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Submission on the proposed amendments to commercial fishing regulations

Introduction

As one of the leading environmental Non-Governmental Organisations (eNGOs) in New Zealand, World Wide Fund for Nature New Zealand (WWF) supports science-based, pragmatic solutions that can deliver a future where humanity lives in harmony with nature. WWF appreciates the opportunity to make a submission on the proposed regulatory changes in the commercial fishing sector.

Aotearoa New Zealand has one of the largest ocean territories in the world, 15 times larger than our landmass and home to approximately 80% of our native species.¹ From Hector's dolphin to the blue cod, many of the creatures that inhabit our waters and coastal areas are found nowhere else on earth. But 22% of marine mammals, 90% of seabirds and 80% of shorebirds are threatened with, or at risk of, extinction.² Many coastal fisheries have shown long-term declines and entire ecosystems, such as estuaries and kelp forests, being degraded.

Our ocean is a taonga – supporting biodiversity, coastal communities, and climate resilience – but our ocean's health is in crisis. The majority of Kiwis care about our marine environment and want to see it protected for future generations. A survey commissioned by WWF-New Zealand and conducted by Horizon Research reveals that 91% of New Zealanders say that the ocean is important to them, while 69% of Kiwis are concerned about the health of New Zealand's ocean and threats such as plastic pollution, overfishing, and climate change.³ 'Concerned', 'disappointed', and 'frustrated' were the words people identified the most when asked to describe their feelings about how the current Government is looking after the ocean and marine life – with almost half of New Zealanders (42% of those surveyed) ranking the Government's record on marine conservation as 'poor' or 'very weak'.⁴ Public sentiment is clear and New Zealanders want stronger ocean stewardship, not erosion of existing safeguards.

A healthy ocean is essential for sustainable fisheries. Continual improvement to the fisheries management system is needed but several of the proposed amendments shift New Zealand in the

¹<https://www.cbd.int/countries/profile?country=nz#:~:text=While%20little%20is%20known%20about,marine%20species%20have%20become%20extinct.>

² <https://www.stats.govt.nz/indicators/extinction-threat-to-indigenous-species/>

³<https://wwf.org.nz/sites/default/files/2025-01/Horizon%20Research%20-Ocean%20Survey%20Report%20FINAL.pdf>

wrong direction by enabling higher commercial utilisation, easing long-standing protections, or allowing more intrusive fishing methods. These changes risk increasing pressure on vulnerable species and ecosystems at a time when climate impacts, sedimentation, and habitat degradation are already pushing our coastal waters to a tipping point. These not only pose significant ecological risks but further undermine the sustainability of our fisheries.

WWF views that the package of changes, in its entirety, poses a risk to our coastal fisheries and health of the marine environment, but we find the proposals below particularly concerning.

Proposal 2: Providing for the ability to sell 19 non-QMS reef species in Fisheries Management Areas (FMAs) 1 and 9 if taken by certain methods

The 19 reef species identified in the proposal are long-lived, slow-growing, and highly vulnerable to overfishing. These resident fish play vital roles in coastal ecosystem functioning, contributing to reef stability, predator-prey dynamics, and overall marine biodiversity.

Allowing commercial sale of these species creates a direct financial incentive to target them, intentionally or otherwise. Such incentives risk altering fishing behaviour, increasing overall fishing pressure, and undermining long-term stock viability. While reducing wastage is an important objective, this proposal does so at the expense of ecological integrity.

The safeguard of non-sale status currently prevents economic drivers from accelerating the decline of reef species already impacted by sedimentation, warming waters, acidification, and coastal development. Introducing new commercial demand for vulnerable species is inconsistent with restoring coastal health and ensuring long-term sustainability.

Proposal 5: Providing for the landing of dead marlin by commercial vessels in monitored fisheries

Marlin have been excluded from commercial landing and sale since 1991 in recognition of the species' migratory nature, high recreational value, and cultural significance. These protections acknowledge the vulnerability of marlin populations to overexploitation and the difficulty of managing them within a domestic quota system. Removing long-standing protections risks creating an unregulated commercial marlin fishery, without limits, without effort reporting, and without appropriate monitoring frameworks.

Providing a financial return for landed marlin risks setting a precedent that could lead to marlin entering the Quota Management System, opening the door to full commercial exploitation. There is also practical uncertainty regarding the ability of onboard cameras to reliably distinguish between genuinely dead fish and those that may be moribund but potentially survivable. Maintaining strict prohibitions on commercial utilisation reflects the long-standing, precautionary approach required for highly migratory, high-value species.

Proposal 8: Increasing maximum set-net length in open waters to 4,500 m

Allowing set nets of up to 4.5 km in length significantly increases the risk of overcatch, bycatch, and increased waste. The primary target species, rig and school shark, are already showing signs of commercial pressure, with TACCs repeatedly failing to constrain catch in several quota areas. Many coastal shark species are long-living and slow to reach maturity, making them highly susceptible to population decline.

Set nets are inherently indiscriminate. As nets become longer, they cover a greater spatial footprint, increasing the likelihood of bycatch of protected species, elevated catch of non-target species and juveniles, and waste. Expanding net length conflicts with global trends toward reducing high-risk fishing methods, improving gear selectivity, and strengthening ecosystem-based management.

Proposal 9: Removing the 3 nautical mile prohibition on Danish seining in the South Island

The existing prohibition on Danish seining within 3 nm of the South Island has been in place for more than 70 years, for good reason. Inshore waters provide essential nursery habitats and support some of the most ecologically productive and sensitive environments in the country.

Bottom trawling is already permitted in much of the same area and allowing additional bottom-contact methods such as Danish seining risks further degrading fragile benthic habitats, increasing juvenile mortality, and exacerbating waste issues.

From an ecosystem-based management perspective, mobile bottom-contact gear has no place in inshore environments. To protect biodiversity, rebuild declining fish stocks, and preserve ocean health for future generations, New Zealand should be moving toward greater restrictions on the use of these destructive methods.

Conclusion

Across all the proposals, a common thread is that each would increase commercial extraction, expand incentives to target vulnerable species, or introduce more intensive fishing methods into ecosystems already under pressure. This tactic is not aligned with the precautionary approach required to protect and restore marine ecosystems in the face of climate pressures, biodiversity loss, and decades of overexploitation.

A healthy, resilient ocean is fundamental to New Zealand's economy, cultural identity, and intergenerational well-being. It supports sustainable fisheries, protects taonga species, and ensures food security. To safeguard these values, regulatory settings must be guided by long-term ecological health, not short-term commercial gains.

We therefore urge Fisheries New Zealand to adopt a more cautious, ecosystem-centred management approach that prioritises the restoration of ocean health, the sustainability of fish stocks, and the wellbeing of future generations.