

PAU2 INDUSTRY ASSOCIATION INC.

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CONSULTATION ON THE PROPOSED NEW INITIATIVES FOR 2004/05

The consultation document does a good job of outlining MFish deficiencies in implementation of the Treaty Strategy.

A similar outline is required of MFish deficiencies in carrying out effective compliance. It could easily look like this:

- Ineffective use of compliance resources
- Lack of strategic planning
- No underlying foundation of proven management regimes
- Compliance expenditure not linked by way of any cost benefit analyses
- Inappropriate expenditure by way of compliance output classes, thus isolating resources
- Inappropriate non-confrontational policy decreed by head office
- Poor resourcing of front line fishery officers

However, such an outline is missing from the New Initiatives document so it appears that paua and rock lobster will continue to be plundered by poachers and the fishing industry and public of New Zealand will continue to loose out to fish thieves.

Sustainability will be threatened, capital will be lost through resultant quota cuts, annual income will be lost through loss of ACE, quality of fishing experiences will be diminished, stakeholder tensions will raise, jobs will be lost, and the government will receive reduced tax revenue.

The status quo for the Ministry of Fisheries Compliance unit is not a viable option and when in the world will the Ministry finally realise this? The unit is dysfunctional and requires a complete restructure including a clean out of its governance. The status quo is costing this country tens of millions of dollars every year. This is a national scandal and this Association is determined to get fisheries compliance fixed, one way or the other.

1. Health and Safety – Compliance Field Communications

We support this initiative but note that the reasoning is related to “*today’s more sophisticated criminal environment*” and due to “*field officers working in remote locations and in an environment which, in general terms has become more aggressive and threatening*”.

Such reasoning clearly puts the need for this initiative in the black market and poaching silo and therefore should not be cost recovered from industry.

2. Improved Information on Marine Recreational Fishing

We support this initiative.

3. Serious Offences Unit

We do not support this initiative. Compliance expenditure on the commercial sector is already way out of balance with that spent on black market and poaching. The compliance unit provides no data (even when repeatedly asked) on levels of offending in the commercial sector. There can be no justification for additional resources to go anywhere except towards curbing the rampant and totally out of control poaching of the paua and rock lobster resources.

4. Corporate Infrastructure Projects

We support this initiative particularly if the glaring deficiencies of the compliance unit are to be (and they must be) targeted as a triple ‘A’ priority. Common best practice business principles and proven management regimes such as cost benefit analysis and strategic planning are completely lacking. Similarly, communication between the compliance unit, science unit and fisheries managers is nonexistent and must be addressed if the purpose of the Act is to be upheld.

The compliance unit is oblivious to the need for external communications and pleas from the fishing industry to work constructively together are being immediately and summarily dismissed. As the resolution of under and over recovery of cost recovery levies show, joint Industry/Ministry initiatives can be highly successful. There is no reason that this success can not extend into the arena of compliance.

5. Initiatives not to be further considered in 2004/05

What rationale is the Ministry using in its decision to not consider Poaching and Black Market Enforcement and who provided it? Does the Ministry realise that its continuing abject failure in compliance places the Ministry and the Minister in a position of failing to carry out the purpose of the Fisheries Act 1996?

PAU2 Industry Association

Ed Arron
Chairman