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CEO and Minister of Fisheries,
Ministry of Fisheries

**Fisheries Services Proposed for 2004/05: Privatisation of
Fisheries Management and Research continued.**

Thank-you for the opportunity to make submissions on this document.

PART I: KEY ISSUES AND INSTITUTIONAL ARRANGEMENTS, PAGES 3-80:

We welcome moves to increase attention to the environment and the impacts of fishing. We agree that fisheries standards need to be developed, and we welcome moves to consider how fishers can face the onus of proof that they will avoid, remedy or mitigate adverse effects of fishing on the aquatic environment.

These moves however are fatally undercut by the intention to devolve to fishers fisheries management and research. The Ministry seems to take as an article of faith that such a move will improve fisheries management. Nowhere have they provided evidence, authority, or argument for this contention – except for references to Sutinen’s work and suggestions that the “contractual clubs” of fishers that the system is designed to deliver will improve compliance.

The problem is that the central question of “compliance with what?” seems to be fudged. It should come as no surprise that fishers will be more likely to comply with rules that they write for themselves – and into which all others are placed as supplicants whose pursuit of the public interest is demoted from that of equal citizen before the government, to unequal supplicant before the most powerful and well-resourced vested interest who holds the pen.

Our unanswered concern remains that the economic incentives dominant in all but a few inshore fisheries will be for “mining” of stocks – and that is exactly what both standard economic theory¹ the evidence² suggest. Except under the relatively uncommon circumstances of high productivity and fast growing stocks with expectations of future increases in net capital value in the sea being greater than the returns from “mining” the resource now, the Quota Management System does not relieve the incentive to over-harvest.

¹ See for instance Pearce, D W & R K Turner (1990) Economics of Natural Resources and the Environment. Harvester Wheatsheaf, New York, chapter 16).

² See the stock assessment records for the predominant commercial stocks.

The QMS does not either, reduce incentives to externalise environmental costs. All it does is to give incentives to take control of decisions and to reduce over-capacity. The Ministry has made no case to counter our concerns.

We want to make it clear too, that we will not tolerate the need to internalise externalities being used as an excuse by the Ministry to devise and promote industry property rights to space at sea. The current property rights do not have such an element, and neither should they.

The cases where it is likely that there will be enhanced compliance are those where rules are set and enforced by a relatively small and cohesive community located close to the resource with many ties to each other and who value the long term existence of the resource.³ This would be so in the case where there are short-lived animals, which grow relatively quickly or in other respects have increasing future expected net capital value compared to the present and financial returns.⁴ The most likely group that would have these characteristics are small coastal communities and hapu. Footloose communities such as commercial corporates not particularly tied to their communities would not have these characteristics; neither would deep sea and other low productivity fisheries.

The evidence of the last 18 years – 21 if we include the deep-water QMS trial launched in the 1983 – is unequivocal: there have been on-going over allocations of TAC and TACC, most of this under sustained pressure for such from the industry which has pressured scientists, managers and ministers to do so. The “cute” requests for reductions and shelving of late are political theatre or have the effect of misleading the financial sector. They do not detract from the overwhelming conclusion that the industry has exerted sustained and significant pressure for over allocation. Such over-allocation has resulted, but not to the extent it would have done if the industry themselves had control.

It is our view that the moves by the Minister and Ministry to devolve fisheries management and research to the fishers – principally commercial fishers given the transactions costs that face other parties – lacks any legitimacy and is simply yet another version of the “Project X” agenda of devolution launched in secret after a secret compact between certain Ministry officials, commercial fishing interests and John Luxton.

It has been countered that setting standards will allow for fishers to simply meet performance standards their own way and to exempt the Ministry and Minister from the “bog” of regulations and controls that they have to administer, and the legal actions that result.

It is our contention that these problems could be addressed by a combination of socially developed performance standards and publicly administered and developed fisheries plans. If the public, and significant non-commercial interests, were provided with capacity building assistance such a process would have some degree of robustness and legitimacy.

The Minister and Ministry ask us to take their analysis that devolution will work on trust. Since neither the empirical record nor the theory of dynamic optimisation by commercial harvesters provide any support for the Ministry’s faith, we do not trust their proposal. The proposal is analytically and empirically unsound. Further, we consider that the Ministry

³ Ostrom, E, (1990) *Governing the Commons*.

⁴ See Pearce and Turner, *ibid*; Ostrom, E, (1990) *Governing the Commons*.

remains significantly captured by the fishing industry. The fisheries plans and related devolution proposals lack empirical, theoretical or democratic legitimacy.

It is unfair and unreasonable of the Ministry and Minister to proceed with this effective privatisation of fisheries management and research knowing full well that there is still no provision for public input and that most non-fishing interests and indeed most Maori and recreational fishers will be unable to participate due to the very high transactions costs that the fisheries plans will engender.

It is fundamentally unsound and undemocratic to hand the pen on fisheries planning and the commissioning and defining of research to private, largely to commercial interests, who have strong incentives to disregard other's interests and the *in situ* value of fish in the sea, the environmental impacts of fishing and so on.

We doubt the Ministry's commitment to serious environmental impacts control or to effective environmental management – so we are not reassured by the notion that the empowering of the strong and powerful vested interests at the expense of other citizens, the environment and the future will be effectively off-set by the standard setting and matching requirements. The standards are likely to be weak, the pressure to approve poor plans significant. Far better not to give such strong vested interests such enhance power and control. These standards and the “Yes/No” and no changes to the plan will be a fragile and vulnerable arrangement for any protection of the marine environment and fish stocks.

Under this proposal Ministry and Minister are ultimately accountable – but that is not true of the fishing industry in any due process sense, except for the “hinge-point” binary Ministerial decision of “Yes/No” to a proposed fisheries plan.

This end of process “Yes/No” decision will prove to be a controversial decision. The pursuit of full agreement by the industry has led to the notion that the “negotiated contract” must not be changed: but that pursuit of buy-in by the industry players will be at the expense of the rest of us, who are to be disadvantaged by handing the pen to the powerful. The rest of us will be easily disregarded – and the Ministry's own papers in the past make it explicit that lack of agreement from some stakeholders will not be fatal to any plan.

The Minister may not change anything – all that can be done is a yes/no. The pressure from powerful well-resourced industry on officials and the Minister will be intense – and industry, officials and others will rely on asymmetric information and resources to ensure that the “special interest effect” prevails. A “special interest effect” is when a decision that is negative for society will prevail because of the rational ignorance by the many because of information and transactions costs. The special interests – the commercial players – will pressure officials and the Minister with a variety of threats and other incentives, so that their wishes prevail.

Any reasonable institutional analysis of the proposals, both from the “Public Choice” framework and from the democratic legitimacy tradition lead to the rejection of the underpinning institutional arrangements in the Ministry's intended direction.

You have no right to ignore the legitimate expectations of the rest of us to have input to an authority, which ought to have a genuine interest in all the social values that are at stake. You

have no right either to pretend that the transactions costs are not fatal for the engagement of non-commercial interests in the processes that you plan.

We have said all this to you before: it is not as though we have just come up with these concerns at the last minute. You know what these concerns are, you have done nothing at all to address them. You do not have our confidence as neutral officials with intent to give effect to the Purpose of the Fisheries Act 1996. Rather, it is clear that you want a quiet life – to be rescued from the on-going litigation of the industry, that the Ministry’s sympathies reside with the industry and that you have little concern for democratic legitimacy or non-harvesting concerns.

No one in the terrestrial context would accept that developers should write District Plans or Consent conditions. Neither would anyone accept polluters commissioning or doing the research to underpin pollution control, as well as defining the problem.

We do not accept your premises or your solution. We do not accept your institutional proposals. What you want to do is to privatise fisheries management and research – we will take that proposition to the public since you have again ignored us when we made submissions on the Statement of Intent.

PART II: MORE DETAILED ANALYSIS

Declaration of Responsible Minister and Chief Executive

We note that although New Zealand’s officials and fishing industry have cultivated the international community’s mistaken belief that the NZ QMS has been a success, the reality is that the only success has been the accretion of power and wealth to those who were grand parented quota and who have dominated decision making and the institutional design of the QMS. Fish stocks have not been well served, nor has the environment, nor have most public interests.

Page 7 Fisheries Intervention Plans. We disagree with the language here, which seems designed to convey the idea that the government has no business to be involved with fisheries plans and in doing so is “intervening” in the presumptively private activity of fisheries planning. We reject this language and any such imputation.

Page 15 New Policies

We would like to see environmental damage caused internalised, but we are alive to the fact that this call is being used by some in the commercial industry to try to assert and gain *de jure* or *de facto* property rights to marine space &/or environmental qualities. We find these attempts both intolerable and greedy – and in the light of the denial of claims to the seabed and foreshore unacceptable. We are very alive to the support for these commercial aspirations offered by certain particular and senior officials – this favouritism to the industry at the expense of the rest of society must be stopped. Again, there is a serious problem with the pursuit of these privatisation agendas by the industry assisted by officials – and we urge the Minister not to fall for this, however beguiling the case made.

Page 16 Civil Action

The notion on the top of page 16 that protection of the environment be achieved via civil action is flawed. First, all the well-analysed problems of free loading apply. Those who endeavour to protect the interests of the future and non-humans can never be repaid by them. Those replete with the resource rents of private gains from fishing will always have many

resources with which to combat the guardians who may, on their slender resources, try to take action.

Any system such as civil action that relies on the pretence that poorly resourced guardians of common goods (non-rival and non-exclusive benefits) will be effective at protecting the environment from the impacts of mobile, footloose, resource rent rich harvesters, is a sham. Such market failures are precisely the rationale for government action. Neither officials nor the Minister should shirk these duties.

Page 16 The burden of Proof

We support the reversal of the burden of proof – but only if the proof is to the community and public authorities who have the right to reject proposals, and a capacity and capability of fisheries management and research that is independent of scientists and others who otherwise depend on fishers for their livelihood and institutional support.

Page 17 Certification of NZ Fisheries: a devalued currency

The MSC certification of fisheries had merit as an idea and we went into those processes in good faith. The devaluation of the currency of that certification scheme by the hoki certification and others around the world has been disastrous. The flight of ENGO support from MSC is significant – as reported in *The Guardian*⁵.

Page 17 _Other New Policies to be Developed

Most of these seemed aimed to simply further enhance the rights of the harvesters at the expense of the rest of us, and we do not support these.

We do however support continuance of the Oceans Policy and provision for public input into fisheries management – though we believe it quite possible that Min Fish’s input to the Oceans Policy may well be to the detriment of the environment.

Other elements of this list are so summary as to be too cryptic to comment on.

Page 18 Organisational Initiatives

We are struck by the mismatch of the lofty sentiments and the actual appointments of some of the key staff – who have served simply to reinforce the narrowly focussed, market values-are-all-that-matter, pro industry disposition of the Ministry and its policies. If only what you have written truly matched what you do.

Page 19 Effective Relationships

The Ministry’s relationship with environmental stakeholders will remain poor as long as the Ministry continues to promote industry in particular and harvester interests at the expense of the environment, the future and the public interest. Your institutional redesigns further entrench what are already deeply unfair processes and biased interpretations both of the Fisheries Act and the law. We continue to have little confidence in the Ministry and our confidence in the Minister will continue to be seriously harmed by the continuance of those agendas and institutional moves to hand power and control to the fishers.

⁵ 21 2 04 “Crisis of Credibility for Green Fisheries: Drastic Reforms Urged to save Watchdog from Collapse, by Paul Brown, Guardian, London.

Page 20 Why fisheries Need to be Managed – BUT NOT by the Industry

There is an elementary and glaring flaw in the first paragraph of the page under the heading above. Garrett Hardin’s “Tragedy of the Commons” title and thesis has long, long since been re-diagnosed as a tragedy of open access. It is NOT a tragedy of the commons as such. There is no theoretical or empirical case for considering that fisheries or any thing else should not be managed as a commons. The issue is rather that open access should be denied. There are many, many cases of successful management of commons (and others of failure). The issue is the quality and legitimacy of the rules and the institutions and decision-making frameworks, enforcement etc.

As Bromley says:

“The fallacy in traditional approaches to the commons is that writers have failed to understand the concept of property, they have very often treated a particular natural resource as if it had inherent characteristics that suggested it would everywhere be controlled under a particular type of property regime, and they have invariably failed to learn that the world is replete with reasonably successful common property regimes.” Daniel W Bromley, (1991) *Environment and Economy: Property Rights and Public Policy*, Blackwell, Oxford.

The point has been made many times in the literature that Hardin had it wrong. He correctly observed the problem but incorrectly attributed the problem to common ness of management or ownership, rather than the lack of effective controls on access.

It is alarming that the Ministry should make such a long-refuted mistake – and if this is the foundations of the Ministry’s analysis then, it is little wonder both that it is mistakenly pursuing privatisation into individual private hands and that it has got so much wrong.

Page 21 – Frameworks to Grant Access

We note yet again that neither efficiency nor equity can possibly be achieved when the Ministry fails to provide for *in situ* values of fish. The Ministry is again, in reality, only the **Ministry of Dead Fish.**

Page 21 Frameworks Designed to Limit Access to Fisheries

The claim “The QMS, which ensures fish stocks are conserved for use by future generations” is untrue and contradicted by the facts of the dismal fish stock “tobogganing” graphs that show the QMS has manifestly failed to protect whole sets of fish stocks, especially the vulnerable long-lived and slow growing species. That the Ministry should continue to peddle this assertion in the face of the evidence of the collapses of the orange roughy stocks testifies to the power of the Ministry’s own myth-making and the lack of rigour or integrity of the Ministry’s claims. If the Ministry were operating under the Fair Trading Act, we would take you to court for your misleading claims. **The Minister should note the continued unsupported and untrue claims made by the Ministry, and should demand that these be withdrawn.**

The subsequent sections to page 23 are largely covered by the comments made in our generic comments above. We urge you to ditch the “naïve property rights” approach in favour of a richer, more encompassing analysis.

Page 24 – New Fisheries Management Approach

Your performance standards are too low – and you seem to have forgotten that you must “avoid, remedy or mitigate any adverse effects of fishing on the aquatic environment” – it is not enough to simply “not exceed a specified level”. It may be that some effects are not tolerable at all and must not be allowed.

Bullet point 2 on page 25 is poor – efficiency is not the only criterion – what about equity, reliability, etc? There is no hope of efficiency as long as fish are regarded as good only for harvest.

We note that you omit the opportunity for the public to be consulted and there is provision only for the representatives of certain interests to be consulted.

The Ministry says: “The standards framework will be enabling in nature rather than documenting prescriptive requirements”. What does this mean? That there will be no standards to be met, or that the standards will be set but the means of meeting these will not be prescribed? If the former, then we have to suggest that this is not acceptable. In the latter case, there will always be some prescriptive and proscriptive regulations needed, but within that space, we accept that undue prescription is unhelpful. What is "undue", however, needs careful attention.

The suggestions that value will be maximised via a fisheries plan, when non-harvesting values are ignored, is nonsense. The institutional arrangements will consistently cause non-harvest values of fish and the values of the environment to be disregarded and degraded.

Page 25

The allocation of rights

The analysis under this heading is particularly shallow and at times specious. The allocation of private rights as planned provides an incentive to maximise the private rights – but NOT to ensure sustainability. There is nothing in the theory or the 18 years of empirical experience to support the claims made. The incentive is to externalise costs, to capture private benefits in a myopic manner that disregards the interests of non-harvesters, non-humans and the future.

Page 26 Participation in Management

“Supporting the formation of representative stakeholder groups” looks good at first glance – but we know that this is really intended only to mean harvester groups. Environmental groups already exist but need support to engage in the processes envisaged by the Ministry. Failure to provide support will result in marginalisation of environmental concerns through this mechanism, further loss of legitimacy for the Ministry. Political action and action to inform consumers and others as to the real environmental damage caused by fishing in New Zealand will be our only remaining recourse.

Page 28 Fisheries Intervention Plans

We note again our rejection of your language of “fishery intervention plans”, as covered above. We hope that any determination of regulatory action will be by the government, not by fishers.

Page 31 & ff: Ministry’s Outputs to achieve is contributing outcomes

We deplore the Ministry’s failure to actually set outcome targets for the fish stocks and the protection of the environment. The Ministry seems not to have emancipated itself from

its output planning – outcomes remain out of focus for the Ministry – and seemingly the Ministry’s tradition of being largely uninterested at a senior level in the fate of the fish stocks and the environment will continue. We find this immensely disappointing and suggest it fails to understand the whole move by SSC and others to focus on outcomes.

We note the lack of any inclusion of policy research. This however is consistent with the Ministry’s behaviour.

Policy Implementation

It is unlikely that the Ministry will have the capacity or capability to rely effectively on standards. The Ministry would be very unwise to rely solely on standards.

Policy Monitoring

We understand that the Ministry for the Environment has largely shelved or abandoned its environmental indicators programme – so which indicators does the Ministry of Fisheries intend to use?

Measuring Progress

Aquatic Environment

The list of indicators in the Figure on page 35 is particularly worrying. We do not accept these indicators properly reflect the purpose of the Fisheries Act 1996.

The indicators on the first column under Aquatic environment have virtually no ecological systems health indicators. There is no consideration of range, resilience, complexity of community, or biodiversity.

There is no measure of damage done by fishing, apart from % of stocks at or above an unspecified target level.

What about those below the target and the degree to which they have declined?

We support the inclusion of marine protected areas and marine reserves as indicators and hope, against our experience of the Ministry, that it will regard more as better rather than the converse.

Best Value

The indicators show bias of lack of any non-harvest value. Non-market values are ignored; there is no recognition either of cultural value, ethical values or the like.

There is no provision for consideration of the value of fisheries resources to the future.

The list of “Value” measures provides for significant double or multiple counting. It fails to distinguish changes in stocks from changes in flows. It does not measure the value gained or lost of natural capital. It should. It does not measure the non-market values for recreational or customary fishers or for others.

Treaty

The indicators of Treaty obligations fail to recognise the Treaty obligation to provide for the protection of the marine environment, of water and its intrinsic qualities. There is no

indication of how “catch by customary fishers” will indicate Treaty compliance. Share by Maori, management roll of Maori and so on are likely to be important indicators.

Protecting the Health of the Aquatic Environment

The 18 marine reserves are tiny and insignificant against the damage wrought by fishing.

The closure of the 19 seamounts is welcome but far from adequate. Fishing had already significantly damaged some. Collectively they account for only 2.5% of the total area of the EEZ and of the number of seamounts. That is not good enough.

The list does not set any targets – it does not chart any future action by the Ministry.

The list is notable for its failure to comment on the manifold threats to the environment and adverse effects of fishing – and makes no attempt to signal the areas of intense need for protection.

The levels of seabird deaths in the New Zealand tuna fisheries remain high.

Enabling the best value from fisheries

See our points above.

The Ministry is again relying on Fishing Industry figures without putting the basis for these up for debate or scrutiny. We regard this simple-minded faith as being in stark contrast to the rigour of the stock assessment processes. We do not accept these figures as accurate, absent any disclosure as to how they have been arrived at – even if they have been “recycled” through Statistic NZ.

The Ministry should nominate its sources and disclose the evidence that it relies on for its selective claims on Page 36. There is again no mention of non-market values, or the damage done to these by fishing, of the loss of environmental quality and capital.

There are many dimensions to a healthy environment that are not captured under the heading “healthy environment” on page 36.

Page 41 Consultation

The so-called principles on page 41 read like a partial and incomplete account of a legal opinion on consultation.

It must surely be that the starting point for the Ministry must be its statutory duties to consult. There is no reference in the Principles that the Ministry intends to adopt, either to its statutory duty to consult (in the Fisheries Act, s 12 for instance) or to well-established case law, in particular to the *International Airport v Air New Zealand* case. That case makes it clear that consultation requires an open mind (a bit of a hurdle for the Ministry of Fisheries?); sufficient information and time for those consulted to form their views; and so on.

We find it astonishing that the Ministry does not refer to those elements or to its statutory obligations in this section.

We reject emphatically the suggestion that the standard for consultation should be that stakeholders should have an interest greater than those of the general public. The fisheries are common heritage of all. We are all stewards of the fisheries. Those who wish to take are not somehow more entitled to be heard than those from whom the fish and environmental quality are taken.

Revised Cost Recovery business Processes and impacts on Consultation

We wish to re-emphasise the point made at the consultation meeting, that the redesign of the Ministry's business processes and functions, including Fisheries Research Services Observer services and compliance activity are of interest to all stakeholders and should not be consulted on solely within the confines of the Cost Recovery Processes. All of these have implications for the environment and we must be invited to such consultations.

The Ministry is not entitled to confine its consultation to "affected" stakeholders (p 43).

Page 49 International

This table has a significant bias towards use – it should provide "that any use is sustainable".

We wish formally to request that the Ministry of fisheries commit to consultation with all stakeholders and interested public on the formation of New Zealand's position at international meetings, whether or not they are part of delegations. Further, the Ministry should hold debriefing meetings in which the outcomes and processes of the meetings are reported and discussed.

Output 13 The Biodiversity performance expectations are too blunt and too unformed. What are these standards? Achievement of biodiversity protection is not simply a matter of percentages – significance and risk are important characteristics.

Page 53 Utilisation and Sustainability of NZ's Fisheries Resources Measured

The stock measurement is necessary but not sufficient.

Pages 31, 32 and following.

The specification of % achievement of targets is largely meaningless in the absence of any measure of the significance of the % unachieved, or of the targets themselves.

As at the beginning of this submission, we continue to disagree with the ministry on its outputs and explanations in this section **Utilisation and Sustainability Reported**. We continue to disagree with the Ministry's fixation on stakeholder (= harvester) fisheries plans.

As before, we want to be included in the development of NZ's positions on international agreements and meetings. The Ministry of Foreign Affairs and Trade and other agencies such as DoC do this routinely, so the Ministry of Fisheries should also include us.

Page 74 Biosecurity

We are struck by the paucity of activity under this activity.

Biodiversity

We deplore the lessening of effort on biodiversity research and protection – such as it has been.

Thankyou for the answers to our questions. We note that there are a number of matters that we may wish to comeback to you on about which we have not had time to form a view. We note that there is one question to which you have not given us an answer. We await your answer and will respond when we have it.

You promised that you would provide us with the “New Initiatives” proposals for consultation before this was due – in fact you said early January. We have not seen these. We want to. Please advise whether these are now available and if not, why not. Is there now a policy to restrict disclosure? Who has instituted this?

We will send you further comments from the ecowatch address.

Yours sincerely,

Catherine Wallace

FISHERIES RESEARCH SERVICES FOR 2004/05

PROPOSED PROJECTS FOR 2004/05

The research services proposed for 2004/05 are supported but we are concerned at the narrow range of projects, poor range of aquatic environment projects, and the failure of the Ministry to implement the results of many projects. The Ministry should promote:

1. The need for more aquatic environment research: The Ministry is still not responding to the report of the Parliamentary Commissioner for the Environment on “Setting Course” and Section Five of the Fifth Report to Parliament for 1999 of the Controller and Auditor General. Both reports stressed the need for more research on the aquatic environment and the adverse effects of fishing on it, as well as on the matters in the Environmental Principles, section 9.

Of the 10 Aquatic Environment projects that produced 1 pages only 5 projects were accepted by the managers and proceeded to the Research Co-ordinating Committee and into the proposed fisheries research projects for 2004/05. Other projects rejected included impacts of mobile bottom fishing gear (three projects including one shellfish project), framework for ecosystem modelling, and impact of fishing on demersal fish populations. The Ministry has yet to adequately fund or give high priority to the impacts of fishing on the aquatic environment.

2. More research on new species recently added or to be added to the quota management system.
3. Greater observer coverage. We supported moves 2 years ago to increase observer coverage to assessed sea bird captures in fisheries. We are disappointed that this increased observer coverage is not included in this year’s business plan nor is it commented on in this research plan.
4. Greater assessment of non-fish by-catch in fisheries: We are opposed to a change to biannual assessments of fur seals.
5. If research is not carried out into a fish stock then a management response consistent with precautionary management should be to reduce catch limits.

Our Ranking System:

Our priority ranking system is based on 5 points:

- 4-5 - high priority
- 3 - medium priority
- 2- low priority - could be deferred to a future year.
- 0-1 - Of doubtful scientific merit

We have also included a commentary on some of the projects.

DEEPWATER FISHERIES

<u>Code</u>	<u>Title</u>	<u>Priority</u>	<u>Our Priority</u>
ANT2004/01	Characterisation of the toothfish fishery	High	5
ANT2004/02	Aspects of the biology of fishes in the Ross Sea toothfish fishery	High	5
ANT2004/03	Seabird and marine mammal interactions with the Ross Sea toothfish fishery	High	5
ANT2004/04	Stock Assessment of toothfish	High	5
ANT2004/05	<p>Modelling of the ecosystem effects of fishing in the Ross Sea</p> <p><i>Internationally the Ross Sea has been recognised as a special area (see report of the Worlds Parks Congress IUCN 2003). If fishing continues in the Ross Sea then it is critical that the impacts of fishing on the marine environment is well considered.</i></p> <p><i>These projects should be cost recovered from Antarctic fishers.</i></p>	High	5
OEO2004/01	Estimation of the abundance of black oreo and smooth oreo in selected areas	High	5
OEO2004/02	Oreo stock assessment	High	5
ORH2004/01	Estimation of the abundance of orange roughy in selected areas	High	5
ORH2004/02	Orange roughy stock assessment	High	5
ORH2004/03	Stock assessment of orange roughy fisheries outside the New Zealand EEZ	High	5
OBS 2004/01	<p>Research Observer Days – Deepwater fisheries</p> <p><i>This project is support but additional observer coverage should be considered.</i></p>	High	5
OBS 2004/02	<p>Research Observer Days - Antarctic</p> <p><i>This project is a requirement of CCAMLR conservation measures.</i></p>	High	5

HOKI AND MIDDLE DEPTHS FISHERIES

<u>Code</u>	<u>Title</u>	<u>Priority</u>	<u>Our Priority</u>
HOK2004/01	Hoki population modelling and stock assessment <i>We welcomed the inclusion on objective 2 – the investigation of prediction of year class strength from environmental variables. This is a crucial aspect for future management of this fishery.</i>	High	5
HOK2004/02	Estimation of hoki and middle depth fish abundance on the Chatham Rise using trawl surveys	High	5
HOK2004/03	Estimation of spawning hoki biomass using acoustic surveys	High	5
HOK2004/04	Estimation of mortality of juvenile hoki <i>This project should continue. We do not support MFish projects being replaced by industry controlled research.</i>	High	5
HOK2004/05	Stock discrimination of hoki <i>Note: Four hoki projects were not included in the RCC assessments.</i>	High	5
HAK2004/01	Stock assessment of hake	High	5
LDO2004/01	Age and growth of lookdown dory	High	5
LIN2004/01	Stock assessment of ling	High	5
MDT2004/01	Estimation of hoki and middle depth fish abundance on the Southern Plateau using trawl surveys	High	5
MID2004/01	Determination of catch at age in hoki, hake and ling fisheries	High	5
MID2004/02	Catch sampling and ageing of hoki and ling in the Cook Strait fishery	High	5
SBW2004/01	Stock assessment of southern blue whiting	High	5
SBW2004/02	Biomass estimation of southern blue whiting using acoustic surveys <i>Assessment of SBW management strategies was not included in this year's proposals. Further work on management strategies should be included in research projects.</i>	High	5
OBS 2004/03	Research Observer Days – Hoki and middle depth fisheries <i>We support this project but increased observer coverage is necessary so that non-fish bycatch can be more accurately assessed.</i>	High	5

INSHORE FINFISH FISHERIES

<u>Code</u>	<u>Title</u>	<u>Priority</u>	<u>Our Priority</u>
BUT2004/01	Characterisation of the Cook Strait butterfly fishery	High	5
EEL2004/01	Recruitment of freshwater eels	High	5
EEL2004/02	Monitoring commercial eel fisheries	High	5
EEL2004/03	Wairewa customary eel fishery	High	5
EEL2004/04	Longfin eel population modelling <i>We strongly support research into the threatened longfin eels. We are concerned that the proposals to look at sustainability of eels in lakes and wetlands was not deferred.</i>	High	5
INS2004/01	Validating bluenose and rubyfish ageing using radiocarbon dating	High	5
INT2004/01	Estimation of inshore fish abundance off the west coast South Island using trawl surveys <i>We look forward to the development of future trawl surveys in other areas. This includes the reinstatement of the Southland trawl survey.</i>	High	5
SNA2004/01	Snapper population modelling and stock assessment	High	5
SNA2004/02	Estimation of snapper year class strength in SNA 1	High	5
SNA2004/03	Estimation of snapper year class strength in SNA 8	High	5
SNA2004/04	Estimation of snapper year class strength in SNA 2	High	5
SNA2004/05	Biomass estimation for snapper in SNA 1	High	5
SNA2004/05	Measurement of abundance of 0+ snapper in SNA8 <i>We support the development of this assessment method.</i>	High	5
STA2004/01	Stock assessment of stargazer in STA 7	High	5
STA2004/02	Relative abundance of stargazer in STA5	High	5
STA2004/03	Verification of growth zones in stargazer otoliths	High	5
TAR2004/01	Stock assessment of tarakihi in TAR 7	High	5
TAR2004/02	Relative abundance of tarakihi in TAR 1	High	5
	<i>1. We look forward to future proposals for observer in inshore fisheries. 2. We are opposed to the dropping of the spiny dogfish project. This is inconsistent with obligations under the NPOA on sharks.</i>		

SHELLFISH FISHERIES

<u>Code</u>	<u>Title</u>	<u>Priority</u>	<u>Our Priority</u>
COC2004/01	Stock assessment of Snake Bank cockles	High	5
COC2004/02	Stock assessment of cockles in Papanui and Waitati Inlets, Otago	High	5
COC2004/03	Stock assessment of cockles in Tapu Bay, Ferry Point and Pakawau <i>We support the cockle projects continuing on an annual basis.</i>	High	5
CRA2004/01	Main larval sources that support the red rock lobster fishery	High	5
CRA2004/02	Rock lobster recruitment <i>We strongly support this project and strongly urge this information be used more as an input into stock assessments. Currently this information is rarely used, in particular in forward projections.</i> <i>The rock lobster proposals are supported.</i>	High	5
GEN2004/01	Determination of age, growth rates and spawning events in shellfish using stable isotopes	High	5
OCT2004/01	Characterisation of octopus catches	High	5
OYS2004/01	Foveaux Strait oyster stock assessment <i>The proposal to look at factors affecting Bonamiosis in Foveaux Strait oysters should have been continued. This is a key issue in the management of the oyster stock. The assessment of closed areas must be part of any assessment process.</i>	High	5
PAU2004/01	Fishery independent survey of paua in PAU7	High	5
PPI2004/01	Stock assessment of Mair Bank pipis	High	5
SCA2004/01	Stock assessment of Coromandel scallops	High	5
SCA2004/02	Stock assessment of Northland scallops	High	5
SCI2004/01	Measuring the abundance of scampi	High	5
SUR2004/01	Characterising kina fisheries in Tory Channel, Marlborough	High	5
	<i>We note that:</i> <i>1. The project to assess horse mussels was axed despite it being a new species in the QMS;</i> <i>2. The impacts of shellfish dredging in two projects were not continued.</i> <i>3. The project to assess surf clams was axed despite it being new species added into the QMS.</i>		

NON-COMMERCIAL FISHERIES

<u>Code</u>	<u>Title</u>	<u>Priority</u>	<u>Our Priority</u>
AKI2004/01	Intertidal shellfish monitoring in the Auckland Fisheries Management Area	High	5
BCO2004/01	Abundance of blue cod around the Banks Peninsula	High	5
BCO2004/02	Abundance of blue cod off North Canterbury (BCO3)	High	5
PAU2004/02	Fishery independent survey of paua in PAU2, between Tirua Point and Patea River, Taranaki	High	5
REC2004/01	Estimation of recreational harvest of priority fish stocks	High	5
REC2004/02	Survey of marine recreational fishing in selected areas	High	5
	<i>We note that three projects have been removed from consideration. Two of these relate to assessing recreational activity in particular areas.</i>		
REC2004/06	Analysis of marine recreational diary data	High	5
REC2004/07	Catch and effort in marine recreational fisheries	High	5
REC2004/08	Indices of recreational fishing effort	High	5
	<i>We support the early development of standards and specifications for recreational fishing surveys which is supposed to be carried out via a workshop.</i>		

AQUATIC ENVIRONMENT

<u>Code</u>	<u>Title</u>	<u>Priority</u>	<u>Our Priority</u>
ENV2004/02	Estimation of New Zealand sea lion incidental captures in New Zealand fisheries	High	5
<i>ENV 2004/03</i>	<i>Estimation of NZ fur seal incidental captures in New Zealand fisheries.</i> <i>We are strongly opposed to the removal of the project to assess fur captures in New Zealand fisheries.</i>	<i>High</i>	<i>5</i>
ENV2004/04	Characterisation of seabird captures in New Zealand fisheries	High	5
ENV2004/05	Modelling of impacts of fishing-related mortality on New Zealand seabird populations	High	5
ENV2004/06	Assessment of Maui's dolphin – fisheries interaction	High	5
ENV2004/07	Investigating the effect of fishing on seamounts	High	5
OBS2004/04	Research Observer Days – SQU6T and SQU 1T	High	5
	<i>We strongly support this project.</i>		
	<i>19 further projects did not continue to this stage – this includes six which were axed just prior to the RCC. This does not show a strong commitment to aquatic environmental research projects. At the very least the projects deferred at the RPG stage should be reconsidered.</i>		

PELAGIC FISHERIES

<u>Code</u>	<u>Title</u>	<u>Priority</u>	<u>Our Priority</u>
EMA2004/01	Stock monitoring of blue mackerel	High	5
JMA2004/01	Stock monitoring of jack mackerels	High	5
JMA2004/02	Stock assessment of JMA1	High	5
KAH2004/01	Characterisation of the kahawai fisheries	High	5
KIN2004/01	Developing kingfish stock monitoring and assessment	High	5
STN2004/01	Movements of southern bluefin tuna	High	5
SWO2004/01	Stock Assessment of swordfish	High	5
TRE2004/01	Stock assessment of TRE 1	High	5
TRE2004/02	Stock assessment of TRE 7	High	5
TUN2004/01	Estimation of non-target fish catches in the tuna longline fishery	High	5
OBS2004/04	Research Observer Days – Pelagic fisheries <i>We strongly support this project.</i>	High	5
	<i>We note that three projects did not continue beyond RCC stage.</i>		

STOCK ASSESSMENT METHODS

<u>Code</u>	<u>Title</u>	<u>Priority</u>	<u>Our Priority</u>
SAM2004/01	Process based CPUE models	High	5
SAM2004/02	Optimal design in catch at age sampling	High	5
SAM2004/03	Catchability of trawl surveys <i>This project should continue.</i>	High	5
SAM2004/04	Medium-term research plan <i>We strongly support the development of a medium term plan for SAMs</i>	High	5

OTHER SERVICES

<u>Code</u>	<u>Title</u>	<u>Priority</u>	<u>Our Priority</u>
MOF2004/01	Stock assessment process	High	5
MOF2004/02	Scientific support for international obligations related to fishing	High	5
MOF2004/03	Technical input to policy advice	High	5
MOF2004/04	Socio-economic research	High	5
MOF2004/05	Estimation of customary Maori harvest	High	5

RESEARCH DATA MANAGEMENT

<u>Code</u>	<u>Title</u>	<u>Priority</u>	<u>Our Priority</u>
DAT2004/02	Research Data Management	High	5

The research data management and other services are strongly supported.