

SUBMISSION ON CONSULTATION DOCUMENT ON FISHERIES RESEARCH SERVICES PROPOSED FOR 2004/05 AND 2004/08 STATEMENT OF INTENT INCLUDING OUTPUT PLAN FOR 2004/05

Area 2 Inshore Finfish Management Company Ltd
P O Box 1304, Nelson
Ph: 021 552 543 Email: john@fiveoceans.net

20 February 2004

Re: 2004/08 Statement of Intent and Fisheries and Research Services Proposed for 2004/05

1. Area 2 is the Commodity Stakeholder Organisation (CSO) for the inshore east coast fishery of the North Island. Area 2 represents 97% of quota holders.
2. The Statement of Intent (SOI) states that “*A fisheries plan will contribute to fisheries outcomes beyond what the Ministry proposes achieve through a stock strategy*” (page 25).

Area 2 is unclear as to whether or not a stock strategy is sufficient to ensure sustainability of a particular stock. If a stock strategy is sufficient to ensure a sustainable fishery, why would a CSO contemplate a fish plan? Please note, Area2 supports the concept of increased stakeholder participation in fisheries management but has to be realistic about its ability to finance the increasing demands for consultation by AMAs, marine farm applications, customary rights and recreational fishers.

Area 2 suggests that the distinction between a stock strategy and a fish plan be clarified.

3. Area 2 notes that the “...*new [framework] approach requires MinFish to develop stock strategies for all species and if requested by stakeholders, to assist them in the development of fisheries plans*” (page 24). The new fisheries management approach goes on to describe that “*Incentives and opportunities will be provided to enable stakeholders to optimise preferred outcomes...*” (page 25).

Area 2 would like to see more detail on what such incentives will be, and in particular, how a CSO will achieve reduced cost recovery levies should they decide to invest in developing fish plans.

4. Area 2 notes that there are significant overlaps between the environmental projects being levied across many fisheries by the Ministry under the umbrella of Aquatic environment research, and the Department of Conservation (DOC) work carried out under the Conservation Services Program (CSP). Responsibilities and boundaries for sustainability issues relating to threatened species must be clearly spelled out. It is a waste of time and money to have two government departments researching and providing services for the same thing. Start talking to each other on this one!

Area2 would like to see a rationalisation of interests between DOC and the Ministry of Fisheries.

5. Area 2 wishes to see funding for the project SNA2004/04 (Estimation of SNA2 year class strength) include a contribution from the Crown on behalf of customary rights and recreational fishers who have access to 30% of the TAC. As is typical for many inshore species, the commercial sector is levied to provide stock assessment research and sustainability information and other users obtain significant benefit of this research.

Area 2 believes that associated with customary and recreational rights are responsibilities to contribute to information about sustainability. A financial contribution must be made by all users if this project goes ahead.

6. Area 2 notes that the cost of SNA2004/04:Estimation of SNA2 year class strength is estimated to be \$50,000 - \$100,000. This is a straightforward shed sampling project, nothing new involved, and should be able to be carried out at a cost much less than \$50,000.

Area 2 believes the estimated cost, \$50,000 - \$100,000 is excessive.

Thank you for considering these comments.

Kind regards

John Reid,
Executive Secretary
Area 2 Inshore Finfish management Company Ltd,