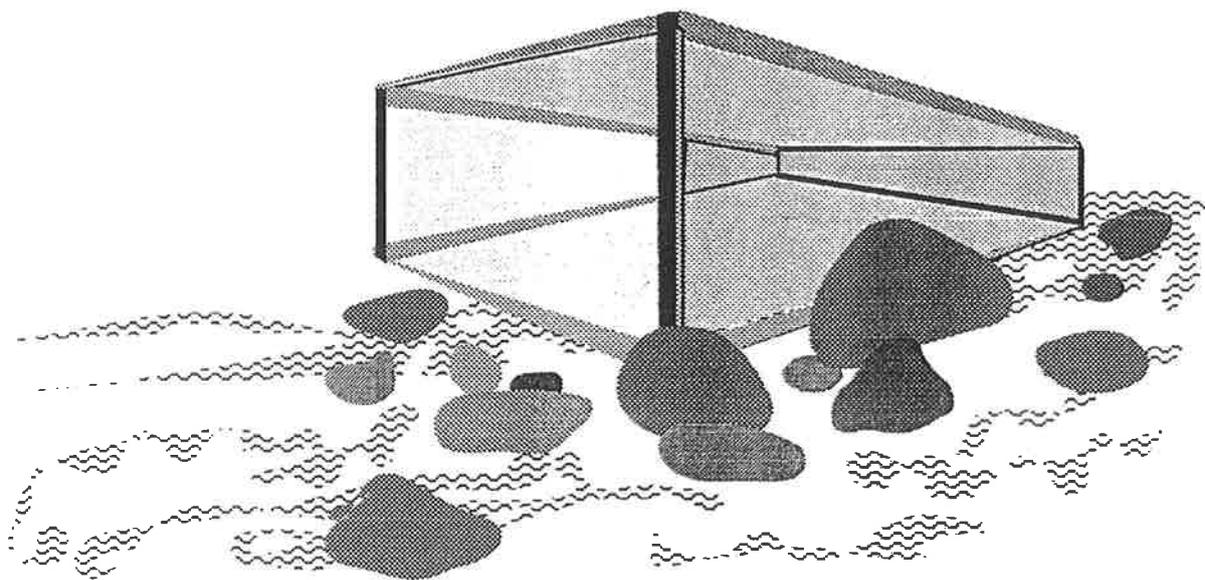


West Coast Whitebait Fishery

SYNOPSIS OF PUBLIC SUBMISSIONS



639.219 WES

Prepared by

Rankine & Hill Limited

For the
Department of Conservation

August 1991



West Coast Conservancy

REVIEW OF THE MANAGEMENT OF THE

WEST COAST WHITEBAIT FISHERY

Background Information to the

Synopsis of Public Submissions

In February 1989, Government directed the Department of Conservation (DOC) to undertake a review of the management of the West Coast whitebait fishery as part of the South Westland South of the Cook River: Resource Management Study (prepared by the Ministry for the Environment). The review was to cover a range of management practices for whitebait fishing, and was to involve the Ministry of Agriculture and Fisheries (MAF), local people and interest groups.

In October 1990, the Department released a public discussion document as a focus for local people and interest groups to make their views known to the Department. Public submissions were called for before 1 February 1991. The Department received 195 submissions.

An independent consultant was engaged to provide a synopsis of the submissions.

In order that people are informed on the nature of the submissions received, the consultants synopsis is now being made available for public information.

The next stage in the review will be final consideration of the submissions by the Department of Conservation in consultation with MAF and the preparation of a review paper which will set out recommendations to Government on the management of the West Coast Whitebait Fishery.

Any changes to the West Coast Whitebait Fishing Regulations which result from the review will not come into effect until the 1992 whitebait season.

Neil Clifton
for Regional Conservator



CONSERVATION
TE PAPA KŌWHiri

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Management Review

West Coast Whitebait
Fishery

• SYNOPSIS OF
PUBLIC
SUBMISSIONS

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SYNOPSIS OF PUBLIC SUBMISSIONS

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EXECUTIVE SUMMARY

The Department of Conservation is undertaking a review of the management of the West Coast Whitebait resource. This has arisen from central Government decisions on the South Westland South of the Cook River Resource Management Study undertaken by the Ministry for the Environment. This report provides a synopsis of public submissions received in response to the discussion document titled, "West Coast Whitebait Management Review" which was prepared by the department to provide a focus for public comment on West Coast whitebait management issues.

Of the 195 submissions received, 164 included a completed questionnaire contained within the discussion document. An analysis of the questionnaires has been undertaken and the results are provided in the appendices of this report. The results from responses to the questionnaire show that of those people who responded many were from the Westland District, over 60 years of age, had fished for whitebait for more than 20 seasons, and fished predominantly from stands.

Overview

The public submissions focussed on those aspects of the management review which were perceived as impacting on the way in which whitebait fishing would be regulated in the future. There was a unanimous agreement that conservation of the whitebait resource was of paramount importance and a general acceptance that changes in the resource's management would be required to ensure the ultimate survival of the species. There were many suggestions about the causes of the decline in whitebait numbers including climate change, increased pressure on the resource in terms of there being more fishers, reduced spawning areas and environmental damage. A few respondents suggested that fluctuations in whitebait numbers was normal, had occurred in the past and that the resource had recovered again naturally with no changes in management techniques. Respondents were more in favour of whitebait conservation through the provision of appropriate environmental conditions (such as preservation of spawning areas) and were opposed to regulating the resource to severely restrict its use as a means of conservation. Generally, the conservation message was to tackle the cause of the decline rather than to over-regulate the use of the resource.

The need to undertake more research was considered to be important, with many respondents offering local knowledge and catch records assistance. Further contact could be with these people as this will provide both valuable information and demonstrate a willingness to include West Coasters in the process of resource management. The submissions suggested a number of methods for the on-going monitoring of whitebait catches and resource users.

A major issue within the submissions are the differences between recreational and commercial whitebaiters. The differences between these two groups of resource users are evident in some regulation related comments.

The current whitebait regulations were seen by many respondents as being ineffectively enforced and the call is for enforceable, clear regulations from the management review.

There was generally little support for special whitebaiting provisions for Maori under the Treaty of Waitangi. However, of those submissions from obvious Maori respondents (individuals or groups stating their Maori ancestry), there was a clear direction for the Department of Conservation to work together with Maori to meet the requirements of the Treaty of Waitangi, particularly in terms of access to this traditional whitebait food source.

Principles of Management

The discussion document set out three principles of management. There were few comments on these and no disagreements with them. Few respondents mentioned the regulations in terms of detailed wording with most commenting on specific elements of the current management regime such as net types, catch, fishing times, and season length.

Closed Areas were the most frequently suggested whitebait habitat protection measure with strong support for closing tributaries, black creeks and areas past tidal reaches. It was generally recognised that the closed areas currently in force had worked well and suggestions were made of other places where a closed area would be of benefit to the conservation of the whitebait resource. It is suggested that the review process could incorporate liaison with people in each area with good local whitebait knowledge to work on the introduction of closed areas where appropriate. It has also been suggested that local people can be used to police the closed areas.

Season length was discussed by many respondents. There appeared to be no real consensus on the issue with as many stating that the season should remain the same as those who thought there should be some change. Common was the call to restrict the season length to allow more whitebait to reach the spawning areas; change the end and start date, but leaving the ten week period to allow bait to be caught earlier; make the season the same as other parts of the country to stop people coming to the Coast for "their" season and for "fairness"; leave the season length as it is.

Alternatives were also suggested to changes to the season length including limiting days per week, making alternate sides of a river "closed" to fishing each year, closing alternate rivers each year, allowing all year fishing, but limiting days per week.

Back pegs were favoured by most respondents as the solution to confusion that currently exists regarding the extent of the river permitted to be fished. The regulations permit only the tidal section of the river to be fished and there is often difficulty determining the upper extent of the tide. A peg would mark the area within which fishing would be permitted. The suggestion was made in several submissions that an existing landmark or solid object should be used as the back marker as this would be less vulnerable to vandalism and natural deterioration such as that caused by flooding.

Net traps were frequently mentioned and appear to have caused considerable controversy amongst whitebaiters. Many respondents thought the traps should be banned as they were "too effective" in terms of the amount of whitebait they catch and so were depleting the resource. Traps were also considered to be inappropriate because they allow whitebaiters to leave nets unattended and to fish different rivers at the same time using more than one net.

However, many respondents stated that traps were not as damaging to the resource as suggested by trap antagonists. Some older whitebaiters (of which there are considerable number) considered traps allowed them to continue to fish as it meant that they did not have to lift the net as frequently as they did with other types of nets. Any decisions relating to traps in nets will need to be considered very carefully as the reaction will be strong to any change.

Socknets, as with traps, generated considerable discussion within the submissions. Clearly, socknets are very effective at catching whitebait and, as with traps, there are protagonists and antagonists with some calling for bans and other wanting their continued use.

Even whitebaiters who use them commented that there could be limits imposed on their use, with many continuing to use these nets to "get their fair share of the bait".

Scoop nets were mentioned as being the conservationists' net as it required the operator to be in attendance at all time and allowed some selectivity in terms of the fish that were caught.

Stands and stand fishing were frequently discussed by respondents. This is not surprising given that many of the respondents to the Department of Conservation's discussion document (according to the questionnaire) were whitebaiters with stands, these often tending to be the more "serious" or commercial fishers. There were comments from non-stand fishers against stands and as with the other obvious issues (such as net types) there seemed to be a reasonably even split between the "fors" and "against".

The central issue with stands was the matter of equitability with those against the stands concerned that they give stand holders better access to the whitebait. The way in which stands are allocated was also of concern with many non-stand holders suggesting that a more equitable distribution of available stands be made.

There is very little support for passing stand licensing to the Regional Council following the enactment of the Resource Management Act. Whitebaiters see the Department of Conservation as the body with knowledge of the resource and, as such, the best controlling authority. Splitting the functions of regulation and stand licensing is seen by the majority of respondents who commented on this matter as wasteful duplication of available management resources.

Whitebait licenses were commonly cited as worthy of introduction for their ability to generate revenue for whitebait research, and as means of monitoring whitebaiters and their catch. License fees were suggested that ranged from \$30 to \$200 for a season and in some instances different commercial and recreational fishing licenses were proposed.

Although license based revenue generation was considered a good idea, there were some reservations about the real benefits when consideration was given to the costs of administering a licensing system. Honorary rangers were proposed as a means of reducing the costs of operating a licensing system and involving local people in the management of their local resources.

1.0 INTRODUCTION

1.1 Discussion Document

In October 1990, the Department of Conservation, released a discussion document titled, "West Coast Whitebait Management Review - A Public Discussion Document" as the basis for people to make submissions on the management of the whitebait fisheries. The document was made available from the Department's offices throughout the South Island and Wellington for a cost of \$2.50. The final date for the receipt of submissions by the Regional Conservator in Hokitika was 1 February 1991.

The discussion document explained the reason for the review and a brief background to the Department of Conservation's administration of the whitebait fisheries. The issues discussed within the document were a mixture of those required by Government and those considered by the Department of Conservation to be fundamental to the sound management of the whitebait resource. The issues covered in the discussion document included management structures, season length, supervision resources, regulations, habitat protection and fishing methods.

The discussion document also included a one page questionnaire form which was to be returned with submissions. The questionnaire (appendix 1) asks six questions of respondents including name, place of residence, age, rivers normally fished, fishing methods, and why they fished for whitebait. A detailed analysis of the results of this questionnaire is provided in the next section of this report.

Rankine & Hill Limited was contracted by the Department of Conservation to conduct an independent analysis of the submissions, identifying and summarising the responses to the issues raised in the discussion document. The contract specified that matters requiring the Department's attention should be identified and that a statistical analysis of the questionnaire be conducted. Matters outside those addressed in the discussion document are also identified and summarised where they are considered to be of merit.

1.2 Submission Characteristics

The request for submissions on the whitebait management review produced a total of 195 responses, with a few of these received after the 1 February cut-off date. Of these 195 submissions, 164 of the questionnaires supplied in the discussion document were completed and returned. As a comparison, there are approximately 700 licensed standholders currently registered with the Department of Conservation.

In some instances, more than one questionnaire form accompanied each submission where it was signed by more than one person. A list of all the people who made a submission is appended to this report (appendix 2). This list denotes those submissions that were accompanied by a questionnaire with an asterisk(*).

Generally, each submission was only a few pages in length. However, some provided comprehensive information in terms of river characteristics, historical catch records and detailed management practices. Two thirds of the submissions were received from people living on the West Coast. Of those received from non-Coasters, most were from people who owned holiday properties there. The Westland District Council, West Coast Regional Council, West Coast Business Development Board and the West Coast Tourism Council were the only organisations to make submissions.

Three submissions were received from Maori groups or representatives. These were Iwi Takawaenga, Tai Poutini - Hemi Te Rakau; JM Russell - Kaiwaewae; Te Runanga O Te Koeti Turanga - Helen Rasmussen.

Also of note were the several submissions made by multiple signatories. A photocopied set of suggestions for a management plan were received from a number of respondents (a copy of this sheet is appended to this report - see appendix 3).

In addition to the submissions received in response to the discussion document, other comments regarding whitebait management that have been received recently by the Department of Conservation have also been noted and are included in this report where appropriate.

1.3 Synopsis Process

This report presents a synopsis of the submissions received in response to the document titled "West Coast Whitebait Management Review - A Public Discussion Document".

The synopsis will provide the Department of Conservation with a structured summary of the ideas, issues and information contained in the public submissions for consideration in the development of a report to Government.

As the submissions were read, the subject areas raised were noted and pertinent points subsequently included in a section of the synopsis report. An overall impression of the main issues concerning the respondents are presented in the executive summary at the front of the report.

1.4 Questionnaire

A questionnaire form was enclosed in the discussion document. The form (refer appendix 1) asks seven questions of respondents including name, place of residence, age, rivers normally fished, fishing methods, and why they fished for whitebait. The questionnaire was also included to provide an indication of the types of people providing submissions.

From a strict statistical point of view, the questionnaire is not an accurate representation of the characteristics of West Coast whitebait fishing in that the sample size is not large compared to the probable total number of whitebaiters. Furthermore, the questionnaire was not circulated to all whitebaiters and was only returned by those with interest enough to obtain (and pay for) a copy of the discussion document which contained the questionnaire form. As a result, there was a statistical bias in the results towards those people that responded to the call for submissions. It is possible that those whitebaiters with a financial interest in the fishery are more prevalent in the sample than perhaps occasional or recreational whitebaiters.

Several of the questions elicited more responses than the questionnaire intended. (For example, "What fishing methods do you use?" had answers that included more than one of the options, such as *scoop netting from a stand*). As a result, where some respondents gave more than one answer to a question, only the first answer was

recorded in the analysis to reflect the priority of the first answer.

The information will be useful as an indicator of the general characteristics of those whitebaiters who responded to the questionnaire, but the results could be misleading if used out of this context.

A total of 164 questionnaires were received, from which the following results were obtained:

- 49% of the respondents to the questionnaire were from the Westland District (from the Taramakau River south to Awarua Point);
- 37% of respondents to the questionnaire are over the age 60, while over half the respondents have been fishing for longer than 20 seasons;
- 66% of the respondents fished from whitebait stands.
- About one third of the respondents stated that they are fishing for money.
- There was a great range of rivers fished, none particularly more than others except that the Hokitika and Wanganui Rivers seemed to be the most popular (both rivers fished by 9% of the respondents).

1. District of Residence

Buller	10%	17
Grey	9%	15
Westland	49%	80
Other South Is.	30%	49
North Island	1%	2
No Response	0%	0
Total	100%	163

2. Age of Respondent (yrs)

Under 15	1%	1
16 to 30	5%	8
31 to 45	25%	41
46 to 60	31%	50
over 60	37%	61
No Response	1%	2
Total	100%	163

3. Seasons Fished

1 season	0%	0
2 seasons	2%	3
3 to 5 seasons	7%	12
6 to 10 seasons	14%	23
11 to 15 seasons	10%	16
16 to 20 seasons	13%	22
over 20 seasons	51%	83
No response	2%	4
Total	100%	163

4. River Fished Most Often

Little Wanganui	4%	6
Mokihinui	6%	10
Orowaiti	4%	7
Taramakau	5%	8
Hokitika	9%	15
Waitaha	1%	2
Wanganui	9%	15
Poerua	2%	3
Whataroa	2%	4
Waitangitona	1%	2
Saltwater	1%	2
Karangarua	4%	6
Manakaiaua	1%	1
Jacobs	3%	5
Mahitahi	1%	2
Ohinemaka	0%	0
Paringa	5%	8
Moeraki	2%	3
Haast	1%	2
Okuru	3%	5
Turnbull	2%	4
Waiatoto	8%	13
Arawata	2%	3
Cascade	7%	12
No response	2%	4
Total	100%	163

5. Fishing Methods

Stand	66%	108
Set Net	15%	24
Scoop	18%	30
Other	0%	0
No Response	1%	2
Total	100%	163

6. Reasons for Whitebaiting

Traditional	39%	63
Fun	20%	33
Holiday	5%	8
Money	35%	57
Other	1%	1
No Response	1%	2
Total	100%	163

**WEST COAST WHITEBAIT
SURVEY RESULTS**

2. WHITEBAITING - AN OVERVIEW

As a precursor to the synopsis of submissions on the whitebait fisheries management, it will be useful to have some background to the subject in order to "set the scene" for the comments that will follow.

2.1 Whitebait Species

Whitebait is a collective term for five native fish species and for hundreds of years have provided a food source for people living in this country. Little is known about these fish, their habits or general biology. Research by Eldon and McDowall (1980), the Ministry of Agriculture and Fisheries, and more lately Department of Conservation, are the main information sources.

2.2 Legal Context

The conservation and management of freshwater fisheries passed from the Ministry of Agriculture and Fisheries to the Department of Conservation in 1990 as a result of the Conservation Law Reform Act 1990. A function of the Department is "*to preserve so far as is practicable all indigenous freshwater fisheries, and protect recreational fisheries and freshwater fish habitat.*" The Department of Conservation currently administers the Fisheries (West Coast Whitebait Fishing) Regulations 1985, which form the basis for the management of the whitebait resource.

The intention of this review is to examine the management of the fishery, and the Department will report the findings of this review to the Government. As a result, changes to the current regulations may be necessary. It is important that any changes in management reflect the requirement of the Conservation Act to conserve the whitebait resource and protect the recreational fishery for present and future generations. The basis for this was set out in the Principles of Management in the discussion document.

2.3 Economic Factors

Since European settlement of the West Coast, the region has experienced both economic bonanzas from the gold rush days, and depressions as a result of the winding down of the main industries of coal mining and timber milling. In difficult economic times, people look for alternatives to their normal sources of income.

On the West Coast it seems that there are a considerable number of people fishing for whitebait either seeking to supplement their regular income or using the resource as the sole form of income over the period of the whitebait season. Although there have been "commercial" whitebaiters for many years, it seems that there is a growing number of people who are whitebaiting for some financial return. This growth creates greater pressure on the resource, and together with loss of fish habitat, there is the danger that it could be overfished and the fishery collapse.

Under New Zealand law, the New Zealand whitebait fishery is not considered to be a commercial fishery. Even though people sell their catch, whitebait is specifically excluded from the Fisheries Act as a commercial fishery.

2.4 Social & Cultural Factors

The whitebait season is a celebrated institution on the West Coast with a great deal of pleasure derived from spending time by the river fishing for a "feed" of these small fish. People of all ages fish for whitebait and it appears to be a favourite pastime of many Coasters as well as those from "over the hill" in Canterbury or Otago who visit the West Coast during the season, especially to spend time whitebaiting.

During the season, the river banks are the meeting places of regular whitebaiters each with their "possie" and often a shelter rigged up. A number of whitebaiters have been fishing the same river for many years and they appear to derive as much enjoyment from the social occasion of a few hours together on the river as they do from the fish they catch.

The cultural significance of the whitebait resource is an important consideration as Maori people have traditionally fished for whitebait as a food source since their arrival in the area many hundreds of years ago. Section 4 of the Conservation Act requires the Department to give effect to the principles of the Treaty of Waitangi.

3. THE SUBMISSIONS

This is the main section of the synopsis report and addresses the issues, ideas, opinions and information contained in the submissions. This section comprises parts which correspond with the layout of the public discussion document. Where comments are italicised, these are direct quotes from the submissions and have been selected as they capture well a particular point of sentiment.

The majority of the comments referred to in the submissions focus on section 8 of the Discussion Document titled "Fundamentals for Future Management". However, before reporting on the section 8 comments, sections 4 to 7 are summarised first.

3.1 Maori Values

The Department of Conservation is required by the Conservation Act to give effect to the principles of the Treaty of Waitangi. As such, the issues relating to the management of the whitebait resource with its special Maori cultural value will play a significant part in the future of the fishery.

Very few submissions were received (less than 10) which made comment on Maori issues associated with the whitebaiting resource. Submissions supporting Maori rights to the resource were received from Maori individuals or representatives of the West Coast Maori people.

A comprehensive submission was received from JM Russell which provides his view of the rights conferred to the Katiwaewae people by the Treaty of Waitangi. This submission also provides a detailed description of the history of these people in Te Tai Poutini (West Coast). Although this submission does not specifically focus on the issues identified in the Department of Conservation discussion document, it is significant for its Maori perspective. For this reason it is recommended that it is read by the review panel and discussed in consultation with its author and his people.

The submission from Te Runanga O Te Koeti - The Maori Council for South Westland and the submission from Hemi Te Rakau - Iwi Takawaenga, Tai Poutini also request consultation with the Department of Conservation in the development of any new system of management.

In contrast to the above three submissions from Maori groups, a few other submissions were received that did not support any special rights of Maori people to the resource under the Treaty of Waitangi. This attitude is based on the perception that it is not "fair" to give Maori special rights to use the resource that are not available to all other whitebaiters.

The main comments regarding Maori values in relation to the whitebait resource were generally split between those who were strongly in support of special Maori rights and those that were not. As a result, the comments are listed below with those in support first and then those in opposition second.

- *"It is expected of our Treaty partner that the Department (of Conservation) will honour its obligations under the Treaty..." (JM Russell, Upoko Te Runaka o Katiwaewae);*
- That the Katiwaewae have the right to fish all rivers, streams, creeks, lakes and lagoons of the West Coast, this being guaranteed by Article 2 of the Treaty of the Waitangi 1840;
- Maori traditionally fished for the "whale bait" or "plukies" which arrive at the end of the season or later. These are considered a delicacy and there should be some special cognizance of this in the regulations to allow them to be taken in the period after the season finishes;
- *"Modern day Pakeha and Maori both live in a society based on a western ideology of consumerism. Consumerism as a whole is destructive on the natural environment, so both people should be subject to control" (Dr Jon G H Hickford);*
- Let Maori people have their own river for fishing whitebait, but the standard regulations are to apply on all other rivers;
- Traditionally Maori may have fished for adult inanga, but they cannot claim to have traditionally fished for the juvenile whitebait as they did not have the fine net required to trap them;
- Allow Maori people to continue ownership and administration of the Arahura River only as their whitebait source;
- Maori people are happy to share the whitebait resource with others.

3.2 Conservation Values

There is a unanimous agreement in the submissions received that the conservation of the whitebait resource is of paramount importance. However, the desire to conserve the resource is tempered by the wish to continue to fish for whitebait and, as a result, there would be little support for a total closure of the fishery as a conservation measure. The key conservation message to come from the submissions is that sustainability and the continued harvest of the resource is important. The submissions highlighted the many different reasons people enjoy whitebaiting, and there seem to be as many who enjoy the social occasion of a few hours on the riverbank as there are those who enjoy catching whitebait.

The Department of Conservation has generally been praised for its review of the management of the whitebait fishery, while many submissions demonstrated considerable concern that the resource may be depleted to the point of extinction.

The conservation views of many of those submissions received are perhaps best summed up by the following lines:

- *"Favourite memories of whitebaiting were all about their childhood experiences on the riverbank. We want our children and their children to also have these experiences" (Ian & Geoff Gibson, Oparara);*
- For too long, fishing for whitebait has been considered to be a "right" by people on the West Coast, when it should be considered to be a privilege.

It is also clear that there are a lot of older people who continue to fish for whitebait each season who have a considerable knowledge of their fishing area and the history of the catch sizes for different seasons and with ideas about why these fluctuations occur. It is important for the conservation of this resource that this source of information is not overlooked and that some consideration is given to this "local" knowledge. The point was also made that there should be an educational role played by the Department of Conservation to explain that conservation of the whitebait resource is important and that there are things individuals can do themselves that will contribute to conserving the fishery.

3.3 Habitat & Harvest

The general opinion of those who discussed the matter of the size of the whitebait catch and the amount of whitebait in the run, and most did, is that it does seem to be declining. However, it was also pointed out that these fluctuations have always occurred. A concern was that there are more people fishing for whitebait than there were in the past, and as a result there are less fish caught per person. This is a common characteristic of an over-harvested fishery as the CPE (Catch per Effort) required increases as the fish numbers decrease.

Most people recognise the importance of the habitat for the spawning of the whitebait. Mention was also made of the influence of weather patterns, changes in the sea temperatures, numbers of sea predators and introduced freshwater fish species such as the trout into the whitebait runs.

As was mentioned above, there is a considerable wealth of information about catch sizes in times past that is held by individuals who have been fishing the same areas for many years. For example, the Dobson family have made a submission (number 35) with considerable information about fishing the Awarua River with catch records and conditions. Although this information may not present a complete picture of the catch sizes and number of whitebaiters through history, it will give some indication of the way in which the fishery has changed.

With regard to the whitebait catch and the current dearth of information on the numbers of baiters, the following comments were made in the submissions:

- There is a need to monitor catches, especially of recreational whitebaiters;
- Train local people as harvest monitors which will also provide employment;
- Need to decide whether it is commercial management or recreational, as a monitoring system will not be effective when there is a disincentive to declare catch for commercial or tax reasons;
- Stand holders should have to carry a license which also has tear-off catch record slips that would then be collected by a patrolling officer;
- Organise for everyone to return catch figures to the Department of Conservation at the end of the season.

Specific comments regarding habitat and its protection are addressed below.

3.4 Principles of Management

Very few comments were received which dealt specifically with the Principles of Management set out in the discussion document. However, there were no disagreements with the three principles given. People who made submissions tended to comment more on the more practical section of the discussion (section 8) where there were more controversial issues.

Although not directly mentioning the three principles of management, many submissions did agree that the resource must be preserved and protected, and that it should remain accessible for the present generation, as well as for those in the future.

3.5 Fundamentals of Future Management

This section of the Discussion Document was the most frequently responded to in the submissions. It contains the issues that the respondents were most concerned about and, as a result, forms the largest proportion of the synopsis content.

(a) Habitat Protection

There was a general agreement that whitebait habitat, particularly spawning areas, must be protected. However, other influences also need to be considered (and the ability to influence them calculated), such as weather patterns, sea conditions and predator numbers.

The specific comments relating to habitat protection were as follows:

- Reduce the amount of swamp drainage and sedimentation in rivers (although one submission suggested that drainage work enhances whitebait habitat by creating more places to spawn);
- Flood control dykes, bank modifications and introduced fish species have all changed the whitebait habitat;

- Tighten planning controls on the taking of shingle, mining, land clearance, intensive farming;
- Whitebaiters are altering the habitat through trenches and excavation of the riverbed;
- Protect spawning areas in farm land creeks through the use of fences;
- Concentrate on the reduction of farm and industrial waste disposal into streams (particularly dairy farms), and prohibit the use of sprays and fertilizer near waterways;
- Concern about whitebaiters urinating and defecating in streams and rivers which, in addition to polluting also increases the chances of giardia;
- Tap into local knowledge to identify spawning areas and planting of kowhai, flax and berry shrubs to enhance the spawning environment;
- Concern that the protection of the inanga may be at the expense of other species of whitebait;
- River committees which, under the guidance of the Department of Conservation, could work on habitat protection and enhancement;
- *"With the climate being very similar to Auckland I have wondered about the benefit (to the whitebait habitat) of introducing mangroves...(G Jeffrey)"* .

(b) Control of Fishing

Few submissions mentioned the regulations specifically* with most commenting on what they envisaged would be appropriate changes to these in the specific areas such as net types, catch, fishing times and season length (these are addressed in subsequent sections of this synopsis).

With regard to regulations as a mechanism for the management of the whitebait fishery, the following comments were made:

* Note that submission 112 - G B Mitchell gives specific comments on the regulations

- The fishery should not be over regulated, otherwise it will be the whitebaiters and not the fish themselves that will become depleted;
- Allow a trial period of 5 years for new regulations;
- Regulations should be reviewed every 5 years;
- Regulations should be common sense, clear, concise and enforceable;
- Regulations must have a definable purpose, as whatever changes are made will "rock the boat" so the benefits must be made clear;
- There should be more public information about the regulations with some guidelines for whitebaiters;
- Regulations must be expertly and cost effectively policed, perhaps using honorary rangers selected by the Department of Conservation;
- River advisor appointed by the whitebaiters that would report to the Department of Conservation on regulatory matters;
- Regulations should be different for different river environments;
- Policing should be respectful and not heavy handed;
- Considerable fines to apply (up to \$5000) for breaches of the regulations;
- The regulations should apply New Zealand-wide, as opposed to specifically for the West Coast;
- Should only regulate the high take-low skill methods of fishing;
- Establish quotas, particularly for commercial fishing;
- Regulations should recognise the recreational side of whitebait fishing;
- Regulations should be different for South Westland to recognise its more commercial nature;

- Regulations must be administered by people who are not politically motivated, but by people (Department of Conservation) who make decisions based on sound scientific and management principles;
- Regulations should be developed in conjunction with established interest groups - this was neglected in the 1985 review;
- Any changes to the regulations should be publicised early to allow baiters to gear up in time;
- Must be an awareness of the impacts of whitebaiters on the areas they fish. For example, there are often car parking difficulties and conflicts with residents in popular areas. Also there are important bird breeding grounds near rivers and river mouths which should be protected from whitebaiters and their vehicles;
- *"Constant changes of an enforcement authority leads to regulations being flouted or treated as a joke. A stable and recognised authority is a must. Department of Conservation is recognised as such" (RJ Burrell).*

(c) Closed Areas

About a third of the submissions addressed the matter of closed areas with a general agreement that they are a valuable part of the conservation of the whitebait resource and so should be retained. Very few submissions expressed the view that closed areas should not be imposed. More than one half of the submissions were supportive of permitting fishing in tidal areas only, as it was recognised that tributary streams are often overfished and subject to poaching.

The discussion document invited comments on areas and tributary streams that should be closed; there were almost as many suggestions as there were submissions. The suggestions regarding closed areas are listed below:

- Close tributary streams from all whitebait fishing to enhance spawning success and increase the bait population;
- Prohibit all fishing past tidal areas of rivers;

(e) Back Pegs

There was a general concurrence that some indication of the extent of a river or waterway that was "tidal" needed to be clearly defined in each case and that backpegs would be a good way to do it. There was also support from a few respondents for a graded system of markers which would not only indicate the area past which fishing would be prohibited, but would also provide different areas for different fishing methods on any one river.

It was interesting to note that there were some submissions from whitebaiters who appeared to be adhering to the peg system that was in operation some years ago. Comments made in relation to the use of back pegs included:

- Prohibit fishing past the first road or rail bridge on any river;
- Back pegs on all rivers between neap tide highwater and the highest spring tide mark;
- Back pegs must be on both sides of a river and with a notice attached that says "No Whitebaiting Past This Point";
- Need pegs on all rivers, and these should be photographed so their positions are known and people will not steal them;
- The old system of yellow pegs should be reinstated whereby from the yellow peg to the mouth only scoop nets are allowed. In the area between the yellow pegs back up the river to a red peg is where pot netting from stands is allowed. No fishing is permitted beyond the red pegs;
- Reinstating yellow peg system from the 1981 regulations to give those with limited gear a chance;
- Allow fishing of all parts of the tidal area to the coast and have all sites in the area registered to control the number of people fishing;
- Using a system of pegs set aside an area for families, pensioners and tourists;
- Should have peg back from the mouth of each river where no fishing is allowed as this is where most fish is caught;

- Additional closed areas would put more pressure on the other streams;
- Consider each tributary on its merit, as not all streams are suitable or used as spawning areas;
- Closed areas will not improve the fishing in other streams as whitebait return to the same rivers to spawn;
- Close all "Black Creeks" or tributaries where blackbait are found;
- In the north of the West Coast there is less water stain and therefore not all creeks or tributaries should be closed;
- Close every river once every 5 years;
- Prohibit fishing for one day per week;
- Close each bank of the river on alternating seasons ;
- Prohibit whitebaiting near sewer outfalls.

Suggestions for Closed Areas

Old Serpentine River	Oparara River/Lagoon (parts only)
Orowaiti River south of rail bridge	Hunts Creek
Black Creek of Wanganui River	Black Creek into Karangarua River
Fiordland Rivers from Milford to Puyseger Point	Blaketown Lagoon
Tributaries Little Wanganui River	Cobden Lagoon
Crikey Creek	Heaphy River
Black Creek (Collier Creek) into Turnbull River	Blackwater Creek south of Karamea
Martins Creek	Bakers Creek
Greens Beach Lagoon	Waimea Creek
Duffers Lagoon	Acre Creek
Saltwater Lagoon	Hindley Creek
Taramakau River	Content Creek
Big Waitaha River (parts only)	Nolans Creek
	Ounatai Lagoon

(d) Season Length

Season length was frequently commented on by those making submissions. There was a reasonably even split between those who thought the season should either be longer, stay the same length or should be shortened.

In addition to season length, the comments regarding the hours of fishing are also included in this section of the synopsis.

- Have the season length the same throughout New Zealand, either by extending the West Coast's season, or by shortening the other areas' seasons. This will result in less confusion and give "outsiders" no excuses for fishing out of season;
- Close the season at the end of October, as most whitebaiters have packed up by the first week in November;
- As more blackbait is dumped at the end of the season, the start and finish should be varied to finish earlier and start sooner;
- The season length could be varied on some rivers as conditions are different;
- The season length should remain the same - September to 14 November;
- Change the season length depending on the conditions, i.e., if there is a lot of rain and floods during the season then allow a couple of extra weeks after flooding for a catch up;
- Good to have the season the present length, because it gives the "new chums" the chance to have a go when there is less pressure on the rivers;
- Increase the season length from 15 August to 15 November;
- Season start and finish dates will not always match the best fishing periods because the whitebait runs up the river depend on the rainfall patterns;
- The fishing hours should be revised to take account of daylight saving;
- Allow fishing all year round, but for only limited days per week.

- Put marker pegs at the bottom of the last rapid affected by the tide;
- Use landmarks, like bridges for example, to mark the area beyond which fishing is prohibited as this will be difficult to move and will be easily recognisable by people;
- "... fishing efficiency and escapement depend on the number of fish that fishermen highest up in the estuary allow to escape" (GB Mitchell).

(f) Fishing Methods

Of all the matters addressed in the submissions, the various fishing methods employed to catch whitebait was the most commonly mentioned. The comments ranged from brief statements that certain whitebait fishing methods should be banned, to long dissertations about the merits or otherwise of different methods and their respective effects on the whitebait catch. Of particular note was the difference in opinion regarding traps in nets and registered stands.

There were some general comments regarding fishing methods which are listed here. Comments which specifically concern either net traps or sock nets are noted in the following two parts of this section of the synopsis.

i) General

General comments were made in the submissions which concern the fishing methods regulations. These are as follows:

- Variations in the number of nets, screens and nets sizes allowed depending on the particular nature of the river;
- Hand held nets should be allowed near the mouth of the river only;
- "Wigglesticks" should be allowed and written into the regulations;
- Set a minimum distance between all whitebaiters (suggestions 20 or 40 metres, 1 or 2 chains);

- Ban whitebaiting from boats and keep boats from the tidal areas during the season;
- Allow only drag nets;
- Disallow fishing by wading, as this damages the river bed;
- Ban all go by and deflecting devices;
- Scoop nets should be encouraged as they are conservationist and recreational nets, not commercial;
- Allow areas for scoop nets only, although they should all be the same size;
- Scoop nets need to be regulated to stop "gang fishing" by groups of people;
- Set nets should be banned as more than one can be used per person;
- Should not be required to be in attendance of the net at all times as fishing is a social occasion and therefore people want to leave their nets to talk to others. Also need to relieve themselves every so often and this cannot always be done within 10 metres of the net!

ii) Net Traps

The issue of net traps was frequently discussed in the submissions. Close attention was paid to the net trap issue in reviewing the submissions. Of those respondents who mentioned the issue, 75 thought they should be banned, while 55 thought they should be retained, although many advocated some form of restriction.

Of those who considered that net traps should not be permitted, the reason was usually that trap nets catch too much whitebait so having a severe impact on the species and should be disallowed for the species' conservation. It should also be noted that there were submissions made involving groups of people, either present at a meeting, or in the form of a signed petition. Of these type of submissions, all mentioned trap nets. These submissions included one with 206 signatories that stated only scoop nets should be allowed on the Mōkīhinui River, and another with 23 signatories that stated that trap nets should not be allowed at all.

Of those respondents who considered that trap nets should be retained, the reasons were varied. The most popular reasons for trap nets being retained were that on deeper rivers it is impossible to catch bait without a trap (for example the Cascade River); that for "commercial" whitebaiters traps were needed, that older people need trapnets to continue fishing as the trap allows them to lift their nets less frequently.

Many of those who thought traps should be allowed also considered that there should be limitations to the number of trap nets allowed (usually one per stand/or fisher) and that limits to the trap net's size should be made. Generally trap nets seemed to be favoured by stand fisheries and were accepted in this situation as fair fishing methods.

The geographical spread of the proponents of trap nets was also noted in the synopsis of the submissions. Although the spread of whitebaiting was West Coast-wide, from the Little Wanganui in the north to Cascade River in the south, the submissions indicate there is a greater concentration of whitebaiters using trap nets in the south of the region. Of those submissions supporting the retention of trap nets, the most frequently mentioned rivers fished were Waiototo, Cascade, Turnbull, Okuru, and Arawata. In total, 57 respondents made mention of 26 different rivers, some rivers being mentioned more than once.

The following were specific comments made regarding the trap net issue:

- Traps in nets are not as bad as first thought as when the current is less than 1 knot fish enter the trap and swim out. With an open net the operator is always on hand to lift the catch out and therefore more fish are often caught with open nets;
- Net Traps should be allowed on stands only;
- Have a minimum size for traps in nets of 125mm;
- Net traps are good for the elderly and less able bodied whitebaiters as they do not have to continually pull their nets out of the water;
- There is not a great deal of merit in banning net traps as this will only change the position on the river where the fish are caught, rather than decreasing the amount of fish caught;

- Fishing would shift upriver on slow moving rivers to sites with more current;
- If net traps are banned then there will be a flurry of activity as people lift their nets up and down in the river and the fish will be driven out into the middle of the channel;
- Allow traps, but they must be well policed to ensure that they are attended;
- If net traps are banned, then other illegal methods will develop;
- Katiwaewae have traditionally fished with traps in nets so they should not be banned;
- Allow traps on deep rivers where bait cannot be caught any other way;
- Allow 1 trap per stand;
- Allow net traps for commercial whitebaiters only;
- Maintain the status quo;
- It is impossible to keep fish in a net without a trap when fishing a back tide and so they should be allowed;
- Net traps mean there will be good fresh bait as they are kept in the net in the water and do not get lifted out every 15 minutes;
- No need for traps in nets as if you are tending your net as you are supposed to then you will catch fish without it;
- Traps should be banned as they catch juvenile flounder, red finned, blue gilled and common bullies, torrent fish and smelt;
- Net traps catch far too much whitebait and should be banned as they are adversely affecting the conservation of the resource;
- Fines of \$500 for whitebaiters using net traps if they are banned.

iii) Socknets

Socknets were the subject of controversial discussion in the submissions. The familiar differences between those who thought socknets should be retained and those that thought they should be banned were evident.

It was interesting to note that even some of those whitebaiters using socknets thought that they should be banned as they are too efficient and catch an unsustainable amount of the fish stock.

Specific comments regarding socknets were as follows:

- Socknets can be easily carried, the user does not have to be very alert while fishing and it allows the user to fish lazily;
- Careful consideration should be given to banning socknets as it is the most appropriate method in some situations;
- *"While many legitimate fishermen currently use socknets (myself included) I believe the benefits to be gained by banning their use outweighs any arguments for their continued use (R Sadler)"*;
- Socknets are the most effective means of catching fish and should be banned;
- Fishing methods are a scapegoat for those whitebaiters who do not catch enough;
- Reduce the net size to 3 metres;
- Socknets should be banned on smaller rivers;
- Retain socknets, but reduce their size;
- Katiwaewae did not traditionally use socknets and this is an insensitive fishing method given its effects on the resource and so should be banned.

iv) Whitebait Stands

The whitebait stand was mentioned frequently in the submissions. Although many respondents to the discussion paper were people who had a registered stand, there are clearly those who have not been able to obtain a stand. The comments tend to reflect the animosity between those who have stands and those who have not, as opposed to whether stands increase or decrease fishing opportunities and equitability.

There are also more general comments related to the length, registration, or position of stands.

- *"One man, one net, one spot" (J & HA Hirst);*
- The distance between stands should be reviewed. Some suggestions for stand distances apart are: remain the same, 40 metres or more apart;
- Stand length should be based on the spirit of maintaining a minimum percentage of the waterway unobstructed. There are a number of variations in proposed stand length ranging from 6 metres to 30 metres;
- Stands are a good way to prevent the erosion of river banks as they stop people from trampling the banks into the rivers. For this reason, stands should also be allowed parallel to the river bank;
- There have been suggestions that seating and better access to rivers would enhance the fishing experience.
- People with stands should be allowed to reposition them to take into account changes in channel and as a result of flood damage. There should be no relocation fee charged for this;
- Stand whitebaiters are more responsible and contribute more to the fishery through license fees;
- Stands are not the advantage that people seem to think as they limit the place where you can fish, whereas people without stand can move around all over the area to the best fishing spots;

- Stands are a good way to limit the number of people fishing a river;
- Alternate the fishing from stands so that every other year each stand is fished;
- Stands should be built safely, or where the river is very shallow, they should not have to be built at all;
- Holiday homes and baches are built near rivers where registered stand sites are and the stand guarantees a place to fish for these people. The people visiting bring money into the area and so should not be discouraged through disallowing the same stand to be used each year;
- Stands change hands for as much as \$15,000 and so should be non-transferable except as an estate;
- Stands should be limited to two people for which it is registered. There should be no family block registering of stands;
- Stands licence holders should be allowed to nominate a substitute person to fish on their behalf;
- Stands should not be allowed;
- Stands should be balloted out every year to allow everyone to have chance at getting one;
- Stands that are not fished should be removed;
- Stands should be fished a minimum of 4 days per week during the season or passed to someone else;
- Stand whitebaiters should not be allowed to fish the other parts of the river;
- Licensing of stands should remain with the Department of Conservation, and not become a function of the Regional Council as the Department has the resources and experience already;
- The fee for stands should be reduced to \$80, and \$50 to change site.

(g) Whitebait License

The concept of licensing whitebaiters to generate revenue to allow fisheries research to be funded was met with both positive and negative responses. Although research was generally agreed upon as an important matter, licensing was not always seen as a very effective way of obtaining revenue to do it given that there would be administrative costs associated with a licensing system that may outstrip any revenue generation.

Specific comments regarding this matter are as follows:

- Licensing fees suggested range from \$10 to \$200 for each season. Visiting and commercial whitebaiters should pay more to fish on the West Coast, and children, pensioners and students license fee should be less;
- Allow only ratepayers in each area to fish there;
- *"Establish a two-tier fishing license system, that is a commercial license (\$500) and a recreational license. Recognise a commercial fisher as an "agent" of all New Zealanders who choose to buy their share of the resource from retailers rather than to actively pursue the species physically"* (GB Mitchell)
- The license fee should be additional to the cost of stands with those who have stands paying for both;
- Licensing fee would be a good way to generate revenue to fund research into the whitebait fishery. However, there must be some analysis of the costs associated with administering a licensing system to ascertain whether there would be a significant benefit after administration costs have been met;
- Licensing could provide statistics for the Department of Conservation on such matters as membership numbers;
- License each river to stop whitebaiters moving from one river to the next;
- There should be no licensing fee as this will cause too much commercialisation;
- No licensing as New Zealand is no longer a free country!

- There should be a license required to be able to sell whitebait;
- Licensing is not good as many people fish as part of the livelihood and they could not afford the costs of a licensing fee;
- Licensing fee is not very good for tourists who want to have a brief try at whitebaiting;
- There should be a minimum local residency requirement of 3 months before a license is given to anybody to fish for whitebait;
- License the different methods of fishing as this will allow more commercial whitebaiters to pay more. License for commercial fishing should cost \$500;
- Confiscation of fishing gear for licence infringements and minimum of \$5000 fines;
- A set of regulations should be attached to the license so there is no room for argument about license infringements;
- All whitebaiters should be licensed as recreational fishing is really a myth as all whitebaiters sell bait or obtain some benefit from this resource;
- If licensing was introduced, whitebaiters would catch more as they try to get their money's worth from the fee;
- There should be an age limit of 16 for all licenses;
- The license will allow a limit to the number of people fishing for whitebait;
- Each net should be individually licensed with tag.

4.0 CONCLUSION

In conclusion, the submissions were characterised by the following:

- A belief that conservation and the sustainable use of the whitebait resource is important;
- A wealth of local knowledge about the whitebait species, its habits and habitats;
- A divergence in opinion about whitebait netting methods and their effect on the resource;
- A strong interest in the resource's management, particularly from whitebaiters using the resource as a means of income;
- More use of closed areas could be made to assist with conservation of the resource;
- The current season length is generally accepted with some variations suggested with regard to the start and finish dates;
- Back pegs would be a useful indicator of tidal areas and make regulations easier to enforce;
- Stands are generally accepted, although there are concerns about allocation, charges, and their licensing.

Appendices

Appendix 1.

Copy of the Questionnaire

Appendix 2.

Alphabetical List of Submissions

Appendix 3.

Copy of an 11 Point Submission

Appendix 1

QUESTIONNAIRE

The Department of Conservation appreciates your time spent in considering this document. If you are making a submission we ask that you fill out this sheet and attach it to your submission. The information supplied on this page will remain confidential.

Name: (optional)

.....

Place of Residence: (town, city)

.....

Age: 0-15 16-30 31-45 46-60 over 60

—
—

Number of seasons fished:

—

Rivers normally fished: (Please indicate the river fished most frequently)

.....
.....

What fishing methods do you use: (stand fishing, set netting, scoop netting)?

.....

Why do you go whitebaiting on the West Coast?

Traditional

—
—

Fun

—

Holiday

—

Money

—

Other

.....

PLEASE REMEMBER TO ATTACH THIS TO YOUR SUBMISSION

Appendix 2

Alphabetical List of Submissions

The following pages present an alphabetical list of persons and organisations who sent in submissions on the discussion document '*West Coast Whitebait Management Review*'. The closing date for submissions was 1 February 1991, and all the named submissions below were received by or about this date.

Unclear writing on some of them made it difficult to be accurate in the spelling of every name. The best translation of every name is given.

Those submissions which were accompanied by a completed questionnaire in the discussion document are denoted by an asterisk (*).

NAME	SUBMISSION NUMBER
Adams, P	1
Adamson, W & B*	158
AG &JR Fell*	58
Anderson, G*	137
Arnold, KB*	62
Arnold, MJ*	186
Banks, D*	71
Barratt, J*	101
Bates, DS*	81
Beland, S	147
Bell, CB*	70
Bevrey, VA*	193
Biddington, DL*	172
Black, HF*	154
Blanchfield, F*	92
Boddy, GW*	8
Bowman, L	162
Bradley, HM*	125
Brooks, M*	109
Buchanan, DE*	38
Buchanan, HJ*	131
Buchanan, K *	90
Buchanan, ME*	105
Buchanan, RB*	54
Buchanan, RB*	60
Buchanan, RW*	55

NAME	SUBMISSION NUMBER
Buchanan	50
Buchanan, WA*	191
Burrell, RJ*	195
Burrow, JF	128
Business Development Board (Rivers, VA)	13
Calteaux, J*	155
Campion, P*	132
Chalmers, B*	113
Cannell, RS*	39
Chapman, W	22
Coleman, EW	6
Coleman, MJ*	51
Condon, B*	14
Condon, D	161
Condon, G	163
Condon, PF*	40
Condon, T*	160
Cowlin, DM*	23
Cozens, NG*	19
Cross, R*	65
Curtis, MW*	140
Dale, G (et al) (32 signatories)*	86
Dale, G (et al) (refer Sub No. 86)	122
Dale, G	2
Dawson, DB*	78
Dick, R*	93
Dick, T*	12
Dobson, ID (et al) (7signatories)*	35
Downie, JF & W*	189
Duggan, M*	57
Duncan, R*	89
Eggeling, CP & ME*	129
Elliot, MS*	180
Ereckson, B & L*	106
Feust, J*	146
Finch, E	21
Finch, EA*	69
Friend, IG*	170
Gibson, I & G* (et al) (23 signatories)	144
Gilliter, J (et al) (22 signatories)	31
Gordon, GL,*	139
Groom, JR*	74
Groom, K*	56
Guich, RF & AM*	53
Gunn, D*	32
Hall, EK*	178
Harding, G*	126
Haronga, S*	156
Harris, KR & MJ*	49

NAME

SUBMISSION
NUMBER

Harris, P*	7
Hart, J*	33
Hausmann, BJ*	99
Henderson, CK*	83
Herring, SA*	119
Hetherington, D*	152
Hewer, J*	183
Hewer, JW*	184
Hewer, SR*	182
Hibbs, AWC*	142
Hickford, JGH *	87
Hickford, RH*	61
Hirst, J & HA*	190
Horne, BD	124
Horne, ML*	173
Howse, NW*	30
Hughey, DJ*	28
Hughey, M*	34
Illegible*	36
Illegible	133
Iwi Takawaenga, Tai Poutini (Te Rakau, H)	116
Jacobs, J (et al) (5 signatories)*	104
Jeffery, G	24
Johnston, N*	130
Johnstone, R*	77
Jones, ML & WE*	95
Keenan, CMA*	97
Kerr, NJ	121
Kyle, BJ & EA*	3
Kyle, R*	4
Lafferty*	188
Langdon, GE*	85
Larcombe, TL*	75
Lawn, RG	17
Lee, IG*	10
Main, J*	59
Marett, EO*	5
Marley, RS & ME *	52
Marley, TA & EA*	153
Martin, K*	120
McBride, M*	143
McCallum, KC*	107
McCarthy, JB*	175
McDonald, GA*	123
McLean, JI*	46
Minehan, FG*	64
Mitchell, GB*	112
Mokihinui River Petition (206 signatories)	43
Monk, GD & BE	82

NAME

SUBMISSION
NUMBER

Mori, LG*	134
Mulholland, I*	48
Murray, G*	179
Newspaper Report	16
Nolan, AJ*	80
Nolan, PB*	94
Not Applicable	9
Nuka, JA*	76
Oats, GE*	25
Oats, GM*	26
Orlowski, IL*	67
Orlowski, J*	68
Panckhurst, DJ*	159
Pierson, MR*	45
Poulsen, PR*	167
Pugh, S*	185
Rae, N & Z*	117
Rasmussen, H & I*	138
Rawcliffe, RC*	37
Roberts, BM*	15
Robinson, EJ & LJ*	42
Robinson, R	96
Rochford, JD	194
Roulston, AJ*	174
Russell, JM	187
Sadler, R*	27
Scott, D & C*	177
Scott, DC	148
Scott, JP	149
Scott, N*	150
Searle, R & V*	141
Seymour, L*	79
Silcock, LR*	110
Silcock, PJ*	84
Silcock, RN*	171
Small, A*	108
Small, MM*	103
Smith, RG*	111
Soper, OA*	11
Stack, NJ*	181
Surgenon, G	88
Sweeney, NA*	72
Taylor, WK*	20
Te Rakau, H	115
Thomas, WNS*	169
Thompson, P*	73
Titheridge, B*	145
Tonkin, C	91
Towers, B*	127
Towers, GT*	98

NAME

SUBMISSION
NUMBER

Towers, JL*	100
Townrow, DA*	114
Unsigned*	41
Veale, B*	66
Vincent, RW	157
Waugh, DR*	63
Waugh, M*	151
Waugh, R*	118
Waugh, R*	176
Wells, J	136
West Coast Regional Council	102
West Coast Tourism Council (Wooster, IG)	192
Westland District Council(Simpson, R)	18
White, G*	47
Williams, W*	168
Wilson, FW	165
Wilson, JG*	29
Wilson, KR	44
Wilson, M	166
Wilson, P	164
Woodward, J*	135

Appendix 3

11 Point submission

(Six of these submissions were received)

1. *A fishing licence for all whitebaiters needs to be a priority. All monies received from the license fee must be put aside to be channelled back into research and management of the fisheries.*
2. *Stands should continue to be licensed but restricted in length, with a maximum length of 15 metres.*
3. *The fishing of whitebait should be restricted to main rivers only or the river proper.*
4. *Back pegs are a must but should be positioned where the tide reaches them daily.*
5. *The existing hours of fishing are satisfactory but the season should finish on 31st October, the reason being less dumping of "black bait".*
6. *There is no support for one "closed day" per wk.*
7. *There may be room for the appointment of Honorary Rangers nominated by fishermen from each river.*
8. *The whitebait management review must acknowledge that the whitebait industry is both a commercial and recreational pursuit on the West Coast.*
9. *The use of sock nets and nets with traps is not compatible within the concept of reasonably managing a resource. There is no room within the commercial or recreational whitebaiting industry for sock nets or nets with traps.*
10. *The West Coast Whitebaiting Management Plan must be reviewed at least every five years.*
11. *Stands should not be fished by any one else other than the person registered to that sight (sic).*