

Submission on Proposed Management Measures for the Northland Spiny Rock Lobster Fishery (CRA 1)

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STET is a limited liability company formed in 2011 by Shaun Lee. The term 'stet' comes from the publishing industry and means undo changes. Stet is a social enterprise that supports restoration and conservation projects in New Zealand.

STET supports robust and enforceable management measures to address the ecological imbalance caused by overfishing spiny rock lobster in CRA 1. The proliferation of urchin barrens along Northland's east coast due to reduced predator populations, including rock lobster, is a critical environmental issue that demands urgent and effective action.

General Comments

1. Support for Legally Enforceable Measures:

We strongly agree with Fisheries New Zealand's (FNZ) initial view that non-regulated measures and current industry actions will not sufficiently address urchin barren issues. Voluntary measures have proven ineffective historically (E.g. In New Zealand's orange roughy fisheries, voluntary measures failed to prevent stock collapse, necessitating regulatory intervention with quotas and area closures) and the lack of sustainable industry practices has already led to legal action. Future measures must be enforceable under law to ensure compliance and tangible ecological benefits.

2. Value of kelp forests

Research from overseas has estimated the economic value of Ecklonia kelp forests to be up to USD 147,100 per hectare annually¹. These values highlight the significant lost ecological and economic value of Northlands kelp forests. We understand FNZ is currently quantifying the area of kina barrens in Northland and suspect the lost productivity far outweighs the value of the CRA 1 TACC.

3. Kina Barrens as Adverse Effects of Fishing:

Under the Fisheries Act 1996, FNZ has a duty to manage the adverse effects of fishing on the aquatic environment. Kina barrens are a significant adverse impact, undermining the productivity of entire ecosystems. Efforts to eliminate barrens must begin immediately, addressing the problem within the generation responsible for their creation rather than leaving the burden to future generations. Kina barrens hold no ecological or economic value, and the proportion of Northland's reefs left barren should be reduced to zero.

¹ <https://ethicalhour.com/environment-sustainability/kelp-forests-a-500-billion-powerhouse-for-global-economy/>



Kina barren Mangawhai Heads. Photo March 2024 Shaun Lee.

Specific Measures Supported

4. Subdivision of CRA 1 Quota Management Area (QMA):

Subdividing CRA 1 into east and west coast management zones is a logical step to address the specific environmental needs of the east coast, where urchin barrens are prevalent. This will allow tailored management measures and better control over localised fishing impacts.

5. Catch Reductions and Increased Minimum Legal Size (MLS):

Commercial Fishers: Increasing the MLS will enable more lobsters to reach sizes where they can effectively prey on kina. Simply reduce the Total Allowable Commercial Catch (TACC) to prevent too many smaller rock lobster from being caught.

Recreational Fishers: We support implementing a Maximum Legal Size (MaxLS) for recreational fishers to protect large, reproductively valuable lobsters. This aligns with tangata whenua values and promotes ecosystem health.

6. Area Closures:

Evidence indicates that closures to all fishing in specific areas are the most effective approach for reversing urchin barrens. No-take zones should be prioritised, with closures

focused on high-priority locations identified by local stakeholders and ecological assessments.

7. Seasonal Closures:

We support regulated seasonal closures during key breeding and moulting periods. This measure will reduce fishing pressure during critical life stages of rock lobsters, aiding population recovery.

Opposition to Ineffective Measures

8. Special Permits for Urchin Removal:

The current special permit system for kina removal is insufficient to address barrens effectively due to the labour-intensive nature of reducing kina densities to ecologically meaningful levels (<1 kina per square metre).

9. Reliance on Industry-Led Non-Regulated Measures:

The failure of past voluntary measures underscores their inadequacy. Such measures cannot replace robust, enforceable regulation and must not be relied upon to achieve management goals.

Conclusion

STET Limited urges FNZ to prioritise enforceable, science-backed measures that address the root causes of urchin barrens. Immediate reductions in lobster catch, increases in MLS, and the establishment of area and seasonal closures are critical steps to restoring kelp forest habitats and ecological balance. Delayed action will only exacerbate environmental and economic costs of lost kelp forest.

Thank you for considering our submission.

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