercial fisheries in 2023-24 were 79,995t with a TACC of 80 t for commercial catch and 34 t for recreational catch.

Three options are proposed for CRA2 with Option A1 being the status quo, Option A2 an increase for commercial (only) of 10 t to the TACC and Option A3 is an increase of 20 t, for commercial only.

There is also a proposal to develop special management areas with Option B1 being the status quo and Option B2 closure of the inner Hauraki Gulf noting the new High Protection Areas (**HPAs**) will also be exclusion areas.

Discussion

Crayfish are highly valued by customary, recreational and commercial fishers. They are a critical part of marine food webs feeding on shellfish, crabs, kina, other crustaceans and small fish. They are one of the

most important predators of kina and the development of kina barrens has been linked to low crayfish and snapper abundance.

Catch rates

The TACC in 2004 was 80 t for commercial fishers and 16.5 and 34 t for customary and recreational fishers respectively. Actual catch rates for commercial fishers in 2024 was just under 80 t.

Abundance of marine biota can vary considerably at different time scales from years to decades and include linkages to likes of El Nino Southern Oscillation (ENSO) and other climate conditions. Setting higher quotas because of perceived increase in stocks over a few years is not valid.

As noted in various documents Fisheries NZ must take a precautionary approach where there are unknowns or stocks are below a sustainable level. The uncertainties are noted in various parts of FNZ 2024. Examples are

- As stated on p2 of FNZ 2024 *"In the absence of both an agreed management target and a known biomass and density of rock lobster..."*. Yet they propose to set a higher TACC and a preliminary biomass management target.
- A full stock assessment is planned for 2025 and any changes should wait until then.
- P6 – In reference to kina barrens *"However, this abundance is unknown"*
- P7 *"A planned stock assessment in 2025 will further inform the development of new CRA 2 management procedures – thus not enough information is available now.*
- P43 – *"there is no comprehensive record or map of their distribution (kina barrens) to support tangata whenua and stakeholder engagement or inform management decision making"*. More work is needed before any decisions are made about increasing crayfish quota.

There should be no changes until we have a better understanding of the populations and then long-term biomass limits can be set.

Closures

It is not just the inner Hauraki Gulf where there are concerns about crayfish numbers and kina barrens. There are concerns along the east coast of the Coromandel and when we see commercial pots around islands just off the beach in Whangamata, and low numbers being collected by recreational divers then there is no justification for increasing the TACC for commercial fishers. There is real concern that the TACC for the whole of CRA2 is proposed to be increased when there are areas that should not have any increase (and not just the Inner Hauraki Gulf).

The proposed closure only address the Inner Hauraki Gulf yet FNZ admits that *"rock lobster are not evenly distributed and other parts of the HGMP may have low abundance and biomass."* Limits should not be changed until we have a better understanding of where the issues really occur. Unfortunately, the data for recreational harvest surveys in FNZ 2024 only included data for the Inner HG. Maps show that off the east coast there is considerable interannual variation and it is difficult to discern any trends.

Kina barrens

Having fished the Whangamata area for many years our members have seen dwindling fish and crayfish populations while kina barrens have increased around the islands including in the Marine Reserve at Mayor Island. These barrens are a direct consequence of low crayfish and snapper numbers with high kina numbers having flow on effects reducing kelp habitats, biodiversity and productivity.

The recent allocation of High Protection Areas (HPAs) including around Slipper Island and the Alderman Islands took no account of the proposals from local groups (fishing clubs, concerned groups, mana whenua) for locally driven specific management which would make a difference to the environmental health. The high kina numbers occur even in the present reserves and the idea that there will be an increase in

commercial crayfish take from this part of the Coromandel is not at all consistent with the objectives set for the HGMP.

Summary and Recommendations

There is not sufficient data and too many uncertainties to make short- or long-term decisions on crayfish quotas. There is a need to take a precautionary approach for CRA2 and the TACC should not be changed until we have the full understanding based on stock surveys in 2025 and results from other work on the likes of kina barrens. We are not all clear how stocks are really tracking and kina barrens and low numbers continue to be a concern to some areas of the east coast. The HGMP extends as far south as Whangamata on the east coast yet most of the work is in the Hauraki Gulf. There is a critical need to build stocks of crayfish along the east coast of the Coromandel if we want to control kina populations, not increase the take as proposed by FNZ.

We fully support the recommendations proposed by the NZSFC as follows:

- No increase in the TACC for commercial fishers (Option A1) until at least 2025/26 when we will have more information to base decisions.
- An assessment be made of where there are subareas with low crayfish abundance and issues with kina barrens i.e Option B2 but expanded to other areas where3 closures may be needed. Consider increasing commercial kina take to better control kina, including in HPAs (such locally driven management approaches were recommended in our submissions but rejected by the Bills select committee).
- Greater use of independent scientific studies on abundance, sustainable levels and appropriate targets.

In addition, we want to see:

- A more holistic approach which covers the likes of crayfish, kina and snapper as these are linked in the food web.
- Smaller areas defined and assessed than CRA2, in closer consultation with local recreational fishers and mana whenua.
- We are not convinced there is a good case at all for increase in commercial quotas, noting most are exported. We need to learn lessons from the recent scallop closures that were implemented because stocks were virtually wiped out along our coast. We need more crayfish in the water not less.

Please keep us informed on developments with CRA2. Our primary contact is Dr Mark James markj@aquaticsciences.co.nz.

References:

FNZ (2024). Review of sustainability measures for spiny rock lobster (CRA2) for 2024/25.