



TE HUAPAE MATAORA MO TANGAROA
THE FUTURE OF OUR FISHERIES



SUBMISSION FORM
CONSULTATION DOCUMENT 2016

Future of our Fisheries – Submission Form

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NOTE: there are responses to some questions in all 3 parts of this submission document. In Sections 2 & 3 we have only made a few responses so you will need to keep going through the whole document to collect all our answers.

Submissions must be lodged by 5pm on Friday 23 December 2016.

Submissions can be:

- emailed to fisheries.review@mpi.govt.nz
- posted to [Future of our Fisheries Consultation](#)
Ministry for Primary Industries
PO Box 2526
Wellington 6140

General questions: Volume 1

What will success look like in the future fisheries management system?

Our proposed long-term vision and objectives are as follows:

Vision Abundant fisheries and a healthy aquatic environment that provide for all our people, now and in the future			
Objective 1: Abundant fisheries in our seas and a healthy aquatic environment	Objective 2: Everyone plays their part in managing New Zealand's shared aquatic resources	Objective 3: Everyone can share fairly in the social, economic, cultural and environmental benefits of our aquatic resources	Objective 4: The fisheries management system is widely trusted in New Zealand and internationally

How strongly do you agree with this vision for our fisheries (please tick only one box)?

- Strongly disagree
- Disagree
- Neither
- Agree
- Strongly Agree

How strongly do you agree with our objectives (please tick only one box)?

- Strongly disagree
- Disagree
- Neither
- Agree
- Strongly Agree

Would you like to comment?

Fisheries management decisions impact the whole marine ecosystem and therefore all New Zealanders, whether or not they fish. Therefore the implementation of this vision and objectives must take into account the values and needs that ALL New Zealanders have for the marine environment and its fish communities, regardless of whether or not they fish.

What vision would you propose, and why?

Volume II: The Fisheries Management System Review

Strategic proposal 1: Maximising value from our fisheries

Address discarding of fish

Tighter regulatory controls to manage discards.

Approach 1: Allow minimal discarding

How strongly do you agree with this approach (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Approach 2: Allow the approved release of live fish if they are likely to survive

How strongly do you agree with this approach (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Approach 3: Allow the approved release of live fish if they are likely to survive and approved discarding of dead fish of low commercial value

How strongly do you agree with this approach (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

- We believe that all caught fish should be landed. This will incentivise fishers to target better, find markets for different species and sizes. Consumers, chefs etc can be educated to use fish of all sizes rather than those in a narrow size range if they understand the wasteful discarding consequences of their narrow choices.
- We only agree to live release of the very few species that are known to survive well eg. rock lobster, paua.
- All finfish should be landed as survivorship is poorly known and we already are operating fisheries at very low abundances.

Do you think it should be permissible to release live fish if they are likely to survive?

- We only agree to live release of the very few species that are known to survive well eg. rock lobster, paua.
- All finfish should be landed as survivorship is poorly known and we already are operating fisheries at very low abundances.

Do you think it should be permissible to discard some dead fish, as long as they are balanced against ACE?

- All caught fish should be landed. This will incentivise fishers to target their catch and extract economic value from all fish that are killed and therefore taken out of the ecosystem.
- If dead fish are discarded they MUST be balanced against ACE.

Additional economic incentives to reduce discarding

Do you think that adjusting a TACC to take account of discarding would provide an incentive for quota owners to ensure commercial fishers reduce discarding?

Yes, and it should be done.

Do you think quota owners should be accountable for fishing behaviour?

- Yes, most definitely.
- Quota holders may not be directly fishing, but they are deriving a private benefit from a public resource and therefore MUST be accountable for the activities that they are ultimately profiting from.

What measures do you think would help in discouraging catches of small fish? Is minimum legal size needed?

- Fish Forever believes a requirement to land ALL fish caught regardless of size would incentivise both commercial and recreational fishers to target better, and retailers/restaurants to educate the public to accept a wider size range of fish.
- Survivorship of many species is poorly understood and where there are mortality estimates from research studies, survivorship from public discarding may be quite different due to lack of expertise in fish handling.

Maximise the value of our shared fisheries

Managing fish stocks for increased abundance.

Do you agree with the objective of managing fish stocks for abundance, to achieve higher catch rates for all fishing sectors (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment?

Fish Forever wholeheartedly supports the move to managing fisheries based on abundance targets (rather than maximum sustainable yields).

Using higher abundance targets will meet the needs of a wider range of stakeholders:

- Recreational/customary fishers will be able to catch fish more easily and closer to home, the fish they catch will probably be larger.
- Recreational snorkelers/divers could have an interesting dive at their local reef.
- Underwater tourism opportunities could increase if there were more fish and diversity in the sea to show people.
- Those who believe in maintaining thriving ecosystems for their intrinsic value will have their cultural/spiritual needs met.

What principles do you think should guide decisions on allocating the relative share of the TAC between non-commercial and commercial fishers?

Whatever principle is developed will need to take into account New Zealand's relentless population increase and the likelihood that the number of people seeking to engage in recreational fishing will continue to increase. This will be an ongoing issue in high population areas.

Build the market position of New Zealand seafood

New Zealand's seafood market position is secured through improved transparency and quality of fisheries.

Do you agree that government should provide certification of the environmental performance of New Zealand's fisheries (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment?

This must be independent of the fishing industry and uphold the highest environmental sustainability standards.

Do you prefer a non-governmental certification scheme such as that provided by the Marine Stewardship Council?

- As a very high proportion of our fish is exported an international certification like MSC is more likely to influence foreign consumers.
- However, MSCs recent decision to certify orange roughy fisheries greatly disappoints Fish Forever as no fishery reliant on bottom trawling should be certified due to the destruction of benthic communities and therefore the negative consequences for the whole ecosystem that orange roughy are part of.
- Perhaps NZ could develop its own fish certification/brand much like our agricultural industries have.
- Certification MUST be independent of fishing companies.

Deliver value from new or underdeveloped fisheries

Value from low-information stocks is delivered, and incentives to develop fisheries is created.

Do you agree that investment in better information on new and underdeveloped fish stocks is needed (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

- The government should NOT supply incentives to develop fisheries.
- Our marine ecosystems are already greatly compromised and until they are restored we do not need to add the strain of further fishing activity.
- In the development of any new fishery the onus MUST be on the fishing sector to prove that their activities will not harm the marine environment, and the levels of extraction will be sustainable for the fish stock in question and the ecosystem it inhabits, of the current situation where the onus is on the government to prove a fishery is harmful.

Who do you think should invest in such research: government or the private sector?

- It is NOT the governments job to fund the research or development of commercial fisheries.
- The private sector should fund ALL research that is for the purpose of developing a new fishery or increasing activity in less developed fisheries.

Should quota holders' investment in research be reflected in the value individual quota holders get from any consequent increase in the TACC?

Strategic Proposal 2: Better Fisheries Information

Option 2: Gather more information to support decision-making and value-adding

Monitoring of non-commercial fisheries (recreational and customary fisheries): MPI and stakeholders have access to information of non-commercial fishing activities at a QMA level and a range of finer scales.

Do you agree that MPI should do more to collect information on non-commercial fisheries (for example, undertaking more aerial overflights, boat ramp surveys or reviewing Amateur Charter Vessel reporting) (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment?

- The current estimates of recreational catch in areas of high recreational activity are robust, but the results need to be better and more frequently disseminated to the public as many recreational fishers continue to be reluctant to believe that the recreational catch is high enough to impact stocks.
- Fisher-dependent data gathering in areas of lower recreational activity as proposed on p. 14, Vol 2 is likely to be very prone to various sources of bias and therefore difficult to make use of.
- A better option for low activity areas could be to fund students or citizen science projects, so that there was some level of independence between the recreational fisher and the data.

What steps could you and other non-commercial fishers take to provide better estimates of harvest for better management of fish stocks?

Monitoring fisheries at finer spatial scale: Effective fisheries management takes place at a sub-QMA level.

Do you agree that monitoring and management of fisheries should take place at a finer geographical scale than the current quota management areas (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Fisheries would be better managed at a stock level rather than the arbitrary QMA level and data collection standards and mechanisms should reflect this.

In those areas of very high commercial or recreational fishing activity finer scale monitoring and management should take place, especially as required for ecosystem based management in these areas.

Finer scale community based management MUST have equal representation of extractive and non-extractive stakeholders on decision-making bodies.

Particularly at a fine scale, in areas of high marine recreational activity, the activities of those who like to fish is already greatly compromising the underwater recreational and tourism activities of others. The voice of non-extractive stakeholders needs to be considered in these areas.

Fish Forever is wary of fine scale decision making being delegated to community forums. These Forums were initially welcomed by community groups around the country. However their use in recent years in other sectors has shown problems such as: an asymmetry when commercial sectors pay their representatives and can have teams working on the issues outside the Forums, and most other sectors are reliant on volunteer representatives, and also the very high workload and general upskilling required for all concerned, and the high support cost to the government organisations concerned.

Who should contribute to the additional costs associated with monitoring and managing at finer geographical scales?

In areas where they are operating, and therefore deriving private benefit from a public resource, the commercial fishing sector should contribute to the additional costs of finer scale management in proportion to their catch relative to the recreational/customary allocation/catch

Socioeconomic information: Scale and quality of available information on the socioeconomic aspects of fisheries is appropriate to inform fisheries management decisions.

Do you agree that MPI should invest in more socioeconomic information (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment?

- Fish are a public resource being used by the commercial fishing sector for private benefit. Private financial benefits must be balanced against the environmental cost of gaining them and the negative impacts on the recreational and tourism activities of non-extractive users.
- Better socio-economic information could shed light on this. As long as it is recognized that snorkeling/diving activities are currently greatly reduced due to the paucity of interesting marine habitats to visit as a result of overfishing of inshore waters.

How would you describe value for non-commercial fishers and for people who do not fish?

- I love the sea and want to see it restored so that its ecosystems are flourishing.
- I get great pleasure simply knowing that our marine environment is doing what it supposed to do, which is simply being alive.
- I also love to be in the water and get great joy from snorkeling/diving in thriving ecosystems. Because of the low abundance that historical and current fisheries management has taken most commercial species down to, the only places I can currently enjoy my recreational activity of choice is in no-take marine reserves. However, there are very few of those and most are not easy to access.
- The activities of those who like to fish for profit or pleasure should not be allocated a higher value than the recreational activities of those who like to look.
- Currently the opportunities for underwater tourism are also greatly restricted by the impact of fishing stocks down to very low levels. In general the only places interesting enough to develop underwater tourism business around are no-take marine reserves, of which there are very few.

Option 3: Investment in ecosystem-based management

An integrated management approach that considers fisheries management in the broader context of the ecosystem, and recognises the social, economic, cultural and environment needs of New Zealanders is developed.

Do you agree that an ecosystem-based approach is needed for fisheries management (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment?

- It is essential we move away from single-species fisheries management decisions.
- Species that people like to fish are part of a wider marine community in which all species impact on each other.
- Single-species management decisions disproportionately favour the needs of the few people who have an interest in fishing that species.
- Ecosystem based management means that the needs of ALL people with an interest in a marine environment, in which a particular species is being fished, can be taken into consideration.

What principles and values would you like to see underpin an ecosystem-based approach?

- Ecosystem based management needs to be much wider than the sustainable seas challenge and incorporate *the precautionary approach, prior environmental assessment* and increased investment in ecosystem and stock research.
- The health of the entire marine community should be maximised, not just the species' being fished.
- Recognition that marine ecosystems operate best at their full complexity, and therefore the flow-on effects and unintended consequences of low abundance and restricted age/size ranges of a particular fished species should be avoided, for example the low abundance of large snapper and crayfish has turned flourishing inshore reefs into kina barrens.

- Fishing methods must not destroy non-target marine organisms or marine habitats.

Who should pay for the additional costs of implementing ecosystem-based fisheries management?

- Those who derive economic gain from fishing i.e. extracting the resource from the ecosystem, should bear the biggest share of the costs of implementing ecosystem based management.
- The fishing sector does not own the sea, they profit from using a resource that belongs to everyone else. Their activities have a negative impact on that resource and so they should bear the cost of managing their activities.
- Polluters, including agricultural polluters, are externalizing a cost of their production when their outputs find their way into the sea and impact on its ecosystems, reduce its productivity, and negatively impact on the pleasure of non-extractive users. They should also contribute to the costs of the ecosystem based management of their pollution. If they don't pollute then they won't have to pay!

Option 4: Use more externally commissioned research

MPI and all stakeholders trust and can rely on the science and research information used to inform fisheries management decisions.

Do you agree that MPI should make more use of externally commissioned research (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

There are 2 big problems with externally commissioned research:

1. it advantages well financed stakeholders over those stakeholder groups that don't have money at their disposal.
2. It means that external organisations/companies can carry out research projects and only submit research results that meet their own objectives and hold back research results that don't support their own cause. This flaw is well known to occur in research carried out by pharmaceutical companies and is very difficult to stop.

Should the principles of the Research and Science Information Standard be applied to all research?
Should any additional principles apply to externally commissioned research?

- Yes. The principles of the Research and Science Information Standard should be applied to ALL research used by MPI to make fisheries management decisions.
- An additional principle should be that research will ONLY be accepted into the system if it is tabled at the PROPOSAL stage, i.e. before the results are known.
- parties submitting externally commissioned research into the fisheries management process MUST be compelled to submit ALL their research for scrutiny – all research in or nothing in. Although it is unlikely such a principle could be effectively policed.

Strategic Proposal 3: Agile and Response Decision-Making

Option 1: Shift decisions to a level of accountability that reflects the level of risk to achieving clearly identified management objectives

The Fisheries Act allows for some decisions to be shifted from the Minister to a delegated decision-making level (for example, the Director-General of MPI).

Do you agree with a risk-based approach to determining what decisions could be delegated and to whom (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

While agreeing that the current system delegates too many decisions to too high a level, Fish Forever is wary of the extractive fishing sectors gaining more control of fisheries based decisions that effect many other sectors of the community, and advises a cautious approach to change in this regard.

What do you think about the approach we have suggested to guide delegation decisions?

Option 2: Establish a National Fisheries Advisory Council

A National Fisheries Advisory Council provides advice to Ministers and the Director-General, reflecting community, tangata whenua and stakeholder aspirations.

Do you agree with the establishment of a National Fisheries Advisory Council (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

- Many groups outside the fishing sectors have a stake in how our fisheries are managed because the state of our fisheries directly impacts their values, recreational activities and business interests.
- To truly represent “stakeholders” any National Fisheries Advisory Council (NFAC) MUST have EQUAL representation of extractive AND non-extractive stakeholders.
- In recent years many groups/forums that have been setup to represent “stakeholders” have only included, or have been dominated by extractive users of the resource in question. For example the SNA1 Strategy Group only had members from the 3 fishing sectors on it, and their management plan reflected this with a raft of weak recommendations and a very long timeframe for a rebuild to the 40% target.
- Non-fishing stakeholders that must be included on any NFAC would include: recreational snorkelers, recreational divers, underwater tourism operators, environmentalists, conservationists, and members of the community with spiritual or cultural needs for a flourishing ocean.

What do you think should be the purpose of a National Fisheries Advisory Council, and what skills should its members have?

Fish Forever believes a NFAC as a body would be too small to reflect the values, aspirations and needs of all those impacted by fisheries.

Option 3: Develop a more flexible decision-making framework

A more flexible and responsive decision-making framework is developed that considers how decisions are made and the scale at which fisheries are managed.

Do you agree that a more flexible and responsive decision-making framework is needed (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

What do you think would make the decision-making process more efficient?

What do you think the role of standards and decision rules should be in guiding decisions in fisheries management?

All standards and decision rules need to be pre-cautionary and there needs to be clear and timely pathways to determine whether or not they are being met.

Volume III: Integrated Electronic Monitoring and Reporting System (IEMRS)

Current state

Do you agree with how we have defined the current state in relation to monitoring and reporting (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment? For instance, how would you describe the current system? What other factors should be considered?

- Sadly the fishing industry provides too many examples to support a general public view that they cannot be trusted to act within fisheries management regulations.
- Therefore Fish Forever supports all efforts to better monitor commercial fishing activities.
- Given that stock assessments and subsequent TAC decisions are critical for the health of our marine ecosystems and stock abundance affects many groups beyond the fishing sector, Fish Forever fully supports fuller and more timely reporting than we currently have.
- Fish Forever also contends that as the commercial fishing sector is taking a private profit from a public resource then all information related to the catch and effort should belong to the public, held in trust by government agencies, and be available to all those researching fishing effects. Commercial sensitivity should NOT be a reason for CPUE data to be withheld.
- ALL costs must be borne by the commercial operators.

Problem definition

Do you agree with how we have defined the problem (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |

Strongly Agree



Would you like to comment? For instance, what evidence should we examine to inform further analysis of the problem?

Objectives

Do you agree with objectives of IEMRS (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment?

- Fish Forever believe that the fishing sector has not respected the “social licence” bestowed on them to extract private benefit from our public resource.
- We welcome any effort to restore confidence in this regard.

Option 1: Current state

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 2: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017

Do you agree with this option?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Option 3: Electronic reporting and geospatial position reporting for all permit holders from 1 October 2017, and introduction of electronic monitoring on commercial fishing vessels beginning 1 October 2018

Do you agree with this option (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment?

As above.

General questions

Are there other options, not described in this section, which should be considered? If so, what are the potential disadvantages and benefits of those options?

Do you have any suggestions on how IEMRS and its components (EM, ER, GPR) could deliver benefits to the commercial sector generally and to you particularly?

Given that the introduction of IEMRS technologies would occur in stages across the commercial fishing fleet, do you have any suggestions on how that phase-in period should be rolled out?

What do you consider are particular difficulties that vessel operators may encounter in implementing EM?

If you do not consider EM practical on some vessels, how else would you propose MPI verifies catch-effort reporting?

Where EM is not practical or cannot provide good coverage of fishing activity, then there should be 100% observer coverage on these vessels, with all cost born by the vessels concerned.

Permit holders

What EM, ER or GPR technology/ies (if any) do you currently use in your operations?

Do you operate this technology on your own behalf, or as an input into someone else's operations?

If so, is it linked to the electronic systems of a Commercial Stakeholder Organisation (the representative body for commercial fishers of a particular stock or group of stocks, such as the Paua Industry Council), or other similar management group?

What issues do you currently have with ER?

What sort of feedback do you want from ER? What sort of data from ER would be helpful to you?

If you do not currently utilise ER, EM and/or GPR technology, do you have any interest in being an “early adopter”?

Commercial stakeholder organisations (CSOs)

If you represent a CSO, would you be prepared to share your information standards for data collection on fishing activity with MPI on a confidential basis?

How might your existing systems used by you and your stakeholders deliver on IEMRS objectives?

Would you be prepared to identify vessels that use types of GPR and ER amongst those represented by your organisation?

Licensed fish receivers

Would problems do you experience with landing data?

Implementation plan

Do you agree with the proposed implementation arrangements (please tick only one box)?

- Strongly disagree
- Disagree
- Neither
- Agree
- Strongly Agree

Would you like to comment?

Do you see value in a MPI, commercial sector and service provider working group to work on implementation issues?

What other issues does MPI need to consider to facilitate the commercial fleet's transition to IEMRS?

Monitoring, evaluation and review

Do you agree with the proposed monitoring, evaluation and review arrangements (please tick only one box)?

- Strongly disagree
- Disagree
- Neither
- Agree
- Strongly Agree

Would you like to comment?

What do you think should be monitored? To whom should the results be reported?

Volume IV: Enabling Innovative Trawl Technologies (EITT)

Current state

Do you agree with the description of the EITT current state (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input checked="" type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

- While it is laudable that trawl gear is being developed that will result in lower levels of bycatch and waste from damaged fish, these innovations do not reduce the impact of trawl gear on the seafloor.
- Fish resources cannot be sustainably used as stated in Objective 1 if the habitat they live on is destroyed by the method of catching them.
- Destructive fishing methods such as trawling should be banned.
- If destructive fishing methods such as trawling are used, they should only be allowed in small defined areas to minimise their impact on the health of the marine communities.
- The fact that large areas of our seafloor have suffered tremendous damage by decades of trawling, is NOT a reason to continue trawling in these areas. Trawling needs to stop in these areas so the marine communities that live on the seafloor can restore themselves.

Problem definition

Do you agree with the description of the EITT problem (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?

Objectives

Do you agree with the EITT objectives (please tick only one box)?

- Strongly disagree
- Disagree
- Neither
- Agree
- Strongly Agree

Would you like to comment?

Options and impact analysis

Do you agree with the range of options addressed (please tick only one box)?

- Strongly disagree
- Disagree
- Neither
- Agree
- Strongly Agree

Would you like to comment?

Are there other options that we have not considered? If so, what are the potential costs and benefits of these options?

Do you agree with MPI's assessment of each option's contribution to achieving the EITT objectives?

Preferred Option – Amend existing regulations

Have the correct EITT assessment criteria been identified (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment?

- Strongly Agree.
- Given the destructive nature of trawl gear Fish Forever does not agree with the deregulation of its use.

Are there other EITT assessment criteria that should be considered?

Costs

Do you agree with the EITT application process and costs set out in Annex II (please tick only one box)?

- | | |
|-------------------|-------------------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input checked="" type="checkbox"/> |

Would you like to comment?

- Strongly Agree.
- Commercial fishers are gaining a private benefit from a public resource, so Fish Forever agrees they should bear the full cost of gear development and testing.

Risks

Do you agree with the EITT identified risks (please tick only one box)?

- | | |
|-------------------|--------------------------|
| Strongly disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Neither | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Strongly Agree | <input type="checkbox"/> |

Would you like to comment?