

# RED GURNARD (GUR), TRUMPETER (TRU) AND BLUE COD (BCO) RECREATIONAL SIZE LIMITS – SUMMARY OF SUBMISSIONS

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## Submissions Received

### *Red Gurnard*

- Akaroa Harbour Recreational Fishing Club
- Denis Petty (ProDive NZ)
- Garry Workman
- Hartley Family
- Hilton Leith
- John Forrest / Wanders Surfcasting and Anglers Club
- John Robertson
- K.B. Turner
- Kaikoura Boating Club (Inc)
- Keith Ingram
- Mark Iggo
- Marlborough Combined Divers Association (Inc)
- Marlborough Recreational Fishers' Association
- New Zealand Seafood Industry Council Ltd
- Ngati Whatua Fisheries Limited
- North Island South-East Regional Recreational Forum
- North Island South-West Regional Recreational Forum
- Pelorus Boat Club
- Piako Underwater Club
- Raglan Sports Fishing Club
- South Taranaki Underwater Club (Inc)

- Tasman and Sounds Fishers Association (Inc)
- Te Runanga o Ngati Whatua
- The New Zealand Big Game Fishing Council (Inc) and option4
- Tim Hornby

### *Trumpeter*

- Akaroa Harbour Recreational Fishing Club
- Brian Dean
- G.A. O'Rourke
- Hartley Family
- Hilton Leith
- John Robertson
- Kaikoura Boating Club (Inc)
- Keith Ingram
- Mark Iggo
- Marlborough Combined Divers Association (Inc)
- Marlborough Recreational Fishers' Association
- New Zealand Seafood Industry Council Ltd
- Ngati Whatua Fisheries Limited
- North Island South-East Regional Recreational Forum
- North Island South-West Regional Recreational Forum
- Raglan Sports Fishing Club
- Tasman and Sounds Fishers Association (Inc)
- Te Runanga o Ngati Whatua
- The New Zealand Big Game Fishing Council (Inc) and option4
- The South Marine Recreational Fishers Advisory Committee

### *North Island Blue Cod*

- Hilton Leith

- John Forrest / Wanders Surfcasting and Anglers Club
- John Robertson
- K.B. Turner
- Keith Ingram
- Marlborough Combined Divers Association (Inc)
- Marlborough Recreational Fishers' Association
- New Zealand Seafood Industry Council Ltd
- Ngati Whatua Fisheries Limited
- Ngawi Sports Fishing Club)
- North Island South-East Regional Recreational Forum
- North Island South-West Regional Recreational Forum
- Pelorus Boat Club
- Raglan Sports Fishing Club
- South Taranaki Underwater Club (Inc)
- Stuart Marsh
- Tasman and Sounds Fishers Association (Inc)
- Te Runanga o Ngati Whatua
- The New Zealand Big Game Fishing Council (Inc) and option4
- The Top of the South/West Coast Regional Recreational Forum
- Tim Hornby

## Summary of Submissions

### *Red Gurnard*

#### *Submissions in support of a MLS (21)*

- 1 **K.B. Turner** submits that to sustain a red gurnard with a reasonable sized fillet, a MLS (MLS) of 25 cm would be appropriate.
- 2 **John Robertson** is in agreement with specifying a recreational MLS of 25 cm for red gurnard.

- 3     **The Kaikoura Boating Club (Inc)** submits the Club represents approximately 400 members and their families. The Club supports a MLS of 25 cm for red gurnard.
- 4     **Raglan Sports Fishing Club** supports specifying a recreation MLS of 25 cm for red gurnard in the Fisheries (Amateur Fishing) Regulations 1986.
- 5     **The Hartley Family** submits they support a MLS of 25 cm for red gurnard.
- 6     **The North Island South-East Regional Recreational Forum** generally supported the proposal to introduce a 25 cm MLS for red gurnard.
- 7     However, the Forum commented on the value of only imposing a MLS for the recreational sector as mainly commercial fishers catch and retain small fish, whereas recreational fishers generally return small back to the sea. In addition, many local clubs impose their own voluntary 500 g minimum weight. It was noted in the Forum that a MLS should apply to both commercial and recreational fishers
- 8     **Denis Petty of Pro-Dive Watersports Limited** submits that after 25 years there are finally a few gurnard returning to the inner Gulf area. The commercial over-fishing of previous times took its toll, virtually wiping them out. The size limit would be welcome by all.
- 9     **Mark Iggo** submits he is in agreement with a MLS of 25 cm for red gurnard.
- 10    **The Pelorus Boat Club** supports the introduction of a MLS of 25 cm for red gurnard.
- 11    **Tasman & Sounds Fishers Association (Inc) (TASFISH)** submits that the society is a recognized group covering recreational fishing issues in Area 7. The membership consists of individual and affiliate members including Dive and Fishing Clubs along with various Residents & Ratepayer Associations. Overall their membership exceeds 1500 and covers much of the Top of The South.
- 12    TASFISH supports the establishment of a MLS for red gurnard and cannot understand how policy promoting the taking of any species below its breeding size can be allowed. Most gurnard are lip hooked and small ones are generally able to be released in good condition. Recreational fishers in Area 7 are committed to improving the quality of the fishing experience and want to see a move to harvesting fish at best yield by species rather than trying to catch the last available fish.
- 13    **The Akaroa Harbour Recreational Fishing Club** support the introduction of a minimum size limit of 25 cm for red gurnard.
- 14    **Hilton Leith** supports a recreational MLS of 25 cm for red gurnard.
- 15    **The Marlborough Combined Divers Assn. Inc** agrees that there needs to be a minimum size introduced for red gurnard.
- 16    **Keith Ingram** submits that there has been some significant debate on the subject of a MLS for red gurnard. Mr Ingram supports the proposal that a recreational MLS of 25 cm be introduced for red gurnard nationally.

- 17 **The South Taranaki Underwater Club Inc.** submits that the club supports the introduction of a MLS of 25 cm for red gurnard. The Club notes the reason for their support to introduce a size limit is that a large part of the fish is lost when separating the head from the edible trunk, any size less than 25cm would be counter productive. The Club also notes fishers find the gurnard a pretty tough customer and believe that if released in good order, it will survive.
- 18 **Ngati Whatua Fisheries Ltd** supports the introduction of recreational size limits for red gurnard, provided the regulations are in line with the Fisheries Act 1996 and would not create the effect of devaluing the present or future assets of Ngati Whatua Fisheries Ltd.
- 19 **Te Runanga o Ngati Whatua** supports the introduction of recreational size limits for red gurnard provided the regulations are in line with the Fisheries Act 1996 and do not create a dual layer which would be difficult and costly for compliance.
- 20 **Tim Hornby** supports the introduction of a recreational MLS for red gurnard at 25 cm. Mr Hornby submits that he has witnessed many recreational fishers taking sub 25 cm red gurnard as a replacement for the target species of blue cod and snapper when they cannot gain access to these two species due to weather, sea conditions and in some cases stock depletion. Mr Hornby also submits that when filleted, a sub 25 cm red gurnard does not return a great deal of edible flesh. Leaving them to reach sexual maturity at 25 cm and above is common sense as it allows them to breed and the fillets are of a larger size.
- 21 **Garry Workman** submits that he has been a regular recreational fisher for over 50 years and has fished extensively in Northland, Wellington and the Marlborough Sounds. Mr Workman submits that in his experience the proposed 25 cm MLS is far too small and recommends a MLS of 30 cm.
- 22 **The Piako Underwater Club** submits that the club does not agree to the size limit of 25cm as this would be a small fish. The Club would recommend a size limit of at least the same as Snapper (27cm) or a further increase to 30cm.
- 23 **The North Island South-West Regional Recreational Forum** had mixed views on this proposal. Several members agreed the proposed 25 cm MLS should apply to both recreational and commercial fisheries, but that no changes should be made at this time until recreational fishing rights are resolved.

*Submissions that do not support a MLS (4)*

- 24 **John Forrest and the Wanderers Surfcasting and Angling Club** submit that the *status quo* should be maintained for red gurnard.
- 25 **John Forrest and the Wanders Surfcasting and Angling Club** point out that the IPP states reports have been received on fish as small as 10 cm being landed and that this is the basis for the suggested size limit on red gurnard. No investigation appears to have undertaken to determine the real reason for these 10 cm fish being landed. Without knowing the reason for these fish being landed, it cannot be determined what action will correct the problem. The IPP also states that ramp surveys have determined that 98% of recreational caught red gurnard in the surveys are over the

25cm fork length. This would suggest there is little or no problem with recreational landings.

- 26 John Forrest and the Wanders Surfcasting and Angling Club submit the IPP states that MLSs are used to enhance fish populations by allowing them live long enough to spawn. It also states that red gurnard reach sexual maturity at a fork length of about 23cm. John Forrest and the Wanders Surfcasting and Angling Club submit published information by Saul [sic] states that red gurnard reach sexual maturity at specific fork lengths greater than 25 cm and with one sex at a substantially greater fork length than the other sex. Should the information by Saul be correct, then a fork length of 25 cm would not achieve the suggested benefits.
- 27 John Forrest and the Wanders Surfcasting and Angling Club submit a far more beneficial way of enhancing the red gurnard stocks would be to reduce or eliminate the huge wastage of red gurnard from the commercial trawl fishery. Increasingly, recreational boat fishers are advising of sightings of large quantities of red gurnard floating where trawlers have been. Recreational fishers have used terms such as "enough gurnard to fill the boat" or "a trail of gurnard 300 metres long" to describe the quantities they have seen.
- 28 John Forrest and the Wanders Surfcasting and Angling Club submit a size limit on recreational caught red gurnard should not be introduced without a substantial reduction in the number of similarly sized commercially caught fish. It is not unheard to see tiny gurnard fillets of around 10 cm long in supermarkets. In saying that they would not advocate a minimum size limit as this will simply see a further wastage of this resource.
- 29 The New Zealand Big Game Fishing Council Inc. and option4 do not support a MLS for red gurnard.
- 30 The New Zealand Big Game Fishing Council Inc and option4 also draw attention to the potential for post release mortality of returned red gurnard.
- 31 The New Zealand Big Game Fishing Council Inc and option4 submit that the IPP states recreational catch is *"likely to be relatively low in comparison to the commercial harvest of the species"*. Recreational harvest estimates could be around 10% of the commercial harvest and just 2% of landed catch is smaller than 25 cm. So the bag limit proposal will affect 0.2% of the fish caught many of which may die on release anyway, therefore it will have no impact on the stock or local abundance. The only result of a recreational size limit is that some amateur fishers will be prosecuted for keeping a small red gurnard that was likely to die if released.
- 32 The New Zealand Big Game Fishing Council Inc. and option4 further submit if there is a lack of bigger size fish available to be caught then the cause for that needs to be explored including the cumulative effect of over-fishing on the biomass.
- 33 The submitters would support a well researched code of practice, with the objective of increasing yield per recruit, which would encourage amateur fishers to release red gurnard that they consider too small and have a good chance of surviving.

- 34 The New Zealand Seafood Industry Council Ltd (SeaFIC) opposes the proposed amendments to the recreational regulations for red gurnard.
- 35 SeaFIC submits almost no information has been provided about the impacts on sustainability of the proposed amendments. At the basis of the proposals for red gurnard (and trumpeter) is that undersized fish that are caught will be returned to the sea. There is no information, however, about the survivability of the fish that are returned except for vague assessments based on anecdotal reports.
- 36 SeaFIC submits section 10 of the Fisheries Act 1996 requires the Minister to take into account that decision makers should be cautious when information is uncertain, unreliable or inadequate. The lack of information on survivability of red gurnard (and trumpeter) suggests that the Minister should be very cautious about introducing MLSs for these fish. The MLSs could increase the risk of fishing-related mortality. SeaFIC considers the allowances made for non-commercial removals (including allowances for fishing-related mortalities) are likely to be impacted by the proposed changes to MLSs. Given the lack of information about whether current allowances will be breached SeaFIC considers that the proposed amendments to MLSs are untenable.
- 37 SeaFIC submits the overall level of removals by the recreational sector is already poorly monitored. Introducing exceptions to what must be retained through introducing MLSs will only exacerbate the problem. Given that MFish has little knowledge of the survivability of small red gurnards (and trumpeter) returned to the sea, the proposed amendments for these fish stocks can only increase the uncertainty around their sustainability.
- 38 In SeaFIC's view, compliance efforts for recreational catch should be concentrated on the primary input control of bag limits. MFish focus should be on well targeted regulations aimed at ensuring sustainability rather than on measures that may or may not provide for utilisation. The additional regulations that are proposed for red gurnard (and trumpeter) will require extra surveillance by MFish.
- 39 In SeaFIC's view the introduction of the proposed MLSs will not prevent smaller fish being caught, nor will this encourage recreational fishers to modify their fishing practices to reduce the incidence of small fish being landed. Instead, SeaFIC believes the amendments will have the opposite effect. They will provide incentives for recreational fishers to catch as many small fish as they wish until the bag limit is reached of fish over the MLSs stipulated.
- 40 SeaFIC considers that the introduction of MLSs (for red gurnard and trumpeter) will almost inevitably have to be followed up by additional regulations targeted at how fishing is undertaken by recreational fishers. To prevent small fish being taken in large numbers the regulations would have to be supplemented by rules governing such things as net mesh sizes and hook sizes. This could only increase the amount of surveillance required.
- 41 SeaFIC submits that the proposed MLS is completely unnecessary. In paragraph 16 the IPP states that 98% of 18,493 red gurnards taken since 1990 (and recorded in surveys) were larger than 25 cm. SeaFIC cannot understand, therefore, the basis for the request for a MLS when so few fish that are landed by recreational fishers are smaller than the MLS that is sought.

- 42 SeaFIC submits the increased compliance costs and decreased certainty that would accompany such a move together with the inability to achieve policy goals far outweigh the small benefits that might accrue to the recreational sector.
- 43 The Marlborough Recreational Fishers' Association submits that they do not support a MLS for red gurnard. The Marlborough Recreational Fishers' Association submits that in the light of "uncontrolled" commercial fishing, which kills fish under the proposed 25 cm limit, such a size limit becomes meaningless. The recreational catch of gurnard is low and fishers return small sized fish and particularly with gurnard that have a low flesh return relative to length.

### *Trumpeter*

#### *Submissions that support a MLS (7)*

- 44 Raglan Sports Fishing Club submits that trumpeter is only occasionally caught off the Raglan Coast. Mostly these are mature fish taken from deep offshore reefs. All fish landed by the Club have far exceeded the proposed new size limit. Juvenile fish in shallow water do not seem to exist in the Raglan area.
- 45 Raglan Sports Fishing Club supports specifying a recreational MLS of 45 cm for trumpeter in the Fisheries (Amateur Fishing) Regulations 1986.
- 46 John Robertson is in agreement with specifying a recreational MLS of 45 cm trumpeter.
- 47 Tasman & Sounds Fishers Association (Inc) supports the establishment of a MLS for trumpeter and cannot understand how policy promoting the taking of any species below its breeding size can be allowed. Recreational fishers in Area 7 are committed to improving the quality of the fishing experience and want to see a move to harvesting fish at best yield by species rather than trying to catch the last available fish.
- 48 Hilton Leith supports a recreational MLS of 45 cm for trumpeter.
- 49 The Marlborough Combined Divers Assn. Inc agrees that there needs to be a minimum size introduced for trumpeter.
- 50 Ngati Whatua Fisheries Ltd supports the introduction of recreational size limits for trumpeter provided the regulations are in line with the Fisheries Act 1996 and would not create the effect of devaluing the present or future assets of Ngati Whatua Fisheries Ltd.
- 51 Te Runanga o Ngati Whatua supports the introduction of recreational size limits for trumpeter provided the regulations are in line with the Fisheries Act 1996 and do not create a dual layer which would be difficult and costly for compliance.

#### *Submissions in favour of a smaller MLS (9)*

- 52 The Hartley Family does not support a MLS of 45 cm for trumpeter. The Hartley Family submits most inshore caught trumpeter are under 45 cm. Shore fishers and small boat fishers would no longer have access to a feed of trumpeter if the 45 cm MLS were applied. The Family note that a MLS of 30-35 cm would be acceptable.

- 53 **Mark Iggo** submits he is in favour of supporting the breeding stock of trumpeter but believes there is a need to consider areas on their ability to catch 45 cm plus trumpeter. Mr Iggo recommends a MLS of 35 cm as this size would allow most recreational fishers a chance to sample a trumpeter.
- 54 **The North Island South-East Regional Recreational Forum** generally supported the proposal to introduce a 45 cm MLS for trumpeter. A suggestion was made that 40 cm MLS may be more appropriate because trumpeter is related to moki (where a 40 cm MLS applies to both blue and red moki).
- 55 **The North Island South-West Regional Recreational Forum** had mixed views on this proposal. It was suggested a MLS should be set at 40 cm (not 45 cm as proposed) because trumpeter is related to moki (where a 40 cm MLS applies to both blue and red moki). Some considered a 40 cm MLS was too small and must be set at a size that protects spawning fish.
- 56 **The South Marine Recreational Fishers Advisory Committee** was concerned at the number of trumpeter around the 15 to 20 cm length that were being observed to be landed and considered this to be inappropriate. The Committee also considered a MLS of 45 cm would effectively exclude recreational fishers from the trumpeter fishery. The Committee recommended a MLS of 35 cm accompanied by some biological research into the age of maturity of trumpeter would ensure a better yield from the fishery while moving to ensure sustainability.
- 57 **The Akaroa Harbour Recreational Fishing Club (Inc)** submits that only juvenile fish are found in the shallow waters of their area, and the species is not common. However, it is a valued part of recreational catches and would be eliminated entirely if the size limit were to be set at 45 cm. It may be advisable to set regional size limits for those areas where the species may be under pressure.
- 58 If considered necessary for conservation reasons, the Akaroa Harbour Recreational Fishing Club proposes a minimum size limit of 35 cm.
- 59 **G.A. O'Rourke** is in favour of a MLS for trumpeter but considers that a MLS of 45 cm is too large as trumpeter in the inshore reefs do not attain this size. Mr O'Rourke proposes a MLS of 35 cm.
- 60 **The Kaikoura Boating Club (Inc)** submits the Club represents approximately 400 members and their families. The Club does not support a MLS of 45 cm for trumpeter. The Club submits shore fishers and small boat fishers would no longer have access to a feed of trumpeter as most inshore trumpeter do not grow that big. The Club is concerned about the catching of large numbers of trumpeter in the 15 to 20 cm range. The Club would not support a MLS above 35 cm for trumpeter.
- 61 **Brian Dean** submits that due to the size of trumpeter found in Southern waters, until there is sufficient scientific evidence to the contrary, the size limit for trumpeter should be 35 cm.

*Submissions that do not support a MLS (4)*

- 62 **Keith Ingram** submits that with respect to trumpeter, this proposal was raised by Southern fishers and has been given mixed responses. He notes the joint submission

from Option 4 and NZBGFC and its suggestion of constraining the commercial catch in southern waters and the introduction of a well researched code of practice for recreational fishers. He acknowledges that it may well be best suited to manage trumpeter on a regional basis and introduce a more local MLS rather than a national one and, also acknowledges the need to introduce more robust management for this fish stock. Management should involve a review of the TAC and TACC and the introduction of a MLS for recreational fishers. He contends there is a strong view that this fish stock be managed on a regional basis. He recommends that MFish place some priority and urgency on this matter.

- 63 Mr Ingram supports maintaining the *status quo* pending a review of trumpeter both nationally and regionally.
- 64 The New Zealand Big Game Fishing Council Inc. and option4 do not support a MLS for trumpeter.
- 65 The New Zealand Big Game Fishing Council Inc. and option4 agree with the suggestion in the IPP that, due to the localised nature of recreational trumpeter fisheries, it may be more appropriate to manage trumpeter stocks on a regional or local scale, rather than implement a national MLS. Considering the problems that have arisen for localised southern fishers the most effective way to improve the Southland trumpeter fishery would be to look at constraining commercial access to those areas.
- 66 The New Zealand Big Game Fishing Council Inc. and option4 would support a well researched code of practice that would encourage amateur fishers to release trumpeter that they consider too small and have a good chance of surviving.
- 67 The New Zealand Seafood Industry Council Ltd (SeaFIC) opposes the proposed amendments to the recreational regulations for trumpeter.
- 68 SeaFIC notes that concerns by recreational fishers about availability occur only in localised areas. SeaFIC believes that it is more appropriate that these specific issues be dealt with locally rather than imposing a national MLS.
- 69 SeaFIC is also concerned that there is no information on the reproductive biology or growth rates of trumpeter to assist decision making. SeaFIC believes there is only a limited basis for choosing 45cm as the MLS for trumpeter. Without information on reproductive biology the claim that it is likely that 45cm coincides with maturity is dubious.
- 70 The Marlborough Recreational Fishers' Association submits that due to the lack of information on stocks and population dynamics of trumpeter, they do not support a MLS for trumpeter.

#### *Blue Cod (BCO1, BCO 2, BCO 8, BCO 10)*

##### *Submissions that support lowering the MLS (12)*

- 71 Raglan Sports Fishing Club supports amending relevant regional amateur fishing regulations to decrease the blue cod recreational MLS from 33 cm to 30 cm in the North Island.

- 72 The Raglan Sports Fishing Club submits that blue cod are becoming more and more plentiful to fishers off the Raglan coast, but sadly very few are of legal size. The Club wishes MFish to take into account the variation between the North Island and South Island blue cod fisheries. The Club feels it is important that legal size limits are placed at sexual maturity of any species. The Raglan Sports Fishing Club notes that the sexual maturity of blue cod is around 28 cm.
- 73 **John Robertson** is in agreement with amending the recreational MLS from 33 to 30 cm in BCO 1, BCO 2, BCO 8, and BCO 10.
- 74 **The North Island South-West Regional Recreational Forum** expressed some support for the proposed 30 cm MLS, but noted that mortality of small returned fish can be high.
- 75 **John Forrest and the Wanders Surfcasting and Angling Club** submit that MFish should amend relevant regional amateur fishing regulations to decrease the blue cod recreational MLS from 33 cm to 30 cm in BCO 1, BCO 2, BCO 8, and BCO 10.
- 76 **Stuart Marsh** submits he has no problem in dropping the size of blue cod as long as the numbers can be governed.
- 77 **Hilton Leith** supports amending relevant regional amateur fishing regulations to decrease the blue cod recreational MLS from 33 cm to 30 cm in BCO 1, BCO 2, BCO 8, and BCO 10.
- 78 **Keith Ingram** supports the proposal to amend the relevant regional amateur fishing regulations to decrease the recreational MLS from 33cm to 30cm in BCO1, BCO2, BCO8, and BCO10.
- 79 Mr Ingram notes this is a species that has a history of both national and regional management and size limits. The introduction of a national MLS of 33 cm has had a negative impact on northern fisheries where blue cod released have a limited survival rate after hook damage, largely from the predominant use of curved octopus style hooks.
- 80 Mr Ingram notes that there appears to be no sustainability issues in northern waters and that those regional areas which retain separate management will still retain this right.
- 81 Mr Ingram acknowledges that in some areas a separate MLS is best suited and this may well be 33 cm.
- 82 **Ngati Whatua Fisheries Ltd** supports the introduction of recreational size limits for blue cod provided the regulations are in line with the Fisheries Act 1996 and would not create the effect of devaluing the present or future assets of Ngati Whatua Fisheries Ltd.
- 83 **Te Runanga o Ngati Whatua** supports the introduction of recreational size limits for blue cod provided the regulations are in line with the Fisheries Act 1996 and do not create a dual layer which would be difficult and costly for compliance.

- 84 **The New Zealand Big Game Fishing Council Inc. and option4** support a change of the North Island blue cod MLS from 33 cm to 30 cm.
- 85 **The New Zealand Big Game Fishing Council Inc. and option4** submit there do not seem to be any current sustainability concerns in most North Island areas if the amateur size limit is decreased. However, they acknowledge they have not had time or resources to fully consult with members and supporters in the lower North Island.
- 86 **The New Zealand Big Game Fishing Council Inc. and option4** observe blue cod do have a tendency to swallow the hook and gut hooked fish are known to have a higher mortality rate when released. Therefore, this change may reduce wastage and allow fishers to select fish to release that are likely to survive. Well researched information on how to handle and release small blue cod should be provided to assist recreational fishers reduce incidental mortality.
- 87 **The Marlborough Recreational Fishers' Association** submits that currently the MLS for blue cod in the Marlborough Sounds and Marlborough east coast area is 30 cm. Dropping other areas from 33 cm to 30 cms would bring consistency and facilitate compliance. On bag limits for the Sounds/east coast, they strongly advocate a six cod limit and a reduction from the Cook Strait 20 limit to six, to facilitate compliance policing. The Marlborough Recreational Fishers' Association notes while their bag limit was reduced to three there was no drop in the allowable catch for the commercial catch. Raising the limit to six and reducing the Cook Strait and other areas to six, would make common-sense management and eliminate a conflict in bag limits. The Marlborough Recreational Fishers' Association submits that currently a number of Wellington boats operating under the 20 cod daily bag limit are fishing three cod limit areas - these have been observed by both recreational and commercial fishers. The Marlborough Recreational Fishers' Association submits that consideration should be given to a bag limit of six around most - if not all- of the South Island.
- 88 Not all members of **The Top of the South Island West Coast Regional Recreational Forum** supported the proposal to reduce the minimum legal blue cod size in the North Island from 33 cm to 30 cm as it is at present in the Top of the South. Some members believe the MLS should be increased to 33 cm in the Top of the South because it creates more breeding opportunities. There was some concern that a decrease in the MLS to 30 cm in the North will increase the opportunity for Wellington fishers to travel to the Marlborough Sounds and harvest more than the bag limit (3 per person) to take home to Wellington where the bag limit is higher.

*Submissions that do not support lowering the MLS (8)*

- 89 **The Pelorus Boat Club** supports a MLS of 33 cm for blue cod.
- 90 **South Taranaki Underwater Club Inc.** submits that a diver probably has a greater knowledge of the blue cod than the average amateur fisherman. In the South Taranaki bight, the blue cod is a sizable fish, both physically and in numbers, and makes up the bulk of fish taken by amateur fishermen. South Taranaki Underwater Club have noted that when this fish goes through the colour change spectrum to become a mature fish that is able to spawn and keep the fish stocks in good numbers, the fish by this stage is quite large.

- 91 South Taranaki Underwater Club members don't think a blue cod has reached full maturity at 30 cm and to allow any fish to be taken before full maturity is a fundamental mistake that will ultimately affect the stock. In areas North of Taranaki where blue cod is only caught on the odd occasion (usually small) it is treated as a nuisance by fishermen and often finishes up as chopped up bait. Reducing the size will do nothing for it's survival in these areas.
- 92 On these ground the South Taranaki Underwater Club does not support a reduction in MLS for North Island blue cod from 33 to 30 cm.
- 93 **The Marlborough Combined Divers Assn. Inc** does not agree that the size for blue cod should be reduced. They believe that in the areas where the size for blue cod is 30 cm it should be increased to 33 cm. While there may be a year or two till the fish size grows through, they believe that in general there will be more fish of better size available within all fisheries in years to come by increasing the minimum size.
- 94 **Tasman & Sounds Fishers Association (Inc)** submits that much of Area 7 already has a 30 cm size limit and suggests changes to the MLS elsewhere will have little effect. **TASFISH** submits that only significant bag limit changes are likely to change recreational harvest levels. **TASFISH** submits they are seeing a significant increase in the quality of blue cod catches in parts of their fishery since the reduction to three as a bag limit and don't want any changes in the area until they see what happens in the next five years.
- 95 **The Ngawi Sports fishing Club** submits that the club is against decreasing the MLS of blue cod in the North Island South-East area (BCO 2)
- 96 The club submits there is an abundance of blue cod that is readily able to be caught by recreational fishers in their area and that every species should not be readily available in every area of the country. The club states that if an area has been over-fished to make it necessary to consider the decrease of the minimum legal length to 30 cm, then it would be better to change the daily bag limit from 20 to 15.
- 97 The submission includes data from fishing competitions held by the Club which show that substantial numbers of large fish are being landed into their competitions.
- 98 **Tim Hornby** supports maintaining the status quo of a MLS of 33 cm in the South Taranaki Bight, a sub 33 cm blue cod does not return a great deal of edible flesh when filleted, and as stated in the IPP, it allows a larger proportion of the overall cod population to spawn, if the MLS was reduced to 30 cm it would enable a larger amount of blue cod to be harvested but leave less fish to breed, possibly affecting the viability of the stock.
- 99 In the South Taranaki Bight, blue cod above the MLS of 33 cm are very common with catches up to the Recreational Daily Bag Limit quite common. Mr Hornby suspects those North Island recreational fishers concerned that they cannot catch blue cod above 33 cm are from areas that suffer from high fishing pressure, reducing the MLS to 30 cm would find them struggling to catch blue cod of 30 cm in 2 - 3 years after introduction of such a size as the stock will have been fished down to a 26 - 28 cm size range.

- 100 The North Island South-East Regional Recreational Forum does not support the proposed 30 cm MLS for North Island blue cod. Several members stated that fishers have no difficulty in catching blue cod bigger than 30 cm in local areas. Rather, the problem of catching large blue cod occurs mainly in more northern areas.
- 101 The New Zealand Seafood Industry Council Ltd (SeaFIC) opposes the proposed amendments to the recreational regulations for North Island blue cod.
- 102 In SeaFIC's view no concrete issue has been identified because there is no information about the sizes of fish caught in the North Island. It is insufficient to rely on the following statement as the justification for lowering the MLS for blue cod in the North Island: "*The NZRFC have reported that the MLS of 33cm is actually too high in most places, and that recreational fishers would like to see the limit reverted back to 30cm.*"
- 103 SeaFIC contends that amendments must be able to be assessed in terms of their impacts on sustainability. For blue cod there is no information about what is being caught by the recreational sector, the reasons for there being no large fish off the North Island or the size distribution of fish off the North Island. In SeaFIC's view this lack of information should preclude any change to the MLS at this stage.