

31 May 2022

Conservation Services Programme
Department of Conservation
PO Box 10420
Wellington 6143

Dear Ms Nelson

DRAFT CSP PROGRAMME 2022-23

1. Fisheries Inshore New Zealand Ltd (Fisheries Inshore) represents the majority of quota-owners and operators in the commercial inshore and highly migratory fisheries of New Zealand.
2. Fisheries Inshore's key outputs are the development of, and agreement to appropriate policy frameworks, processes and tools to assist the sector to more effectively manage inshore, pelagic and tuna fish stocks, to minimise their interactions with the associated ecosystems and work positively with other fishers and users of marine space where we carry out our harvesting activities.
3. Fisheries Inshore are committed to working with our members to mitigate the effects of our fishing activities on the environment including protected species. We have ongoing programmes with our fleets and a history of innovation to improve the effectiveness of the measures applied on vessels. Aligned with these as stated previously, we have a history of both constructive criticism of proposed CSP projects and, equally, support for relevant and deliverable workstreams that will materially reduce risk or improve our knowledge of risk.
4. Where there is regional overlap in issues, Fisheries Inshore works closely with other commercial stakeholder organisations that focus on regional and operational issues, including the Southern Inshore Fisheries Management Company (SIFMC) and Deepwater Group Ltd (DWG), which are the mandated organisation for the management of the regional fish stocks as well as.
5. Fisheries Inshore believe research and monitoring must feed directly into extant risk assessments or other such processes or significantly change what we know and can therefore change what we implement if required.
6. The focus to achieve conservation value must be the reduction of material risk to protected species through understanding and actively mitigating the risk. With only a limited budget available, we consider the programme must focus on maximising conservation value.
7. The Department of Conservation (DOC) has sought feedback on projects to be considered for inclusion in the Conservation Services Programme (CSP) for 2022-23. Fisheries Inshore have

attended the planning meetings and provided submissions on projects in the preparation of the programme.

8. We advocated in previous submissions that DOC needed to shift the emphasis to mitigation and species at risk consistent with the purpose of the CSP. We maintain that opinion.
9. We make no comment on projects that are the domain of the deepwater sector. We have discussed this submission with DWG and included their views in this submission.
10. Any queries should be directed to Rosa Edwards, Fisheries Manager, Fisheries Inshore, [REDACTED] or on [REDACTED].

FUNDING FOR MARINE PROTECTED SPECIES CONSERVATION

11. The conservation activities for marine protected species by DOC is, in our opinion, woefully inadequate. That is by no means a comment on the Marine Species Team but on the funding allocations provided to them by DOC.
12. We have consistently requested information on the level of funding from mainstream DOC appropriations for marine protected species conservation and other than comments that it is limited, we have received little information.
13. We note the DOC budget for Conservation of Natural Heritage totals nearly \$400 million per annum and the DOC budget for Recreational Opportunities nearly \$200 million per annum. We have been informed the total expenditure for the Conservation of Marine Protected Species by DOC is less than \$6million per annum but would appreciate some confirmation of the actual total in recent years.
14. We understand the constrained funding position for the Marine Species Team activities and their dependence on CSP levies to fund activities they consider critical to marine protected species conservation. That they receive little other funding from mainstream DOC appropriations is no justification for improper levies under the CSP programme.

ABSENCE OF A STRATEGIC MANAGEMENT PLAN

15. Fisheries Inshore has long expressed our concern as to the lack of strategic allocation of the scarce CSP funding. The CSP team has indicated they feel a need to provide funding for each of their programme streams – Population, Interactions and Mitigation – and within that across the range of protected species.
16. The \$1,800,000 spent on research projects is spread over 33 projects, an average spend of \$56,000 per project per annum with many of these being single-year projects. Realistically, little can be achieved with a \$56,000 budget for a research project.
17. We do not accept that the resource or funding allocation policy as practiced by CSP achieves material conservation benefits. To better support CSP's mandate to reduce adverse effects, we request that CSP adopts a more strategic approach to its resource allocation, underpinned by a strategic plan that identifies priority issues, species at highest risk and then plans activity towards mitigating excess risks, irrespective of the spread between activity areas.
18. As we have continuously emphasised in previous submissions, the absence of a strategic plan for management of marine protected species does not provide strong guidance as to the allocation of available funds. A strategic plan would allow CSP to identify the research to be undertaken in this and coming years, while putting the research projects in a strategic context. It would also preclude the annual need for the unseemly scramble for funding by research providers and allow for better stakeholder engagement on strategic approaches to successfully reduce adverse effects to marine protected species.

NATURE OF PROJECTS

19. As we have identified in previous submissions, the CSP programme is fundamentally concerned with achieving conservation benefits by identifying and implementing effective mitigation for protected species adversely affected by commercial fishing. If that is not the fundamental goal, we would wish to know what the goal is. If it is the goal, then CSP needs to revisit their programmes and re-align their programme to that goal. Many of the current projects do not align directly to that goal and should not proceed with CSP funding.
20. We favour projects that directly relate in implementation of mitigation of risk rather than research into options for mitigation. A number of mitigation concerns, such as lighting and retention of bait, could be better addressed by using liaison officers to raise the issues directly with fishers rather than undertaking research into possible mitigation options. It is for fishers to address risks by making such adjustments as they consider appropriate, not for scientists to provide answers.
21. The table below summarises the 2022/23 CSP Levies across the different project categories.

TABLE 1. SUMMARY OF DRAFT 2022/23 LEVIES

Activity	Levies 2022/23 \$	Levies 2021/22 \$	Percentage of 2022/23 Levies
Observers	2,455,762	2,443,951	57.5%
Population Projects	602,698	274,047	14.1%
Interaction Projects	378,080	284,566	8.9%
Mitigation Projects	637,214	221,452	14.9%
Under & Over	197,444	95,848	4.6%
Grand Total	4,271,198	3,319,863	100.00%

22. While the amount of levies for observers have declined as a proportion of the total budget this year, we remain concerned at the level of expenditure for observer activity. We believe that observer activity needs to be more targeted to fisheries where there is greater uncertainty of the interaction level or where the level of interactions constitutes a sustainability risk to protected species. We cannot accept that conservation value is maximised with such a high spend on observer activity.
23. We are pleased to see the level of expenditure for mitigation projects has been increased this year but have some problems with the projects proposed. Not all are addressing impacts risks. In particular, we see no material value in the project to understand the drivers or resistance of fishers to adopt mitigation measures in the bottom long line fleet. The same project for the surface longline fleet provided no new insights that we did not already know. We consider the funds for that programme would be better spent on implementing or reviewing the effectiveness of measures.

24. We have raised previously our concern relating to the funding of population projects. Population projects should only be undertaken using CSP funding where the risk assessment justifies such research. Accordingly, we cannot support several of the projects proposed.

COST RECOVERY OF CSP EXPENDITURE

25. The CSP was established to ensure the mitigation of adverse effect and risk to protected species. It was intended to address those issues and then phase down its activity as the risk reduced.
26. New Zealand has adopted the risk assessment ratio as indicative of the level of threat from commercial fishing. Any species that requires an increase of more than 50% of the current capture rate to produce a risk ratio of over 0.8 (or an upper 95% confidence interval) cannot be said to have a high risk to the sustainability of the population from commercial fishing.
27. With the exception of a few seabird species, which we contend are also impacted by factors other than New Zealand commercial fishing, we passed that threshold long ago for seabirds and marine mammals as risk and threat assessments confirm. Continued CSP expenditure on species without a high risk to their sustainability from commercial fishing is not valid under the Fisheries Act.
28. We have seen significant progress in reducing the risk to seabirds and marine mammals from commercial fishing to the point where we believe that a re-examination of the CSP strategy and CSP expenditure is warranted.
29. The goal for the Fisheries Act is the absence of adverse effect for a population, that is, where the risk of extinction from fishing has been mitigated. While DOC might wish to adopt zero captures as contained in the New Zealand Biodiversity Strategy as their goal, that is not the objective for CSP activity or funding.
30. That is not to say that industry will not continue to seek lower capture levels of protected species than the prescribed maxima. All operators would prefer to and seek to catch less protected species, but they are realistic that catches will and do occur.
31. Cost recovery of CSP expenditure for activities where protected species are not at a demonstrable adverse sustainable risk is not permitted by the Fisheries Act. Commercial fishers should not be penalised by undue levying when they have already achieved the environmental bottom line of sustainability.
32. We estimate that 81% of the research funding is allocated to species which demonstrably do not have a sustainability risk from commercial fishing.

SUBMISSIONS ON PROPOSED PROJECTS

INTERACTION PROJECTS

INT2022-01 Observing commercial fisheries

33. Fisheries Inshore are extremely doubtful that the observer programme warrants spending over half of the CSP funding on it. The role of the observer services in the inshore and HMS sectors is focused on monitoring, particularly for protected species interaction activities. When the uncertainty level of protected species captures within a fishery sector has been addressed and the sector is not imposing adverse effects, we see no justification for continuing to place observers in that sector.
34. As we have emphasised in the past, Fisheries Inshore supports the observer programme, at least until any alternative or more likely complementary electronic monitoring option has proved effective and cost-effective coverage than is possible with observers. For example, we believe

that as particular fisheries become monitored by cameras, observers should be moved to other, higher risk fleets. We cannot support that observers should be deployed in fleets that have camera monitoring. Since both the observer programme and camera monitoring have protected species monitoring as a prime objective and both deliver the same output, over time observers should be withdrawn from fleets when cameras are installed. This would for example include the west coast North Island trawl and setnet fleets, the east coast South Island trawl and setnet fleet.

35. Fisheries Inshore see those priority areas where observers should be redistributed to as including the Kaikoura fleet, the south coast South Island trawl and setnet fleets and the surface long line (SLL) fleet. In respect of the SLL fleet, we would like to discuss the use of the observers to provide additional information on the fishing practices and protected species interactions as the basis for reviewing current mitigation measures.
36. As financiers of the programme, Fisheries Inshore would like to be engaged in guiding a more strategic redistribution of observer resources to higher priority risk areas.
37. With the inshore observer services predominantly focused on protected species interactions, we are extremely concerned that DOC has not been able to confirm the utility of cameras to adequately record those interactions. We note a research project was proposed this year to do so, however it has been withdrawn from the CSP and incorporated into an FNZ workstream. As the observer programme provides a baseline input of observed captures into all protected species risk assessments, and fisher reporting is not necessarily reliable, with an increasing lack of species-specific reporting of captures, we request that DOC ensure the continuity of species capture reporting.
38. It is difficult to understand how the Government has committed to an expenditure of over \$68 million for the implementation of cameras when the utility of cameras to record protected species interactions has not been verified. Past experience with cameras has demonstrated that for seabirds, unless specific actions are taken by crew to present captured seabirds to a camera with five aspects, species identification is not feasible. We have no confidence that camera technology without significant changes to at sea practices will provide robust evidence of interactions. The species identification of seabird bycatch is critical to estimating the risk of commercial fishing to seabirds. Without robust identification, the quality of risk assessments will diminish.
39. Fisheries Inshore wishes to discuss with CSP the possibility of instituting a contingency process of landing all protected species caught to provide DOC with robust, quantitative evidence of species captures as we have recently done with the Maui and Hector's dolphin retention programme.

Other

40. Fisheries Inshore supports the projects; INT2020-02, INT2022-02 and INT2022-03, relating to the identification of protected species bycatch including seabirds, marine mammals, fish, reptiles and coral. We expect that with climate change and rising sea temperatures, New Zealand will likely see ongoing increases in turtle and chondrichthyan species interactions and industry wishes to be prepared for these with appropriate mitigation measures.
41. Fisheries Inshore recognise the potential for broader scientific benefit that may arise from the proposed research in INT2021-04, and to that extent, can support the project in principle. However, the definition of conservation services is "outputs produced in relation to the adverse effects of commercial fishing on protected species..." and therefore we cannot support that the project as within the scope of conservation services, and strongly oppose that it is cost recovered to industry.
42. With respect to the remaining protected corals projects including INT2022-03, INT2022-04 and INT2022-05, the majority of information that is known about protected corals is fishery-related information. It is information regarding population dynamics, biomass, distribution, abundance and extent of protected corals in areas outside areas that are fished is not well understood.

Hence, we cannot agree with the decision to fully cost recover the coral research, and we endorse DWG's comments in the CSP RAG meeting on these projects.

43. Fisheries Inshore also acknowledges that FNZ is significantly investing into coral distribution and bycatch research, and therefore we are flagging our concern toward the lack of a strategic approach to the proposed research between FNZ and DOC. A more strategic and collaborative approach is needed to guide our collective understanding of the knowledge gaps of deepwater corals, in order to address conservation services needed for these species.
44. Fisheries Inshore do not support INT2022-06 as, similarly to INT2021-04, there is no proposed output in relation to the adverse effect of fishing on protected species. Therefore, we do not consider the research as relevant to CSP nor do we support that the research cost entirely covered by industry. All current Marine Mammal Risk Assessments show limited risks from commercial fishing to marine mammals except for common dolphins, for which we believe the risk is mitigated through industry measures.
45. Fisheries Inshore endorses the comments from Pelco NZ Ltd on the final interaction project, INT-2022-07.

POPULATION PROJECTS

46. We consider only the population projects relevant to inshore commercial finfish fisheries that might be validly undertaken by CSP are:
 - a. POP2022-01 Black Petrel population monitoring,
 - b. POP202207 Westland petrel foraging movements and diving behaviour,
 - c. POP2022-02 Flesh-footed shearwater juvenile survival and dispersal,
 - d. POP2022-08 Auckland Islands seabird research: Gibson's and white-capped albatross,
 - e. POP2022-10 Antipodean Island seabird research: Antipodean albatross and white chinned petrel,

although in all cases more information is needed as to the specific activities to be undertaken.

POP2022-01 Black Petrel population monitoring

47. While Fisheries Inshore supports the ongoing monitoring of black petrels, we are particularly concerned with the lack of an agreed management strategy for this species. Black petrels have featured annually in CSP but there has been little progress achieved in identifying and addressing commercial fishing pressures through this programme. Industry has led a number of developments to provide better estimates and lower the level of capture. Notwithstanding those results, DOC continues to pour, and cost recover, a disproportionate share of its resources into population projects relating to black petrels.
48. We acknowledge that black petrels remain the highest risk scoring seabird but that does not of itself justify ongoing research with limited robust and practical results. We wish to see 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, research into black petrel population issues should be funded from other DOC appropriations rather than drawing needed resources from CSP.
49. We have spent nearly \$1 million on black petrels in the past decade and are still yet to be provided with sufficient robust science to understand the demographics of the population. We appear to be satisfied that the reproduction rate is sufficiently high enough and estimated captures, albeit they have yet to incorporate updated capture levels, are low enough to sustain growth in the population. Uncertainty as to the rate of return of juvenile birds appears to be the unknown that needs to be researched. That is not a CSP project to be levied from the New Zealand fishing industry

[POP2022-02 Flesh-footed shearwater juvenile survival and dispersal and POP2022-07 Westland petrel foraging movements and diving behaviour](#)

50. Fisheries Inshore supports these proposed research projects as we require quantitative information on foraging movements and distribution of both of these species. We recognise that the major data gap for flesh-footed shearwaters is relative to juvenile seabirds and hence we believe POP2022-02 is more valuable than POP2021-04. We see value in quantifying the distribution of juveniles, meaning in turn we will be able to identify areas of high crossover with inshore vessels. We also support gaining foraging distribution and diving behaviour of Westland petrels for the same reasons, as this information is critical in order for industry to most appropriately mitigate interactions with these seabirds both spatially and during sets.

[POP2022-08 Auckland Islands seabird research and POP2022-10 Antipodean Island seabird research](#)

51. Fisheries Inshore supports this work as the species identified are high risk in the Seabird Risk Assessment and require active management to mitigate adverse effects from commercial fishing. We appreciate the inclusion of two species for each research project to minimise research costs for these expeditions. We are concerned at the lack of species-specific management plans and the annual apprehension to secure funding in order to complete this work on these remote islands. Therefore, we request that CSP develops strategic management plans for these species in order to future proof the long-term monitoring and research requirements and associated budget for these protected species.

[POP2022-05 and POP2022-06 Northern Buller's and Northern Royal albatross population monitoring](#)

52. Fisheries Inshore recognises the need to complete the work in both POP2022-05 and POP2022-06. However, neither of these species are 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. Therefore, we disagree with the continuation of further cost-recovered research for both of these species on the basis of "conservation services" until the updated Seabird Risk Assessment is available to guide protected seabird research priorities after the 2022/23 CSP research round.

[POP2022-09 Auckland Islands New Zealand sea lions](#)

53. Fisheries Inshore have consulted with DWG on this proposed research and while we note the importance of continuing to monitor Auckland Island sea lion pup production, we do not accept that commercial fishing should continue to be levied for 90% of the cost of the fieldwork. The risk assessment has demonstrated that commercial fishing is not currently having an adverse or indeed even a significant 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. We consider the cost recovery level for the pup count should be decreased to 50% or less as is done with population monitoring for other protected species.

54. Fisheries Inshore also endorse DWG's comments from the CSP RAG Meeting on the following coral related population projects: POP2021-02, POP2022-03, and POP2022-04.

55. Additionally, we support the proposed crown-funded research (POP2021-06, POP2021-07, POP2021-08). We acknowledge that the protected species in these projects do not hold a risk-status high enough to warrant cost-recovery from the commercial fishing industry. Therefore, we thank DOC for seeking crown funding to cover this research.

56. We do not agree that the remaining projects warrant cost-recovery from the commercial industry.

MITIGATION PROJECTS

MIT2021-01 – Protected Species Liaison Project

57. Fisheries Inshore continues to support the Protected Species Liaison Project however are concerned with the ability of the programme to consistently and adequately respond to significant capture events. This is by no means a concern about the liaison programme team, but rather the framework that the programme sits within.
58. Fisheries Inshore is extremely concerned that the review of protected species capture events, particularly those events more significant than the triggers, is neither effective nor productive. Our concern is based around the collective inability of the stakeholders – FNZ, DOC and Fisheries Inshore - to review those events in the context of vessel, fleet and mitigation option performance. There appears to be no timely notification, review and subsequent response to significant capture events. All parties require access to an up-to-date database of events, and processes need to be developed to respond to significant capture events.
59. The notification of triggers and/or significant capture events is currently slow and follow up is not immediate. There are major data-sharing constraints that restrict industry from receiving fleetwide data on protected species captures and trigger events and industry believe we can add benefit to the capture response if we have access to our own fleets' data.
60. The result of this is a dis-jointed management response and review of significant captures where industry is essentially left 'in the dark' with no ability to transparently assist DOC and FNZ (or vice versa) in the review process. There is currently very limited consultation within regional fisheries management unit at FNZ regarding capture responses, and we see no consistent or timely process maintained to address significant events from those units.
61. While the Protected Species Liaison Programme holds the front end to a high standard, the management processes to review events in a wider context, particularly in relation to systemic issues within fleets, remains limited.
62. Fisheries Inshore believe that work needs to be done to address the backend management framework of inshore and highly migratory protected species to allow for timely, consistent and effective approach to respond to and mitigate significant capture events involving all parties (DOC, FNZ and Fisheries Inshore). FNZ and DOC do not possess the knowledge of fishing activity or the contacts in industry to initiate change. Their role is to achieve high scale outputs, not to manage industry at a fine-scale or vessel basis to achieve outputs. That is the role of industry, as represented by Fisheries Inshore.
63. We are pleased to see 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. The advisory group to-date has been unable to fulfil the needs for a capture response process.

MIT2022-01 Longline hauling mitigation devices

64. Fisheries Inshore have reviewed the recommendations of the project MIT2018-02 and consider that promoting the uptake of hauling mitigation devices is an important aspect of operationalising the previous research. However, we suggest some minor changes are made to the proposed MIT2022-01.
65. Fisheries Inshore believe that the methods and devices determined in MIT2018-02 proved adequate at minimising seabird captures during the haul and therefore objective two "to further quantify the effectiveness of haul mitigation devices used" is not required. We also believe that the longline skippers themselves are best placed to develop recommendations for modifications to the haul mitigation devices in order to achieve objective three. There is significant heterogeneity across longlining operations, and skippers best understand their vessels relative to their fishing operations, crew safety, and appropriate mitigation measures while operating.

Given that experience, this is not an issue where a one-size-fits-all approach would be successful, therefore we request the outputs from this research are actively communicated with relevant skippers in a timely manner.

66. In particular, the inshore bottom longline fleet includes many proactive operators who have proven records of working towards minimising seabird bycatch. As a direct result of being the highest risk fleet to black petrels in New Zealand, the operators in this area have worked closely with the Liaison Officers, Fisheries Inshore, and FNZ. Several operators have been involved in previous mitigation projects through the CSP and continue to attend collaborative working groups to ensure they are aware of the latest information regarding protected species issues in their area.
67. This fleet has a number of experienced skippers who are responsive and have actively been involved in finding the best mitigation measures they need, while meeting regulations. Fisheries Inshore hopes to see these operators being supported and encouraged toward innovation and ownership of any voluntary hauling mitigation measures.
68. Consequently, Fisheries Inshore do not agree that the promotion of hauling mitigation devices and subsequent recommendations to gear improvements warrants the proposed expenditure for this project, nor does it warrant a two-year timeline. Based on the results from MIT2018-02 we believe it could be completed within 1 year, if assisted by the Liaison Programme and/or a well-respected researcher with experience in this fleet.
69. We request that prior to further developments of this research, the recommendations from MIT2018-02 are implemented if they haven't been already. The inshore bottom longline fleet in FMA 1 has already been involved in an EM programme, and the use of that multi-year data is extremely valuable for evaluating uptake of these mitigation measures.

MIT2022-02 – Understanding drivers and barriers to mitigation on in small vessel bottom longline

70. Fisheries Inshore acknowledges the need to improve the uptake of better mitigation but we do not see that need warranting the proposed expenditure of this project without actively working with fishers to provide solutions.
71. As stated previously, the inshore bottom longline fleet is predominantly made up of proactive operators who have a keen interest in mitigating protected species captures. A number of these vessels have voluntarily housed cameras onboard in relation to mitigation projects for the past four years. Furthermore, recent feedback to the Seabird Advisory Committee regarding outreach to this fleet from a Liaison Officer favoured a large portion of the skippers being actively engaged in the Liaison Programme, while requesting support in gaining access to the remaining operators.
72. Fisheries Inshore agree that there have been issues across all inshore and highly migratory species fleets for the uptake of the mitigation methods. We do, however, note there has been an increasing trend for uptake of mitigation measures as outlined in the recently published Liaison Programme Annual report. Specifically for the surface longline fleet, we acknowledge the lack of uptake of hookpods, and the associated research into a better understanding the barriers to uptake. However, those barriers and causes of hesitancy have not yet been resolved by the commissioned study.
73. Our general takeout from the surface longline study was the need for Liaison Officers to forge stronger relationships with fishers and motivate the fishers to adopt higher standards of mitigation. Much of the feedback indicated a general lack of knowledge and/or understanding of the mitigation standards in relation to the regulations. There was also a strong signal to the researcher that the fleet would appreciate having in-person conversations with relevant experts to assist in working towards the mitigation standards. Fisheries Inshore see Liaison Officers as being the most appropriate parties to work with fishers. To that end, we would request CSP arrange a workshop with the Liaison Officers and the more influential surface longline fishers to

discuss with them how they might address the issues raised in the surface longline report. That would be a more productive approach to improving mitigation in that fleet.

74. Depending on the success on that process, Fisheries Inshore would request that a similar process be undertaken for the bottom longline fleet. We would far prefer to see action taken to improve mitigation performance rather than yet more research.
75. Fisheries Inshore rejects the proposed expenditure to perform the same research methods for the inshore bottom longline fleet. We would prefer to use the funds to provide workshops and a more focused implementation plan to achieve improved performance.

MIT2022-03 – Coral Symposium

76. As highlighted by DWG in the CSP RAG meeting, we 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 particular project.

MIT2022-04 – Bait retention as a driver to mitigation use in the surface longline fishery

77. Fisheries Inshore does not support this proposed project.
78. Fisheries Inshore believe the outputs of improved mitigation performance can be achieved by encouraging Liaison Officers to address the issue of bait retention with fishers rather than undertake research into current behaviour. That is after all what the Liaison Officer programme is for. We also see an opportunity here to align discussions regarding this issue with the workshop we request CSP arranges with surface longline operators to address barriers to mitigation uptake.

MIT2022-06 – Light Mitigation: reducing vessel interactions with seabirds

79. Fisheries Inshore has reviewed the preceding light mitigation project MIT2019-03 and are interested in better understanding the methods that will be used. We have some reservations based on the fact that the data was considered inappropriate in MIT2019-03, and hence we want to ensure any outputs from this proposed research will be beneficial.
80. Fisheries Inshore also consider that the focus for future light mitigation research needs to investigate a broader fleet than just commercial fishing vessels. The risk of lighting causing vessel interactions with birds is evident across a variety of vessels, many of which transit through the shipping lanes on the east coast of the North Island. Within the inshore finfish fishing fleet, skippers are already actively encouraged to mitigate the effects of vessel and operating lights to seabirds, through the Liaison Programme and are audited against that mitigation by observers annually.
81. Fisheries Inshore sees the scope of high-risk vessels being targeted within this project should be broadened across more vessel types other than fishing, and therefore we do not agree that the proposed expenditure should be entirely cost recovered from the fishing industry. We also question to what extent this project falls within the scope of “conservation services” and the CSP particularly given that Objective 2 includes light set ups on land, which we do not agree warrants cost recovery by fisheries.

MIT2022-07 Inshore trawl warp mitigation

82. Fisheries Inshore support the continuation of fine-tuning of trawl warp mitigation and endorse DWG’s comments on MIT2022-05 and SIFMC’s comments on this project. We request to see more details on the MIT2022-07 as we understand that while the Mitigation Standards already aim to encompass this work and outline best practice mitigation techniques, research into the efficacy of different mitigation techniques would be beneficial.
83. Fisheries Inshore also notes that the substantial portion of risk to seabirds from inshore trawl fleet is based on cryptic captures, and observed captures make up a very low proportion of overall

captures. We note the Seabird Risk Assessment is due to be updated and it is likely that the extent of those cryptic captures will be lowered.

84. Notwithstanding the prospect of a lower risk score from that revision, Fisheries Inshore would value an evaluation of the performance of trawl warp options as used in the inshore fleet.

SUMMARY

85. If a strict adverse effect test was applied to the proposed 2022/23 CSP programme as per the Act's provisions, few projects would qualify as conservation services.
86. However, industry recognises that many of the proposed projects have conservation merit and high value in continuing long-term monitoring programs and therefore they should be undertaken to assist the management of the protected species.
87. We request that CSP develop a strategic plan for the conservation of marine protected species as the basis for a greater allocation of DOC heritage funding and a correct application of the cost recovery rules for conservation services. That plan should identify the conservation priorities and the management and research plans to address the conservation issues.
88. We request that particular focus is put on the following short-term strategic issues:
- a. Develop a strategic plan for CSP to ensure projects levied to the commercial fishing industry address the specific objectives of the CSP and are therefore legally appropriate.
 - b. Develop and implement a more responsive and collaborative protected species capture-response framework with the objective of reducing protected species captures through a collaborative focused process.
 - c. Resolve the ongoing uncertainties regarding the population estimate for black petrels and develop a strategic threat management plan that includes terrestrial threats. We request a subsequent review of the share of research costs levied to the commercial fishing industry for this species.
 - d. Establish a strategic approach to the management and development of a Threat Management Plan for wandering albatross (Antipodeans and Gibson's).

Yours



Rosa Edwards

Fisheries Manager

Fisheries Inshore New Zealand