CSP Annual Plan 2020/21 Summary of Submissions

List of Submitters

Submitter	Shown in Comment Summary as:
Te Ohu Kaimoana	TOKM
Fisheries Inshore New Zealand & Deepwater Group	FINZ & DWG
Yellow Eyed Penguin Trust	YEPT
Cawthron Institute	CI
World Animal Protection	WAP
Liz Slooten, Professor, University of Otago	LS

PART A: General comments

Submitter	Submission	DOC response
YEPT	Somewhat disappointing to see that the proposed projects on determining hoiho diet via DNA analysis of faeces, and on investigating transitioning fisheries from set netting were not included in the CSP draft plan this time. It is hoped that these will be considered next year as key projects which align directly with the strategic priorities and actions set out for hoiho conservation.	DOC will continue to investigate avenues to progress such research, including consideration for delivery through CSP in 2021-22.
Cawthron	There is no specific consideration of NZ fur seal bycatch in the Cook Strait hoki fishery in this year's plan. Strongly recommend the following: 1. CSP undertake a project investigating options for the mitigation of fur seal bycatch in trawl fisheries 2. 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.	INT2019-03: Characterisation of marine mammal interactions is currently underway, and DOC will be following up on the recommendations from this around mitigation of fur seal bycatch in the 2021-22 year.
FINZ & DWG	We support the use of available new funding being directed toward mitigation projects but would prefer to see more funding in that area. The report for MIT2019-01 Review of Dolphin Dissuasive Device Mitigation in Inshore Fisheries contains recommendations for the field testing of DDDs. 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. Similarly, we consider there would be great conservation value to be achieved by trialling suction cup tagging for Hector's dolphins to research 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	The mitigation gaps analysis workshop and report will provide a strategic direction for mitigation research and focus going forward. The two reports are still in draft form following presentation to stakeholders at the CSP Technical Working Group held on 4 June 2020. Recommendations from the finalised reports will be considered alongside all other proposals as part of future CSP work planning for 2021-22 onwards. The outcome of the review of the Hector's and Māui Dolphin Threat Management Plan will also influence future CSP research regarding dolphin and fishery interactions.

	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. A pilot project should demonstrate the worth of undertaking more intensive research to better understand the risk to dolphins posed by fishing. This project would be a field trial to improve our wider knowledge of dolphin behaviour and foraging that the project should be Crown funded.	
TOKM	The draft Annual Plan mentions a review of the CSP Strategic Statement is intended to be reviewed 2020/21. As part of maintaining our engagement in the CSP process we would expect to take a lead role in the review and the identification of areas in which the Treaty partner relationship can be enhanced. For example, while there is significant mention of Te Tiriti obligations in the Strategic Statement there is a lack of flow through to the processes and other documents produced by the CSP. All such statements must have meaningful follow through or else not be made. Research for species of highest risk should be prioritised and funded. The draft plan includes Crown funded projects for relatively low-risk species, and we recommend that these projects are delayed in order to retain all planned research and workstreams for the Antipodean albatross. It is our view that action cannot be delayed for this species and therefore resources cannot either.	Noted. The CSP Annual Plan describes projects prioritised to achieve the objectives of CSP, which is constrained to the effects of domestic commercial fisheries. DOC considers the greater threat to Antipodean albatross is from fisheries beyond New Zealand's jurisdiction. Research and actions on this species will be funded by DOC Crown funds when undertaken in the international context, with complementary mitigation actions to reduce domestic bycatch undertaken through CSP when prioritised through the annual prioritisation process.

LS	Great to see that a review of the CSP Strategic Statement is planned in 2020/21. Have provided comments to feed into this.	Noted.

PART B: Comments specific to INT2020-01 Observing commercial fisheries

Submitter	Submission	DOC response
2.1 Observing commercial fisheries		
FINZ & DWG	Do not accept the continued coverage on the Taranaki Setnet fleet. Do not accept that continued coverage in The South Coast South Island area. Note the absence of setnet coverage in Statistical Areas 20 and 22, removing set net coverage in the Canterbury – Timaru area should not be taken prior to the TMP decision being determined. Estimated risk scores of black petrels and flesh-footed shearwaters require updating.	Observer coverage is planned based on identification of objectives for coverage and ideal levels of coverage for each fishery. This is then considered in the context of the available resource of the observer programme and feasibility of delivery and is prioritised accordingly. While the level of proposed days in the planning this year was reduced in order to take into account the need to reduce levies due to Covid19, the number of CSP inshore days have still increased by 275 with an increase of 570 inshore days overall from last year's plan. Throughout 2020/21 CSP and FNZ will be working to improve the joint planning process to ensure both agencies' objectives are being met and to clarify the framework needed to deliver on these objectives. This framework will be documented to provide more transparency in future. Feedback provided on the observer days will be passed to FNZ for consideration.
Cawthron	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 fur seal bycatch and to allow for mitigation options to be explored. Recommend that observer coverage in the Cook Strait Hoki Trawl fishery (which has been averaging 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. The Taranaki trawl fishery has averaged 1% observer	

	coverage over the 2003 to 2015 period. Observer Coverage in the Taranaki small vessel trawl fishery needs to be immediately increased to 25% to allow for the estimation of the true level of common dolphin bycatch. Large uncertainty around extrapolating from such a low level of observer coverage, the true number of dead dolphins could be very high.	
YEPT	The Trust supports the provision of observers for coverage of fisheries, in order to help understand the nature and extent of bycatch. Of particular relevance is observer coverage in the East Coast South Island and South Coast South Island setnet fisheries where there is overlap with hoiho habitat. Observer coverage of at least 50% is recommended to provide reliable bycatch estimates for rare species. Te Kaweka Takohaka mō te Hoiho and Te Mahere Rima Tau objectives should be considered in the planning of observer days alongside the NPOA-Seabirds 2020. Actions under this plan recommend that annual observer coverage be at least 50% on setnet vessels within hoiho habitat. Specifically, this would involve increasing the observer effort in the East Coast South Island area, where coverage is currently only set at 30%. Recommended that statistical area 22 should be included, as this is where juvenile hoiho are known to forage and a known area of hoiho bycatch.	
WAP	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 reflects and captures risks of bycatch. Planned coverage is inadequate in meeting standards of comprehensive coverage, as befitting the endangered and threatened status of Māui and Hector's dolphins.	
LS	The number of observer days is far too low to provide scientifically robust estimates of bycatch. Needs specific, measurable goals such as ensuring that the CV on the bycatch estimates is 30% or better for protected species.	

	Statements indicate that observers are placed on practical and economic criteria, not following sound scientific protocols. Several references to the "planning optimisation process" Could you please explain this process, and provide references, or links to reports that outline this process.	

PART C: Customary practices

3.6 Protected coral identification and awareness		
TOKM	We note there is no recognition of the expectation for Māori to recover certain seabird species carcasses for cultural purposes through the observer programme. This expectation stems from a right contemporarily granted through Te Tiriti o Waitangi that has both spiritual and ancestral importance. It is also a provision set out in the CSP Strategic Statement 2018 and this provision should be carried through and incorporated within the CSP Annual Plan. Including this detail recognises CSP's engagement with Māori as a Treaty partner and solidifies the Te Tiriti section of the Strategic Statement.	We recognise this need and will continue to facilitate the transfer of these taonga in support of the rights of iwi.

PART D: Comments specific to proposed projects

Submitter	Submission	DOC response
INT2019-02 Identification of seabirds captured in New Zealand fisheries		
FINZ & DWG	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	This multi-year project was consulted on in 2019/20 and was included in the 2020/21 plan for completeness. Expanding the current seabird necropsy programme would come at a significant cost and identification by photos has proven to be an effective measure. This along with the information captured by observers provides accurate data on

	demographic and biological research.	protected species interactions at sea.
POP2018-03 New Zealand sea lion: Auckland Island pup count		
FINZ & DWG	Note the importance of continuing to monitor Auckland island sea lion pup production, but 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.	This project was consulted on in 2018/19 and was included in the 2020/21 plan for completeness. Cost attribution will next be considered during the development of the next project round in 2022.
TOKM	Fisheries are no longer considered to have an adverse effect on the sea lion population. Considering the current circumstances, we suggest reviewing the current 90:10 apportioning of costs to quota owners and the Crown respectively for the Auckland Islands pup count project.	
3.6 Protected coral identification and awareness		
FINZ & DWG	Do not support protected coral awareness given the low level of impact on those species.	Accurate at sea species identification is crucial to precise understanding of the negative impact commercial fishing activity has on coral communities within NZs EEZ. In particular, coral communities are heavily impacted by commercial trawl fisheries.
3.8 Grey petrel population estimate – Antipodes Island		
FINZ & DWG	Do not support population research for Grey Petrel given its low risk score.	Routine population monitoring for grey petrel was identified in the CSP Seabird Research Plan and has been postponed for a number of years. Progressing the project now allows for potential high levels of cost-saving synergy with other research planned at Antipodes Island.
3.9 Utilisation of the marine habitat of yellow-eyed penguins from Stewart Island/Rakiura		
YEPT	This project is fully supported. Information on the diet and foraging ranges of hoiho are important for assessing	Noted.

	overlap with fisheries and other marine activities, and for informing future conservation management of this protected species. This is particularly important given that there is limited information available on hoiho habitat use to enable informed management decisions and that set netting around Rakiura is currently unrestricted (unlike areas of the mainland).	
4.2 Hook-shielding use in the surface longline fishery		
FINZ & DWG	Support.	Noted.
TOKM	Costs are very high – if this is an annual cost to continue the use of hookpods it is not operationally effective. Above there is mention of a more comprehensive analysis in 2021 – is this the cost of that analysis? It is still far too expensive	The project cost excludes initial provision of pods (100% Crown funded) but does make provision for replacement pods, administration, and data analysis and reporting. Long-term effectiveness (including consideration of costs) will be made following the analysis in 2021.
4.3 Protected Species Liaison Project		
FINZ & DWG	Support.	Noted.
YEPT	This project to grow liaison capacity across inshore fleets is fully supported.	Noted.
TOKM	The species liaison programme approaches protected species mitigation at a fine scale with efficient feedback loops to regulatory bodies. We value this approach as it provides for vessel and fishery specific management at a personal level to ensure continuous improvement of practices and therefore support desired outcomes for protected species mitigation. Support the wider rollout across inshore fleets.	Noted.
4.4 Mitigation gaps analysis towards reducing protected species bycatch		
FINZ & DWG	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.	As outlined in the project proposal, and incorporating feedback from the CSP Research Advisory Group, this project includes two components; a quantitative assessment of the level of bycatch reduction that existing mitigation tools can achieve for protected marine species, and a workshop to consider this analysis and identify the most important gaps in

	Propose cancellation of this in favour of funding field research of DDDs or suction cup technology on Hector's dolphins, industry would support an increase in the CSP budget to cover additional funding to a maximum of $50,000.	mitigation use and in mitigation technology. The workshop recommendations will form an important element in CSP's ongoing strategic approach to investment on bycatch reduction going forwards. As such, DOC is satisfied that the project is of adequate priority to progress and addresses some of the wider feedback received regarding the strategic direction of CSP. See response above in relation to Hector's dolphin research
YEPT	Supported, but should also contain an additional implementation phase to fill those gaps and actively reduce bycatch. It would be good to see this project specifically identify mitigation tools to enable the reduction of Hoiho bycatch, which is one of the at-risk protected species identified for setnet fisheries.	Hoiho will be one of many species this project and workshop will focus on. This is a strategic approach to informing future mitigation research directions going forward thus implementation is intrinsic to the project.
TOKM	Do not support the funding of project MIT2020-03. At the RAG there was general consensus that the objectives of this proposal could be better achieved through a workshop and that a contracted analysis would be more expensive and less relevant. Overall, in concept we support the identification of gaps in order to prioritise future projects however disagree with an approach that puts analysis before stakeholder discussion.	Conducting the quantitative assessment of existing mitigation tools prior to the workshop will provide necessary structure to guide the discussion, enabling stakeholder input on the assessment and allowing a focus on identified gaps.
LS	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.	Following stakeholder feedback, DOC strives to implement a more strategic approach to mitigation research via CSP. This project is across all protected species.