



## **Submission to Fisheries New Zealand on Orange Roughy Fisheries Management**

**From:** Tāngaro Tuia te Ora - Endangered Species Foundation  
**To:** Fisheries New Zealand  
**Email:** [FMsubmissions@mpi.govt.nz](mailto:FMsubmissions@mpi.govt.nz)  
**Re:** Discussion Paper No: 2025/24 - Management of Orange Roughy Fisheries  
**Date:** July 29, 2025

## About Tāngaro Tuia te Ora - Endangered Species Foundation

Tāngaro Tuia te Ora - Endangered Species Foundation is dedicated to protecting Aotearoa New Zealand's threatened and endangered species through evidence-based advocacy, research, and conservation action. We work to ensure the sustainable management of our natural heritage and the protection of vulnerable ecosystems, including deep-sea environments that are often overlooked and critically important for biodiversity.

### Introduction

Tāngaro Tuia te Ora - Endangered Species Foundation (ESF) submits on Fisheries New Zealand Discussion Paper No: 2025/24 regarding the management of orange roughy fisheries. Our concerns encompass both the species itself, and the protected corals and other vulnerable deep-sea wildlife impacted by this fishery.

As a member of the Deep Sea Conservation Coalition, we fully endorse the call to close all seamounts and features to trawling. This would provide much-needed protection for the deep-sea corals and other seabed life found in these environments, which are nominally listed as protected under the Wildlife Act but in reality, lack any meaningful protection from bottom trawling, which is the primary threat to these ecosystems.

### Support for Expert Submissions

While we do not submit detailed commentary on the technical aspects of orange roughy stock management, ESF supports the submissions of organisations with specialised expertise in this field, including the Deep Sea Conservation Coalition, Environmental and Conservation Organisations of New Zealand (ECO), Greenpeace, Environmental Law Initiative and LegaSea, whose detailed technical and legal analyses complement our concerns.

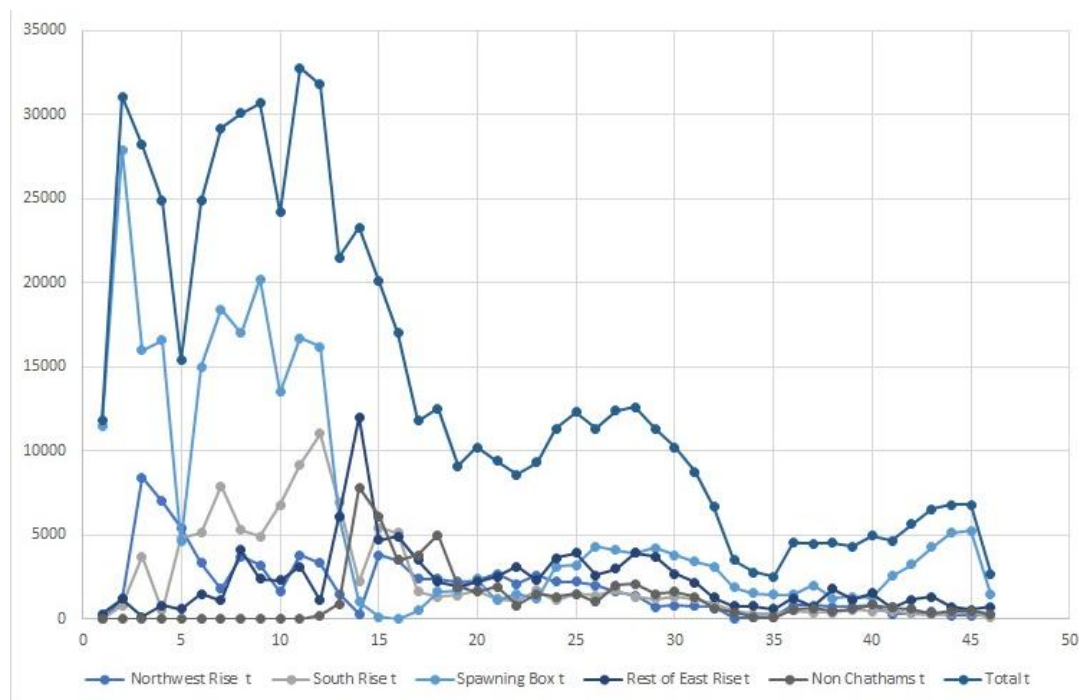


*Photo: Alex Rogers*

## Urgent Need to Close the East and South Chatham Rise Fishery

Orange roughy is a species highly vulnerable to overfishing due to its extremely slow growth rates, late maturation, and exceptional longevity. We urge the Minister to immediately close the East and South Chatham Rise (ESCR) fishery, which has reached the point of collapse as acknowledged in Option 3 of the MPI consultation document. Continuing to fish a collapsed stock is both economically and ecologically irresponsible.

### Chatham Rise Catch Since 1979-80 to 2023-24



### Call for Threat Classification Assessment

We strongly urge the government to assess orange roughy under the New Zealand Threat Classification System (<https://nztcs.org.nz>) and adjust its management accordingly. It is shocking that this assessment has not already been undertaken, particularly given that numerous orange roughy populations have been reduced to less than 10% of their original biomass.

For context, Australia has designated orange roughy as a conservation dependent species under its threatened species legislation. Orange roughy populations in Aotearoa are demonstrably at least as vulnerable as those in Australian waters, if not more so, given the extensive fishing pressure they have endured. This classification gap represents a significant failure in our conservation framework.

## Protecting Deep-Sea Coral Communities

Closing all seamounts to trawling would directly address the severe impacts of orange roughy fishing on protected coral communities. The scale of this impact is staggering: 99% of all reported bycatch of protected corals between 2007/8 and 2019/20 resulted from bottom trawling operations. The orange roughy fishery alone was responsible for more than half of this destruction, accounting for 112.7 tonnes of protected coral bycatch over this timespan.

Critically, the coral brought up in trawl nets represents only a minute fraction of the destruction occurring on the seabed. For every piece of coral visible in the catch, vastly more is crushed, buried, or otherwise destroyed on the seafloor. The 112.7 tonnes of reported coral bycatch from orange roughy fishing only represents the tip of the iceberg of ecosystem destruction.



## Supporting Orange Roughy Recovery Through Habitat Protection

Closing seamounts to trawling would also facilitate the recovery of orange roughy populations from decades of intensive fishing pressure. These fish form critical spawning aggregations on seamount features, but these aggregations have disappeared from heavily trawled seamounts, including the Graveyard Seamount on the Chatham Rise.

Protecting these areas, crucial to orange roughy reproduction, would fulfil the legal obligation under the Fisheries Act to safeguard habitats of particular significance for fisheries management. The current approach of allowing continued trawling over spawning habitat whilst attempting to manage the fishery through catch limits alone has proven inadequate.

## Recommendations for Other Orange Roughy Fisheries

Beyond the critical need to close the ESCR fishery, we call for substantially reduced catch limits across other orange roughy fisheries:

- **Northwest Chatham Rise:** This fishery experienced massive coral bycatch in the most recent fishing year, and spawning now occurs only on a closed seamount, indicating severe depletion of the broader population. Catch limits should be dramatically reduced to allow recovery.
- **Sub-Antarctic:** This fishery has never undergone a comprehensive stock assessment despite evidence that fishing pressure reduced biomass in one area to just 6% of original levels within a matter of years. Fishing should be suspended until a full assessment can be completed.
- **Puysegur:** The stock assessment for this area is out of date and relies on modelling approaches that have proved overly optimistic in other orange roughy fisheries. Catch limits should be reduced pending updated assessment using more conservative methodologies.

## **Conclusion**

The management of orange roughy fisheries has failed both the species and the vulnerable deep-sea ecosystems it inhabits.

### **We urge Fisheries New Zealand to:**

1. Immediately close the East and South Chatham Rise orange roughy fishery
2. Close all seamounts and features to bottom trawling
3. Initiate threat classification assessment for orange roughy
4. Substantially reduce catch limits in remaining orange roughy fisheries
5. Prioritise habitat protection and safeguard habitats of particular significance as they are fundamental to species recovery.

The deep sea cannot afford further delay. These ancient ecosystems, once destroyed, may take centuries or millennia to recover - if they can recover at all.

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