

CSP Annual Plan 2022/23

Summary of Submissions

List of Submitters

Submitter	Shown in Comment Summary as:
Fisheries Inshore New Zealand & Deepwater Group	FINZ & DWG
New Zealand Rock Lobster Industry Council	NZRLIC
BCO5 Association Incorporated	BCO5
Northern New Zealand Seabird Trust	NNZST

PART A: General comments

Submitter	Submission Summarised by DOC	DOC response
<p>NNZST</p>	<p>Feedback on the survey of light use in commercial fishing vessels. Supportive in general with some concerns around methodology. Encourages wider investigation to include light impacts from urban environments (out of CSP scope). Support moving towards mitigation project involving action that reduces lighting impact given it has already been established that vessel lighting negatively impacts seabirds.</p>	<p>Noted. DOC will consider these aspects in the experimental design and project deliverables.</p>
<p>FINZ & DWG</p>	<p>In general, support for projects relating to the identification of protected species fisheries bycatch, subantarctic seabird populations, and work on spine-tail devil ray bycatch.</p> <p>Lack of support for projects being cost recovered through CSP where there is uncertainty around data to support impacts from fisheries on species, in particular corals.</p> <p>Strong preference for a shift away from population projects towards those focused on mitigation and an acknowledgement that this year's annual plan is a step in that direction with a higher number of mitigation projects proposed.</p> <p>Concern over a perceived lack of strategic direction for CSP research planning and fund allocation to better prioritise issues to species most at risk from fishing activities.</p> <p>Funding of the Observer Programme and prioritisation of fleets with greatest risk to protected species has raised concern and support is given to favouring electronic monitoring on vessels in place of observers.</p> <p>Ongoing concern around population estimates for black petrels and industry cost recovery and a request</p>	<p>DOC notes support for research on spine-tailed devil ray, identification of protected species bycatch, identification, storage and genetics of cold-water bycatch, black petrel, Westland petrel, flesh-footed shearwater, Gibson's and white-capped albatross, and Antipodean albatross and white chinned petrel.</p> <p>We also note lack of support for coral research funded through CSP, marine mammal bycatch, and Northern Royal albatross research, but consider sufficient justification exists for these projects to progress. The decision has been made to not cost recover for the Fiordland coral project in the 22/23 financial year.</p> <p>We note that any updated seabird risk assessment may result in changes to species priorities in future.</p> <p>DOC acknowledges that whilst there have been good gains made by the fishing industry to reduce protected species bycatch, the work needs to continue. We also acknowledge the request for collaboration in improving the strategic direction for CSP research in areas of greatest risk to protected species from commercial fishing, and for assurance that projects fit within the terms of reference for CSP research</p>

	<p>to develop a strategic threat management plan.</p> <p>Request for breakdown of CSP annual spend in recent years.</p>	<p>objectives and are happy to discuss. We continue to review the current method for developing and prioritising research with a view to continued progress towards streamlining the process in future annual plans.</p> <p>With regards to the amount of funding for CSP in recent years we refer you to the Appendices in annual plans which contains a breakdown of funding allocation. These can be found on the CSP webpage.</p> <p>Whilst DOC has a zero-bycatch goal under the ANZBS, and these are consistent in nature with aims within the CSP, they do not drive new research proposed in CSP annual plans.</p> <p>We note your continued lack of support towards population projects and a desire to see more mitigation research, and this has been reflected in the number of mitigation projects in the current annual plan compared to recent years. We also note the desire for development of threat management plans for black petrels (and review of levies) and Antipodeans and Gibson's albatross.</p> <p>Regarding the roll out of electronic monitoring (EM) on inshore fishing vessels by FNZ, DOC staff are active members of working groups with a focus on the use of cameras providing data in relation to protected species bycatch. However, DOC has no control of camera utility and this a matter for FNZ and their contractors. Observers serve multiple functions for DOC that cannot be achieved by EM alone and are therefore we not supportive of their full replacement by EM. We acknowledge that currently 50% of CSP funds are</p>
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		spent on the observer programme but deem this work imperative for data driven risk assessments, but and are happy to discuss potential for reprioritisation of efforts in this area.
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PART B: Comments specific to INT2022-01 Observing commercial fisheries

Submitter	Submission	DOC response
INT2022-01 Observing commercial fisheries		
FINZ & DWG	FINZ have concerns about 50% of CSP funding going to the observer programme and it needs to be reprioritised to fleets of greatest risk to protected species and would like to be engaged on this. They also support removal of observers once electronic monitoring is implemented.	Noted. DOC welcomes this discussion and industry feedback on the strategic placement of observers. Observer planning is done with FNZ, and placement of inshore observers is undertaken in light of protected species risks, NPOAs or TMPs, and other objectives as outlined in the Annual Plan. We agree that increased industry engagement in this process could benefit both agencies.
FINZ & DWG	With proposed introduction of electronic monitoring on boats, observer coverage should be better applied to inshore risk areas including Kaikoura, South Coast SI trawl fleet and SLL.	Noted. DOC welcomes this discussion and a revisit to strategic placement of observers, especially on the inshore fleets and considering the proposed camera deployment schedule.
FINZ & DWG	Would like to be engaged in guiding redistribution of resources to higher priority areas.	Noted.

PART C: Customary practices

Nil this year

PART D: Comments specific to proposed projects

Submitter	Submission	DOC response
INT 2022-02 Identification of seabirds captured in New Zealand fisheries		
FINZ	Supportive	Noted.
INT 2022-03 Identification, storage and genetics of cold-water bycatch		
FINZ	Supportive	Noted.

INT 2022-04 Risk assessment for protected corals		
DWG	<p>Qualified support for the idea - but at this juncture DWG does not support this project (Low Priority). Dependent on nature and extent work. Hard to see how the output of this quantitative RA will provide us with anything more concrete than the coral/benthic distribution models and the Benthic Env Support Tool, that we have now that are just as likely to be inaccurate as they are accurate.</p> <p><i>Note: at the Research Advisory Group, DWG expressed support for this project as long as the objective is primarily conservation gains and fisheries management, and coral research prioritisation as a secondary objective.</i></p>	<p>Noted. CSP sees this project as a priority project for corals in line with our Coral Medium Term Research Plan, and the CSP Objectives. CSP and FNZ have several related coral projects, including ongoing distribution projects that incorporate abundance estimates, so these models will greatly improve risk assessment methodology from the pilot study in 2014.</p> <p>We agree that this project needs aligning with benthic work at FNZ and CSP will engage with the FNZ science team to align approach and methodology. To further ensure research synergies and to make the project timing works to leverage outputs of additional research, we have split the project across 2 years, with the first year devoted to methodological development. CSP will invite stakeholder feedback into this process via technical advisory groups.</p>
FINZ	Endorse DWG comments	Noted
INT 2022-05 Determining the Resilience of Fiordland Corals to Fisheries Impacts		
BCO5	<p>Unsupportive and opposed to funding this project. The submitters state that almost 100% of commercial blue cod fishing done in Fiordland is via cod-potting, not trawl, and provide information on fishing effort and distribution until 2012. They consider there to be no demonstrable actual or potential adverse effects of blue cod fishing on the black coral <i>A. fiordensis</i>.</p> <p>Expressed disappointment in misunderstanding of the BCO5 fishery and do not believe cod pots are set in habitat that is suited to <i>A. fiordensis</i>.</p>	<p>Noted. As outlined in the project description, the current knowledge of black coral distribution is outdated (largely limited to SCUBA depths) and Fiordland also contains various other protected corals besides black corals such as stylasterids. Therefore, we cannot unequivocally say that effort for BCO5 does not overlap with coral habitat at this stage, and the project seeks to improve distribution data for all these species through methodology proposed.</p> <p>CSP notes that potting rather than trawl is the predominant method for BCO catch in FMA5. We are interested in the impacts of pot fisheries on the impacts of corals in the area (but had considered impacts more in relation to other target fisheries). CSP agrees with the submission that the extent of effort in</p>

		<p>the area by BCO5 fishers is minimal relative to the overall effort for the BCO stock, as described in the 2021 Fisheries Assessment Plenary that uses recent effort data. CSP did reach out to FNZ to get a better understanding of recent effort in the project area by method, these data had not become available at the time of consultation.</p> <p>Considering information now available, CSP agrees with the submitters and will remove BCO5 from the cost recovery model for this project.</p>
FINZ	Not supportive of full cost recovery due to a lack of information on fishing impacts to corals and endorse previous comments made by the DWG comments in the CSP RAG meeting.	Noted.
NZRLIC	<p>Not supportive and opposed to cost recovery of this project on the basis that they consider it does not constitute a conservation service under the Fisheries Act (1996) because the effect of rock lobster fishing on corals is unknown and no supporting evidence of adverse effects is given. In addition, they state based on current information that little if any fishing takes place in habitats where corals live.</p> <p>Also suggest that is it more a public interest project and therefore not cost recoverable through CSP.</p>	<p>CSP welcomes the opportunity to discuss the project and the submission with NZRLIC.</p> <p>As noted in the project description, the current knowledge of black coral distribution is outdated (largely limited to SCUBA depths). CSP also points out that Fiordland contains various other protected corals besides black corals, such as stylasterids. Recent video data and SCUBA surveys have demonstrated <i>A. fiordensis</i> occurs at the entrances to the sounds, and in some areas stylasterids are abundant. Therefore, we cannot unequivocally say that effort for CRA8 does not overlap with coral habitat at this stage, and the project seeks to improve distribution data for all of these species through methodology proposed.</p> <p>CSP disagrees that the CSP component of the project is being provided predominantly in the public interest. As noted in the project description, the proposed cost recovered part relates specifically to fisheries impacts (not other</p>

		<p>environmental impacts such as climate change).</p> <p>Until we have more information, CSP has decided to progress the project with crown funding, and we will not seek to cost recover it this year. Next year, depending on research outcomes and in consideration of more detailed geo-spatial effort data than was available during consultation, we may revisit this decision.</p>
INT 2022-06 Distribution and abundance of marine mammals observed around commercial fisheries		
FINZ	Not supportive, similarly to INT2021-04 no proposed output relating to adverse effect of fishing on protected species and therefore deemed not relevant to CSP.	Noted.
INT 2022-07 Post release survival of devil rays in purse seine fishery		
FINZ	Endorses previous support for the project from Pelco NZ following the RAG meeting, 7 Mar 2022. Pelco NZ recommended ongoing discussion with industry, including potential re-evaluation of the experimental design and timing of operations due to the unpredictable nature of ray interactions.	Acknowledged.
POP2022-01 Black Petrel population monitoring		
FINZ	In principle, supportive of ongoing monitoring, and accept black petrel are the highest risk seabird. However, they are concerned around the lack of an agreed management strategy for this species and note that industry have spent \$1 million on research over the past 10 years. They request an independent review of the black petrel research to date, a review of the population modelling and the development of a research strategy to provide a comprehensive resolution of population modelling for black petrels. Until that review is completed, they consider research into black petrel population issues should be funded from other DOC appropriations rather	Noted. A wider consideration of threats and management actions is planned as part of Budget 2022, scheduled for 2024/25.

	than drawing needed resources from CSP.	
POP2022-02 Flesh-footed shearwater juvenile survival and dispersal		
FINZ	Supportive as more quantitative information is required on foraging movements and distribution. Recognise that the major data gap for flesh-footed shearwaters is relative to juvenile seabirds and hence they consider POP2022-02 is more valuable than POP2021-04.	Noted.
POP2022-03 Deep sea coral reproduction		
DWG	This could have applications later, but at this juncture DWG does not support this project (low priority). Of higher priority is understanding the nature and extent of coral distribution within the NZ EEZ.	Noted. Under CSP Objective E, CSP considers this project important to provide input data to the concurrent Coral Risk Assessment we are proposing. A gap in coral reproductive knowledge is recognised in the coral MTRP and pilot risk assessment. There is ongoing and concurrent research on coral distribution, so we consider it to be timely.
FINZ	Endorse DWG comments.	Noted.
POP2022-04 Deep diving into decades of uncatalogued corals		
DWG	Questions applicability to CSP work programme.	Noted.
FINZ	Endorse DWG comments from CSP RAG.	Noted.
POP2022-05 Northern Buller's albatross population monitoring		
FINZ	Supportive of the need for research but don't consider this species is ranked high enough in the Seabird Risk Assessment to justify the proposed expenditure being fully recovered from the fishing industry, as there is no quantitative evidence that commercial fishing is posing an adverse risk to these species. Request input from updated Seabird Risk Assessment.	Noted. DOC considers the species sufficiently high priority, and further notes the substantial cost effectiveness by leveraging previous Crown-funded work.
POP2022-06 Northern Royal albatross population monitoring		
FINZ	As for POP2022-05.	Noted. DOC considers the species sufficiently high priority, and further notes the substantial cost effectiveness by leveraging previous Crown-funded work
POP2022-07 Westland petrel foraging movements and diving behaviour		

FINZ	Supportive for the same reasons as POP2022-02 (above).	Noted.
POP2022-08 Auckland Islands seabird research		
FINZ	Supportive as the species identified are high risk in the Seabird Risk Assessment. Appreciate CSP efforts to reduce research costs for these expeditions by the inclusion of two species for each research project (POP2022-10). There is concern at the lack of species-specific management plans and the annual apprehension to secure funding to complete this work on these remote islands. They request that the CSP develop a strategic management plan for these species to future proof the long-term monitoring and research requirements and associated budget.	Noted. The strategic management of Gibson's albatross is included as part the CMS Concerted Action plan for Antipodean albatross.
POP2022-09 Auckland Islands New Zealand sea lions		
FINZ & DWG	Have consulted with DWG and while both consider importance of continuing to monitor Auckland Island sea lion pup production, and are supportive, they do not consider the commercial fishing industry should continue to be levied for 90% of the cost of the fieldwork and it should be reduced to 50%. They consider the risk assessment has demonstrated that commercial fishing is not currently having an adverse effect on the Auckland Island sea lion population. With a high level of observer coverage, the industry is paying an excessive amount for monitoring the sealion population.	DOC recommends that this project continue to be cost-recovered at 90% as the most recent risk assessment for New Zealand sea lions at the Auckland Islands indicated that commercial trawl fisheries pose a higher risk to the population than the total risk of other human interventions. The Schedule of Cost Recovery Rules states: <i>research relating to protected species populations where risk to those populations by human intervention has been estimated will be cost recovered from Industry at a rate of "A / B, expressed as a percentage, where A is the risk to the populations posed by commercial fishing in the EEZ of New Zealand B is the total risk of human interventions on the populations".</i> A quantitative risk assessment of threats to NZ sea lions was completed in 2016. The greatest risks to recovery of this population were <i>Klebsiella</i> , commercial trawl captures, male sea lion aggression and trophic effects/food availability. Of these four greatest risks, two (trawl captures and trophic effects) are directly

		linked to commercial fishing near the breeding colonies , while the other two have not been linked with human activities. All other threats were determined to have a minor effect on population trajectory.
POP2022-10 Antipodean Island seabird research		
FINZ	Supported. As for POP2022-08.	Noted. The strategic management follows the CMS Concerted Action plan for Antipodean albatross, with wider alignment through the Toroa engagement hui hosted by DOC.
POP2022-11 Campbell Island seabird research		
N/A	No specific feedback received on this project.	The project has been rescoped as field research will not be possible due to changes to associated research plans at the island. The project now focusses on utilisation of satellite imagery and preparatory actions for field research which is expected to be possible in 2023/24.
MIT2022-01 Longline hauling mitigation devices		
FINZ	Having reviewed the recommendations of the previous MIT2018-02 project they consider that promoting the uptake of hauling mitigation devices is important but wish to see the recommendations from that project implemented prior to this new project beginning. They also suggest some changes are made to the proposed MIT2022-01 objectives including greater collaboration with vessel operators, cost reduction and reduced timeframes for the research.	This project forms a key step in implementing the recommendations from project MIT2018-02, specifically in further investigation of effectiveness, and by facilitating wider uptake. As outlined in the project description, engagement with the industry forms a key mechanism to implementing this project, and all opportunities will be pursued to maximise cooperation. DOC considers that the very limited number of vessels involved in project MIT2018-02, and the diversity amongst small longline fleets, does require further quantification of effectiveness to ensure the devices can meet the robust requirements of being considered best practice. Further, DOC is committed to a process of ongoing improvement in mitigation effectiveness as we work towards the vision of the NPOA-Seabirds 2020.
MIT2022-02 – Understanding drivers and barriers to mitigation in small vessel bottom longline		

FINZ	<p>Acknowledges the need to improve the uptake of better mitigation but does not consider the proposed expenditure warranted without Liaison Officers actively working with fishers to provide solutions for improving mitigation performance including better fisher knowledge on mitigation standards in relation to regulations. FINZ suggest as a first step holding a workshop with the Liaison Officers and surface longline fishers to discuss with them how they might address the issues and consider extending to include bottom longline fleet. Supportive of funding targeted at providing workshops and a more focused implementation plan to achieve improved performance.</p>	<p>DOC notes comments relating to further action from the research findings in the surface longline fleet and is committed to ongoing implementation of actions in this area. This project is only focussed on small vessel bottom longline, and DOC believes the differences between surface and bottom longline fleets is sufficient to warrant new and targeted research specifically on the bottom longline fishery.</p> <p>DOC acknowledges the value of Liaison Officers in motivating fishers to adopt higher standards of mitigation. The project description explicitly outlines the linkage between the research project and the Liaison Programme. DOC agrees that there would also be value in a workshop with Liaison Officers and has already included this under Output 5 of the project description.</p>
MIT2022-03 – Coral Symposium		
FINZ	<p>As highlighted by DWG in the CSP RAG meeting, FINZ agree that Objective 3 is more relevant to management and research planning and does not fit into the scope of 'conservation services.' Fisheries Inshore endorses DWG's previous comments on this project.</p>	<p>Noted. The symposium has been split into two different components accordingly, with crown funding for objectives less relevant to CSP.</p>
DWG	<p>Supportive in principle but needs to include all the many moving parts (e.g., outcomes from FNZ Benthic Environmental Forum). Essential that Industry presents, engages, and participates. Do not support 100% industry funding due to being the public interest application.</p>	<p>Noted. The symposium has been split into two different components accordingly, with crown funding for objectives less relevant to CSP. We will engage with FNZ to align parallel and related benthic work.</p>
MIT2022-04 – Bait retention as a driver to mitigation use in the surface longline fishery		
FINZ	<p>Not supportive on the basis that outputs of improved mitigation performance can be achieved by</p>	<p>Noted. Research to understand drivers of mitigation uptake falls beyond the current scope of the</p>

	encouraging Liaison Officers to address the issue of bait retention with fishers rather than undertaking research into current behaviour. Also see an opportunity to align discussions regarding this issue with the workshop we request CSP arranges with surface longline operators to address barriers to mitigation uptake.	Liaison Programme, thus a targeted research project is required.
MIT2022-05 Large vessel trawl warp mitigation		
DWG	No comment	
FINZ	Endorse DWG comments. Noted at the CSP Research Advisory Group that 4 years of observer data would be needed to get good results.	Noted.
MIT2022-06 – Light Mitigation: reducing vessel interactions with seabirds		
FINZ	<p>Have queried the methods to be used and lessons learned from previous projects to ensure any outputs from this proposed research will be beneficial.</p> <p>Also consider that the focus for future light mitigation research needs to investigate a broader fleet than just commercial fishing vessels. Acknowledgement that the inshore finfish fishing fleet are encouraged to mitigate vessel and operating lighting impacts through the Liaison Programme and are audited annually. Request the scope of high-risk vessels be broadened across more vessel types other than fishing and remove sole cost recovery from the fishing industry accordingly. Also query whether Objective 2 (light set ups on land), is cost recoverable through CSP.</p>	<p>DOC will take lessons learned from MIT2019-03 into consideration during the contracting and project development phase, and consequently, outputs from MIT2022-06 will be beneficial.</p> <p>We acknowledge that fishers are indeed encouraged to mitigate the adverse effects of lights through the Liaison Programme. Yet, that stream of work does not provide novel solutions for light mitigation. In contrast, MIT2022-06 will enable steps towards the goal of reducing adverse interactions of protected species with fisheries; specifically, MIT2022-06 aims to identify lights that reduce adverse interactions while still being fit for purpose for fishing, and therefore, DOC considers MIT2022-06 an appropriate CSP project. The light set-ups on land will be representative of lights used on vessels, and as such, the on-land terrestrial experimental set-ups are a fundamental and appropriate part of the project.</p>
NNZST	Supports at-sea experiments being the focus of this project (not land-based) and should take place on a working commercial fishing vessel. Suggested variety of alternative methods to previous project (MIT2019-03) including rigging and	DOC considers the land-based experiments a part of this project, as previous work was not sufficient to provide statistically supported conclusions (as stated in MIT2019-03). DOC considers the deck strike mapping exercise useful, but better

	light colours, the need for spatial/temporal considerations, and consideration of vessel type and overlap in lighting types from cruise ships and rec fishing vessels.	placed as a standalone project in conjunction with VIIRS remote sensing data. Inclusion of other light sources (e.g., cruise ships) is out of scope for a CSP project. Sub-contracting for AI applications is also out of scope and poor use of resources. Finer details of logistics and experiments can be adjusted during the project development phase.
MIT2022-07 Inshore trawl warp mitigation		
FINZ	Support the continuation of fine-tuning of trawl warp mitigation and request to see more details on the MIT2022-07 objectives particularly around testing the efficacy of different techniques. Noted that the Seabird Risk Assessment is due to be updated and it is likely that the extent of those cryptic captures will be lowered. Would value an evaluation of the performance of trawl warp options as used in the inshore fleet.	Noted. DOC will include an initial workshop to discuss further details of the project and will consider the recent risk assessment findings to make sure that the project is focused on components of the highest risk fleets.
MIT2021-01 Protected Species Liaison Project		
FINZ & DWG	Continues to support the Protected Species Liaison Project but holds some concerns and considers current response to significant capture events is ineffective and response times inadequate. Highlighted the limited consultation between FNZ, DOC and Fisheries Inshore to review events in the context of vessel, fleet and mitigation option performance due to data sharing constraints. Supportive of the development of an advisory group for the Liaison Programme however we request that the principal stakeholders, DOC, FNZ and Fisheries Inshore are all equally involved.	Noted. However, CSP consulted on this project last year. We will take this feedback into consideration if the project is renewed in the 2024/25 financial year.