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5 June 2020

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Dear Ian

DRAFT CSP PROGRAMME 2020-21

1. Fisheries Inshore New Zealand Ltd (FINZ) and Deepwater Group Ltd (DWG) represent the majority of quota-owners and operators in the finfish sectors of the NZ commercial sector.
2. Both organisations are committed to working with our members to mitigate the effects of our fishing activities on the environment including, in particular, protected species. As you know we have ongoing programmes with our fleets and a history of innovation to improve the effectiveness of the measure applied on boats. 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 our knowledge of risk. In particular, we believe research or 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. The focus at all times must be the reduction of material risk to protected species. With only a limited budget available, we consider the programme must focus on maximising conservation value.
3. The Department of Conservation has sought feedback on the draft CSP programme for 2020-21. Fisheries Inshore New Zealand and Deepwater Group have attended the planning meetings and provided submissions on projects in the preparation of the programme.
4. We advocated in our submission of 25 March 2020 that DOC shift the emphasis to mitigation and species at risk as indicated in the draft project scorings.

Lack of Strategic Plan

5. We have raised the lack of a strategic plan for protected species populations on a number of previous occasions and disappointingly note again the absence of any development in that domain.
6. A strategic plan would allow CSP to identify the research to be undertaken in this and coming years and preclude the annual need for the unseemly scramble for funding by research providers.

Nature of Research

7. We have raised previously our concern relating to the funding of population projects. Disappointingly, while the January meeting set the priorities to be mitigation and species at high risk, the draft programme now contains some projects which were not assessed to be of high priority e.g. Protected Coral identification and awareness POP2020-02; and Grey Petrel Population Estimate POP2020-04. While we recognise the expenditures are not large, it is

nevertheless funding that could have been spent on mitigation projects with greater conservation value and more conservation benefit to protected species.

The Draft 2020-21 CSP Programme

8. We support the use of available new funding being directed toward mitigation projects but would prefer to see more funding in that area.

Observer Programme

9. We cannot accept the continued coverage on the Taranaki Setnet fleet. There has been considerable coverage of that fleet with no sightings of Hector's dolphins reported. It should be apparent to all that neither Maui nor Hector's dolphins frequent the area. We consider the thousands of dollars spent on that futility to be enough and DOC should seek information on the presence of Hector's dolphins by an alternative means.
10. We note the continuing observer programme in the South Coast South Island area, notwithstanding coverage of over 25% of effort in the past five years for low levels of protected species captures. We do not accept that continued coverage in that area is required.
11. We note the absence of setnet coverage in Statistical Areas 20 and 22. Interaction rates are best measured where there are high levels of fishing effort and protected species abundance. We do not consider that a decision to absent set net coverage in the Canterbury – Timaru area should be taken prior to the TMP decision being determined.
12. We would appreciate the text and justification for the section being updated. It is some years since the risk score for Black Petrels was estimated to be 19.4 or fleshfoots 1.32.

Interaction Projects

13. We are concerned that the low level of observer coverage in the inshore fleet results in inappropriate estimates of captures and would welcome discussion with CSP as to how we might retain additional bodies of seabirds, albatross in particular, for improved estimates of captures and providing scientists with additional species for demographic and biological research.

Population Projects

14. We consider that funding for population projects is still excessive. We see no reason why CSP should be funding population research for Grey Petrel given its low risk score or Protected Coral awareness given the low level of impact on those species.
15. Whilst 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 field work. The risk assessment has demonstrated that commercial fishing is not having an adverse or indeed even a significant effect on the Auckland Island sea lion population. With a high level of observer coverage, 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.

Mitigation Projects

16. We support the funding for the hook-shield and protected species liaison projects.
17. We see no reason for the mitigation gaps analysis project to be undertaken by a contract scientist. We believe the objectives of the project can be met by a workshop of fishers, technical experts and interested parties.
18. We are concerned by the absence of funding for field research for Dolphin Dissuasive Devices and Dolphin Tagging.
19. The report for Project MIT2019-01 Review of Dolphin Dissuasive Device Mitigation in Inshore Fisheries contains recommendations for the field testing of DDDs. We consider Stage 1 and 2

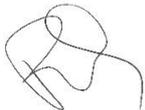
to review the performance specifications and standards for the STM (model DDD-03) should be programmed for 2020/21 research. We consider that, from an industry perspective, any mitigation value is worth pursuing. We do not need a rigorous scientific project to determine the specific level of efficacy achievable. What we need to know is that there is some flight effect and thus conservation value from use of the device. For that reason, we recommend CSP commission a priority research project in 2020/21 to undertake Stage 1 and Stage 2 as recommended to establish the efficacy and performance specifications of DDDs.

20. Similarly, we consider there would be great conservation value to be achieved by trialling suction cup tagging for Hector's dolphins to research the dive profiles of the dolphins. At present, we have no information at all as to the diving capacity and performance of Hector and Maui dolphins, our most endangered marine mammals. In contrast we have dive profiles for a wide range of other marine mammals and seabirds and flight tracks for a range of seabirds, While there are always issues raised as to the reliability of data from low sample surveys such as tracking, we note this has not precluded such information being used for management information for those mammal and seabird species. We consider the value to be gained from a pilot trial warrants undertaking the research. We can better manage risks with knowledge. A pilot project should demonstrate the worth of undertaking more intensive research to better understand the risk to dolphins posed by fishing. We therefore suggest that given this project would be a field trial to improve our wider knowledge of dolphin behaviour and foraging that the project should be Crown funded.
21. If CSP would cancel MIT2020-03 and redirect the funds to field research of DDDs or suction cup technology on Hector's dolphins, we would support an increase in the CSP budget to cover additional funding to a maximum of \$50,000.

Yours



Tom Clark
Policy Manager
Fisheries Inshore New Zealand



Richard Wells
Deepwater Group Ltd