

Dear Minister and CSP,

Thank you for the opportunity to comment on the DRAFT Conservation Services Programme Annual Plan 2020/21.

While the Draft Plan is generally well developed, there are two key elements missing which I would like to draw your attention to. I provide some specific comments below:

NZ fur seal bycatch in the Cook Strait Hoki Fishery

1. There is no specific consideration of the NZ fur seal bycatch in the Cook Strait Hoki fishery. Based on data provided in the MPI Projected Species Database (PSD), approximately **6,941** seals were captured in this fishery alone over the last 16 years and given that 83% of the reported captures are mortalities, then the number of deaths is in the order of a minimum of **5,761** seals or approximately **360** dead seals per year. This level of bycatch could be unsustainable for local populations of fur seals if all the bycatch is coming from a single or small number of colonies. This is significant proportion (~30%) of all NZFS caught in all trawl fisheries NZ over this period.
2. I note that there is still no project related to this large bycatch issue in the DRAFT 2020/21 Plan. I would note that this is the second year that I have submitted this project for consideration to CSP. Attached is my submission on the DRAFT CSP Annual Plan for 2019/20 sent to CSP on 7 June 2019. I also include an outline of a project related to this issue that I submitted to the DOC Research Advisory Group on 7 February 2020 for consideration at that meeting. Both documents provide useful background about this issue.
3. NZ fur seals are fully protected under the Marine Mammal Protection Act but given their status as “non threatened” they appear to given little consideration even though according to the MPI PSD over 20,000 (e.g. >1,100 annually) have been caught in trawl and longline fisheries since 2003. I note that there is some positive research on assessing fur seal populations on the Bounty Islands by DOC but little research on mitigating fur seal bycatch which is surprising given the success with the Sea Lion Exclusion Device in the Southern Squid Fishery.
4. I note that the DRAFT 2020/21 CSP Annual Plan recommends a total of 100 days of Observer coverage funded for the Cook Strait fishery. This is lower than the 150 days budgeted in the 2019/20 Plan which is surprising given the level of bycatch consistently recorded in this fishery. A high level of Observer coverage is required to understand this bycatch and to allow for mitigation options to be explored.
5. I would **strongly recommend** the following:
 - a. that Observer Coverage in the Cook Strait Hoki Trawl fishery (which has been averaging a very low of around 4% over the last 15 years) to be immediately increased to 50% to allow for the estimation of the true level of this bycatch
 - b. that CSP undertake a project investigating options for the mitigation of fur seal bycatch in trawl fisheries
 - c. that CSP fund population surveys of NZ fur seal colonies in the Cook Strait region that are likely being impacted by this large and highly localised bycatch.

6. Data on this interaction is available through the MPI PSD at <https://psc.dragonfly.co.nz/2019v1/released/new-zealand-fur-seal/rawl/all-vessels/eez/2002-03-2017-18/>

NZ common dolphin bycatch in the Taranaki trawl fishery using small vessels (i.e. < 28m)

7. There is no specific consideration of the common dolphin trawl fishery in the Taranaki region from small vessels (i.e. < 28m). This is despite an average of 88 dolphins being killed annually in these fisheries over the period 2003 to 2015 when records end (Data from the MPI PSD) for a total of over 1,100 dolphins. I note that this fishery is different to the well-known, large vessel trawl fishery which catches common dolphins while targeting Jack Mackerel.
8. This fishery has averaged less than 1% observer coverage over this same 13 year time period which is appalling low for such a high level of bycatch. I would also note that the mean estimate of 88 dolphins killed per year is a mean estimate and is based on less than 1% of observer data. The mean estimate for the upper 95% Confidence intervals for this bycatch is 195 dolphins per year corresponding to a total of 2,547 dead dolphins over this 13 year period. Given the large uncertainty around extrapolating from such a low level of observer coverage, the true number of dead dolphins could be even higher.
9. There does not appear to be any Observer days funded for this fishery and given the extremely poor levels of coverage to date and the high potential for a significant dolphin bycatch, this is unacceptable.
10. I would **strongly recommend** the following:
 - a. that Observer Coverage in the Taranaki small vessel trawl fishery is immediately increased to 25% to allow for the estimation of the true level of this bycatch.
11. Data on this interaction is available through the MPI PSD at <https://psc.dragonfly.co.nz/2019v1/released/common-dolphin/rawl/small-vessels/taranaki/2002-03-2017-18/>

Thank you for the opportunity to comment on the Draft Plan. I would welcome the opportunity to discuss these issues with you or provide additional information.

Kind regards
Simon

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