

Possible Responses to the DOC Whitebait Consultation Document

Some possible answers, agreed by your West Coast Whitebaiters Association Executive, to the DOC consultation document questions below. They are suggestions only, it is not expected that all members will agree with them all, or use them all in their own submissions which must be in by 2nd March 2020. They may also provide ideas for some of the issues you may wish to discuss at the local consultation meetings.

DOC Whitebait Consultation Document

Link: <https://www.doc.govt.nz/get-involved/have-your-say/all-consultations/2018/improving-whitebait-management/>

Part 6: Consultation questions:

1. Introduction p. 11-25

- Do you agree with the description of the current state in the introduction?
 - No.
 - Lack of catch data (juveniles)
 - Adult data is incomplete and limited geographically
 - NZ threat classification system states 'data poor' for some species
 - All whitebait species can be bred successfully through aquaculture/ fish farming and are able to be used for restocking rivers.
 - The main species (Inanga 90% of catch) can be found in several southern hemisphere countries.
- Is there other information that should be considered?
 - There are 120,000 Giant Kokopu currently living in whitebait farm tanks.

2. A management goal for whitebait p. 26-29

- What (if any) changes do you think should be made to the proposed management goal?
 - Management goals need to be prioritized. Eg. Collecting valid scientific population data.
 - While consistency of regulations are supported, there must be some specific to each river in response to species population changes.
- Would you like to comment on the management **outcomes** proposed for the whitebait fishery.
 - While equality between fishers is important the document takes no account of commercial fishers and stand holders who have invested considerable amounts of money to legally catch and sell whitebait. there is no reason why some form of quota system can't be used here.
 - Treaty partner involvement is supported, but it is also important that the historic and cultural significance of whitebaiting to all New Zealanders is not overlooked.
- Are there other management outcomes that should be considered?
 -

3. Proposals for amendments to the whitebait fishing regulations

- **Timing of the whitebait season (p. 33-37)**

- 15 August – 14 October
- 1 September – 30 October
- 1 September – 15 November

Which of the 3 timing options do you consider most appropriate for the whitebait fishing season? Why?

- Retention of the current season for the West Coast 1st September - 15th November is supported as whitebait are known to have significant runs both pre and post season.

4. Nationwide upstream limits on whitebait fishing (p. 37-40)
Options are:

- Introduce backpegs to mark upstream limits to whitebait fishing*
- Where backpegs are not in place, whitebait fishing occurs within tidal limits* (Both elements comprise DOC's recommended option).

Do you agree with the proposed approach to selecting rivers (outside the West Coast of the South Island) on which to place back-pegs? Why or why not?

- A combination of these two options is supported
- This should apply to all rivers nationwide.

Do you wish to suggest specific waterways in which back-pegs should be placed? Why do you suggest these waterways?

5. Creation of whitebait refuges in selected waterways (fishing excluded) (p. 41-46)

- Temporary short-term (2 years on, 2 years off)
- Temporary medium term (5– 10 year timeframe)
- Longer term (10+ year timeframe)*
- Entire river systems should not be made into refuges, but if tributaries or small water bodies are made into refuges such as the 23 on the West Coast they should be closed permanently.

Do you agree with the approach proposed for selecting waterways as refuges for the whitebait species, and for the exclusion of whitebait fishing? Why or why not?

- No, the proposed approach bears no relationship to what is happening in the actual rivers biologically. If rivers are to be closed it must be done on evidence based data.
- It makes no sense to close entire rivers, such as many on the West Coast, that already have existing closed tributaries. Fishers have respected these existing 'refuges' and should not be penalised further.

Do you have specific feedback on any of the rivers listed as potential refuges? Can you provide any more information about these sites?

- It would be unfair to close the Hokitika river for example when it already has a major spawning and breeding tributary (Mahinapua Creek) closed.
- Similarly, the Wanganui river (West Coast) has Oneone river (Black creek) as a closed whitebait refuge.

Which sites do you think should be selected for short-term or longer term fishing exclusions? Please provide information you have that informs your view.

- None on the West Coast as it already has applied effective conservation measures with its 23 closed rivers. To close more would be unfair and impose considerable economic hardship to many small communities dependent on the whitebaiting influx of fishers.

6. Whitebait fishing practices (p. 46-55)

What are your views on the proposed changes to whitebait fishing practices? Please tick a All proposals that you agree with.

- ☐ Sock nets should be phased out
- ☐ Traps in nets should be phased out
- ☐ Screens and diversions should be phased out
- ☒ Nationwide size and location restrictions on screens and diversions should be introduced
- ☒ Whitebait fishing should be prohibited from structures other than stands
- ☒ Whitebait fishing should be prohibited within 20 m of weirs, groynes and illegal diversions
- ☒ Nets should not be located beyond the outer edge of a stand
- ☒ One net should be used when fishing from a stand
- ☐ A nationwide maximum overall length limit for gear of 6 m should be introduced
- ☒ There should be a nationwide maximum on the incursion of gear (excluding stands) into a waterway, of 1/4 the width of that waterway
- ☐ The existing drag net provisions should be applied nationwide
- ☐ A minimum distance of 20 m between fixed fishing gears (not stands) should be introduced

7. Phasing out export of the whitebait species p. 55-58

- Are there other approaches to ending export of the whitebait species that should be considered?
 - As all species of whitebait can now be successfully bred through aquaculture, there is no valid reason whitebait cannot be exported.

8. For all proposed regulatory amendments p. 30-68

- Is there other information that should be considered?
 - Sock nets are a helpful aid to old and /or infirmed fishers.
- How do you think the options set out will contribute to achieving the management outcomes and goal proposed?
 - Closing rivers is an unnecessary and drastic management tool for managing whitebait species. Closing breeding tributaries or habitat for adult species makes much more sense. If back-markers are adopted as on the West Coast, nearly all adult habitat will be protected anyway, as will further upstream migration.
- Would you like to provide additional information on the alternative options?
 - If the rest of New Zealand were to adopt the same regulations as the West Coast in terms of shorter season, back markers, shorter screens/stands and disallowing multiple nets and wings, having all screens attached to the bank together with new initiatives such as maximum intrusion into a river of ¼ stream width, then more draconian steps such as closing entire rivers would not be required.
- Would you like to provide other comments on the proposals in this document?
 - Asking people to choose which rivers should be closed in the various regions is tantamount to managing indigenous species through a popularity

poll. This is disgraceful for a government department charged with managing their conservation.

- Which combinations of these options do you think would contribute best to improving whitebait management? Why?
 - The greatest threats to whitebait, in order of importance, are habitat loss, barriers to upstream and downstream migration, water quality, predation and whitebait fishing. This document and its initiatives only concentrate on the least important, fishing. It is therefore critical that DOC direct more resourcing, as it does for our birds, into protecting existing habitat, creating new habitat such as the excellent work on Cobden Island at Greymouth, and identifying and removing barriers to fish passage again such as is being done on the West Coast. Adjusting fishing practices without concomitant work on habitat could actually be counter-productive, as it would take the focus off more important habitat enhancement.
- Are there additional options not described in this document which should be considered?
 - Each region forming a management group such as the West Coast Sustainable Wild Whitebait Fishery group which consists of DOC staff, Whitebait scientists and whitebaiter representatives to look at improvements which could be made to each region.
 - Increased funding for whitebait management and habitat improvement.
 - Restocking rivers with farmed adult whitebait as done by Auckland Regional council.
- Are there other minor changes that should be made to the whitebait fishing regulations, to improve consistency and clarity?
 - Simplify them.

9. Implementation p. 69-72

- What do you see as potential challenges in implementing (any of) the options proposed in this document?
 - Obtaining valid population data of both juveniles and adult populations required to manage the fishery effectively.
 - Lack of funding.
 - Compliance staff too officious and not sufficiently trained in relationship management.
- When do you think any regulatory changes that are carried forward after this consultation should be introduced?
 - 2021. Following effective and ongoing communication and education.
- What do you think about the proposed monitoring arrangements?
 - Monitoring through public opinion data is not a valid way to manage a fishery as special interest groups can swamp the system electronically.
- How should the results of monitoring be reported?
 - Monitoring can be reported through local whitebait associations.

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