

Our particular area of interest is animal welfare, with a focus in this instance on Māui and Hector's dolphins, but also including other animals that suffer negative effects from fishing activities.

We are concerned about the low levels of observer coverage planned, the failure to deliver on targeted levels in past years, and the lack of evidence that the planned and delivered observer coverage actually reflects and captures risks of bycatch.

For example, how are the percentages of observer coverage intended to relate to statistically valid risk levels? In any area how does 10-65% of observer coverage ensure that risks and bycatch are actually observed and addressed? How can 10% observer coverage on the SCSi trawl effort accurately represent bycatch and risk in the other 90% of the area? Furthermore, concentrating on areas where fishing effort and dolphins are likely to be highest does not address potential and actual bycatch risks across the habitat or for dispersed dolphins. If 65-or 100% is what's required to be statistically valid in one area, then assumedly, it's what's required elsewhere. Indeed, with the small size of some of these subspecies (for example the Otago population), 100% observer coverage would be optimum, as with Māui to ensure that in the event of dolphin bycatch (especially in the case of catastrophic entanglement of multiple animals) so that management responses could be developed and implemented in a timely manner – assuming that's what observer coverage is for – to help species management.

Also, how do you ensure that observer coverage doesn't change fishing operation behaviour – ie that "fishing behaviour observed is representative of normal situations", especially when observer coverage planned is so low, when the CSP suggests high coverage is needed to obviate this risk?

How will DoC and MPI ensure these levels of observer coverage are actually delivered?

The whole programme, including past performance, seems inadequate to meet standards of comprehensive coverage, as befitting the endangered and threatened status of Māui and Hector's dolphins.

We encourage a significant improvement in the methodology – for clear, deliverable, measurable goals directed at a clear conservation target. Otherwise you're just carrying out a symbolic exercise that fails on its own objectives, and does not help to reduce current or future bycatch.

Thank you for the opportunity to submit,  
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