

04 May 2026

Submission to the Committee Secretariat Primary Production Committee on the ***Fisheries Amendment Bill***.

As a Catholic Justice and Peace Commission we welcome the opportunity to make a submission on the Fisheries Amendment Bill.

Being a Catholic Commission, we follow a mandate specific to the application of Catholic Social Teaching (CST) in matters of public life, particularly where questions of justice, environmental stewardship, human dignity, and the common good arise. We also affirm Te Tiriti o Waitangi as a foundational moral and constitutional covenant that must guide Crown decision-making, especially in relation to natural resources of Kaitiakitanga o te Moana.

We recognise the importance of sustainable livelihoods within the fishing sector, and although we do not oppose commercial fishing, nor economic development, CST is clear that economic activity must always remain subordinate to ecological limits, social justice, and moral responsibility.

We are concerned that, taken as a whole, the Bill:

- Does not reconcile with the Crown's Treaty obligations of partnership, rangatiratanga, and active protection
- Risks weakening environmental protection in favour of short-term economic gains and narrows environmental considerations in catch-limit decision-making
- Reduces transparency and public accountability over a shared natural resource
- Centralises decision-making power and limits meaningful participation
- Increases tolerance for discarding catch
- Risks normalising ecological harm
- Removes transparency mechanisms intended to protect creation
- Exempts on-board camera footage from the Official Information Act
- Introduces excessively high punitive penalties for sharing information
- Restricts avenues for appeal and judicial review

For these reasons we oppose the Bill in its current form and urge the Select Committee to recommend significant amendments to ensure the Bill better serves the common good, intergenerational justice, the environment, and the integrity of Te Tiriti o Waitangi.

The Common Good and Shared Natural Resources

*The common good is the sum total of social conditions which allow people, either as groups or as individuals, to reach their fulfilment more fully and more easily.*¹

In approaching this Bill from the stance of the common good, we believe fisheries are a *public taonga*, not merely an extractive industry. Our understanding is that the purpose of law and public policy is to serve the common good, not sectional or private interests. Law and policy governing fisheries should therefore prioritise the long-term ecological health, equitable access, and wellbeing of future generations. Fisheries are not merely economic assets, they are a **shared** ecological inheritance that supports food security, cultural life, recreation, and community wellbeing. Our concern is that the Bill places too great an emphasis on commercial certainty and export value while diluting safeguards intended to protect **shared** ecological systems.

We also believe restrictions on transparency and public participation undermine the common good, while the Bill's emphasis on speed, efficiency, and legal certainty for commercial traders, risks narrowing the moral horizon of fisheries management. When transparency is reduced and public participation is constrained, the social conditions required for the common good to flourish are irreparably damaged. In upholding the concept of the common good and equity in sharing natural resources, we call for legislation that reinforces sustainability and ecological health as primary objectives, not secondary considerations.

Participation, Transparency, and Subsidiarity

*“Those responsible for public authority must work for the common good and respect the fundamental rights of the human person.”*²

*“Every democracy must be participative.”*³

We believe that decisions affecting communities and ecosystems should involve those most impacted, and that democratic oversight is an ethical requirement, not an administrative burden. Participation in decisions that affect shared goods are not optional, but a moral requirement. It is our belief that authority and policy must always be answerable to the people it affects.

¹ *Gaudium et spes*. (1965, December 7). The Holy See.

https://www.vatican.va/archive/hist_councils/ii_vatican_council/documents/vat-ii_const_19651207_gaudium-et-spes_en.html n.26 – paraphrased.

² *Catechism of the Catholic Church - IntraText*. (1993). The Holy See.

https://www.vatican.va/archive/ENG0015/_P7W.HTM n. 2237 – paraphrased.

³ PONTIFICAL COUNCIL FOR JUSTICE AND PEACE. (2004, April 2). *Compendium of the social doctrine of the Church*. The Holy See.

https://www.vatican.va/roman_curia/pontifical_councils/justpeace/documents/rc_pc_justpeace_doc_20060526_compendio-dott-soc_en.html n.190

Our particular concerns are that exempting on-board camera footage from the Official Information Act (OIA) significantly reduces public scrutiny powers, and the introduction of fines (maximum \$50,000) for knowingly disclosing or re-disclosing footage without statutory permission risks silencing whistleblowers and investigative journalists who have historically monitored and assisted in keeping the commercial fishing industry transparent, accountable, and honest. Reducing transparency undermines public trust and erodes moral legitimacy, even where “administrative efficiency” is claimed. Furthermore, placing limits on consultation and judicial review (reduced to a strict 20 working-day turnover deadline) will weaken not strengthen civic participation, and restrict the right to thorough and fair judicial review.

We recommend restoring meaningful public access to information (always subject to proportionality and privacy protections), and seek reassurances that community, recreational, and customary voices are not marginalised by the implementation of new restrictive amendments to legislation.

Te Tiriti o Waitangi and Moral Obligation

Catholic Social Teaching is universal. Yet, we in Aotearoa New Zealand have the opportunity of applying CST to our unique moral covenant within Te Tiriti o Waitangi.

Yours is the noble task of understanding and evaluating all the many elements of your civilization. Yours is the opportunity of fostering the best in your traditions, and of refining and purifying those aspects which require it. You face the challenge of ensuring that your separate cultures continue to exist together and that they complement each other.⁴

We are particularly concerned this Bill greatly restricts Māori Tangata Whenua capacity to exercise their Tino Rangatiratanga (Article 2) right through Kaitiakitanga. The proposed “streamlining” of decision-making risks excluding and marginalising **rangatiratanga in practice**. Fisheries are taonga central to Māori cultural, spiritual, and economic life. Rangatiratanga encompasses not only quota ownership, but Kaitiakitanga – the care, welfare and guardianship of taonga. We do not endorse tokenism or partnership that exists only on paper without meaningful participation or protection. Legislation that does not actively promote Te Tiriti obligations is not compatible with Catholic moral or social teachings. The Crown has a duty to actively protect Māori interests and environmental taonga and support Māori guardianship over moana and species. Any weakening or

⁴ Pope St. John Paul II. *Homily of John Paul II: Christchurch (New Zealand) Lancaster Park, 24 November 1986*. (1986, November 24). The Holy See. https://www.vatican.va/content/john-paul-ii/en/homilies/1986/documents/hf_jp-ii_hom_19861124_christchurch-lancaster.html n.3

exclusion to oversight, precaution, or ecological safeguards conflicts with this obligation, particularly given existing pressures on marine ecosystems.

The Crown is required to act honourably and collaboratively with Māori in good faith, in all decisions, at all times. The development of the Bill is perceived as industry-driven and does not, at any stage, seek genuine partnership. We expect, not only recommend, that the Bill embed stronger Treaty consistent safeguards that require **demonstrable partnership** at all stages of fisheries decision-making but especially in the development of policy, protection, and legislation.

Intergenerational Justice and Solidarity

Catholic Social Teaching stresses moral responsibility across generations.

“Intergenerational solidarity is not optional, but rather a basic question of justice.”⁵

“The environment is on loan to each generation, which must then hand it on to the next.”⁶

Solidarity across generations must ensure that decisions made today do not compromise the ability of future generations to enjoy abundant and healthy oceans.

Our concerns are that prioritising short-term certainty through immediate and temporary economic gains, risk long-term ecological impoverishment. We must ensure our future generations have a voice, choice, and chance to respond to decision-making that will affect their future. They should not have to unfairly shoulder the consequences of the rushed, short-lived, and unsustainable actions, decisions and practices of today.

Intergenerational justice and solidarity should be more than a precursory or precautionary measure, the specific assessment of intergenerational impacts in fisheries management decisions should be a mandatory requirement in forming any new or amended law. We want to state this clearly, any policies that trade ecological resilience for short-term gain fail the longevity and sustainability test. We do not want future generations inheriting the consequences of poor decision-making in the form of an empty or dying ocean.

⁵ Pope Francis. *Laudato Si': On Care for our Common Home*. (2015, May 24). The Holy See. https://www.vatican.va/content/francesco/en/encyclicals/documents/papa-francesco_20150524_enciclica-laudato-si.html n. 159

⁶ *Laudato Si'*. n.159 – paraphrased.

Preferential Option for the Vulnerable

“The obligation to provide justice for all means that the poor have the single most urgent economic claim on the conscience of the nation.”⁷

Following on from the future inheritance of our rangatahi is voicing equal concern for He Tangata – the people, especially those at a heightened point of vulnerability:

- small-scale and recreational fishers
- customary Māori fishers
- coastal communities
- future generations

It is a well-known fact that regulatory flexibility disproportionately benefits large, well-resourced commercial operators. In striking contrast, environmental degradation impacts those with the least access to resources, the capacity to respond, adapt or relocate. Where regulatory flexibility disproportionately benefits large commercial operators, Catholic ethics demands careful scrutiny. The Bill should ensure protections and provisions for those with less ‘power’ in fisheries governance. Clarity and assessment of distributive impacts that are both immediate and future predictive should be provisioned.

Stewardship of Creation and Integral Ecology

“We are not God. The earth was here before us and it has been given to us.”⁸

We would add to the above quote from Pope Francis, that the earth has been given to us to be shared equally and equitably. With this understanding forth most in our minds, we take the concerns of care for creation and stewardship with the utmost seriousness. It is our belief that humanity is entrusted with the guardianship of the natural world, not domination over it. The intrinsic value of oceans is their living ecosystems, without which, there would be no marketable or ‘deemed value’⁹. Oceans and fisheries also possess intrinsic value and are not merely instrumental or economical. Policy must therefore err on the side of ecological caution, especially amid biodiversity loss and climate stress.

We are deeply concerned that narrowing environmental factors when setting catch limits risks a **reductionist approach**¹⁰ to ecosystem management. Increased tolerance for

⁷ United States Catholic Bishops & National Conference of Catholic Bishops. (1986). *Economic Justice for All: Pastoral Letter on Catholic Social Teaching and the U.S. Economy*. America Press, Inc.

https://www.usccb.org/resources/economic_justice_for_all_1.pdf

Economic Justice for All (US Bishops). n. 86

⁸ *Laudato Si'*. n. 67

⁹ Jones, S. (2026, January 16). *Changes proposed for deemed value of fish*. The Beehive.

<https://www.beehive.govt.nz/release/changes-proposed-deemed-value-fish>

¹⁰ Carboni, J. (2024, November 26). *Out with Reductionist Approach: Getting Real With Regeneration in Project Management*. The GPM Blog. DRIVING SUSTAINABLE CHANGE.

discarding fish and limited public visibility of fishing practices undermine ecological accountability. It assumes that what we cannot see will not affect us, what is not documented is not happening, and that harm that cannot be seen does not exist. The introduction of cameras on commercial fishing boats was to monitor illegal activity, the widespread dumping of fish, and the misreporting of catch by vessels.¹¹ Furthermore, “the independent information [that on-board cameras] provide supports the reputation of our fishing industry, the sustainability of our fisheries, and more confident management decisions.¹² Reducing or restricting footage and camera usage, and introducing excessive punitive measures to the releasing of footage is counterproductive. We do not call for unmitigated mass surveillance on-board fishing vessels. We call for the protective measures of deterrence by surveillance and reporting to remain in place if not made stronger.

We look to legislation that strengthens, rather than narrows, environmental considerations in catch-limit decision-making. We recommend the Bill apply the precautionary principle clearly where scientific uncertainty exists, keep and improve transparency mechanisms of monitoring intended to protect creation, discourage normalising discarding catch and ecological harm, and increase public oversight.

Conclusion:

“It is evident that the care of the seas and fishing is intimately tied to the care of persons.”¹³

The sea and oceans, our Tangaroa, are not endless, self-sustaining resources or commodities to benefit the impatient, the greedy, or the powerful. They are shared, natural resources entrusted to the use and care of all. A society is judged not by how efficiently it extracts value, but by how faithfully it protects what has been entrusted to its care.

We sincerely urge the Select Committee to recommend amendments that realign the Fisheries Amendment Bill to:

<https://blog.greenprojectmanagement.org/index.php/2024/11/25/reductionist-approach-getting-real-regeneration-project-management/>

¹¹ *Cameras on boats 2021 - New Zealand Sport Fishing Council*. (2025, April 24). New Zealand Sport Fishing Council. <https://www.nzsportfishing.co.nz/fisheries/fisheries-management/fisheries-policy-and-reform-processes/cameras-on-boats/>

¹² MPI. (2019). *On-board cameras for commercial fishing vessels* | NZ Government. Ministry for Primary Industries. <https://www.mpi.govt.nz/fishing-aquaculture/commercial-fishing/digital-monitoring-of-commercial-fishing/on-board-cameras-for-commercial-fishing-vessels>

¹³ Cardinal Czerny, M. *Message of the Prefect of the Dicastery for Promoting Integral Human Development on the occasion of World Fisheries Day 2025*. (2025, November 13). The Holy See. <https://press.vatican.va/content/salastampa/en/bollettino/pubblico/2025/11/13/251113e.html>

- Embed Te Tiriti o Waitangi obligations by strengthening genuine partnership with Māori at all stages of fisheries decision-making.
- Re-centre ecological sustainability and the precautionary principle by strengthening environmental considerations in resetting catch limits, resisting any dilution of safeguards, and ensuring scientific uncertainty leads to greater protection (not increased exploitation).
- Protect transparency and public accountability by restoring appropriate public access to information, including on-board camera footage (with proportionate privacy safeguards), and remove punitive penalties that risk silencing and lessening public scrutiny.
- Safeguard democratic participation and access to justice by maintaining meaningful consultation processes, avoid over-centralisation of decisions and power, and preserve adequate timeframes and avenues for appeal and judicial review.
- Prioritise intergenerational justice and the common good by requiring clear assessment of long-term ecological and social impacts, ensuring future generations' right to healthy, abundant oceans.
- Apply a preferential option for the vulnerable by ensuring fisheries policy does not disproportionately benefit large commercial operators, but instead protects customary Māori fishing, small-scale and recreational fishers, coastal communities, and those least able to bear the costs of environmental degradation.

As we stated at the beginning of our submission, we do not oppose commercial fishing, nor economic development. We require reassurances that this Bill will help build economic systems that serve human dignity and the flourishing of creation: that seeks transparency and participation as “ethical goods” rather than impediments, and respects Treaty partnership and ecological protection as required moral obligations not token gestures or inconvenient afterthoughts.