Greenpeace Aotearoa
Private Bag 92507
Victoria Street West
Auckland 1142

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2025 Sustainability Review
Fisheries Management
Fisheries New Zealand
PO Box 2526
Wellington 6140
New Zealand.

Cc: FMsubmissions@mpi.govt.nz

Submission on Proposed Changes to Orange Roughy ORH 3B Catch Limits and ESCR Area Closure

Tēnā koutou,

Greenpeace Aotearoa urgently submits this response to the proposed changes for the East and South Chatham Rise (ESCR) orange roughy (ORH 3B) fishery, which is now on the brink of collapse.

It is clear that maintaining the status quo is not an option. But while the official document presents three options for consultation[1], **none go far enough** to guarantee the recovery of orange roughy populations or the protection of the delicate deep-sea ecosystems they inhabit.

Considering the accelerating effects of climate change, the ongoing biodiversity crisis, and the need to follow a precautionary principle on ecological management decisions, even **Option 3** – *the strongest measure proposed by Fisheries New Zealand* – **falls short** of what is scientifically and ecologically necessary.

A *"60% catch reduction and partial closure"* may still not be enough to secure the long-term survival of this fishery and the health of the marine habitats it relies on.

Only a ban on bottom trawling in vulnerable seamounts and similar deep sea features, alongside immediate fishery closure, can prevent irreversible damage.

The current stock assessment reveals a devastating decline, with the population at just *8–18% of its original biomass*[2] – one model suggests it may have already collapsed.

[1] Review of sustainability measures for orange roughy (ORH 3B) for 2025/26 https://www.mpi.govt.nz/dmsdocument/70162-Review-of-sustainability-measures-for-orange-roughy-ORH-3B-for-2025-26-Discussion-document/

[2] 2025 plenary chapter: Orange roughy Chatham Rise and Southern New Zealand, ORH3B https://www.mpi.govt.nz/dmsdocument/70159-Fisheries-Assessment-Plenary-May-2025-Volume-2-Orange-roughy-ORH-3B/

Greenpeace Aotearoa New Zealand Inc PB 92507 Wellesley Street Auckland 1141
0800 22 33 44 tel 09 630 6317 fax 09 630 7121 email info@greenpeace.org.nz www.greenpeace.org.nz

This is a catastrophic failure of fisheries management, and immediate, decisive action is required to prevent irreversible damage.

1. The proposed options are insufficient

Fisheries New Zealand's consultation fails to address the full scope of the crisis:

- **Option 3 (highest cut) still allows fishing in depleted areas**, leaving other stocks within ORH 3B at severe risk.
    - *Northwest Chatham Rise*: Where orange roughy no longer aggregate to breed at heavily trawled sites (*Graveyard Seamount*[3]), and the remaining spawning aggregation is on the non-trawled seamounts (*Morgue Seamount*) and **6 tonnes of coral bycatch[4]** was recorded in a single trawl last year.
    - *Sub-Antarctic Zone:* Where no full stock assessment exists, but partial studies in the 1990s found 94% of the population wiped out in just four years of trawling.
    - *Puysegur fishery*: Still relies on discredited stock assessments from the same flawed modelling that misrepresented ESCR's status.

Half-measures will not save this fishery.

2. A fishery in freefall

- Catches have plummeted from 30,000 tonnes annually (1988–1990) to 2,198 tonnes (2023–24), a **93% decline**.[5]
- Even with an immediate fishery closure, scientific models estimate **33–74 years** for recovery – potentially up to over a century – due to orange roughy's slow maturation (with lifespans that exceed 200 years and late reproductive maturity). Recovery is impossible without drastic intervention.
- The 2023 stock survey had already invalidated previous optimistic assessments, leading to the **suspension of Marine Stewardship Council certification**. The 2025 assessment confirms critical depletion, proving industry and government assurances of "lessons learned" from past overexploitation are hollow.
- We have observed a change in the fishery to using longer tows, rather than short tows. This is further indication that the fish are much harder to catch, and may be increasing the fishing footprint.

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[3] Clark, M.R.; Bowden, D.A.; Stewart, R.; Rowden, A.A.; Goode, S.L. (2022). Seamount recovery: analysis of 20 years of time-series data from the Graveyard Knolls, Chatham Rise, New Zealand. New Zealand Aquatic Environment and Biodiversity Report No. 292

[4] NZ Herald, Conservationists criticise NZ trawling after massive coral bycatch, Jun 11 2025 https://www.nzherald.co.nz/nz/bottom-trawling-six-tonnes-of-coral-caught-in-a-single-net-prompts-backlash/IMBAH7D3XVGSZDPVVNBHILP7MY/

[5] Newsroom, July 2025. Study finds NZ's largest orange roughy fishery facing collapse https://newsroom.co.nz/2025/07/08/study-finds-nzs-largest-orange-roughy-fishery-facing-collapse/

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3. Closure & bottom trawling ban: the only viable solution

Half-measures will not suffice – this population is **on the verge of collapse**, and incremental adjustments will only delay the inevitable.

- Spawning aggregations have already been destroyed. Once-thriving spawning grounds like Graveyard Seamount are now barren, while protected areas like Morgue Seamount still sustain populations.
- Industry's support for a lesser cut *(Option 2)* is a transparent attempt to position itself as a "moderate" choice, ensuring continued exploitation. If rebuilding fish populations is the goal, this must be rejected.
- Close the ESCR fishery immediately – any continued fishing will accelerate collapse.
- **Ban bottom trawling on all seamounts and vulnerable features** – this practice destroys coral ecosystems that take centuries to grow and are crucial for ocean's health.
- Extend catch reductions across all ORH 3B sub-stocks, not just ESCR.
- Review the surveys that have dubious quality and obtain reliable, up to date information about the fish sub-populations.

4. The wider ecological disaster of bottom trawling

The ORH 3B crisis is not just about orange roughy, it is a symptom of **deep-sea habitat destruction**.

- Over 200 tonnes of coral bycatch has been reported in 13 years, **99% from bottom trawling**, with half from orange roughy fishing.[6]
- Observer coverage is inadequate. Only ~30% of deep-water trawls are monitored—meaning actual destruction is vastly underreported.
- Crucial ecosystems like seamounts are in peril. Bottom trawling decimates ancient coral forests, disrupting the entire deep-sea ecosystem. **New Zealand must end bottom trawling on all seamounts**, including in the **South Pacific high seas**.

5. Intergenerational consequences

Without immediate and decisive action:

- **Orange roughy may never recover**—rebuilding to safe levels could take over 100 years.
- Deep-sea coral ecosystems will remain at risk from ongoing trawling.
- New Zealand's international reputation as a sustainable fishing nation will be further eroded.

[6] Meyer, 2023. Report - Final results: INT2021-02 Characterisation of protected coral interactions https://www.doc.govt.nz/globalassets/documents/conservation/marine-and-coastal/marine-conservation-services/reports/202122-annual-plan/int2021-02-characterisation-of-protected-coral-interactions-final-report.pdf

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6. Economic & international repercussions of inaction

- **Short-Term Profits vs. Long-Term Collapse**: The industry's refusal to accept full closure risks permanent fishery loss, costing far more than a temporary shutdown.
- New Zealand accounts for **80% of global orange roughy catch**—we must lead in **sustainable fisheries**, not ecological ruin. We have a global responsibility for this particular fishery, and the way it has become emblematic of unsustainable boom and bust cycles.
- Continued mismanagement undermines NZ's claims of **environmental stewardship**, jeopardizing international market access and putting the nation's reputation at stake.

7. Recommendations

1. Reject all current options as inadequate. Demand stronger protections to prioritise the long term survival of these complex and delicate deep sea ecosystems.
2. **Immediately close the ESCR orange roughy fishery** and halt all bottom trawling in the sub-region to prevent total collapse.
3. Expand protections to all depleted sub-stocks in ORH 3B, including Northwest Chatham Rise and Sub-Antarctic zones.
4. **End bottom trawling on seamounts nationwide and in the High Seas,** this destructive practice simply cannot coexist with ecosystem health.
5. **Conduct independent, transparent stock assessments**—past failures (e.g., flawed modelling by industry-aligned scientists) must not be repeated.

Conclusion

The ORH 3B crisis is a test of New Zealand's commitment to ocean protection. Fisheries New Zealand must abandon incremental compromises and take bold, science-backed action before it is too late.

New Zealand cannot afford to ignore this warning. The ocean is not an infinite resource, and the tipping point for orange roughy may already have been crossed.

Principles of kaitiakitanga must prevail: this fishery must be closed before it is lost forever.

Greenpeace Aotearoa urges Fisheries New Zealand to act decisively: **prioritise long-term ecological survival over short-term industry profits**.

The time for action is now. Please get in touch with me directly for anything related to this submission.

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Juan Parada
Oceans Campaigner
Greenpeace Aotearoa

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