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**Submissions on:-
THE MINISTRY OF FISHERIES Proposals for Blue Cod
Marlborough Sounds**

Introduction: I have recreationally fished in the Marlborough Sounds since 1969 given one or two intervals of several years away from Marlborough. During that time I have served on the Marlborough Regional Development Council in the 1970s and attended Fisheries Liaison meetings both in Nelson and Blenheim. I served on the NZ Recreational Fishing Council as secretary and president in the 1980s.

Over the years, I have taken a keen interest in issues around recreational fisheries.

Comments:-

- I do not support the MFish proposals in the main.
- I have been very disappointed in the consultative process and in the poor basis for the ministry proposing such radical changes. Indeed it is very questionable the proposals have any justification.
- The proposals seemed based on an assumption/delusion/perception that the blue cod fishery is in crisis. In addition that perception is based on flimsy and meagre research. At the Waikawa meeting, a number of experienced fishers said there were more cod now than 10, 20 or 30 years ago. Their experienced anecdotal opinion should not be dismissed.
- MFish are probably not aware of the old adage, "Ten percent of anglers catch 90 percent of the fish." That adage holds for blue cod, slightly less than for a species such as kingfish or snapper, but nevertheless valid.
- The proposals in detail are poorly thought out and show a lack of understanding of the relationship between fish species and habitat environment. Blue cod do not generally inhabit, sandy, shallow areas. Therefore proposals to close areas like Tennyson Inlet, the Grove Arm and many areas of the Queen Charlotte Sound, are seemingly oblivious that it is not favoured blue cod habitat. Therefore in terms of blue cod, the closures lack benefit.
- There seems a lack of knowledge of the population dynamics of the Marlborough Sounds blue cod, e.g. when and where they spawn. Consequently the Ministry allows wholesale cod potting along Marlborough's east coast where the Sounds' cod spawn with the eggs consequently carried northwards, thus "seeding" the Sounds. (reference comments by knowledgeable recreational and commercial fishermen).
- The proposals lack understanding of recreational fishers targeting individual species, such as snapper, kingfish, kahawai, tarakihi and gurnard. The proposed closure areas by banning all "hook and line" fishing would bar those fishers targeting snapper, gurnard etc., who do not impact on cod because they are fishing non-cod habitat or are fishing mid-water or surface strata.
- The research is very suspect. On a map of cod pot sample spots I noted no samples was taken inside Dieffenbach Point, yet the plan seeks to close all that area inside Dieffenbach Point, right up Waikawa, Picton and the Grove Arm. In addition the samples were taken

on just a couple of days in September when the blue cod had migrated, relative to water temperature, to spawn in deeper water.

- The "research" that arrived at a 159 tonnes recreational catch is so flawed in its method and assumptions, based on counting boats at holiday time from the air. Estimates from experienced fishers, put a likely recreational catch at 40 tonnes.
- Before any regulatory measures are put up for debate, the Marlborough Sounds needs redefinition and designated as a Recreational Management zone. Boundaries should be realigned to take in the western side of D'Urville Island and down to the Wairau Bar as proposed by Soundfish, or even to Cape Campbell.
- The reduction in bag limit is ludicrous in view of the points above and because of the Ministry's failure to adjust the 20-bag limit that exists off the Sounds in Cook Strait. It should be six (6) blue cod everywhere.
There should be no increase in size limit. This is counter productive in that fishers will have to catch and release more to get the limit bag. In fact there's a stronger case to conversely reduce the size limit to 28 cm based on that.
The limiting of 6 cod per boat is similarly wrong. Each angler has a right to 3 cod (current dbl). The 3 cod dbl should be per day per person, not per "trip" as proposed.
- Regulating hook sizes shows ignorance of catching "smaller mouthed" species on smaller hooks, e.g. tarakihi. It would penalise youngsters fishing for herrings and spotties. Use of circle hooks which hook fish in the lip is more preferable. Regulations are difficult to police too.
- Instead a forthright educational programme should be launched by the ministry aimed at use of circle hooks, "limit your catch rather than catch your limit" philosophy, the use of PVC tubes to release fish so they're unseen by predatory shags, plus other good practice measures.
- Above all, the ministry must communicate and consult after valid research, before it embarks on far reaching measures. And firstly it must accurately ascertain the extent of the "blue cod crisis" it claims.
- Any change in bag limit must be matched by corresponding **reduction** in the commercial quota. This was never done in dropping the bag limit for cod to three nor in the ill handled reduction of snapper bag limit to three.
- MFish does irreparable harm to its own image in the public eye by its clumsy handling of issues such as the snapper and blue cod issues.
- Under the proposed closed areas, compliance would be complex and muddled in the proposed areas of closure because anglers travelling back from the outer Pelorus and Queen Charlotte Sounds would travel through closed areas on their way back and with blue cod in their possession.
- Under the Fisheries Act. Section 21 instructs the minister to give first consideration to the public recreational sector as affirmed by the "Colin Moyle Promise." The high court decision over Kahawai confirmed this obligation.
- Habitat is of greater importance. The effects of commercial scallop dredging and particularly large scale exotic forestry with resulting siltation on clear felling should be the subject of Ministry research to ascertain the detrimental effects.