

28 July 2026

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Submission on the review of sustainability measures for tarakihi stocks 2026

1. Seafood New Zealand welcomes the opportunity to comment on the review of sustainability measures for tarakihi stocks. Our comments are set out below. We note that other industry organisations, companies, quota holders, and fishers may also provide submissions on this review, and we support their engagement in this process. We are happy to provide further information or clarification on any matters raised in this submission.
2. One significant quota owner does not agree with the position stated below, considering the science and science process to be flawed and inadequate to inform management.

Summary of position

Overview

3. Seafood New Zealand does not support any of the proposed options to reduce catch limits for tarakihi.
4. The consultation is founded on an inadequate process and does not provide a sufficiently robust basis for the scale of changes being proposed. The significant uncertainty has been identified regarding the reliability of key management reference points, potential changes in stock productivity, and long-term rebuilding trajectories. Rather than pausing to consider the implications of that uncertainty and engage with stakeholders on an appropriate management pathway, Fisheries New Zealand has proceeded directly to consultation on substantial reductions in catch limits.
5. Seafood New Zealand is particularly concerned that Fisheries New Zealand is proposing substantial reductions to the Total Allowable Catch Limits without properly developing the fishing mortality-based management approach or providing stakeholders with sufficient information to understand the implications of that approach. The consultation document does not adequately explain the proposed target fishing mortality levels, how they were selected, how they relate to management objectives, the expected rebuilding outcomes, or how success will be measured over time. Stakeholders are effectively being asked to comment on a new management framework without being provided the information necessary to meaningfully evaluate it.
6. These concerns are compounded by the identification of an isolated error in the stock assessment that has changed the situation now facing both industry and decision-makers. Had that issue been identified and understood earlier, previous management decisions in 2018, 2019 and 2022 would likely have been different and some of the significant economic and social impacts associated with the current proposals may have been avoided.

7. Fisheries New Zealand is not adequately acknowledging or explaining this issue and its implications. This leads to the public misunderstanding the drivers of the state of the stock and calling into question the robustness of the Quota Management System. In addition, industry is now being asked to absorb the consequences of these assessment issues through immediate substantial reductions in catch limits.
8. Seafood New Zealand supports ensuring the ongoing health and sustainability of both the eastern and western tarakihi stocks. Healthy fish stocks are fundamental to a sustainable seafood sector, and commercial fishers have a direct interest in ensuring tarakihi remains an abundant and productive fishery for future generations.
9. This review should be viewed as the next phase of an ongoing rebuild programme, not the beginning of one. Since 2018, industry has worked alongside Fisheries New Zealand to implement substantial reductions in fishing mortality through successive catch reductions, catch spreading arrangements, industry-led spatial measures, move-on rules, improved reporting, changed fishing gear, and significant investment in research and monitoring.
10. Seafood New Zealand acknowledges that the available information indicates further reductions in fishing mortality may be appropriate. However, the principal issue arising from the assessment is not simply whether fishing mortality should be reduced, but the significant uncertainty surrounding the magnitude of potential reductions, the rebuilding rates likely to result, and the most appropriate management framework for achieving long-term sustainability objectives.
11. For these reasons, Seafood New Zealand does not support any of the options contained in the consultation document. The proposed options are presented as discrete catch limit reductions, yet are underpinned by broader assumptions regarding stock productivity, rebuilding performance, and a transition to F-based management that have not been adequately developed or consulted upon. In our view, neither the science nor the process provides a sufficient basis for the decisions now being sought.
12. We expect Fisheries New Zealand to undertake a process in the next year to review the stock assessment and management approach to address the issues raised above, and in more detail in the Assessment section below.
13. Nevertheless, while that review process is underway, industry supports an approach that ensures both eastern and western tarakihi stocks continue moving in the desired direction while outstanding scientific and management questions are better resolved. Such an approach would combine a measured reduction in fishing mortality with further stock assessment development, targeted research, operational management measures, and a review of management settings once improved information becomes available.
14. This approach better reflects the uncertainty identified through the assessment process, the best available information regarding current biomass and population trajectories over the short to medium-term and is more consistent with the purpose of the Fisheries Act 1996. It ensures sustainability by adopting Total Allowable Catch limits that result in projected rebuild of the population while avoiding unnecessary impacts on fishing businesses, coastal communities, and seafood supply until the scientific basis for longer-term management settings can be more clearly established.
15. Not all our members consider that catch reductions are needed now – one significant quota owner considers the science is not valid and is not supportive of TAC/TACC reductions in 2026/27.
16. This submission is presented on two alternative bases. First, industry's position is that the consultation does not provide a sufficient scientific or procedural foundation for the catch limit reductions proposed. Secondly, we set out the management approach we consider to be the maximum that should be adopted.

Industry Tarakihi Rebuild Plan update

17. Industry remains committed to the Tarakihi Rebuild Plan and to working collaboratively with Fisheries New Zealand to rebuild both the eastern and western tarakihi stocks. The updated Plan retains objectives from the original East Coast Tarakihi Rebuild Plan to reduce catch and to adhere to catch spreading arrangements, industry avoidance areas and continued investment in research.
18. The updated Tarakihi Rebuild Plan incorporates the western stock and strengthens the operational measures that support rebuilding. Alongside staged reductions in catch limits, industry proposes an improved move-on rule that directly targets juvenile catches and the formalisation of further industry avoidance areas. These measures reflect a modern fisheries management approach where sustainability is achieved through a combination of catch limits, targeted operational controls, and industry-led stewardship, rather than relying on catch reductions alone.

Position on proposed measures

Catch limits

19. Notwithstanding our opposition to the proposed catch limit reductions, should the Minister conclude that further reductions in fishing mortality are required at this time, we consider that higher catch limits than any of the options proposed by Fisheries New Zealand, together with a staged and adaptive approach going forward, is consistent with the statutory framework and provides the most appropriate management response at this time given the level of uncertainty. The following recommendations should therefore be read as our preferred approach if the Minister determines that catch limit reductions are necessary.
20. We propose alternative catch limits that will ensure sustainability through meaningful contributions to the rebuild of the tarakihi stock over the next five years, and support a staged and adaptive rebuild programme that will respond to improvements in information and the development of the management response.
21. We propose an initial 20% reduction in the eastern commercial catch limits for the 2026/27 fishing year. Based on the short-term projections, this reduction would change the stock trajectory to a positive direction and would increase the stock biomass by 2030.
22. We propose an initial 45% reduction in the western commercial catch limits for the 2026/27 fishing year. Based on the short-term projections, this option materially improves the stock trajectory relative to the status quo and moves the stock towards the statutory objective. This reduction would halt the declining trajectory of the stock by 2030 with an increasing trend beginning in 2031.
23. For both of the eastern and western stocks we do not support applying the reduction across all QMAs evenly. We have set out our preferred approach to the allocation of the reduction in the body of our submission.
24. Our recommended catch limits are consistent with the requirements of section 13(2A) of the Fisheries Act. In circumstances where substantial uncertainty exists regarding stock productivity, reference points and long-term projections, the Fisheries Act allows the Minister to determine the most appropriate pathway for achieving the statutory objective.
25. The key uncertainty is what the current biomass of the stock represents as a proportion of the unfished biomass from the assessment, which is the key reference point for management decisions based on B_{MSY} . Where this is uncertain, we agree that a fishing mortality-based management approach is appropriate, but this needs to be done properly, with no reliance on the unfished biomass from the stock assessment or associated metrics, and with careful consideration of how an F-based management approach should be implemented in the context of tarakihi and the changing environment.

26. Any proposed Total Allowable Catch that is consistent with moving the stock towards or above a level capable of producing maximum sustainable yield is open to the Minister in his discretion to determine the appropriate level of precaution having regard to the available information. Given the five-year population projections produced from the stocks assessments, which remain the best available information, a much smaller reduction in catch than proposed in the consultation document would be consistent with moving the stock towards or above a level capable of producing maximum sustainable yield, and therefore consistent with section 13(2A).
27. Seafood New Zealand considers that the industry's proposed catch limits are an available option that delivers material reductions and are consistent with moving the stock towards or above a level capable of producing maximum sustainable yield. Based on the best available information, it is also open to the Minister to adopt higher catch limits than proposed by Seafood New Zealand.
28. With the catch limits proposed by industry as a starting point, a staged and adaptive rebuild approach ensures sustainability, while appropriately allowing for some reduced utilisation and while further work is undertaken to improve the information available for future decisions.
29. In circumstances where there is substantial uncertainty in respect of basic information, a staged approach represents an appropriate exercise of that discretion and reflects the dual purpose of the Fisheries Act.

Deemed values

30. We do not support any deemed value increases. The proposed TACC reductions will already strengthen incentives for catch balancing by reducing Annual Catch Entitlement availability. Fisheries New Zealand has not demonstrated that existing deemed value settings are failing to achieve their statutory purpose, or that additional increases are necessary. Applying both measures simultaneously risks imposing duplicate economic signals in pursuit of the same objective.

Habitats of particular significance for fisheries management

31. Seafood New Zealand supports the identification and protection of habitats of particular significance for fisheries management. However, the proposed closures are premature. Fisheries New Zealand should first complete the work necessary to confirm habitat presence, extent and significance, assess threats, and evaluate management options before considering regulatory restrictions.

Juvenile aggregation areas

32. Seafood New Zealand does not support the proposed juvenile aggregation area closures. While improving juvenile survival may contribute to rebuilding, Fisheries New Zealand has not demonstrated that the proposed closures will provide a material additional sustainability benefit beyond that already expected from substantial catch reductions and strengthened industry measures. Furthermore, the proposed areas have been identified primarily from commercial catch data post-2019, which reflects fishing behaviour after the initial tarakihi catch limit reductions rather than juvenile abundance, creating further uncertainty regarding the effectiveness and appropriateness of the proposed closures.

Who We Are

33. New Zealand's seafood industry generates \$5.2 billion annually in economic output and employs some 16,500 Kiwis¹ who provide New Zealand and the world with high-quality, nutritious and great-tasting seafood.

¹ Business and Economic Research Limited (BERL) (2022) – [The Economic Contribution of Commercial Fishing](#)

34. Seafood New Zealand is a professional organisation delivering industry-good services for the wider benefit of the seafood industry, including the development of responses on legislative and regulatory proposals affecting the industry. Our vision at Seafood New Zealand is to lead a thriving seafood industry that creates value for all New Zealanders from a healthy marine environment.
35. Seafood New Zealand works with other industry representative bodies, such as the New Zealand Rock Lobster Industry Council (NZ RLIC), the Pāua Industry Council (PIC), and the New Zealand Federation of Commercial Fishermen, and with other organisations engaged in the management of New Zealand's fisheries and oceans. These include, *inter alia*, Te Ohu Kaimoana, Aquaculture New Zealand, Fisheries New Zealand (FNZ), the Department of Conservation (DOC), the Ministry for the Environment, regional councils, research organisations, recreational fishing organisations and environmental advocacy organisations.
36. Seafood is a highly nutritious food and is a great source of protein – the New Zealand Heart Foundation recommends we eat fish twice a week. Pleasingly, over 73% of Kiwis eat seafood at least once a week. However, less than 9% of us catch a feed once a year. That means New Zealanders are significantly reliant on Kiwi commercial fisheries and fishers to provide seafood for both our everyday meals and our celebration occasions.
37. To continue to provide Kiwis with locally caught seafood, the fishing industry is wholly dependent on a healthy and sustainably managed marine environment and the ability to access fisheries resources. We therefore have a strong interest in the long-term sustainability of tarakihi stocks and the businesses that rely on them.

Our Position

Fishing mortality-based management and section 13(2A): our common starting point

38. This section of our submission sets out how we approach FNZ's proposed use of fishing mortality-based management (also called F-based management), and how we understand it to sit within the section 13 framework and the wider purpose of the Fisheries Act 1996 (Act). Our aim here is not to advance a contested position but to establish a common base, so that the submissions that follow are read against a shared understanding. We appreciate that these concepts are well known to FNZ's science and management staff, so we set them out briefly to confirm that we and FNZ are describing the same thing in the same way.
39. We are doing this because the relationship between the unfished biomass and fishing-mortality expressions of the Maximum Sustainable Yield (MSY) objective — and the precautionary logic of relying on the latter under section 13(2A) — is a point on which genuine misunderstanding can arise, and some of the language used in the consultation document is unclear about how the fishing mortality approach was being used in relation to tarakihi. In particular, FNZ suggests that because the 2026 assessments do not allow the biomass level that would produce MSY to be reliably estimated then decisions are more appropriately made under section 13(2A) of the Fisheries Act 1996 rather than section 13(2)(b).
40. However, in evaluating options for TAC changes, FNZ make use of FSB_{40%} as a reference point. FSB_{40%} is the fishing mortality rate that results in biomass of a fish population at 40% of its unfished biomass level (a common proxy for the biomass level that would produce MSY). But the values of FSB_{40%} used are derived from the same model that FNZ accept as no longer being reliable for estimating B₀ related reference points.
41. The key issue with the model's estimate of B₀ is that it is based on long-term productivity, but there is evidence that recent productivity has been reduced and the estimated B₀ may no longer be achievable even in the absence of fishing. The Plenary concluded that "target levels of stock

biomass, relative to a static SB_0 , may no longer be appropriate". This provides the key motivation for moving to F-based management.

42. However, a move to F-based management requires a focus on the choice of a target fishing mortality rate. In particular, it must be assessed whether estimates of $FSB_{40\%}$ from a model that assumed a constant B_0 are the appropriate choice.
43. Despite this, and without any apparent explanation, the consultation document (at paragraph 17) suggests that *"the default 40% SB_0 target reference point and associated $FSB_{40\%}$ overfishing threshold ... provide useful default benchmarks for assessing the seriousness of depletion"*. There is no clear discussion of the reliability of the model estimates of $FSB_{40\%}$ that have been used in evaluating the management options, notwithstanding that those model estimates use biomass assumptions and projections as to future productivity that are no longer considered reliable and which give rise to the need to use a different method to determine an appropriate TAC.

What we mean by fishing mortality-based management

44. Our framing of this issue turns on a distinction between two different ways of expressing the same objective, which for convenience we describe as two "currencies." Both answer the same management question — is the stock being fished in a way that is consistent with the MSY objective? — but they answer it by measuring different things.
45. The biomass currency measures the size of the stock. It asks: how large is the stock now, compared with the size that produces MSY? Status is expressed as a percentage of the unfished biomass (B_0). Managing this way requires two things to be known: the unfished baseline B_0 , and where the stock currently sits relative to it. The catch limit is then set to move the stock size towards the target. Alternatively, a relative biomass index may be used to measure stock status relative to an established B_{MSY} proxy, such as average biomass in a particular period.
46. The "fishing mortality rate" currency measures something different — not the size of the unfished stock, but the rate at which fishing is removing fish from it. It asks: is the rate that we are fishing consistent with MSY? That target rate is the fishing mortality that produces MSY (F_{MSY}), and "overfishing" is simply fishing at a higher rate. Instead of explicitly steering towards a target stock size, the manager controls the rate of removal, and the stock is left to settle, over time, at the size that rate implies.
47. In many ways the two currencies are simply two views of the same thing: fishing steadily at the target rate delivers, over time, the target stock size, so a biomass-based and a fishing-mortality-based management approach arrive at the same place. However, the use of different "currencies" implies different information requirements. Where the biomass baseline is not estimated reliably—the situation FNZ considers tarakihi to be in—a fishing-mortality approach may still be feasible given the difference in the information required to use an F-based management approach.

The objective does not change — only the currency used to express it

48. The objective set by section 13 does not change when section 13(2A) is used: the Minister must maintain the stock at, or move it towards, a level that can produce the MSY. What can change is the way (the currency) in which that objective is modelled and pursued.
49. The ordinary course — a Total Allowable Catch (TAC) set under section 13(2) — expresses the objective in a biomass currency: a target stock size, being the biomass that produces MSY (B_{MSY}), conventionally proxied as a percentage of the unfished biomass. For tarakihi, as a lower-productivity stock, the default biomass target under the Harvest Strategy Standard (HSS) is 40% B_0 . This is the currency section 13(2) uses to measure success or failure when the necessary biomass information is available.

50. Section 13(2A) operates differently, and it is worth being precise about what it does and does not require. It does not require the Minister to adopt any particular alternative measure, and in particular it does not mandate a switch to a fishing-mortality currency. What it requires is that the TAC be set — using the best available information — in a way that is not inconsistent with maintaining the stock at or above, or moving it towards or above, a level that can produce MSY. In other words, the same objective must continue to be pursued, notwithstanding that the biomass reference points cannot presently be reliably assessed.
51. That objective may still be pursued using an alternative management target directed at the same MSY goal. Fishing mortality — with the target rate of fishing, F_{MSY} , described above — is one such approach. It is not the only possible one, but it is the approach FNZ has adopted here, and FNZ's Operational Guidelines for the HSS identify F-based reference points as an appropriate method to apply where a reliable biomass estimate is not available. It is also consistent with international best practice, under which the accepted response to the absence of a reliable biomass estimate is to adopt an F-based management (we refer to a leading example later in this submission).
52. However, as explained below, the same information deficiencies and logic that have led to the need to change currencies, make it important to determine whether benchmarks established for assessing the former currency can and should still be used.

The ordinary framework assumes knowledge of B_0 and current position

53. Setting a TAC under section 13(2) in the biomass currency depends on a particular assumption: that B_0 can be reliably estimated, and that we can reliably estimate where the stock currently sits relative to it.
54. That approach depends entirely on the reliability of both the B_0 baseline and the current-status estimate. Where the long-term productivity of the fishery may have shifted — as FNZ considers to be likely for tarakihi — the unfished biomass level itself becomes uncertain, and with it every measurement expressed as a percentage of B_0 . In those circumstances the biomass yardstick becomes unreliable: we can no longer be confident where 40% B_0 actually lies, or how far below (or above) it the stock currently sits.

What fishing mortality-based management requires — and problems with reference points when B_0 is unreliable

55. Two consequences follow from this, and both are important to the balance of our submission.
56. First, if fishing mortality-based management is to do the work it is being adopted to do, the fishing-mortality reference point must be genuinely independent of the unreliable B_0 estimate. A reference point that is itself calculated from B_0 does not solve the problem — it simply carries the same unreliability across under a different label.
57. FNZ acknowledges (at paragraph 17 of the consultation document) that the reference points estimated from the model cannot be treated as reliable reference points (because of uncertainty about the impact of changes in tarakihi productivity). Notwithstanding this, when evaluating the proposed management options, the model estimates of $FSB_{40\%}$ are treated as reference points for an F-based approach.
58. The Operational Guidelines for the Harvest Strategy Standard outline other approaches for deriving a fishing mortality reference point, including proxies based on natural mortality rate, and spawner-per-recruit analyses. These approaches could (and should) have been employed to provide context for the model-based estimates of $FSB_{40\%}$.
59. In short, it seems clear that FNZ are using benchmarks for the proposed F-based management approach that are derived from biomass assumptions and modelling that is not now considered reliable.

60. Second, and for the same reason, it follows that the unreliability of B_0 is not confined to the 40% B_0 target. Every reference point in the HSS that is expressed as a percentage of B_0 depends on the same baseline and is affected in the same way. That includes not only the 40% B_0 target, but also the 20% B_0 soft limit that triggers the requirement for a formal rebuilding plan, the 10% B_0 hard limit at which closure is considered, and the estimate of where the stock currently sits on that scale (for tarakihi, the 7.7% B_0 status figure).
61. If B_0 cannot be reliably estimated, then we cannot reliably say where any of these levels lie, nor how far above or below them the stock currently sits. It follows that, in the present circumstances, the stock's assessed position relative to the 40% B_0 target (the 20% B_0 soft-limit rebuild trigger, or the 10% B_0 hard-limit closure threshold) are also unreliable.
62. This is not a criticism of those reference points in the ordinary case; it is simply the necessary consequence of the lack of a reliable unfished biomass estimate that has made resort to section 13(2A) appropriate. Again, we develop the implications of this point later in this submission.

Section 13(2A): using fishing mortality as the chosen proxy is precautionary — and is what section 13(2A)(b) directs

63. Section 13(2A) is the pathway the Act provides for precisely this situation. As emphasised above, it does not abandon the MSY objective or lower the sustainability requirement; it directs the Minister to keep pursuing the same objective, using the best available information, notwithstanding that the biomass reference points cannot presently be estimated. It also expressly provides that the absence of, or uncertainty in, that information must not be used as a reason for postponing or failing to set a TAC.
64. In that setting, relying on fishing mortality as the proxy — as we understand FNZ to be doing, and as we in principle support — is a precautionary and sensible course. For the reasons already given, it allows management to keep steering the stock, over time, towards the biomass that produces MSY using the best available information about the stock's biology.
65. This is reinforced by the terms of section 13(2A) itself. In setting a TAC under section 13(2A)(b), the Minister must have regard to the interdependence of stocks, the biological characteristics of the stock, and any environmental conditions affecting the stock. A fishing-mortality approach is squarely contemplated by reference to those matters.

Summary of our starting point

66. As we develop later in this submission, pursuing the MSY objective through a fishing-mortality target of this kind is consistent with the HSS and well-established international best practice — most directly in the management of Pacific halibut by the International Pacific Halibut Commission (IPHC)— discussed further below.
67. We set the above out to confirm that we and FNZ are approaching this issue with a common understanding of how FNZ has looked to establish and apply a F-based management approach for tarakihi in the context of s 13(2A). We support, in principle, relying on fishing mortality-based management under section 13(2A) as a precautionary and appropriate response to the present uncertainty about the unfished stock biomass, and as an approach well aligned with the matters set out in section 13(2A)(b). However, we have serious reservations as to how it is being applied and the lack of any opportunity to disuses this issue. The submissions that follow are directed at how an F-based management approach is best given effect — in particular the level and phasing of reductions — not at whether the shift to a fishing-mortality basis is correct in principle, which we accept it is.

Assessment and review

Assessment process

68. Seafood New Zealand recognises that the eastern and western tarakihi stock assessments were accepted through the FNZ science working group process and therefore represent the best available scientific information. However, acceptance of a stock assessment should not be interpreted as an endorsement that the assessment provides a high degree of certainty regarding future stock productivity, rebuilding trajectories or the appropriate level of management response.
69. The Plenary discussions demonstrated that there remained significant uncertainty regarding recruitment, productivity, environmental influences and the assumptions underpinning the assessment models. While the Plenary concluded participants that the assessments represented the best available information, there was also a clear expectation that the process should arrive at an outcome despite those acknowledged uncertainties. There is an important distinction between reaching agreement that an assessment represents the best available information and therefore to be used and concluding that it provides a sufficiently robust basis for substantial management interventions.
70. Those uncertainties are reflected throughout the consultation document and underpin Fisheries New Zealand's recommendation to proceed under section 13(2A) of the Act. In our view, they should also have been more clearly reflected in the range of management options presented for consultation. Rather than presenting only substantial catch limit reductions, the consultation could have given greater consideration to staged and adaptive management pathways that better reflected the confidence that could reasonably be placed in the assessment.
71. Acceptance of the assessment should not be taken to mean there is high confidence in the outputs. We therefore encourage Fisheries New Zealand to distinguish more clearly between acceptance of the best available science and confidence in the management outcomes that flow from that science.
72. The level of uncertainty identified through the scientific review should have been reflected more clearly in the management options presented for consultation. The consultation could have included more measured and adaptive management pathways that recognised the acknowledged uncertainty while still ensuring progress toward the statutory objective.

Assessment uncertainties and required review

73. FNZ indicates in the consultation document that it considers the current estimates of both B_0 and B_{MSY} to be unreliable because of the observed environmental changes and the potentially related changes in the productivity of tarakihi.
74. As explained above, it flows then that the $\%B_0$ used to identify that the stock is below the hard limit in the stock assessment is also unreliable and should not be considered in setting the TAC and any associated sustainability measures.
75. As an example of the unreliability of these metrics, a fishery under 10% B_0 is classified as 'collapsed' in the HSS. The eastern tarakihi stock, which was assessed as being at 7.7%, has been relatively stable there for over a decade. Further examples of the inconsistency of the current assessment with observed data are discussed below.
76. However, it is important to recognise that there remain significant areas of information that are reliable (albeit with some inevitable uncertainty) and represent the best available information. In particular, the best available information as indicated by the Fisheries Assessment Plenary (plenary) includes the current biomass, and five-year population projections. As discussed below, this then provides a sound basis for the Minister to make a TAC decision with confidence that it is consistent with his statutory obligation in section 13(2A) to set a TAC that is not inconsistent with

the objective of maintaining the stock at or above, or moving the stock towards or above, a level that can produce the maximum sustainable yield.

77. The proposed shift to F-based management, as per the consultation document, is sensible, but poorly explained, and appears to apply to only some of the considerations in the consultation document (i.e. the projections looking forward, but not in the assessment or current stock status, which continue to refer to percentages of unfished biomass). We consider that this may be the result of the timing of the completion of the stock assessment and the unexpectedness of the result, and the need to implement management measures for 1 October 2026. It has meant that there hasn't been sufficient time for a comprehensive reasoned explanation and engagement on the most appropriate management approach for tarakihi.
78. We consider that this uncertainty, and the indications of the change in productivity need to be thoroughly considered through a transparent and inclusive discussion. F-based management regimes, including those with dynamic F-based reference points in acknowledgement of environmental changes are used in many well-managed fisheries around the world, and we propose that we invite experts involved in those fisheries to join the discussion and bring their learnings to New Zealand.
79. As an example, the IPHC uses an F-based harvest strategy (expressed as a Spawning Per Recruit). The management is based on a management strategy evaluation that tested harvest rules against productivity regime alternatives as well as other assessment assumptions to ensure that the management procedure is robust and sustainable even with productivity changes. Instead of using a constant F, the IPHC approach recognises that the F_{target} is the product of the current biomass and the current productivity.
80. This is similar in nature to the approach to management that FNZ is proposing (subject to the lack of clarity about whether FNZ has adopted a F based management approach that is truly independent of the unreliable unfished biomass), but there has not been a recent management strategy evaluation, and models specifically designed to accommodate productivity change haven't been tested, and there has not been any discussion on what we (collectively) want our management to look like.
81. Based on the consultation document, the options proposed by FNZ appear to be a knee-jerk reaction to the unreliable estimate of "7.7% B_0 ". As discussed above, that metric is related to a B_0 that FNZ considers unreliable and therefore should not form any part of the information considered in making a decision on the appropriate TAC. However, in any event, a management strategy evaluation is needed to test whether something more akin to the IPHC approach would be more appropriate in this situation.
82. Tarakihi is a cornerstone of our inshore mixed trawl fisheries. It's availability year-round and wide geographic spread means it fills in the gaps between more seasonal fisheries, and smooths out operations over the course of a fishing year.
83. Fishers on the water are attuned to changes in fish behaviour and stocks – their livelihood depends on understanding what the fish are doing when, and it is in their interests to ensure that fish stocks remain healthy.
84. Fishers in some areas have reported trends that are not (and cannot) be explained by the assessment model. For example, the catch per unit effort (CPUE), and feedback from those on the water, in TAR2 are positive in terms of stock abundance. This is not consistent with the model reporting, and the science working groups specifically identified that there were a few trends like this that were inconsistent.
85. Additional to that, fishers have, for at least the last seven years, been actively avoiding catch of juvenile tarakihi, including through larger mesh codends, as well as avoiding areas of high tarakihi abundance because of limited ACE availability. There have also been significant issues with the

lack of availability of snapper ACE in TAR2, TAR3, and TAR8 in particular. This has led to fishers changing their gear set ups and fishing differently in location, time, tow characteristics (including duration), and in the desired quantity of catch per tow.

86. As per the synthesis in Hoyle et al. (2024)², these behaviour changes can have a significant effect on CPUE indices, and unless analysed and standardised at a high resolution, shouldn't be considered to be an index of abundance. These behaviour changes and effects on CPUE should be explored through a spatio-temporal CPUE analysis, which was work recommended by the Plenary.
87. Having a more spatially explicit model would also allow for the model to be used to better allocate catch limit reductions in the way that will best support the rebuild of the fishery. The current model cannot accurately estimate how much tarakihi biomass is in each of the contributing Quota Management Area (QMA)/fishery areas which means our apportionment of the catch limit reductions is being done solely based on the recent distribution of catches. It is unknown if this will maximise the rebuild of the stock.
88. We consider these to be major weaknesses in the current model, and request that this analysis be undertaken and incorporated into a revised model for a further catch limit review in 2027.
89. The Plenary also made a number of other recommendations for work that should be done to increase confidence in the model, and we request that work also be undertaken alongside the spatio-temporal CPUE:
 - a) Testing effects of using an age/length-based M
 - i. This would best test the sensitivity of the model to assumptions regarding the large fish that haven't appeared in TAR1E as expected
 - b) Testing movement hypotheses that would enable fish to move two ways and allow for range expansion/contraction
 - i. This would allow for range contraction and also test hypotheses for different fish movement (i.e. avoidance of warmer waters in the north)
 - c) Incorporate environmental covariates in the assessment
 - i. This would support increasing our understanding of potential correlations with tarakihi recruitment and movement (especially northward)
 - d) Testing effects of observed changes in fishing behaviour on commercial catch-at-age being used in the model
 - i. If fishers are actively avoiding smaller fish (and larger fish to some extent), how does this affect the commercial catch at age and how is that affecting what the model estimates to be the age structure of the population
 - e) Ageing of additional tarakihi otoliths from the Area 2 survey (fishing not affected by avoidance behaviours)
 - i. This would allow for more age data to be introduced that isn't affected by the avoidance behaviours seen in commercial fisheries, and provide a similar series (albeit not long enough to serve as a full time series) to the WCSI, WCNI, and ECSI trawl surveys.
 - f) Incorporation of the latest survey results from both WCNI and ECSI and the next WCSI (scheduled for March-April 2027)

² <https://doi.org/10.1016/j.fishres.2023.106860>

- i. We understand that both of the latest surveys had some positive signs of recruitment. If the information is available and additional work is being done on the stock assessment, the new information must be included
90. Further to the modelling explorations, we also submit that it is imperative that assessments and management of both west and eastern tarakihi stocks should be incorporating information (and recommending management of) TAR5. Catch records would seem to indicate that TAR5 is an area with mostly juvenile tarakihi. The current movement assumption for the eastern stock is that fish start in the south and move northwards, but TAR5 is completely ignored. Catch trends in TAR5 have been decreasing in recent years, and are often primarily smaller fish, but the area is not in scope for the assessment.
91. There remains debate about the stock structure and movement hypotheses for tarakihi as well. Genetic analyses have indicated a panmictic stock, i.e. not significant differentiation between the eastern and western stocks, although we acknowledge that persistent differences in age structure and growth parameters support the current assumption of two stocks.
92. The western stock hypothesis – that juveniles recruit into the eastern Cook Strait and then either turn left or right to go down/up the coasts seems inconsistent with other stock movements and doesn't explain the small fish that were historically caught near the southern part of the west coast South Island. This hypothesis also means that the entire stock trajectory is based on the 1+ biomass from the Tasman/Golden Bay stratum of the West Coast South Island trawl survey which is completed every three years. This reliance on a single data source for the primary driver of future stock status is uncomfortable. It may also help to prioritise ageing of otoliths from the next West Coast South Island survey.
93. It is imperative that we continue to expand our understanding of tarakihi and their stock dynamics to ensure our management can support a sustainable fishery.
94. To this end, we request the development of a multi-year research plan specific to tarakihi and resolving many of these questions. As a starting point, we would like to see:
 - a) Completion of a Management Strategy Evaluation in the context of the changed environmental conditions and likely change to management approach
 - b) Consideration given to monitoring approaches for TAR5 and juvenile/pre-recruit fish in the area
 - c) Consideration given to improving the monitoring of pre-recruit fish on the East Coast South Island (TAR3 and 5)
 - d) Further work done to identify any other areas of potential pre-recruits or juveniles in the western stock area
 - e) Consideration be given to biochemical or other analyses to increase our confidence in the stock movement hypotheses (both west and east)
 - f) Comprehensive catch sampling of tarakihi (including sub-minimum legal size (MLS)) catch in deepwater fisheries
 - g) Adding strata to the East Coast South Island trawl survey in the eastern Cook Strait to provide further information on tarakihi in the area
 - h) Consideration given to a tarakihi tagging programme – potentially focused on those using FloMo gear
 - i) Investigation into the impacts of very high snapper abundance on other species, e.g. tarakihi
95. There has been significant discussion throughout this consultation period about the importance of ensuring that stock assessment modellers are able to hear and consider the knowledge and

understanding that active fishers have of stock dynamics. We would suggest that in future, across all stocks, that there be a dedicated opportunity for fishers to input to the process, likely most appropriate to be undertaken outside of the FNZ Science Working Group process. Seafood New Zealand will continue to work to ensure that our representatives at the science working groups also have a full understanding of the on-the-water dynamics, but this doesn't replace the need for fisher observations to be heard.

Environmental drivers

96. Tarakihi (jackass morwong, *Nemadactylus macropterus*) is a long-lived demersal species with a pelagic larval stage that is highly influenced by oceanographic conditions during early life history. International literature, including studies on the same species in south-eastern Australia, indicates that recruitment variability is strongly influenced by environmental variability, including ocean temperature regimes, large-scale climate oscillations, and oceanographic processes that affect larval transport, retention and settlement.
97. Research on jackass morwong in Australian waters has demonstrated relationships between recruitment patterns and broad-scale climate indices which has identified potential shifts in productivity associated with changes in ocean conditions. These studies also highlight that recruitment variability can be driven by environmental conditions operating at spatial scales that extend beyond individual fisheries management settings.
98. In addition to large-scale climate variability, local environmental factors may also influence early life history survival. These include oceanographic conditions affecting larval dispersal pathways, and habitat conditions in coastal and inshore nursery areas. Sedimentation and changes in benthic habitat quality in shallow coastal environments may influence juvenile habitat availability and survival, particularly in areas where juvenile tarakihi utilise inshore nursery habitats prior to moving into deeper adult grounds.
99. It is important to understand how the environment affects tarakihi, not just recruitment but also other biological parameters that may change with changing conditions. If we are seeing a permanent regime shift towards a lower stock productivity we need to be managing on that basis, which will look different to managing through a period of low recruitment in a more productive fishery.

The value of tarakihi to Aotearoa New Zealand

100. Tarakihi is one of New Zealand's most important inshore fisheries. It delivers value that extends well beyond commercial returns, supporting coastal communities, providing employment, contributing to domestic food security, and supplying one of New Zealand's most popular table fish.
101. Unlike many inshore fisheries, tarakihi is harvested consistently throughout the year. While many commercial fisheries are characterised by strong seasonal peaks driven by fish availability, weather, or market demand, the tarakihi fishery provides a reliable year-round source of income for many inshore fishing businesses. This stability is particularly important for owner-operators and small family-owned fishing enterprises, allowing them to maintain regular employment, retain skilled crew, support associated shore-based businesses, and generate steady cashflow throughout the year. Inshore businesses are viable by working across a portfolio of quota species. Tarakihi is often the basis for vessels' catch plans because it is the dependable species that fills the gaps between more seasonal fisheries. Losing access to tarakihi doesn't simply reduce tarakihi revenue it undermines the economic viability of the whole inshore business.
102. The year-round nature of the fishery also supports processing facilities, transport providers, seafood wholesalers and retailers by providing a consistent supply of product rather than more seasonal volumes. This contributes to the resilience of New Zealand's domestic seafood supply

chain. Importantly, tarakihi is predominantly a domestic-supply fishery. More than 90% of commercial tarakihi is consumed within New Zealand, making it one of the country's most important locally supplied seafood species. Tarakihi provides affordable, high-quality protein for New Zealand households, restaurants, fish retailers and takeaway businesses throughout the country.

103. For many New Zealanders, tarakihi is synonymous with the traditional local fish-and-chip shop and remains one of the country's preferred white-fleshed table fish. The fishery therefore makes an important contribution to domestic food security by providing New Zealand consumers with reliable access to fresh, healthy, locally harvested seafood.
104. Rebuilding the tarakihi stock is essential. We support the objective of restoring the stock to healthy levels and ensuring its long-term sustainability. However, rebuilding can and should be undertaken in a manner that ensures sustainability and allows utilisation at a level that gives appropriate weight to the social, cultural and economic wellbeing that this fishery supports, consistent with the purpose of the Act.
105. The speed at which rebuilding occurs should be carefully weighed against the consequences of substantially reducing access to a fishery that provides year-round employment, supports regional economies, underpins domestic seafood supply, and delivers a valued food source for New Zealanders.
106. Where alternative rebuilding pathways are available that achieve the long-term management objective while reducing unnecessary social and economic impacts, these should be given careful consideration.

Impacts on tarakihi fishery and sector

107. We acknowledge that any material reductions in TACs will inevitably result in economic impacts on the commercial fishing sector. Industry accepts that some level of such impacts is an unavoidable consequence of rebuilding the fishery. The key question is not whether impacts occur, but whether they are proportionate to the sustainability benefits achieved and minimised wherever possible while ensuring rebuild.
108. FNZ's assessment demonstrates that their proposed options would have substantial immediate economic consequences. Depending on the option selected, the analysis estimates reductions in landed revenue of between approximately \$4.8 million and \$10.1 million per year, together with reductions in ACE revenue of between \$1.3 million and \$2.7 million. However, FNZ also acknowledges that these estimates represent only the immediate impacts and do not capture the wider economic effects on quota values, ACE markets, processors, Licensed Fish Receivers, distributors, retailers, regional communities, or the broader inshore fishing sector.
109. The practical impacts are also likely to extend further than the direct loss of tarakihi revenue. Tarakihi is a cornerstone species of New Zealand's inshore mixed trawl fishery, occurring across much of the country's coastline and supporting commercial fishing businesses from Northland to Southland. Unlike many sustainability reviews that affect a single region or localised fishery, the proposed reductions will have widespread consequences across the national inshore fleet. While the extent of the impacts will vary between regions and individual businesses depending on their reliance on tarakihi, the cumulative effect will be felt throughout the sector.
110. Opportunities to switch to alternative target species are limited, many higher-value inshore stocks are already fully utilised, and vessels continue to incur substantial fixed operating costs regardless of fishing activity. Reduced availability of tarakihi may also constrain the efficient harvest of other associated species within mixed trawl fisheries, increasing operating costs and reducing the profitability of fishing trips. Consequently, the impacts of these reductions will affect the economic viability of the wider inshore fishing sector.

111. The significant tarakihi reductions will also have impacts on New Zealand's domestic seafood supply. Tarakihi is of the country's most important fresh inshore fish species. Significant reductions in catch limits will therefore directly reduce the availability of a key species supplied to local fish retailers, supermarkets and food service businesses.
112. The consequences will also impact the harvest and supply of other species. Tarakihi is harvested as part of a mixed-species trawl fishery alongside other important inshore species. If reduced tarakihi catch limits, combined with increasing ACE prices and deemed values, result in tarakihi becoming a constraining or "choke" species, fishers may be forced to reduce or cease fishing for other associated species even where those stocks remain healthy and abundant. This would reduce the supply of a wider range of fresh seafood to the domestic market, despite those stocks being capable of supporting sustainable utilisation.
113. There are also longer-term consequences if the reductions result in fishing businesses becoming uneconomic. The loss of vessels, skilled crews, processing capacity and distribution networks would reduce New Zealand's ability to harvest and supply not only rebuilt tarakihi stocks, but many other inshore species. Once this capability is lost it is unlikely to be readily re-established, creating enduring impacts on coastal communities, domestic seafood supply and the resilience of New Zealand's food system.
114. For these reasons, we consider it is important that the Minister seeks to minimise the impacts on utilisation while achieving the necessary sustainability outcomes. Our recommended catch limits recognise that reductions in fishing mortality may be appropriate to ensure sustainability based on the best available information while preserving as far as possible the long-term capability and viability of capability of New Zealand's inshore fishing sector to continue supplying high-quality domestic seafood throughout the rebuilding period.

Industry Tarakihi Rebuild Plan

115. The east coast tarakihi stock has been subject to a documented industry-led rebuild plan (Rebuild Plan) since 2018, following the first successful stock assessment which indicated the stock was below the management target and had been for a prolonged period. Since then, industry has consistently supported rebuilding the stock and has worked collaboratively with FNZ to implement both regulatory and voluntary measures to accelerate recovery.
116. The Rebuild Plan has involved successive reductions to commercial catch limits, supported by a comprehensive package of non-regulatory industry initiatives. These include industry closed areas, catch spreading arrangements to split catch across QMAs, move-on rules and operational changes to reduce juvenile catch such as increased mesh size, significant investment in research and monitoring, and voluntary shelving when a review did not occur but signals indicated catch decreases were required. This demonstrates that industry has not simply relied on regulation but has proactively adapted fishing practices to contribute to rebuilding the stock. Adherence to the Rebuild Plan has been monitored and reported on by FNZ.
117. Throughout this process, industry has remained committed to the principle that has underpinned the rebuild programme: reduce, research and reassess. The current review represents the natural next step in that process. As our understanding of the stock changes, management settings should also evolve.
118. Industry remains committed to rebuilding tarakihi stocks to target levels, and the management response should continue to ensure sustainability while allowing for utilisation that supports the social, cultural and economic benefits that the fishery provides. We have updated the Rebuild Plan to reflect new information and include the western stock. The main measures and key performance indicators of the draft Tarakihi Rebuild Plan 2026 are set out below in Table 1. The draft Tarakihi Rebuild Plan 2026 is attached as Appendix 1.

Management Measure	Milestones	KPI
Commitment	Quota signatories and fishers signed up to plan	90% of owners of each eastern and western TAR stock
Catch Reduction	Catch reduction progress & monitoring reporting.	Fish within the allocated ACE
Catch Spreading	Cumulative reporting of TAR1 & 7E/W catches against voluntary catch spreading limits. Cumulative reporting of individual ACE allowances for TAR1 & 7E/W.	90% adherence to providing east/west catch reports in line with east/west split arrangements
Move-on rule	Reporting of the number of move-on rule triggers by QMA, actions taken by fishers following the triggers & any follow-up actions taken.	90% adherence to move-on rules by signatories
Industry Avoidance Areas	Reporting of the number of incidents of vessels crossing closed area boundaries while fishing & any follow-up actions taken.	97% adherence to closed areas by signatories

Table 1. Sustainability measures and key performance measures for the draft Tarakihi Rebuild Plan 2026

Catch limits and catch spreading

119. One significant quota owner does not agree with the position stated below, considering the science and science process to be flawed and inadequate to inform management.

Approach to proposed catch limits

120. If the Minister decides to make a reduction to the TAC, we support a moderate reduction in catch limits for both the eastern and western tarakihi stocks based on the best available information. While there are differences in trajectories and fishery characteristics between the western and eastern stock assessment areas, the underlying management approach we support is the same.
121. We acknowledge that the updated stock assessments indicate reductions in fishing mortality are appropriate to rebuild both the eastern and western stocks towards their management targets.
122. As discussed above, the assessment of unfished biomass is now considered unreliable, and that biomass should not form part of the information considered in the decision.
123. We also acknowledge that the remaining best available information, including the current stock assessments and future projections are subject to recognised uncertainty, as is always the case with such information. As outlined in the consultation documents, this includes uncertainty relating to recruitment, stock dynamics, model assumptions and the projected response of the stocks under different catch scenarios.
124. For these reasons, five-year projections have been used for the review of sustainability measures – this is a relatively short timeframe in the total rebuild period and there is therefore more certainty in relation to these projections than is the case for the longer-term projections.
125. The five-year projections are the best available information about the impact different Total Allowable Commercial Catch (TACC) decisions would have on the trajectory of tarakihi stocks. They demonstrate that the TACCs proposed by Seafood New Zealand ensure sustainability of the tarakihi stocks because the population projections indicate that the TACC proposed by Seafood New Zealand would result in trajectories consistent with moving towards B_{MSY} within five years.
126. These five-year projected population trajectories remain conditional on the assumptions applied within the projection model, some aspects of which make the projections more conservative. For example, the projections assume fishing mortality (TACCs) remain constant as

a proportion of the population through time, meaning that the projections assume that catches increase as biomass rebuilds. In practice, future TACCs remain subject to separate management decisions, and there is no expectation that catch limits would automatically increase as stock biomass improves or be reviewed annually. A management approach that maintains catch limits following an initial reduction would result in lower fishing mortality than that assumed in the projections, meaning the modelled rebuilding trajectories are likely to be conservative relative to how the fishery would be managed in practice.

127. Given these uncertainties and projection assumptions, we consider there is a sound and legally defensible management rationale for implementing reductions through a staged approach.
128. The catch limits proposed by Seafood New Zealand would provide an immediate reduction in fishing mortality consistent with legislative requirements while mitigating major disruption to commercial fishing businesses, processors and coastal communities. They would also provide an opportunity to review the stock assessments and reduce uncertainties before determining whether additional reductions are required.

Requirements of section 13(2A)

129. Due to the substantial uncertainty and unreliability regarding the biomass level capable of producing maximum sustainable yield (B_{MSY}), section 13(2A) is the appropriate statutory pathway for this review. Where section 13(2A) applies, the Minister must set a TAC that is not inconsistent with the objective of maintaining the stock at or above, or moving the stock towards or above, a level capable of producing MSY, based on the best available information available at the time of the decision.
130. In setting a TAC under section 13(2A), the Minister must have regard to the interdependence of stocks, the biological characteristics of the stock, and any environmental conditions affecting the stock, use the best available information and not use the absence of, or any uncertainty in, that information as a reason for postponing or failing to set a total allowable catch for the stock. Therefore, we understand that despite the uncertainty in the current stock assessment, the TAC must be set to reflect the available information and be consistent with the objective to move the stock towards or above B_{MSY} .
131. Under section 13, when the best available information indicates a stock is below B_{MSY} , the Minister shall have regard to relevant social, cultural, and economic factors in considering the way and rate at which the stock is moved towards or above B_{MSY} . This provides the Minister discretion to choose from a range of TACs with associated rebuild rates – the Minister is not bound to rebuild the stock at the fastest possible rate. Rather, the inclusion of social, cultural and economic factors can be considered and slower rebuild rates can be applied to the extent that the TAC is still consistent with the overall objective of section 13(2A).
132. Our alternative recommended catch limits (set out below) have been developed specifically to meet the requirements of section 13(2A). They deliver immediate and meaningful reductions in fishing mortality and result in a material increase in the stocks within five years, and are therefore not inconsistent with the objective of moving the stocks towards B_{MSY} . However, our recommended catch limits place more weight on the social, cultural and economic factors associated with the tarakihi stocks in the short term than is the case for the options proposed by FNZ.
133. We agree that compliance with section 13(2A) must be assessed on the basis of the TAC decision itself and not on the assumption that additional reductions may be implemented in the future. Our recommended catch limits are not dependent on future management action to satisfy the statutory requirements. Rather, future reviews would occur because additional information will become available through updated stock assessments, fishery performance and improved understanding of recruitment and productivity. That information may further improve confidence in the projected stock trajectories, particularly in the long-term and inform whether further

management action is appropriate, but it is not relied upon to make the current decisions consistent with section 13(2A).

134. As explained above, where a proposed TAC is consistent with section 13(2A), the Act does not prescribe a single management outcome. Rather, the Minister retains discretion to determine the appropriate TAC (and therefore the TACC and other allowances), informed by the best available information and the purpose and relevant provisions of the Act. Our proposed reductions ensure sustainability by taking immediate action to improve stock status while avoiding unnecessary impacts on utilisation in circumstances where the assessment acknowledges significant uncertainty regarding recruitment, productivity and future stock dynamics.
135. Larger catch reductions would result in the projected rebuild occurring more quickly, but that faster rebuild is achieved at increasing and likely irreversible social, cultural and economic cost. All options before the Minister – including the options proposed by Seafood New Zealand – will ensure the sustainability of the tarakihi stocks by rebuilding the stocks over time. The decision for the Minister is whether increasing the speed of the rebuild is justified at this time given the lack of proper development and consideration of the proposed F-based management approach and the additional utilisation impacts associated with the lower TAC options proposed by FNZ.

Significant impacts on industry

136. We acknowledge that the reductions we have proposed will still have significant impacts on the inshore fishing sector. While our preferred approach reduces the economic impacts relative to the larger reductions proposed by FNZ, it does not avoid them. Industry accepts that meaningful reductions in fishing mortality are necessary to rebuild tarakihi stocks and ensure their long-term sustainability. The question is not whether impacts should occur, but the extent of those impacts.
137. Tarakihi is a key species for the New Zealand inshore mixed trawl fishery. The proposed reductions will affect commercial fishing operations across much of the country, with consequences across individual quota owners, vessel operators, skippers, crew, processors, transport providers and domestic seafood markets. Unlike many stock reviews, the geographic extent of the eastern and western tarakihi stocks means these impacts will be felt across a large proportion of the inshore finfish sector rather than being confined to a single region or fishery.
138. The ongoing viability of the inshore fleet should be an important consideration in determining the appropriate management response. Fishing businesses that become uneconomic during the rebuilding period are unlikely to simply re-enter the fishery once stocks recover. The loss of vessels, experienced crews, processing capacity and market relationships would have enduring consequences for the wider inshore sector and New Zealand's ability to harvest and supply a range of sustainably managed inshore species, not just tarakihi.
139. Maintaining the capability and capacity of New Zealand's inshore fishing fleet is itself an important long-term consideration. Rebuilding a fish stock is only one component of sustainable fisheries management; maintaining the industry capable of harvesting that stock once rebuilt is equally important.
140. The practical consequences of significant catch reductions are well illustrated by one long-established, family-owned seafood business supplying Wellington's seafood – Wellington Seamarket. For generations, this business has supported local fishers and supplied fresh, locally caught seafood to fish retailers, restaurants and fish and chip shops throughout Wellington.
141. The business operates within the TAR2, TAR7 and TAR8 fisheries, where tarakihi forms a core part of its catch but is also an unavoidable component of fishing for other inshore species, including moki and warehou. Recent increases in tarakihi catch rates in these areas means that fishers are already finding it increasingly difficult to avoid catching tarakihi while targeting these other species.

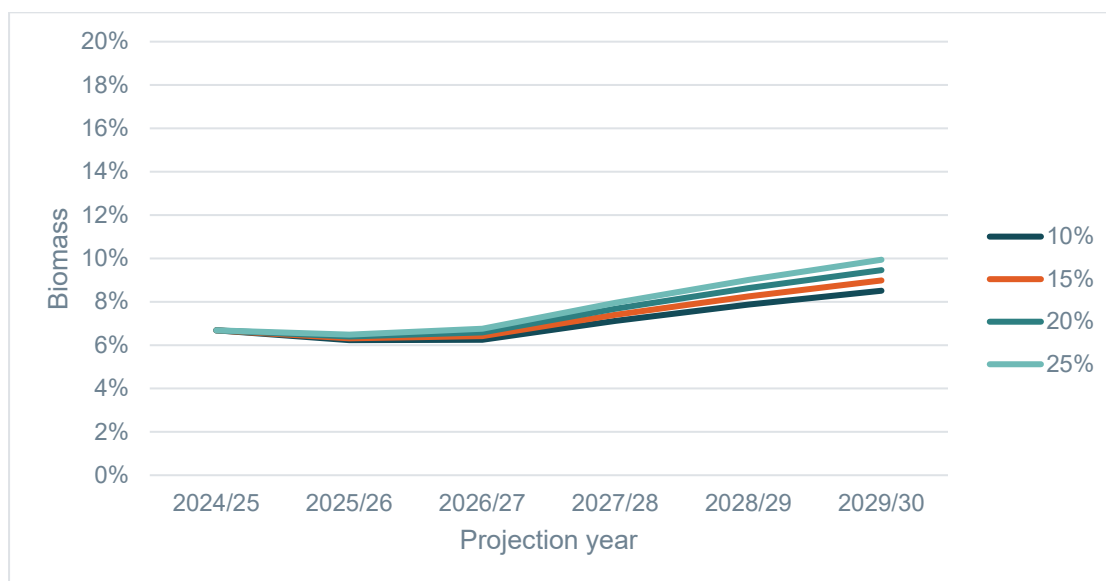
142. The proposed reductions therefore have implications on more than just tarakihi stocks. Tarakihi is already a constraining ("choke") species in parts of the inshore mixed trawl fishery, and that constraint will become more significant as the stock rebuilds and abundance increases. The extent of those impacts is directly influenced by the level at which catch limits are set. Larger reductions will result in tarakihi becoming a more significant constraint on fishing activity, reducing fishers' ability to harvest other associated species despite those stocks remaining healthy and available for sustainable utilisation. Because the proposed reductions apply across much of the New Zealand coastline, there are few practical opportunities to relocate fishing effort to alternative areas where tarakihi interactions can be avoided.
143. For this business, the consequence is not simply reduced tarakihi landings, it means not being able to catch other species as well – this means the potential loss of the ability to reliably supply fresh local seafood to the Wellington market. This situation illustrates the risks facing many family-owned, multi-generational fishing businesses throughout New Zealand. If businesses become uneconomic and vessels leave the fishery, communities lose not only locally caught tarakihi but also access to a wider range of fresh inshore species, together with the knowledge, infrastructure and supply chains that support them. These impacts are likely to be felt in coastal communities across the country as the effects of the reductions flow through the wider inshore fishing sector.
144. This demonstrates that decisions on tarakihi catch limits have wide reaching consequences across the inshore fishing sector. They affect the continued utilisation of other fisheries resources, the viability of family-owned fishing businesses, and the availability of fresh locally caught seafood for New Zealand communities.

Catch Limits

Eastern tarakihi commercial catch limit reduction

145. We support an initial 20% reduction in the eastern commercial catch limits for the 2026/27 fishing year. Based on the short-term projections, this reduction would change the stock trajectory to a positive direction and would increase the stock biomass by 2030.
146. On any of the proposed catch limits, including both the FNZ proposed options and the TACC and regional limits proposed by Seafood New Zealand, the tarakihi stock will rebuild. The decision for the Minister is therefore about how quickly that rebuild will occur.
147. This can be seen in the below graph based on information provided by FNZ that plots the population trajectories under scenarios with different TACC levels, described by reference to the level of reduction from the current TACC. The five years of this graph reflect the population trajectories based on the Plenary-accepted assessment, and the particular numbers that are plotted in the graph are set out in the table provided. The y-axis refers to the percentage of B_0 , which are unreliable, however the trajectories (i.e. the shape of the graph) remain reliable (albeit with uncertainties as discussed below), including whether the projected stock at any stage is more or less than the current stock level.
148. Seafood New Zealand's proposed TACC outlined below reflects a 20% reduction in commercial catch limits. As can be seen, after an initial dip in all scenarios (which is the result of the recruitment of fish already hatched in recent years), all scenarios then show an increase in the population trajectory over time (Fig. 1). Focusing on the five years that Plenary has adopted, all scenarios involving at least a 10% reduction in TAC show an increase in the population trajectory within those five years (Table 2).

Figure 1: Population projections for eastern tarakihi based on differing commercial catch limit reduction scenarios



Response to biomass							
Projection year	0	1	2	3	4	5	6
TACC							
Reduction	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
10%	7.7%	6.7%	6.2%	6.3%	7.1%	7.9%	8.5%
15%	7.7%	6.7%	6.3%	6.4%	7.4%	8.3%	9.0%
20%	7.7%	6.7%	6.4%	6.6%	7.7%	8.6%	9.5%
25%	7.7%	6.7%	6.5%	6.8%	8.0%	9.0%	9.9%

Note: These figures are indicative given the acknowledged deficiencies in the assessment

Note: These figures may not represent the most up to date projections

Table 2. Eastern tarakihi stock biomass response to differing commercial catch limit reductions.

149. The eastern assessment indicates that this reduction improves the projected rebuilding trajectory and is consistent with statutory obligations. While larger reductions provide greater confidence of rebuilding over the projection period, we consider a 20% reduction represents the appropriate exercise of the Minister's discretion under section 13(2A). It delivers an immediate reduction in fishing mortality while recognising the acknowledged uncertainty surrounding recruitment, productivity and future stock dynamics.

150. We consider the reduction in each area should be based on the lower of the current catch or the current catch limit. The reason for using the lower of the catch or the catch limit is to ensure that additional catch is not provided to areas that have exceeded the catch limit in recent years. We support an approach that reduces the catch in TAR1E by a higher percentage than other areas, with the purpose of allowing that catch to be taken in TAR2 where abundance remains high. The area limits for our preferred option are set out in Table 3.

SNZ Preferred Option					
20% catch limit reduction in year one					
A 20% catch limit reduction equates to a 17% reduction in current catch*					
Stock	Current limit	Limit reduction	Current catch*	Catch Reduction	Eastern limit
TAR1	399	30.3%	352	21.0%	278.26
TAR2	1104	15.0%	1104	15.0%	938.40
TAR3	694	22.2%	658	18.0%	539.59
TAR7	131	18.0%	131	18.0%	107.42
	2328	19.9%	2245	17.0%	1864
*Current catch equating to the lower of the average last 3 years catch or the catch limit					

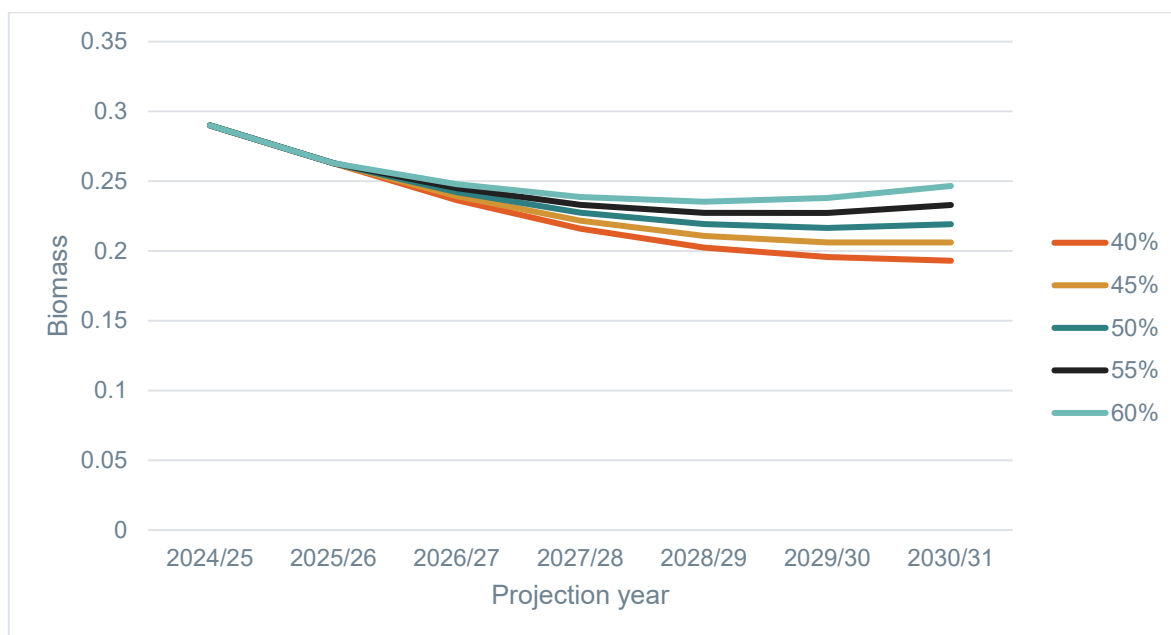
Table 3. Seafood New Zealand option for 2026/27 commercial catch limits for eastern tarakihi

151. While an overall reduction in catch may be required to support the rebuilding of the tarakihi stock, there remains flexibility in how that reduction is distributed across the relevant quota management areas. The objective is to achieve the level of catch reduction necessary to ensure sustainability, not to apply equivalent reductions in every QMA regardless of local fishery characteristics. This provides an opportunity to consider the practical implications of catch limit changes and to allocate reductions in a manner that achieves the required conservation outcome while minimising unnecessary impacts on utilisation.
152. This is particularly relevant for TAR2 and TAR7E, where industry experience and catch rates indicate that tarakihi remain relatively abundant and are difficult to avoid when targeting other species. In these fisheries, tarakihi already function as a choke species, meaning substantial TACC reductions would constrain access to healthy target fisheries and could result in fishing activity being curtailed well before other catch limits are reached. Applying disproportionately large reductions in these areas would therefore impose significant economic and operational costs without necessarily providing a commensurate sustainability benefit.

Western commercial catch limit reduction

153. We support an initial 45% reduction in the western commercial catch limits for the 2026/27 fishing year. Based on the short-term projections, this option materially improves the stock trajectory relative to the status quo and moves the stock towards the statutory objective. It would halt the declining trajectory of the stock by 2030 with an increasing trend beginning in 2031.
154. The western assessment projections indicate that this reduction improves the rebuilding trajectory and moves the stock towards the statutory objective. We acknowledge that larger reductions would provide greater confidence of rebuilding under the projected scenarios (Figure 2). However, the projections remain conditional on assumptions that fishing mortality remains constant through time, resulting in increasing catches as biomass changes. They should therefore be interpreted as projections under a defined management scenario rather than forecasts of future management. In our view, a 45% reduction represents the appropriate exercise of the Minister's discretion under section 13(2A), balancing immediate sustainability gains with the significant uncertainty surrounding future recruitment and productivity.

Figure 2. Population projections for Western tarakihi based on differing commercial catch limit reduction scenarios



Response to biomass							
Projection year	0	1	2	3	4	5	6
TACC Reduction	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
40%	29.0%	26.3%	23.6%	21.6%	20.2%	19.6%	19.3%
45%	29.0%	26.3%	23.9%	22.2%	21.1%	20.6%	20.6%
50%	29.0%	26.3%	24.2%	22.7%	21.9%	21.7%	21.9%

Note: These figures are indicative given the acknowledged deficiencies in the assessment

Note: These figures may not represent the most up to date projections

Table 4. Western tarakihi stock biomass response to differing commercial catch limit reductions.

155. We consider the catch limits for each area should be set so that the reduction comes equally from TAR1W and TAR7W as a proportion of current catch and the catch limit for TAR8 remains at status quo. The area limits for our preferred option are set out in Table 5.

SNZ Preferred Option					
Staged decrease with 45% catch limit reduction in year one					
A 45% catch limit reduction equates to a 11.5% reduction in current catch*					
Stock	Current limit	Limit reduction	Current catch*	Catch* reduction	Western limit
TAR1W	579	52%	327	14.6%	279
TAR7W	863	52%	483	14.6%	413
TAR8	225.4	0%	225	0.0%	225
	1667.4	45%	1036	11.4%	917

*Current catch equating to the lower of the average last 3 years catch or the catch limit

Table 5. Seafood New Zealand option for 2026/27 commercial catch limits for western tarakihi

156. We consider that making no material reduction to the TAR8 TACC is justified given the unique development of this fishery. Prior to the widespread adoption of GPS and modern navigation technology, much of the TAR8 fishing ground was effectively inaccessible due to its offshore location and complex seabed limiting the ability of vessels to reliably target tarakihi or safely avoid foul ground. Consequently, historical catches were low, not necessarily because of limited stock abundance, but because the fishery was not practically exploitable. As a result, the original TACC was likely established from a limited catch history rather than a comprehensive understanding of the stock's productive capacity. With advances in navigation technology, the fishery has become safely and consistently accessible, revealing productive fishing grounds that industry considers to be indicative of a previously under-utilised resource rather than one that has been heavily exploited. In this context, a proportionate reduction to the TAR8 TACC would not appropriately reflect the fishery's historical development or the available evidence, and greater reductions should instead be directed towards TAR1 and TAR7, where there is clearer evidence of the need for catch reductions to support stock rebuilding.

Catch spreading

157. We support continued industry management of catch spreading in TAR1 and TAR7 through non-regulatory measures rather than regulatory subdivision of quota management areas.

158. Since implementation of the Rebuild Plan in 2018, industry and FNZ have successfully managed the spatial distribution of fishing effort through non-regulatory catch spreading in TAR1 and TAR7. These measures have demonstrated that fishing behaviour can be effectively influenced without the need for additional regulation. Catch spreading is formalised and monitored through Fishserve which “tags” ACE with a sub-area code.

159. The existing non-regulatory framework provides an adaptive management response that can be refined as new information becomes available, without introducing unnecessary regulatory complexity. This flexibility is particularly important given the uncertainty recognised throughout the stock assessment and the ongoing evaluation of rebuilding progress.

160. In the absence of evidence that the current arrangements are ineffective at managing the eastern and western stock catch limits, we consider the existing non-regulatory approach remains the most appropriate, adaptive and effective means of managing catch distribution within the fishery.

161. We acknowledge that the TAR7 East sub-area catch limit has been exceeded. However, this outcome does not demonstrate that the catch spreading framework has been ineffective. Catch spreading has continued to influence fishing behaviour and constrain catch within the agreed eastern and western stock limits. Importantly, catches within TAR7 East did not result in the total eastern stock catch limit being exceeded.

162. The exceedance of the TAR7 East sub-area limit is partially a consequence of increasing abundance within a relatively small geographic area of the fishery, where unavoidable catch can occur despite operators' efforts to minimise tarakihi catch in that area. This reflects the challenge of setting an appropriate catch limit for a dynamic part of the fishery, rather than a failure of the non-regulatory catch spreading framework itself. Creating additional regulatory quota management areas would not address this issue, as the underlying challenge remains determining an appropriate catch limit that reflects the complex spatio-temporal distribution and availability of the tarakihi stocks.

163. A further contributor has been that a small number of operators have not adhered to the industry catch spreading arrangements. Because catch spreading is a non-regulatory measure, fishers holding sufficient TAR7 ACE are able to cover catch taken outside the agreed catch spreading arrangement without incurring deemed value liabilities. Industry leadership and ACE trading arrangements have however substantially reduced this issue in recent years.

164. The proposed reductions to both the eastern and western portions of TAR7 are also expected to strengthen compliance with the catch spreading arrangements. Previous reductions focused primarily on TAR7 East while surplus ACE remained available in TAR7 West. Reducing both portions of the QMA will remove this surplus ACE, creating stronger incentives for operators to fish in accordance with the agreed catch spreading arrangements without the need for additional regulation.
165. Rather than introducing further regulatory complexity through subdivision of quota management areas, TAR7 demonstrates the importance of continuing to improve the information used to set responsive catch limits. As knowledge of the stock improves through future spatially explicit assessments and monitoring, catch spreading arrangements and sub-area catch limits can continue to be refined within the existing adaptive management framework.

Other sources of fishing related mortality

166. The current allowance for other sources of fishing-related mortality (OSFRM) was established during the 2018 sustainability review as a precautionary generic setting rather than a stock-specific estimate. In making that decision, FNZ advised that the allowance was intended to account for fishing-related mortality that is not landed or otherwise able to be accurately accounted for. Officials also recognised that information on these sources of mortality was, by its nature, highly uncertain.
167. In the absence of better information, FNZ adopted a generic approach of setting the allowance at 10% of the TACC where the majority of the commercial harvest was taken by trawl. The resulting allowance was therefore a pragmatic default designed to manage uncertainty, rather than a quantified estimate of actual mortality for the stock. Implicit in this approach was that, as better information became available, the allowance could be refined to more accurately reflect the level of fishing-related mortality occurring within the fishery.
168. We consider that the information available since 2018, and the increased certainty in that information provides rationale for an allowance for OSFRM lower than the default 10%.
169. At the time that the decision to apply a generic 10% allowance for OSFRM for trawl caught stocks, there was no consistent, nationwide electronic reporting of species-specific sub-MLS catch across the commercial fleet until the electronic reporting rollout during 2019. Prior to that, reporting was limited by the staged implementation of electronic reporting and, for most fisheries, the absence of the reporting fields and codes needed to record sub-MLS catch in a standardised way.
170. The other aspect of unreported catch is deliberate unlawful discards. However, with the rollout of onboard cameras completed in 2022, 85% of the inshore catch by volume is monitored. This creates a high level of certainty in the reliability of fisher reported data both in relation to landed and discarded fish.
171. Because of the above advancements in reporting, the amount of unreported catch has been reduced, and this should be incorporated into the calculation of the allowance for OSFRM.
172. Since 2019, the percentage of sub-MLS has been less than 1% of the tarakihi catch on the east and less than 0.1% on the west (see Table 6).

Fishstock Code	Sub MLS catch 2019-2025 (t)	TAR catch 2019-2025 (t)	Percentage sub MLS
TAR1	1.00	4599	0.02%
TAR2	7.77	7325	0.11%
TAR3	34.13	4319	0.79%
TAR4	0.00	228	0.00%
TAR5	2.82	781	0.36%
TAR7	3.18	5146	0.06%
TAR8	0.91	1286	0.07%

Table 6. Proportion of reported sub-MLS returns in tonnes by QMA from 2019/20 to 2024/25.

Deemed values

173. We acknowledge FNZ's rationale for reviewing deemed value settings alongside proposed changes to the TACC. Deemed values play an important role in the QMS by incentivising fishers to acquire sufficient ACE to balance their catch, while ensuring unavoidable catch is landed and reported. Where TACCs are reduced, it is appropriate to consider whether deemed value settings continue to provide the desired incentive to balance catch with ACE.
174. However, we do not support the proposed increases to deemed value rates. The proposed rates are unnecessarily punitive and replace the current stock-specific settings with a single deemed value rate across all eastern and western tarakihi stocks. Under all options, the annual deemed value rate would exceed the port price for every tarakihi stock, while the highest option would set the deemed value substantially above the lowest port price, creating a significant financial penalty for unavoidable catch.
175. Deemed values are not a sustainability measure. Their purpose under section 75 of the Act is to incentivise catch balancing while ensuring unavoidable catch continues to be landed and reported. FNZ has not identified evidence that the current deemed value settings are failing to achieve that purpose. While the consultation document notes that ACE market conditions may change following TACC reductions, it does not demonstrate that the current deemed value settings will become ineffective or that higher deemed values are required.
176. The proposed reductions in catch limits will reduce ACE availability and are expected to strengthen incentives for catch balancing through increased ACE scarcity. Increasing deemed values seeks to achieve the same behavioural outcome by increasing the cost of catching fish without ACE coverage. Applying both levers simultaneously compounds the same market signal and risks increasing ACE prices and compliance costs beyond the level necessary to achieve the statutory objective of incentivising catch balancing.
177. Reducing the TACC does not simply reduce catch limits; it also reduces the quantity of ACE available to fishers. As ACE availability declines, fishers face stronger incentives to avoid catch that cannot readily be balanced and to secure ACE before fishing. The reduction in TACC therefore naturally strengthens the same catch balancing behaviours that deemed values are designed to encourage.
178. The consultation document does not fully recognise how the ACE market is expected to respond to a lower TACC. As ACE becomes scarcer, its market value is expected to increase, strengthening the incentive for fishers to acquire ACE and manage their catch accordingly. In practical terms, the proposed TACC reductions will themselves strengthen the behavioural incentives that deemed values are intended to create. FNZ should allow that market response to occur before imposing substantially higher deemed values designed to influence the same behaviour.

179. This is particularly important in mixed-species trawl fisheries, where tarakihi is often an unavoidable component of the catch. Excessively high deemed values, combined with increased ACE prices, have the potential to distort fishing behaviour and materially erode the profitability of otherwise sustainable fishing operations. Recent shifts in the distribution of some inshore species have also increased the frequency with which deepwater operators encounter tarakihi. Because many of these operators hold limited tarakihi quota, they rely on purchasing ACE to balance unavoidable catch and would be disproportionately exposed to the proposed deemed value increases where ACE availability becomes constrained. Similar market outcomes were experienced during the SNA8 rebuild, where elevated deemed values contributed to significant increases in ACE prices and imposed substantial economic pressure across the fishery.
180. Deemed value settings can readily be reviewed and amended if market conditions demonstrate that stronger incentives are required. We therefore support an adaptive approach. Following any TACC reduction, FNZ should monitor ACE prices, catch balancing behaviour and deemed value usage before considering whether further intervention is necessary. If evidence emerges that current settings are no longer achieving their intended purpose, deemed value rates can be adjusted at that time.
181. The proposed approach for tarakihi is also inconsistent with FNZ's treatment of other stocks undergoing sustainability reviews. In the concurrent LIN7 review, FNZ proposes a substantial reduction in TAC and TACC but does not propose corresponding increases in deemed value rates. This reflects an acceptance that reduced ACE availability is itself expected to strengthen incentives for catch balancing.
182. Tarakihi is being treated differently despite broadly comparable management circumstances. In both fisheries, reductions in TACC will naturally reduce the supply of ACE and increase its value. However, only tarakihi is proposed to be subject to simultaneous and substantial increases in deemed value rates. The consultation document does not explain why this additional intervention is necessary for tarakihi but not for LIN7, nor does it demonstrate that the current tarakihi deemed value settings have failed to achieve their statutory purpose.
183. In the absence of such evidence, FNZ should adopt the same adaptive approach for tarakihi that it has applied to LIN7. The natural market response to a lower TACC should be allowed to occur before additional regulatory incentives are imposed. If subsequent monitoring demonstrates that catch balancing is deteriorating or deemed value use is increasing, deemed value rates can readily be reviewed and amended.

Additional industry-led sustainability measures

Move on rule

Change to move on rule parameters

184. The purpose of the move-on rule is to reduce the catch of juvenile tarakihi and support the rebuilding of the stock. As part of the review of existing management measures, we have assessed whether the current rule is effectively identifying fishing events where juvenile catch is of concern.
185. Under the current rule, a move-on event is triggered when adult tarakihi comprise more than 10% of the catch and juvenile tarakihi comprise more than 15% of the tarakihi catch. While this approach was intended to identify fishing activity associated with higher juvenile catch, it relies on catch composition rather than the actual quantity of juvenile fish caught.
186. Analysis of catch information indicates that this can produce outcomes that are not always consistent with the objective of the measure. In some cases, relatively large catches of juvenile tarakihi do not trigger a move-on event because the proportion of adult tarakihi in the catch is low. Conversely, relatively small catches of juvenile tarakihi can trigger the rule because of the composition of the catch in a particular fishing event.

187. The amended move-on rule would replace the existing percentage-based rule with a direct threshold:

If sub-MLS tarakihi catch exceeds 20 kg in a fishing event MOVE-ON:

o Ensure that all subsequent events for that trip are:

- o more than 1nm from **all** parts of the event where small fish were encountered, **or**
- o deeper than 10 metres along all points of the event where the small fish were encountered.

188. This approach focuses directly on the outcome the measure is intended to address - the catch of juvenile fish. It removes the need for multiple percentage calculations and provides a clear and consistent threshold that can be readily understood and applied more quickly by fishers.

189. Importantly, the analysis indicates that juvenile tarakihi catches are generally low, with only a small number of fishing events recording higher catches. The proposed threshold therefore targets those events that are most relevant to the objective of reducing juvenile catch, rather than increasing the overall number of move-on events.

190. Overall, the change is intended to improve the effectiveness of the measure by aligning the trigger more closely with the management objective, while also providing a more transparent and practical rule for fishers to apply.

191. This rule only applies to the inshore fleet and excludes vessels above 28metres. The exclusion of deepwater vessels is due to the practical implications for these vessels in quantifying the level of sub-MLS catch. Due to the volume of deepwater catches and the onboard processing – it is unlikely that catch would be able to be quantified prior to the next event being commenced.

Benefits of move-on rule approach

192. Move-on rules provide a targeted management response that directly addresses the objective of reducing juvenile tarakihi catch while avoiding unnecessary restrictions on fishing activity.

193. Unlike large scale static area closures, which prohibit fishing regardless of whether juvenile tarakihi are present, a move-on rule is triggered only when juvenile catch occurs. This means the management response is applied where and when it is needed, rather than assuming that juvenile abundance and distribution remain constant over time.

194. The distribution of juvenile tarakihi is influenced by environmental conditions, recruitment strength and seasonal patterns, and can vary considerably between years. A move-on rule is inherently adaptive to these changes because it responds to the presence of juvenile fish at the time of fishing, rather than relying on fixed spatial boundaries established from historical information. As a result, the measure provides direct protection for juvenile tarakihi while minimising unnecessary impacts on access to fishing grounds and the utilisation of other target species.

Spatial management

195. Not all spatial management measures require the same level of justification. There is a clear continuum between informal operational practices, voluntary industry agreements and regulatory intervention. As measures move along that continuum towards formal regulation, there is a corresponding increase in the level of evidence, analysis, consultation and justification required before they can be considered appropriate. There is an important distinction between regulatory closures imposed through legislation and non-regulatory measures implemented by industry agreements. Regulatory measures determine the lawful rights of all fishers and are difficult to amend once established. They therefore require a high evidential threshold and a robust assessment demonstrating that they are necessary and effective.

196. By contrast, industry led spatial measures provide a flexible and adaptive management tool. Industry can respond quickly to new information, changing fishing patterns, or emerging risks by establishing, modifying or removing avoidance areas without the need for regulatory intervention. These arrangements allow action to be taken where appropriate while recognising that scientific understanding and fishing conditions continue to evolve. The following measures demonstrate that industry is already actively using this approach to support the sustainable management and rebuilding of tarakihi.

Existing industry avoidance areas in Rebuild Plan

197. Since 2018, there have been four industry avoidance areas in TAR2 identified for high abundance of sub-MLS tarakihi. These avoidance areas are year-round for the method of trawl and adherence has been >99% every year since their implementation. These four areas are at:

- a) Cape Turnagain
- b) Porangahau to Mangakuri beach
- c) Tuaheni Point to North of Gabel End Foreland
- d) Koutunui Head to Hautai Beach

New proposed industry avoidance areas

198. Industry is proposing to formalise existing practice to avoid juvenile tarakihi catch through the non-regulatory avoidance of areas that are currently avoided by industry due to relatively high levels of juvenile abundance. The areas proposed are at:

- a) Pegasus Bay
- b) Top Rocks
- c) Cape Campbell to Ward Beach
- d) Kekerengu to Waipapa Bay

Existing industry avoidance areas for other purposes

199. Industry also implements several other avoidance areas for fisheries management purposes including:

Area	Description
East Coast South Island	2nm Trawl restriction Birdling's flat to beyond Timaru
East Coast South Island	Nth Timaru/Rangitata River mouth down to Sth Timaru out to 6nm
FMA2	Springs box BT and PS closure 1 Dec-28Feb
Tasman Bay	Bark Bay around to Pepin Island, follows the coastline with varying distance offshore. Introduced to preserve juvenile SNA7 occupation of inshore areas on a seasonal basis. Closed from 1 Nov- 30 Apr to trawl
Golden Bay	Voluntary closure of inner area of regulatory closed area in Golden Bay for SNA7 trawl
SPO7	Farewell Spit closure to all fishing methods. Part of SPO7 Fisheries Plan measures
Kapiti	No pair or single trawl between Rangitikei River and Titahi Bay. Areas around Mana Island and another around Kapiti and coastal extent.

Proposed regulatory closed areas

Habitats of particular significance for fisheries management

Overview

200. The Act requires decision-makers in every decision under the Act to take into account the environmental principle that habitats of particular significance for fisheries management should be protected. Seafood New Zealand therefore supports the identification and protection of habitats of particular significance for fisheries management where there is sufficient evidence to demonstrate their significance, the threats they face, the need for management intervention, and the benefits of such intervention as compared to the losses incurred.
201. However, we do not support the proposed nursery habitat closures. FNZ has consistently described these areas as potential habitats of particular significance and acknowledges substantial uncertainty regarding their actual extent, condition, threats, and benefits of management. In these circumstances, regulatory intervention is premature and inconsistent with the evidence-based approach that underpinned the development of the Habitats of Particular Significance to Fisheries Management (HoPs) process.
202. We are concerned that this process has fallen well short of the standard of evidence and engagement required for regulatory intervention. The proposed closures have been introduced alongside substantial reductions to catch limits and a broad suite of other regulatory proposals, creating a cumulative package of change that cannot reasonably be considered through a four-week consultation process. Many fishers have expressed that they were taken by surprise by the inclusion of these proposals, particularly where information they had previously shared in good faith to improve understanding of seabed habitats and fishing practices now appears to have been used to identify areas for potential closure without prior discussion. This approach risks undermining the trust and collaborative relationships that are essential to improving knowledge of important habitats and developing effective management responses.
203. We therefore strongly urge that these proposals are set aside and instead commence a dedicated engagement process with affected fishers. Such a process should refine the understanding of habitat values, test whether proposed boundaries are appropriate, evaluate alternative management approaches, and develop a robust assessment of the likely environmental benefits and utilisation impacts before any regulatory spatial measures are considered.

Legislative framework

204. The Act requires the Minister to provide for the utilisation of fisheries resources while ensuring sustainability. In giving effect to that purpose, the Act requires the Minister to take into account the environmental principles in section 9, including that habitats of particular significance for fisheries management should be protected.
205. We support this principle. Where habitats are demonstrated, using the best available information, to be habitats of particular significance for fisheries management, appropriate management measures should be implemented if the best available information shows that they are needed to protect the habitat because of their fisheries management function.
206. However, the existence of the environmental principle does not require the Minister to regulate every area that may *potentially* constitute such habitat. Rather, the Act requires decisions to be made if an area “**is**” of particular significance in terms fisheries management (and if measures are needed to protect them). This denotes that a decision has been made that the area does in fact have those required characteristics or qualities. The need to be cautious in terms of s10 does not negate or override this requirement. Rather it informs how that decision is to be made and in particular how information is to be used when making that decision. But a decision is required before the section 9 obligation become relevant. Section 10 is intended to

stop decision makers sitting on the fence. It is the decision that an area “is” in fact of particular importance to fisheries management, that moves it into the category where protection should be considered.

207. This review is primarily a review of sustainability measures for tarakihi under section 13 of the Act. The proposed reductions to the TAC and TACC are the primary mechanism for reducing fishing mortality and rebuilding the eastern and western tarakihi stocks. FNZ explicitly acknowledges this throughout the consultation document.
208. While section 11 provides the Minister with the ability to implement additional sustainability measures, including spatial management tools, those measures represent separate management decisions that must be independently justified. The recovery of tarakihi under the proposed catch reductions is not contingent upon implementation of the proposed nursery habitat closures – and it is uncertain if the proposed nursery habitat closures would contribute to their recovery. The supporting measures should therefore be assessed on their own merits, rather than being viewed as a necessary component of the catch-setting decision.
209. We acknowledge the recent High Court decision concerning habitats of particular significance for fisheries management and recognise that the Court decided that ‘habitat’ is not confined to physical seabed features, but may include areas of the water column that are functionally important to a fishery. We also acknowledge that the Court emphasised the importance of considering whether protection is required where potential habitats have been identified.
210. Importantly, however, the Court did not determine that every potential habitat must be protected. Nor did it determine that protection is required in circumstances where there remains substantial uncertainty regarding the existence, extent, location or fisheries significance of the habitat concerned. Rather, it emphasised the need for a decision to be made, and for that purpose, information to be provided to the Minister as the decision maker, on whether protective measures are required. The decision reinforces the need for careful assessment and robust advice; it does not remove the Minister’s discretion to determine that further work is required before regulatory measures are imposed.
211. The issue is not whether habitats of particular significance for fisheries management should be protected. The issue is whether the currently available information supports regulatory intervention. FNZ has not demonstrated that the proposed areas are confirmed habitats of particular significance for tarakihi, that existing fishing activity poses any material risk to those habitats, or that the proposed closures represent an appropriate management response. Those questions should be resolved before regulatory restrictions are imposed. As said above, section 10 does not provide a basis for avoiding making those decisions. To the contrary, it emphasises the need to make them.
212. Those issues are particularly important in the present review.
213. Throughout both the consultation document and supporting appendix, FNZ consistently describes the proposed nursery areas as *potential* habitats of particular significance for fisheries management. The consultation material explains that FNZ is still assessing the available evidence for inclusion on the HoPS register and acknowledges uncertainty regarding the current status, extent and condition of the habitat. It further recognises that uncertainty regarding habitat extent and patchiness will need to be taken into account in determining where any restrictions should apply.
214. We understand that, since publication of the consultation document, additional trawl survey information has been incorporated into the analysis of several proposed nursery areas, resulting in changes to the mapped distribution of the potential nursery habitats. In our view, this raises an important question as to whether the analysis is identifying habitat or simply identifying locations where juvenile tarakihi have been caught. Catch and survey data provide evidence of species occurrence and relative abundance, but do not, on their own, identify the physical or functional

habitat that section 9(c) is intended to protect. The apparent movement of the proposed "habitat of significance" boundaries following the inclusion of additional catch information suggests the analysis is highly sensitive to changes in fish distribution, rather than identifying sessile habitat features. This reinforces the uncertainty acknowledged throughout the consultation material regarding the extent and location of the proposed nursery habitat and highlights the need for further habitat mapping, validation and ground-truthing before regulatory spatial closures are considered.

215. Decisions to protect habitats of particular significance should be based on robust identification of the habitat itself, not solely on the changing spatial distribution of juvenile catch. In our view, these acknowledgements are significant. They demonstrate that the proposed management areas have not yet been sufficiently identified or delineated to justify regulatory closures.
216. The proposals are based on broad indicative polygons rather than confirmed habitat boundaries. Many of the proposed areas encompass extensive areas of seabed that are unlikely to uniformly contain habitat performing the relevant nursery function. The practical implementation issues further reinforce this conclusion. Fisheries management measures must be capable of being accurately implemented, understood and complied with by fishers. Several of the proposed closure boundaries consist of broad rounded polygons that do not reflect practical fisheries management design. Such boundaries are difficult to plot operationally and appear to reflect preliminary analytical mapping rather than management-ready spatial measures.
217. The consultation material itself recognises that habitat is patchy and uncertain, yet the proposed management response applies restrictions across large continuous areas. This creates a significant disconnect between the information relied upon and the regulatory measures proposed.
218. Where the objective is to protect habitat of particular significance for fisheries management, regulatory measures should be directed toward protecting the habitat itself. Broad precautionary closures encompassing substantial areas of uncertain habitat are unlikely to represent a proportionate or evidence-based regulatory response.
219. More fundamentally, we consider the consultation does not provide sufficient information to enable meaningful consultation on the proposals.
220. The consultation document repeatedly acknowledges uncertainty regarding:
- a) whether all proposed areas constitute habitats of particular significance;
 - b) the actual spatial extent of nursery habitat;
 - c) the actual risk to the habitat of the activities proposed for exclusion;
 - d) the stock-level benefits likely to result from the proposed closures;
 - e) the likely displacement of fishing effort;
 - f) the broader environmental consequences of displaced effort; and
 - g) the full economic impacts on commercial fisheries, processors and regional communities.
221. Likewise, FNZ expressly notes that a full closure of the identified nursery areas may unnecessarily constrain utilisation and may be overly cautious, while also acknowledging that the extent of any closure may need refinement following consultation.
222. In effect, submitters are being asked to comment on regulatory options before the underlying evidence and analyses have been fully developed. Consultation is most effective where affected parties are able to understand the proposed measures, their expected benefits, their implementation and their likely impacts. In this case, significant aspects of the proposals remain

unresolved, including the location of the habitat requiring protection and the spatial extent necessary to achieve the stated objectives.

223. Without that information it is difficult for stakeholders to meaningfully assess whether the proposed measures are proportionate or whether alternative approaches may better achieve the statutory objective.
224. The consultation also provides only limited assessment of utilisation impacts. While indicative port-value estimates are presented, FNZ acknowledges that these do not account for displacement effects, changes in operating costs, supply chain impacts, regional economic consequences, impacts on non-QMS species, or cumulative effects arising from existing spatial restrictions. These omissions are particularly significant given the proposed closures affect productive mixed-species fishing grounds supporting numerous inshore fisheries beyond tarakihi.
225. The current proposals are not sufficiently developed to justify regulatory intervention. Deferring implementation would recognise that:
- a) rebuilding of the tarakihi stocks is being addressed through the proposed TAC and TACC reductions under section 13;
 - b) the environmental principle in section 9(c) remains an important consideration;
 - c) additional measures should be implemented only where there is sufficient evidence to identify the habitat requiring protection, understand the threats it faces, and assess the likely benefits and costs of the management intervention; and
 - d) further work is required to validate habitat extent, undertake ground-truthing, refine boundaries, and fully assess utilisation impacts before regulatory closures are considered.
226. Accordingly, we submit that the Minister should decline to implement the proposed nursery habitat closures as part of this sustainability review. Deferring these measures pending further scientific development and consultation would remain entirely consistent with sections 8, 9, 10, 11 and 13 of the Act, while ensuring that any future protection measures are targeted, evidence-based, practical to implement, and appropriate for the sustainability benefits they are expected to achieve.

Juvenile areas

227. We do not support the proposed regulatory closure of areas identified as juvenile tarakihi aggregation areas. We acknowledge that reducing juvenile mortality can contribute to improved recruitment and may support a more rapid rebuilding trajectory in some circumstances. However, the Act requires the Minister to consider whether proposed sustainability measures are consistent with the statutory purpose of ensuring sustainability while providing for utilisation. In this case, we consider that the potential benefits of the proposed measures are insufficient, and too uncertain, to justify the impacts on wider fisheries.
228. The proposed juvenile aggregation measures are fundamentally different from measures designed to protect habitats of particular significance. They do not seek to protect a defined habitat feature or ecological function; rather, they seek to reduce fishing mortality by restricting access to areas where juvenile tarakihi have historically been caught. We acknowledge that such measures may provide some benefit where juvenile fish occur predictably and are concentrated in discrete areas. However, the effectiveness of these measures depends on those areas representing the locations of highest juvenile abundance, rather than simply locations where juvenile fish have historically been harvested.
229. The evidence presented in the consultation does not demonstrate this distinction.

230. The proposed juvenile aggregation areas have been identified using reported commercial catch data for sub-minimum legal sized tarakihi. While this information provides an indication of where juvenile tarakihi have been caught, it does not necessarily identify where juvenile tarakihi are most abundant or where they are most concentrated. Catch data is inherently influenced by fishing behaviour, including where fishers choose to operate, areas they avoid, operational constraints, market considerations and existing voluntary management practices.
231. This is particularly relevant for tarakihi. The catch data used to identify these areas are from October 2019 onwards, following the introduction of the first tarakihi catch limit reduction in 2018. Over the data collection period, measures restricting tarakihi have been incrementally increased and with this, fisher avoidance behaviour has also increased. Industry has already implemented voluntary avoidance practices and has reduced targeting of areas associated with juvenile tarakihi catch. Further, the majority of the fleet increased mesh size to 5-inch mesh after research focussed on tarakihi selectivity was conducted. As a result, areas with the highest recorded juvenile catch since 2019 may not represent areas of highest juvenile abundance; they may simply represent areas where fishing activity has continued to occur. Conversely, areas where fishers have voluntarily avoided juvenile aggregations may not appear in the analysis because there is limited or no catch data from those areas.
232. Accordingly, there is a risk that the proposed measures regulate areas of recent juvenile catch rather than areas that are genuinely high abundance areas. Closing these areas could provide a false sense of protection while failing to address juvenile mortality if juvenile tarakihi occur outside the proposed boundaries or shift in response to changing environmental conditions, recruitment patterns or fishing behaviour. The scale of the proposed closed areas may result in fishing effort being moved into areas that are currently being avoided. FNZ itself acknowledges this uncertainty, noting that the proposed approach relies on predicted juvenile presence based on past catch data and that fish moving beyond these areas would remain vulnerable to capture.
233. Further, the incremental sustainability benefit of these measures must be considered in the context of the wider management package. The proposed reductions in TAC and TACC under section 13 are the primary mechanism for reducing fishing mortality and rebuilding the tarakihi stocks. These reductions will necessarily reduce fishing opportunity, fishing effort and the overall catch of tarakihi, including juvenile tarakihi. The reduction in overall fishing pressure provides a broad-based reduction in juvenile mortality without the additional risks associated with spatial displacement.
234. In addition, the industry has already demonstrated a commitment to reducing juvenile tarakihi mortality through voluntary measures and operational changes. Existing voluntary closures and avoidance practices in areas identified by fishers as supporting juvenile tarakihi have been incorporated into fishing practices. Further, the proposed move-on rules will provide an adaptive mechanism to respond to areas where high juvenile catches are encountered, reducing juvenile mortality across the fishery rather than only in historically identified locations.
235. The proposed closures must also be considered against their wider utilisation impacts. Spatial restrictions on mixed-species inshore fishing grounds will affect the ability of fishers to access other important fisheries resources. This is particularly significant given that the proposed measures are intended to address a relatively small component of total tarakihi mortality, with juvenile tarakihi catch accounting for approximately one percent of total tarakihi catch. The consultation does not demonstrate that the additional sustainability benefit achieved through these closures would outweigh the impacts on other valuable fisheries, fishing businesses and communities.
236. In our view, the proposed juvenile aggregation closures are therefore not required to ensure sustainability of the tarakihi stocks. The combination of reduced catch limits, reduced fishing pressure, adaptive move-on provisions and continued industry avoidance practices provides a

comprehensive and flexible management approach to reducing juvenile mortality while maintaining utilisation opportunities.

237. The Minister is therefore entitled to decide not to impose these additional spatial restrictions as part of this review. Should future evidence demonstrate that juvenile tarakihi mortality meaningfully increases or becomes a significant impediment to rebuilding (i.e. current industry avoidance areas and existing closures for other reasons are inadequate) and that specific areas can be reliably identified as persistent juvenile aggregation areas, targeted spatial measures could be considered at that time. However, the current proposals rely on historical catch distribution rather than robust identification of juvenile abundance and risk imposing significant utilisation impacts without a demonstrated sustainability benefit.

Impact assessment of spatial restrictions

238. We are concerned that the information provided in support of the proposed regulatory spatial closures is insufficient to enable meaningful consultation or informed decision-making. The consultation document provides only a high-level assessment of the proposed closure packages, rather than the individual regulatory measures that comprise them. As a result, submitters are not provided with the information necessary to understand the implications of each proposed closure or to assess whether the anticipated conservation benefits justify the impacts on utilisation.
239. The consultation aggregates the proposed closures into broad Option A and Option B packages and reports a single estimate of the annual commercial value affected and the proportion of juvenile tarakihi catch represented by each package. While this may provide an indication of the overall scale of the proposals, it does not provide sufficient information to evaluate the individual closure areas. There is no assessment of the commercial catch, species composition, economic value, or expected conservation benefit attributable to each proposed closure. Consequently, neither submitters nor the Minister can determine whether each individual area represents a proportionate and effective regulatory response.
240. This omission is particularly significant because the proposed closures span multiple geographic areas, ports and Quota Management Areas, affecting different fishing businesses, quota owners and ACE holders. A fisher operating in one proposed closure area cannot determine the specific impacts relevant to their business, while quota owners cannot assess the implications for the quota management areas in which they hold property rights. Effective consultation requires that those affected are provided with sufficient information to understand and respond to the proposals that directly affect them. The information provided does not meet that standard.
241. The aggregated presentation of the proposals also prevents any meaningful assessment of the relationship between utilisation impacts and conservation outcomes. The consultation reports only the combined value of catch affected and the combined proportion of juvenile tarakihi associated with each package of closures. It therefore provides no means of determining whether individual areas impose high economic costs for relatively small conservation gains, or conversely, whether some areas deliver substantial ecological benefits with comparatively limited impacts on fishing. This information is fundamental to assessing whether each proposed regulatory measure is necessary, proportionate and represents the least restrictive means of achieving the intended sustainability outcome.
242. We are also concerned that the economic analysis excludes the value of tarakihi historically caught within the proposed closure areas on the basis that these impacts are reflected elsewhere in the assessment of proposed TACC reductions. This approach understates the economic consequences of the spatial closure proposals. The proposed reductions in catch limits and the proposed regulatory closures are separate management measures with separate impacts. A reduction in catch limits affects the quantity of fish that may be harvested, whereas a regulatory closure removes access to particular fishing grounds, changes where fishing can occur, influences operational costs, constrains fishing flexibility, and affects mixed-species fisheries. The

economic assessment of a regulatory closure should therefore reflect the full value of the fishing opportunity affected by that closure. Any interaction with proposed TACC reductions can then be considered as part of the overall assessment of cumulative impacts, rather than by excluding a significant component of the affected fishery from the analysis.

243. The consultation also provides little assessment of the broader economic and operational impacts that are likely to arise from the proposals. While FNZ acknowledges that the figures presented are an initial assessment, the analysis is largely limited to historical catch value and does not examine the practical consequences for fishing businesses, including effort displacement, increased operating costs, changes to mixed-species fishing opportunities, impacts on associated fisheries, or the cumulative effects of implementing multiple spatial closures alongside substantial reductions in tarakihi catch limits. Nor does it quantify the expected conservation gains that each individual closure is anticipated to achieve. This creates a fundamental imbalance in the assessment. The utilisation costs are identifiable and immediate, while the anticipated ecological benefits remain largely unquantified.
244. Given the enduring nature of regulatory spatial closures and their potential impacts on commercial fishing access and property rights, Seafood New Zealand considers that a substantially more robust assessment is required. At a minimum, the consultation should provide an area-by-area assessment of the expected ecological benefits, the commercial species affected, the historical catch and economic value, the number of fishing businesses likely to be impacted, and the rationale for the proposed boundaries. Without this information, submitters cannot meaningfully evaluate the proposals, nor can the Minister be satisfied that each proposed closure is evidence-based, proportionate, and justified.

Cumulative spatial loss

245. Marine space is subject to multiple competing demands for the use and protection of marine resources and the marine environment under a wide range of statutes. Commercial fishing may be displaced or constrained because of closures made for various purposes under at least twelve different provisions of the Act, and closures may also be imposed under at least nine other Acts or by special legislation. While displacement effects are most apparent in fully developed fisheries with a strong spatial dependency (such as pāua and rock lobster), the same principle applies to all fisheries.
246. Multiple fisheries spatial closures in a QMA can give rise to cumulative adverse effects on commercial fishing. These closures can have impacts on:
247. **Fisheries sustainability** – Displacement of fishing effort may lead to localised depletion outside the closed area if fishers compete to take their existing catch entitlements from a reduced area within a QMA and, consequently, a smaller resource. Displacement can also lead to stock-wide sustainability risks as a result of increase in harvest from a smaller area of suitable habitat and increased adverse effects of fishing due to concentration of fishing effort in a smaller area.
248. **Economic value of fisheries** – Displacement of fishing effort adds costs for fishers (e.g. longer travel times, lower catch rates, different species mixes, and increased competition). If the displaced catch cannot be caught sustainably in the remaining open area of the fishery, catch reductions will be required, with adverse economic impacts on quota owners and commercial fishers. Alternatively, some fishers may choose to exit the fishery or move to another QMA which could result in economic impacts.
249. **Industry certainty** – Reduced areas available for fishing, combined with potential for additional area closures in the same fishery, creates uncertainty for the industry. This hinders investment decisions and removes/reduces the incentives for industry-led management initiatives or industry involvement/funding of monitoring and research.

250. **Other stakeholders** – Displacement of fishing effort may increase spatial competition between customary non-commercial, recreational and commercial fishers and lead to spatial conflict, which in turn can impact on relationships between industry and tangata whenua and/or non-commercial stakeholders.
251. **Fisheries Settlement** – Fisheries displacement that results in localised depletion may have an impact on Māori customary non-commercial fishing rights. Provisions in Part 4 of the Fisheries Act were created to provide for the recognition of Māori customary non-commercial fishing interests.³ For instance the effect of not explicitly considering fisheries displacement may be that the first number of mātaihai reserve applications may be granted, but others may breach the undue adverse effects test for the declaration of a mātaihai reserve. Displacement can also lead to further requests for closures and restrictions, including from coastal hapū wishing to protect local kaimoana (seafood) abundance in their rohe moana.
252. **Administration** – There are costs on the organisations engaged in responding to multiple fisheries closures.
253. All of the issues outlined above should be considered in a comprehensive, integrated, and, as far as possible depending on the specifics of the relevant legislation, in a consistent way in advice to decision-makers on measures proposed under the Act. Advice and process should not only focus on the initial driver for an initiative i.e. an adverse effect of a fishing method, improving localised abundance for customary Māori, or biodiversity protection. When developing advice, the proposed closure should be considered alongside existing closures to consider the cumulative effects.
254. We consider that the proposed options for spatial management have lacked the context of existing spatial management measures and the impacts of cumulative effects.

Existing spatial management measures

255. The proposals for juvenile habitat closures does not acknowledge that the inshore tarakihi fishery already operates within an increasingly complex network of spatial restrictions that have accumulated over several decades for a wide range of environmental, biodiversity and fisheries management objectives.
256. The major regulatory spatial restrictions that the tarakihi fishery operates around are set out below in Table 7. This table sets out some of the main restrictions, but is not exhaustive.

Measure	Purpose	Geographic extent	Approximate area
Hector's and Māui dolphin set-net closures	Protected species	West Coast North Island, East Coast South Island (Cloudy Bay–Slope Point), parts of South Island south coast	~32,675 km ² closed to set netting
Hector's and Māui dolphin trawl restrictions	Protected species	Various coastal areas around South and North Islands	~12,825 km ² subject to trawl restrictions/closures
South-East commercial fishing regulations	Method restrictions	Numerous areas from Kaikōura to Southland including trawl prohibitions, set-net prohibitions	Numerous individual closures

³ [Section 21 of the Fisheries Act 1996.](#)

Measure	Purpose	Geographic extent	Approximate area
South-East Marine Protected Areas network	Biodiversity protection	Otago and South Canterbury coast	Multiple marine reserves and fisheries closures covering several hundred km ² combined
Marine reserves	No-take protection	Around both islands (Cape Rodney-Okakari Point, Te Angiangi, Tonga Island, Westhaven, etc.)	Marine reserves total approximately 615 km ²
Mātaihai reserves	Customary fisheries management	Numerous coastal locations around New Zealand	Variable (many exclude commercial fishing)
Hauraki Gulf Marine Protection Network	Biodiversity protection	Hauraki Gulf	Approx 1,500 km ²
Taiāpure	Local fisheries management	Multiple coastal areas	Species and method restrictions varying by area
Cable Protection Zones	Infrastructure protection	Hauraki Gulf and Cook Strait	Commercial fishing prohibited within zones; nationally about 78 km ²
Seasonal closures	Stock-specific management	Various fisheries and regions	Numerous local closures under fisheries regulations
Temporary customary closures (rāhui under s186A/B)	Customary management	Numerous locations nationwide	Area varies; generally renewed every two years

Table 7. Main spatial measures restricting commercial fishing in the western and eastern tarakihi stock areas

Recreational measures

257. We note that the proposed reduction in bag limits and allowance for recreational fishing will not have a significant impact on the rebuild of tarakihi. However, we support setting a species-specific limit for tarakihi.

258. We consider that the general mixed bag limit of 20 is not appropriate for stocks undergoing a rebuild or that are part of specific target fisheries.

Utilisation of fisheries resources

259. We recognise that rebuilding the eastern and western tarakihi stocks will require a sustained reduction in fishing mortality over a number of years. While this is necessary to achieve the long-term sustainability of the fishery, it will also have significant implications for the inshore finfish sector, including reduced catch opportunities, impacts on fishing businesses and processors, and reduced supply to domestic seafood markets.
260. The purpose of the Act is not only to ensure sustainability, but also to provide for the utilisation of fisheries resources. In our view, this principle should be considered across the wider inshore fishery as rebuilding measures for tarakihi are implemented.
261. Where robust stock assessments demonstrate that other inshore stocks are above their management targets and can support increased utilisation, FNZ should actively consider opportunities to provide additional access to those resources. Current proposals for TRE2 and SNA2 are examples where utilisation of fisheries resources can be provided for while ensuring the sustainability of tarakihi. We encourage FNZ to continue identifying similar opportunities for healthy stocks, including future reviews of stocks such as SNA7 and SNA8 where the best available information indicates there may be scope to support greater utilisation.

Concurrent review of SNA2 and TRE2

262. We are concerned that the analysis supporting the proposed increases to SNA2 and TRE2 does not adequately reflect the operational reality of the inshore fishery. While the consultation document identifies a potential risk that increased catch limits for other species could result in increased tarakihi catch, this assessment appears overly simplistic and does not sufficiently consider the spatial separation, depth differences, fishing behaviour, and economic drivers that influence where and how fishers operate.
263. SNA2, TRE2 and TAR2 are not wholly interchangeable fisheries. The availability of abundant snapper and trevally does not automatically translate into increased tarakihi catch. Rather, providing additional opportunity for abundant stocks can support fishers to target those species in areas where they occur in abundance, reducing the need to travel further offshore or to known tarakihi grounds to maintain viable fishing operations.
264. For example, fishers operating from Gisborne and Napier currently undertake targeted tarakihi fishing, including trips to areas where tarakihi abundance supports a viable fishery. Increasing access to abundant nearshore stocks such as snapper and trevally provides an opportunity for these fishers to remain closer to port and utilise alternative fisheries rather than relying on tarakihi catch to support their businesses. In this context, increased catch limits for healthy stocks are not a threat to tarakihi sustainability; they are part of the solution.
265. It is therefore disappointing that the analysis has focused primarily on the theoretical risk that increased TACCs may increase catch pressure on tarakihi, without adequately considering the compensating effect that other increased utilisation opportunities can provide. A more complete assessment should consider how management decisions across multiple stocks interact and whether providing access to abundant fisheries can assist in achieving sustainability objectives for stocks requiring rebuilding.
266. The purpose of fisheries management is not to manage stocks in isolation, but to provide for sustainable utilisation while ensuring fisheries remain productive and resilient. Where one stock requires a reduction in catch to rebuild, management should actively consider opportunities to support fishers to transition effort towards more abundant stocks. Increasing SNA2 and TRE2 therefore represents not only a utilisation opportunity, but also a practical mechanism to reduce dependence on tarakihi while continuing to provide fresh seafood for New Zealand consumers.

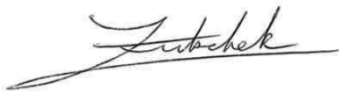
Conclusion

267. One significant quota owner does not agree with the position stated below, considering the science and science process to be inadequate to inform additional management measures.
268. Industry acknowledges that action is required to rebuild tarakihi stocks and remains committed to supporting a sustainable and productive fishery into the future. The health of the stock and the long-term sustainability of the fishery must remain the primary consideration in decision-making. We recognise that rebuilding will require continued effort, adaptation and, in some circumstances, difficult decisions.
269. At the same time, the Act requires decisions to provide for utilisation while ensuring sustainability is maintained. This requires a management approach that not only achieves the necessary biological outcomes, but also considers the impacts of those decisions on fishing businesses, communities and the ongoing ability of the fishery to operate. Supporting utilisation does not mean avoiding necessary action; rather, it means ensuring that the pathway selected enables the fishery to endure through the rebuilding process and continue contributing to New Zealand's economy, communities and seafood supply.
270. All of the measures proposed through this review will have significant impacts on the inshore fishing sector. Catch reductions, spatial restrictions, catch management measures and associated operational changes will affect fishing businesses and the communities that rely on them. The challenge for decision-makers is therefore not simply identifying the largest immediate reduction possible, but determining a pathway that achieves rebuilding while maintaining the capacity of the fishery to adapt and continue operating.
271. Industry supports an adaptive approach that responds to new information as it becomes available. Given the uncertainty inherent in the stock assessment and projections, a staged approach to reductions provides an opportunity to take necessary action now while allowing future decisions to be informed by improved information and monitoring of rebuilding progress. This approach provides greater confidence that management settings remain aligned with the actual trajectory of the stock, rather than locking the fishery into reductions based on the most precautionary interpretation of uncertain projections.
272. The experience since 2018 demonstrates that effective rebuilding requires a cooperative and adaptive approach. Industry has demonstrated its commitment through the implementation of voluntary measures, including catch spreading, catch reductions, spatial management arrangements and supporting research initiatives. These measures have been developed and implemented because industry recognises its role in supporting recovery and maintaining the future value of the fishery.
273. Industry supports continued adaptation as new information becomes available and accepts that management settings may need to change as rebuilding progresses. However, the success of any rebuild plan depends on maintaining a framework that is practical, achievable and capable of being implemented by those operating within it.
274. The scale of reductions and associated measures considered through this review represents a significant challenge for the inshore fishing sector. While industry remains committed to the rebuild objectives, there is a limit to the cumulative impacts that fishing businesses and communities can absorb while continuing to participate in and support non-regulatory rebuilding measures. A successful rebuild pathway must therefore balance the need to recover the stock with the need to maintain a viable fishery capable of supporting and delivering that recovery.
275. Ultimately, the strongest rebuild outcome is one that the stock, the fishery and the people who depend on it can sustain. A management framework that imposes impacts beyond what the fishery can reasonably withstand risks eroding the cooperation and commitment that has

supported progress since 2018. Maintaining a balanced and durable pathway is therefore essential to ensuring the rebuild plan remains effective over the long term.

276. While industry remains committed to the objectives of the rebuild plan, there is a risk that measures which impose impacts beyond what can reasonably be accommodated by fishing businesses and communities may undermine the ability of participants to continue delivering the non-regulatory components of the plan.
277. We are happy to provide further information or discuss any aspect of this submission. Where issues are identified, we are committed to working collaboratively to develop practical solutions.

Nāku noa, nā



Lisa Futschek
Chief Executive
Seafood New Zealand

Appendix 1:

DRAFT Tarakihi Rebuild Plan 2026

Commitment

Signatories of the Tarakihi Rebuild Plan are committed to the rebuild and maintenance of the Eastern and Western tarakihi stocks.

Scope

This Plan only relates to inshore finfish fisheries⁴ and is intended to provide a minimum expectation of conduct in the tarakihi fishery.

This Plan does not preclude individual companies or fishers from implementing additional measures to those included in this agreement.

Objectives

Our objective is to rebuild and maintain the biomass of the eastern and western tarakihi stocks at or above maximum sustainable yield.

Key performance indicators (KPIs) from the Tarakihi Rebuild Plan that Fisheries New Zealand monitor and report against quarterly are set out in the table below.

Management Measure	Milestones	KPI
Commitment	Quota signatories and fishers signed up to plan	90% of owners of each eastern and western TAR stock
Catch Reduction	Catch reduction progress & monitoring reporting.	Fish within the allocated and available ACE
Catch Spreading	Cumulative reporting of TAR1 & 7E/W catches against voluntary catch spreading limits. Cumulative reporting of individual ACE allowances for TAR1 & 7E/W.	90% adherence to providing east/west catch reports for TAR1 and TAR7 in line with east/west split arrangements
Move-on rule	Reporting of the number of move-on rule triggers by QMA, actions taken by fishers following the triggers & any follow-up actions taken.	90% adherence to move-on rules by signatories
Industry Avoidance Areas	Reporting of the number of incidents of vessels crossing area boundaries while fishing & any follow-up actions taken.	97% adherence to industry avoidance areas by signatories

⁴ Excludes vessels >28m

Agreement Measures

To support achievement of the objective signatories agree to the following measures

ACE Management

The effectiveness of the Tarakihi Industry Rebuild Plan relies on the accurate identification of participating fishers and the ACE they utilise. Fisheries New Zealand monitors implementation of the Plan by assessing fishing activity associated with ACE held by Plan signatories. Where ACE is transferred from a signatory to another party, fishing undertaken using that ACE is considered by Fisheries New Zealand as activity undertaken under the Rebuild Plan, regardless of whether the recipient has formally agreed to the Plan.

For this reason, quota owners and ACE traders who are signatories have a responsibility to exercise due diligence when transferring TAR ACE. Before any transfer is completed, the transferor **must ensure that the recipient has signed this Agreement** and, where the recipient is the permit holder undertaking the fishing activity, has also signed the associated Data Sharing Agreement.

This responsibility applies equally where ACE is transferred through multiple parties or where a participant operates under multiple FishServe client accounts. Failure to ensure these requirements are met may compromise the integrity of the Rebuild Plan.

Failure to adhere to the agreed measures will likely result in regulatory action in place of the industry non-regulatory measures and potentially more severe catch limit reductions.

Where an individual or organisation operates multiple FishServe client accounts, each account that holds or transfers TAR quota or ACE must be identified and included. Failure to include all relevant accounts may prevent accurate monitoring of participation in the Rebuild Plan.

Before transferring TAR ACE, quota owners and ACE traders must ensure that:

- the recipient has signed this Agreement;
- where the recipient is also the permit holder undertaking the fishing activity, they have signed the associated Data Sharing Agreement (see further below);
- all FishServe client accounts under which the recipient holds or transfers TAR quota or ACE are covered by the Agreement and, where applicable, the Data Sharing Agreement.

To support compliance with these requirements, quota owners and ACE traders may:

- request the current register of known signatories from Seafood New Zealand;
- provide this Agreement and the Data Sharing Agreement to prospective recipients who have not yet signed;
- return completed agreements to Seafood New Zealand for recording before ACE is transferred.

Industry-led management depends on industry participants meeting these responsibilities. Quota owners and ACE traders are therefore expected to undertake reasonable due diligence to ensure ACE is transferred only to participants who have formally committed to the obligations of the Rebuild Plan.

Data Sharing Agreement

Effective implementation of the Rebuild Plan requires timely access to operational information so that adherence to the Plan can be monitored and any issues can be identified and addressed as they arise.

Accordingly, all permit holders undertaking fishing activity under this Agreement must also enter into the associated Data Sharing Agreement with Seafood New Zealand. This enables Seafood New Zealand to access the information necessary to monitor implementation of the Rebuild Plan, assess performance against agreed measures, and work proactively with participants where non-adherence or emerging issues are identified.

Participation in the Rebuild Plan requires both:

- signing this Agreement; and
- where the signatory is a permit holder undertaking fishing activity, signing the associated Data Sharing Agreement.

The Data Sharing Agreement is appended to the end of this Rebuild Plan.

Catch reduction

Fish within available and allocated ACE for eastern and western stocks.

Catch spreading

Provide east/west catch reports for TAR1 and TAR7 in line with east/west split arrangements:

As an ACE transferor you will need to complete the sub stock splits when transferring TAR1 or TAR7 in FishServe.

As a permit holder you will need to assign your catch as TAR1E or TAR1W when completing a catch report.

Industry avoidance areas

Industry avoidance areas formalise existing practice through avoidance of areas of high juvenile abundance as identified by industry. These areas are to be avoided when fishing with trawl, seine, set net or line methods regardless of target species.

Industry avoidance areas are set out at the end of this document.

Move on Rules

Move on rules apply to mobile fishing methods.

If sub-MLS tarakihi catch exceeds 20kg in a fishing event MOVE-ON:

o Ensure that all subsequent fishing events for that trip are:

- o more than 1nm from **all** parts of the event line where small fish were encountered, **or**
- o deeper than 10 metres along all points of the event line where the small fish were encountered

Further measures to reduce juvenile catch

Note, the below measures are **not a part of the KPIs** that Fisheries New Zealand report against.

In order to reduce juvenile TAR mortality the following management measures are recommended.

Where possible avoid fishing areas (or certain times) where, juvenile tarakihi is the predominant catch. That is tarakihi <32cm in fork length.

Through cooperation between skippers and shore side reporting systems immediately convey information about areas and times where there are high numbers of small fish.

Ongoing assessment and management plan review

This agreement will be reviewed and updated as required to ensure that it remains effective and relevant in the broader context of the rebuild.

Declaration

Signatories acknowledge that individual compliance contributes to the collective performance of the Rebuild Plan, and that non-adherence by a participant may affect Fisheries New Zealand's assessment of industry performance against the Plan's objectives and key performance indicators.

By signing this Agreement, I acknowledge that I have read and understood the Tarakihi Industry Rebuild Plan and commit to supporting its implementation and agree to comply with the responsibilities and management measures that apply to me as a participant, including:

1. ACE Management – ensuring TAR ACE is only transferred to participants who are signatories to this Agreement and, where applicable, have also entered into the associated Data Sharing Agreement.
2. Data Sharing – providing Seafood New Zealand with access to the relevant fisheries information required under the Data Sharing Agreement.
3. Catch Reduction – managing fishing activity within available ACE.
4. Catch Spreading – adhering to the agreed catch spreading arrangements for TAR1 and TAR7.
5. Move-on Rule – complying with the Move-on Rule whenever triggered.
6. Industry Avoidance Areas – complying with the industry avoidance areas.

I acknowledge that the effectiveness of this industry-led Rebuild Plan relies on participants making genuine and ongoing efforts to comply with these commitments. Where Seafood New Zealand determines that a participant has demonstrated repeated or unreasonable non-adherence to the Agreement, and reasonable opportunities have been provided to address those issues, Seafood New Zealand may withdraw that participant's signatory status and remove them from the register of recognised participants.

Signature:	
Name:	
Fishserve client number/s:	



Authority to release commercial fishing information

1. I give permission for Fishserve to provide Seafood New Zealand Inshore Council the following Electronic Reporting (ER) information supplied to Fishserve by the permit holder listed below.
2. Fishing location coordinates and catch information are included in this agreement.
3. Data will be used for the purpose of monitoring and responding to adherence with the Tarakihi Rebuild Plan.
4. This permission will remain in force until for the duration of the Tarakihi Rebuild Plan or I inform Fishserve in writing that I wish to cancel the authorisation.

Name of permit holder

Fishserve client number

Name of fishing vessel

Vessel Registration Number

**Name of person authorised by the
permit holder to approve the release of
information**

Signature of authorised person

Date signed

Tarakihi Industry Avoidance Areas

Area 2

- a) Cape Turnagain
- b) Porangahau to Mangakuri beach
- c) Tuaheni Point to North of Gabel End Foreland
- d) Koutunui Head to Hautai Beach

Area 3 (TBC)

- e) Pegasus Bay
- f) Top Rocks
- g) Cape Campbell to Ward Beach
- h) Kekerengu to Waipapa Bay