

Urgent closure of the LEA 1 kōkiri / leatherjacket (*Meuschenia scaber*) fishery

Submission to Fisheries New Zealand

30 June 2025



Kōkiri in the Alderman Islands 2025. Photo Shaun Lee.

Reported landings of kōkiri in LEA 1 have fallen from \approx 180 t in 2012/13 to just 30 t in 2023/24—an 83 % drop—while the TACC has remained at 188 t since 2003. Recreational harvest has also collapsed, from an estimated 2,398 fish in 2017/18 to 132 fish in 2022/23.

Fisheries New Zealand's (FNZ) discussion paper proposes leaving the TACC unchanged or trimming it to 137 t (-25 %) or 87 t (-50 %). All three options still allow three-to-six times current landings, so they cannot halt depletion or rebuild age structure.

STET Limited therefore requests a five-year closure of LEA 1 to all take (commercial, recreational, customary) while independent reef-survey and catch-per-unit-effort (CPUE) monitoring are undertaken.

The stock is in free-fall

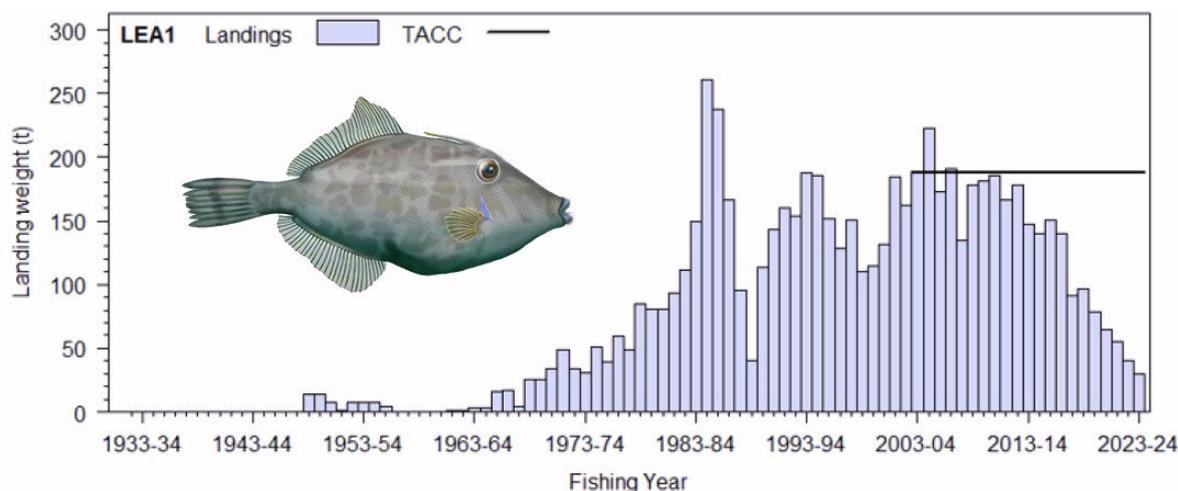
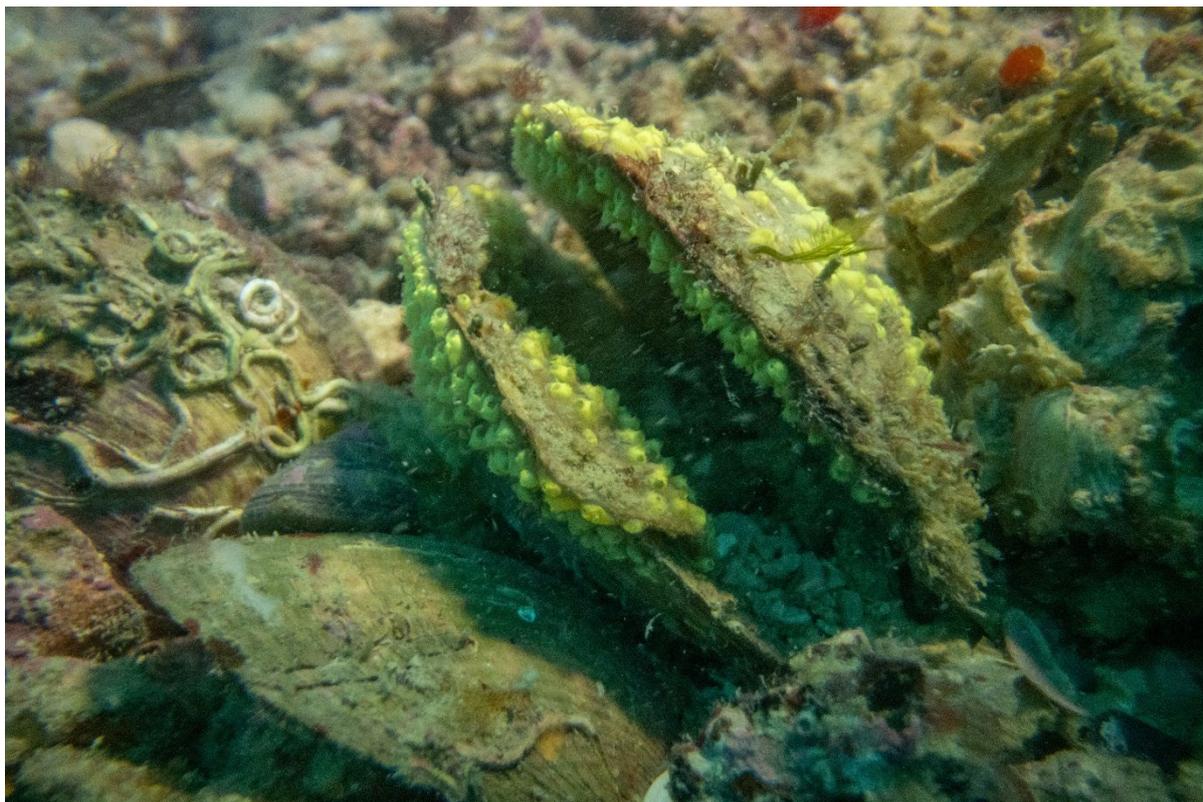


Figure 8: Landings for LEA 1 in tonnes between 1932/33 and 2023/24.

Key concerns about the population

Issue	Evidence	Consequence
Persistent decline across sectors	Commercial landings down 83 % since 2012/13 ; recreational catch down 90 % since 2017/18	Indicates genuine biomass loss, not just market or reporting artefacts.
Unchanged quota	TACC fixed at 188 t for 22 years	Management settings have not longer reflected stock state for more than a decade.
Ecological role	Kōkiri are the only resident reef fish whose diet is dominated by ascidians and sponges ¹	Loss increases risk of invasive ascidian (<i>Didemnum vexillum</i> , <i>Styela clava</i> , <i>Ciona savignyi</i> , <i>Symplegma brakenhielmi</i> , <i>Botryllus schlosseri</i> , <i>Asterocarpa humilis</i>) spread, harming kelp and aquaculture. Reduced ecological resilience to the next invasive ascidian.

¹ https://webstatic.niwa.co.nz/library/AEBR_125.pdf



The Invasive seasquirt *Symplegma brakenhielmi* colonising a dead kūtai / green-lipped mussel off Waiheke Island. Photo Shaun Lee.

Flaws in FNZ's assumptions

FNZ claim	Why that is not convincing
Decline driven mainly by gear & fleet behaviour FNZ notes that “ <i>changes in fishing gear and operations may have contributed to the recent declines in LEA 1 landings.</i> ”	A hypothesis, not a test. FNZ offers no quantitative data (e.g. CPUE data) to show that availability has stayed constant while selectivity fell. Eight straight years of falling landings across both commercial and recreational sectors are more parsimoniously explained by a shrinking population than by simultaneous, perfectly correlated changes in trawl, set-net and spearfishing behaviour. If landings were falling only because the gear now lets kōkiri escape, we would expect to see more fish in the water. Instead, neither commercial skippers nor divers are reporting higher numbers—my own observations suggest they are scarcer than ever.
Proposed cuts (137 t or 87 t) are “ <i>unlikely to constrain current catch levels</i> ”	Those TACCs are still 2.5–4.5 × recent landings (30–55 t). Leaving such head-room means the fishery could expand sharply without any further review, defeating the precautionary purpose of a cut.
Monitoring is adequate to detect dumping.	On-board observer coverage of 3.9 % and camera coverage of 9.1 % for events where LEA 1 was caught. With > 90 % of trips unobserved, low-value kōkiri can still be mis-coded or discarded without detection. Until coverage approaches full fleet rollout, landings cannot be assumed to equal total catch.

<p>“Significant reduction in landings could indicate a sustainability concern” but status can’t be confirmed</p>	<p>FNZ acknowledges a possible risk yet treats it as speculative and then sets TACCs that would allow the historic peak catch to resume. Under s 10 Fisheries Act, high uncertainty plus potential harm requires a more cautious harvest limit, not a quota that still exceeds recent removals by a factor of three or more.</p>
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Precautionary assessment under the Act

Section 8: Purpose is to provide for utilisation while ensuring sustainability; current landings trajectory shows sustainability is not ensured.

Section 9: Loss of the principal ascidian grazer risks wider ecosystem effects, contravening environmental principles.

Section 10: Information is uncertain (no stock assessment), so a conservative response is mandatory.

Section 13(2A): When stock status is unknown but risk is high, the Minister must set a TAC “not inconsistent with” MSY—zero catch is safest until better information exists.

Recommended management actions

1. Close LEA 1 to all fishing mortality from 1 October 2025 to 30 September 2030.
2. Require recreational fishers to report their catch or commission a fisheries independent survey to monitor the kōkiri population.
3. Review landing-exception notices so no discard pathway exists if the fishery re-opens.

Conclusion

The sharp fall in both commercial and recreational landings, coupled with the species’ slow-to-rebuild life history and an unchanged 188 t TACC, shows that keeping catch limits high conflicts with the Fisheries Act’s clear duty to act cautiously when information is uncertain (s 10) and to set TACs that are not inconsistent with rebuilding depleted stocks (s 13(2A)). Until independent evidence confirms recovery, the only credible response is to close LEA 1 entirely. STET Limited therefore urges the Minister to take this cautious step now, safeguarding kōkiri populations for northern Aotearoa’s future.

Thank you for considering our submission.

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