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Cost Recovery
Ministry for Primary Industries,
PO Box 2526,
Wellington 6140

27th May 2022

Dear Sir/Madam

Re: Submission from the BCO5 Association (BCO5) on the draft Conservation Services Programme Annual Plan 2022/23

The BCO5 Association (BCO5) represents all commercial fishermen and quota owners who utilise the blue cod resource in Fisheries Management Area 5 (FMA5). The objectives of BCO5 are to promote sustainable management of FMA 5 blue cod stocks, protect harvest and access rights and protect/enhance quota value. All commercial blue cod fishing in BCO5 is done by cod-potting.

The address for service for this submission is: Attn: Rodney Tribe, P.O Box 113, Bluff, Southland. Ph [REDACTED], email [REDACTED]

BCO5 has read the submission of the Rock Lobster Industry Council (RLIC). BCO5 agrees with and endorses all comments and points made in the RLIC submission. For brevity, they shall not be repeated in this submission.

More specifically, BCO5 is concerned with Section 2.7 of the proposed Plan, whereby a Project is outlined with title “*Determining the Resilience of Fiordland Corals to Fisheries Impacts – Project Code INT 2022-05*”. This project budgets \$30,000 per year for three years (total \$90,000), with 100% cost recovery imposed on BCO5 and CRA8 fish stocks. The rationale for this appears to be principally based on:

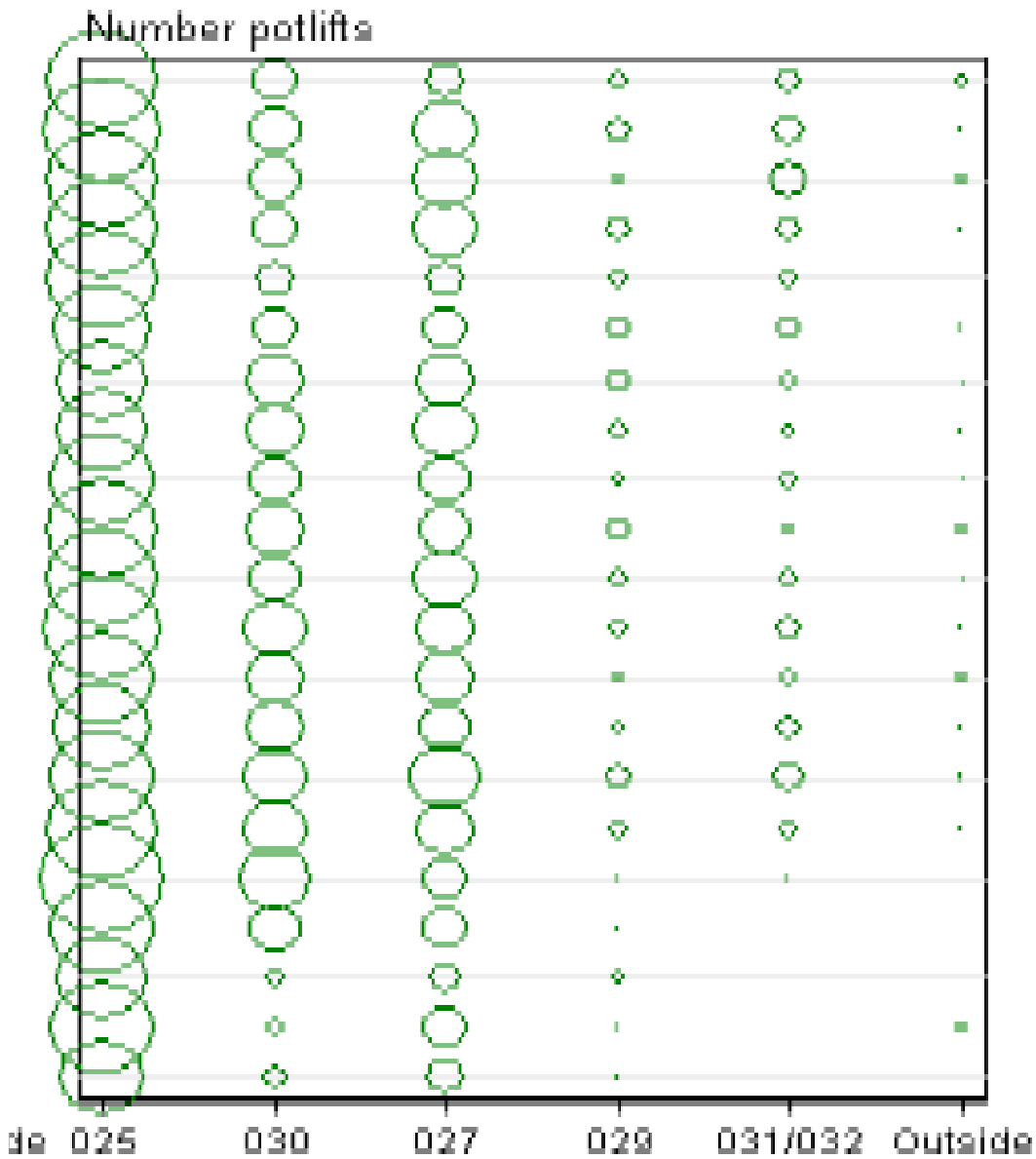
Commercial fishing is prohibited in the inner waters of Fiordland, however, rock lobster potting and trawl fishing for blue cod is known to occur in the outer areas of the fiords, where A. fiordensis is abundant and there is virtually no fisheries observer presence.

The proposal suggests that BCO5 should co-fund this project along with CRA8.

However, BCO5 cannot contribute to this proposed study for the following reasons:

1. Nearly 100% of the commercial catch is done by cod-potting, not trawling. While a miniscule amount of BCO is caught as a by-catch in trawl vessels, they are never targeted via trawling. No information is provided by the proposal which demonstrates that setting or retrieving cod pots is likely to have a significant adverse effect on *A.fiordensis* populations.

2. The figure below (from Starr 2012) shows the extent of blue cod potting in FMA5 by sub-statistical area. Fiordland is “Sub-statistical area 031/032”. It can be seen that there is comparatively little commercial blue cod fishing in Fiordland waters.



The recorded catch in 031/032 is insignificant and is not generally used in stock assessment calculations for BCO5. Any effect on *A.fiordensis* of this small amount of commercial blue cod fishing would be correspondingly minor.

3. The map below shows the extent of the blue cod commercial harvest by habitat type (from Pomerade 2012).

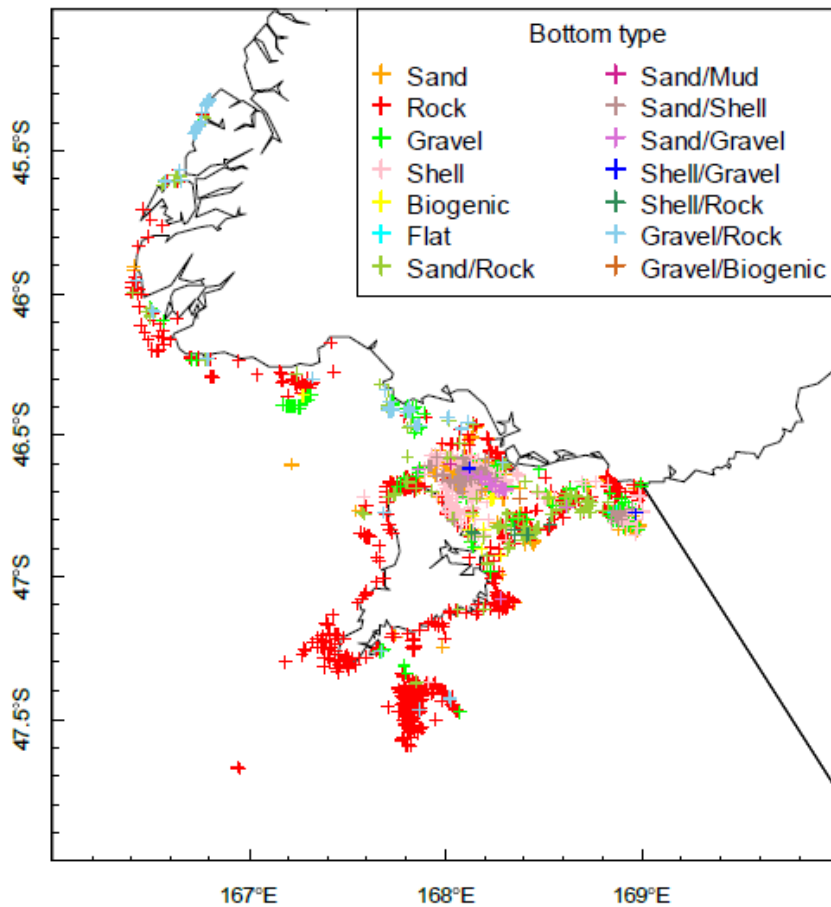


Figure 14: Bottom complexity for the full diary dataset.

This map shows that commercial cod potters generally do not set their pots in sheltered Fiordland waters where *A. fiordensis* is likely to be present. In Fiordland, pots are mostly set in open waters on “rock” or “sand/rock” habitats. These open-water habitats are not typical habitats of *A. fiordensis*.

Furthermore, Carbines & Usmar (2012) studied blue cod benthic habitat preferences in Foveaux Strait. They found that blue cod were observed most often with cobble/macroalgae/sea tulip/sponge and macroalgae/sponge. These habitats are more associated with open coastline habitats, not the more sheltered habitats frequented by *A. fiordensis*.

General comment:

It is disappointing that the proposal shows so little understanding of the BCO5 commercial fishery, including a surprising lack of knowledge on BCO5 fishing methods and (un)likely interactions with *A. fiordensis*. This lack of knowledge could have been quickly cleared up by the proponents contacting BCO5 directly. BCO5 contact details are readily available from

Fisheries New Zealand's Dunedin office. The fact that this wasn't done reflects poorly on the Conservation Services Programme and those involved with this proposal.

BCO5 wholly rejects the notion that its members have any actual or potential adverse effect(s) on *A. fiordensis*. Accordingly, BCO5 will not contribute to this proposed research in any way.

Yours faithfully



R.Tribe

Chairman – BCO5 Association Inc.

References

(NB: Copies of all references are available from BCO5 on request).

Carbines, G.D.; Usmar, N.R. 2012. Comparative estimates of abundance and size of blue cod derived concurrently from potting and flown video methods at fixed sites in Foveaux Strait 2009. Video derived descriptions of benthic habitat and blue cod utilisation. Saltwater Science Client Report 2012-02. 23 p.

In : Middleton, D. 2012 (compiler): Ecosystem Spatial Management for Blue Cod. Seafood Innovations Ltd Project 0903

Pomarede, M. 2012. Mapping of habitat data from the BCO 5 fishers' diary programme.

In : Middleton, D. 2012 (compiler): Ecosystem Spatial Management for Blue Cod. Seafood Innovations Ltd Project 0903

Starr, P.; Kendrick, T. 2012. Review of the BCO5 fishery.

In : Middleton, D. 2012 (compiler): Ecosystem Spatial Management for Blue Cod. Seafood Innovations Ltd Project 0903