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## **P a u a I n d u s t r y C o u n c i l L t d**

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### **Submission on 2005/08 Statement of Intent**

**20 February 2005**

1. The Paua Industry Council Limited (PIC) represents the generic interests of the New Zealand paua industry. The shareholding of PIC is made up of five regional PauaMac's (Paua Management Action Committees) and these hold the mandate of each paua quota management area.
2. The Paua Industry Council (PIC) fully supports the submission made by the NZ Seafood Industry Council. We particularly support paragraph 17, as we too welcome a more collaborative approach between rights holders and the government in the development of fishery plans. We should note that we are beginning to witness this with involvement of Ministry personnel in meetings working on a PAU7 Fishery Plan. We applaud this commitment.
3. PIC also particularly supports paragraph 25 in SeaFIC's submission, which deals with initiatives to improve economic performance by (taken from SeaFIC's submission):
  - facilitating a cross-government approach to the identification and removal of legislative and policy impediments for the sustainable development of fisheries and aquaculture;
  - continued emphasis on increasing the efficiency and accountability of fisheries services provided by the government, and actively exploring opportunities for more efficient or effective service provision by external providers through more competitive or devolved services;
  - protecting and maintaining the integrity of the fisheries management regime and the incentives provided by secure commercial harvest rights (e.g., in relation to spatial encroachments on the exercise of ITQ rights);

- protecting and maintaining the quality of the aquatic environment in support of sustainable extractive use (e.g., in relation to poor water quality affecting aquaculture activities);
  - facilitating rights-holder responsibility for fisheries management within parameters set by the Crown through an agreed process
4. PIC (like SeaFIC) is in agreement with the general direction the Ministry is taking towards fisheries management but is very concerned that *“the move to objectives-based fisheries management underpinned by the assessment and management of risk”* runs headlong and head first into the Marine Protected Areas Policy. In fact, much of what the SOI document sets out to achieve will be simply undermined by implementation of the ad hoc policy of placing 10% of New Zealand’s marine area into protection.
  5. The fact that New Zealand has come to be an acknowledged world leader in the use of property rights to manage fisheries, coupled with the sustainability requirements of the Fisheries Act seems not to matter a jot. The truth of the matter however is that the implementation of the MPA policy will seriously undermine this world leading management system. The Minister of Fisheries can not assist in this implementation without seriously impacting on the objectives in the SOI. The simple oil and water analogy applies - the two do not mix. One undermines the other and this dichotomy must be spelt out to the government.
  6. PIC fully supports the new initiatives in Fisheries Enforcement, but the current way MFish Compliance operates must change. Real goals and targets must be set and met. For example, a good target would be for 90% compliance with recreational fishing rules. Similar goals and targets would need to be set for black market and poaching, customary, commercial etc. These would be reported on annually and the public of New Zealand could gain some confidence that their fisheries were being protected and at least a portion of their taxes were spent usefully.
  7. PIC would like to see some significant changes in the culture of the compliance managers. We are of the view that the top tiers of compliance management remain deeply entrenched in a pre QMS mindset that all commercial fishers are fish thieves. Additionally, these managers latch onto dubious snippets of ‘intelligence’, allow themselves to be blinded by misanalysis and launch ill-conceived operations on the commercial sector. This is neither efficient nor effective use of scarce compliance resources.
  8. PIC is fully committed to eliminate IUU fishing in the paua sector and wishes to work collaboratively with MFish Compliance at all levels. While the joint paua compliance working group has come up with some good strategies to combat IUU fishing, relationships at national level have not greatly improved with ingrained views of each other unfortunately remaining intact.
  9. Despite repeated submissions from the PAUA 2 Industry Association, transparency and accountability in Compliance is still not forthcoming. The Compliance Unit is still permitted to operate as a secret walled city, impervious to

even requests from MFish science managers requiring figures for IUU fishing so as to be taken into account for TACC setting.

10. The paua industry has campaigned for some time to have the constraint of compliance funding being isolated in specific silos (Commercial rules enforced, Poaching and Black Market etc.) lifted so that compliance effort could be targeted where the need was the greatest (e.g. Poaching and Black Market). We are now dismayed to learn that the Poaching and Black-Market budget has been considerably under spent! We believe this not only reinforces our view that senior compliance managers are stuck in a 1980's (commercially hostile) time warp but shows a serious lack of commitment to fisheries compliance full stop.
11. Under Output: *International fisheries policy advice provided*, PIC would like to see the Ministry working urgently to get clauses in all Free trade Agreements (and in particular the FTA with China) to deem trade in smuggled seafood illegal. This is a critical choke point and could hugely reduce the demand for poached paua in China. The current situation is that poached paua having reached China is freely able to be traded and that just fuels demand. This is a one off opportunity and should be pursued vigorously.