

## **CSP 2020-2021**

It's great to see that "A review of the CSP Strategic Statement is planned in 2020/21."

### **Comments on the Objectives (page 4):**

#### Objective A:

This should not be "fisheries with known interactions" but "fishing gears known to cause bycatch". It shouldn't be up to other, non-government researchers to prove, for each gillnet fishery, that there is a problem, before gillnets are removed from marine mammal habitat. Gillnets and trawling are known to kill marine mammals internationally, we don't need to prove that again here, one fishery at a time.

#### Objective B:

"described" is a bit vague. We should have scientifically robust data on bycatch. If the fishery (e.g. gillnet fisheries) can't afford to pay for such research, then they should change to marine mammal safe fishing methods.

#### Objective C:

"adequately understood" is vague and a very low bar. What's needed are SMART goals. Specific objectives that are measurable and have a clear timeline. e.g. Demonstrate that bycatch is sustainable (PBR, not PST) within 2 years, and eliminate bycatch within 5 years.

#### Objective E:

Clearly not met for Hector's and Maui dolphins, because DOC have left the gathering of this information to MPI, with inadequate oversight from DOC. DOC urgently need to ensure they have a core group of staff with a strong science background, in order to provide oversight of the poor science carried out by MPI.

### **Observer coverage (project 2.1)**

The number of observer days is far too low to provide scientifically robust estimates of bycatch (project 2.1).

The information provided for project 2.1 is vague and qualitative.

For example: "Coverage levels are driven by several factors including data needs for protected species and fisheries management, compliance, international obligations and ministerial directives."

What's needed is specific, measurable goals such as ensuring that the CV on the bycatch estimates is 30% or better for protected species. Basically, the observer programme needs to be designed from the ground up, properly coordinated and organised.

It is not clear why observer coverage is allocated (again) to the west coast of the North Island, Kaikoura and Otago.

The following statement makes it clear that observers are put out based on practical, rather than scientific criteria:

"It is important to note that observer programmes typically have high spatial and temporal variation, as well as multiple priorities for information collection, which can make the data challenging to interpret and extrapolate to estimate actual bycatch rates by fishery, location, or other desired variables. Data accuracy and relevance can be affected by inter-observer variability, weather conditions and access to vessels, while precision is affected by the observer sampling design. Data quality may also be biased by the opportunistic allocation of observers to vessels, as it is not always possible to place observers on vessels randomly or representatively."

If DOC and MPI don't have the scientific skills to design an observer programme, then international guidelines on designing observer programmes (e.g. the US GAMMS guidelines) should be followed.

Again, this statement indicates that observers are placed on practical and economic criteria, not following sound scientific protocols:

"Final decisions on the levels and placement of this observer coverage were undertaken by FNZ with consideration to capacity of the Observer Services Unit. .... While the tiered approach and risk assessments highlight the observer effort required to reduce uncertainty in these fisheries, often these levels of coverage required cannot be reached due to the nature of the inshore fleet as described above..."

It's good to see that this text, on page 11 talks about "quantifying" bycatch:

The main goals of the Inshore Observer Programme are to:

- *inform management of impacts from fishing on protected species by identifying and **quantifying** interactions between inshore fisheries and protected species, and assessing the effectiveness of mitigation measures, where appropriate;*
- *minimise adverse effects of fishing on the aquatic environment, including on biological diversity; and*
- *inform management of fish stocks by gathering biological and other information on board fishing vessels*

It's not clear how these criteria are implemented, and how they relate to the very general, non-specific goals outlined in the overall objectives on page 4.

Several statements in the document refer to a “planning optimisation process”.

ε.γ.□ √The planning optimisation process identified 30% coverage required to gain sufficient data"

I could not find any information about this "planning optimisation process" Could you please explain this process, and provide references, or links to reports that outline this process.

20% observer coverage for Maui dolphins (page 17) would result in a close to zero probability of detecting any bycatch, with such a small population of dolphins and such low observer coverage. The priority for Maui dolphin should be to remove gillnet and trawl fisheries from their habitat immediately, as the IWC and IUCN have recommended since 2012. The proposed research amounts to studying the extinction process for Maui dolphins.

It was disturbing to read that:

"As for previous years, planning of observer days was conducted jointly with FNZ to identify an overall amount of observer coverage which will meet both agencies goals. Costs were then apportioned to each agency on the basis of how much of the observers' work in each fishery will be focused on Conservation Services. Typically, the CSP component is 15% of the total days, which reflects the time that observers are likely to spend on protected species tasks."

Does this mean that out of the already very low number of total observer days, only 15% of the focus will be on bycatch of protected species, as opposed to general fisheries duties?

#### **Project 4.4 on mitigation gaps analysis**

This project would waste valuable funding and staff time, and further delay the implementation of mitigation methods that are known to work such as reducing the overlap between dolphins and gillnets. It is already well known that the only effective technical mitigation available at this time is for reducing seabird bycatch on longlines. Tori lines, setting fishing gear at night (and avoiding moonlit nights), weighted lines, thawing bait and other simple, practical measures can dramatically reduce bycatch. The only problem is a lack of monitoring and enforcement to ensure fishers use these effective mitigation measures.

There are no technical mitigation measures on the horizon for marine mammal bycatch in gillnets and trawling. The simple solution to reduce marine mammal bycatch in the short-term (e.g. 2 years), and eliminate it within 5 years is to reduce or eliminate the use of these fishing methods in marine mammal habitat. It would be sensible to keep a watchful eye on international progress with mitigation. But it would be extraordinarily wasteful to do such research in NZ waters.

MPI, and especially DOC, should be making precautionary decisions on the basis of available information. For example, require the fishing industry to change to marine mammal safe fishing methods if they wish to fish in marine mammal habitat. i.e. Banning gillnets or trawling throughout NZ waters less than 100 m deep. Another decade spent doing “more research” would take valuable time and resources away from effective management action. Most of the proposed projects would be a diversion, and would further delay taking the tough decisions, protecting the interests of the public in protecting their taonga species. AFTER precautionary action has been taken, THEN more research will be useful to see if it's working. The IWC has repeatedly urged NZ to put in place effective protection, NOT do “more research”.

**CSP observer programme outputs (page 30)**

It would make sense for all marine mammals, as well as all seabirds, to be returned and/or photographed.

**Protected species liaison project (page 56)**

It would be wasteful to spend a quarter of a million dollars on this project, when the solutions are already very clear. Government simply needs to remove fishing methods that kill marine mammals from marine mammal habitat, especially for our two endemic species: NZ sealion and NZ dolphin (Hector's and Maui dolphins).

Thank you for the opportunity to submit these comments,

Liz

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