WWF New Zealand

Dear CSP team,

Thank you for the opportunity to comment on the Conservation Services Annual Plan 2016/17. WWF New Zealand would like to make some general comments and some specific recommendations.

General comments

With regards to Maui dolphins - due to the extremely vulnerable state of the Maui dolphin population, the Government should be working to remove fishing related threats to Maui dolphins from their **entire habitat**: from Maunganui Bluff to Whanganui River Mouth, within harbors, and out to the 100m depth contour.

An important aspect of the Government's work to save Maui dolphins should be to research and identify effective pathways to support the fishing fleet on the West Coast North Island to either move out of Maui habitat, or transition to dolphin safe fishing methods (e.g. long lining). We consider that this work could fit within the Conservation Services Programme.

With regards to New Zealand Sea Lions - there are some very important research gaps that are not addressed in the CSP plan. These include: 1) the need to improve understanding of the efficacy of SLEDs, and 2) the need to improve understanding of the indirect effects of fishing on food availability and population demographics (health of sea lion populations e.g. pup survival). This work may be better placed in the Threat Management Plan research programme, however we will highlight these important gaps for you here also.

WWF recommends Government prioritise research to improving knowledge about efficacy of SLEDs.

- We don't have very good knowledge of how many sea lions are coming in contact with trawl nets and SLEDs (interactions and strike rate). According to Thompson et al (2013) and MPI (2014) estimates of the number of interactions has become increasingly uncertain with the most recent interaction estimates being effectively 'unbounded' (MPI, 2014, p42).
- We don't know if the SLEDs are masking the mortality rate by allowing drown seal lions to fall out of the SLED escape hole during hauling (Row and Meynier, 2012). There is no evidence that the hoods are effective at containing dead animals.
- We don't know the rate of survival once sea lions leave the SLED or net (Robertson and Chilvers 2011). It is possible that some sea lions exceed their dive limit and drown before reaching the surface after escaping from either the SLED or the front of the net. Such sources of 'cryptic mortality' are presently "unquantified and are not reflected in the estimated overall survival rate of encounters with trawls" (MPI, 2014, p43).

WWF recommends that the Government prioritise research to improve knowledge about the indirect effects of fishing, and move towards being able to quantify the threats/risks (and hence better manage them). This will require more research on:

- demographic effects of food limitation, and
- how availability of particular species impacts demographics.

Specific comments - regarding the Inshore Trawl observer programme (p. 18 of the Draft CSP Annual Plan 2016/17).

We support the increase in proposed observer coverage. We note that over the last two years only 13% of fishing days were observed in the trawl fishery 2-7 nautical miles, and only 18% in the 2-12 nm and 2-20 nm areas of the West Coast. Ideally there would be 100% coverage, however the proposed increase to 75% coverage will be a significant improvement.

WWF NZ recommends that MPI improve vessel location reporting to observer team and compliance by requiring all fishing vessels working inside Maui habitat (defined above) to install and operate a centralised Vessel Monitoring System. We consider that MPI should cover the cost of the technology and installation.

This recommended action will address the significant delay in the notification of vessel location on the WCNI which was an important issue identified at the Maui Dolphin Research Advisory Group (2nd November 2015). The MPI observer services representative at the MRAG meeting identified that it can take up to 3 months for information about vessel location to get through the system to inform the observer team about which vessels might require observers.

We understand that efforts to address this issue are already under way, through requiring vessels to pro-actively report where they are planning to fish a week in advance. However, we feel that real-time automatic vessel location monitoring will more efficiently provide the information required to implement existing observer coverage commitments, and circumvent issues of human-error and accuracy.

References

- Ministry of Primary Industries (MPI), 2014, Aquatic Environment and Biodiversity Annual Review, 2014 Summary of environmental interactions between the seafood sector and the aquatic environment.
- Robertson and Chilvers, (2011), The population decline of the New Zealand sea lion *Phocarctos hookeri*: a review of possible causes. *Mammal Review*, 41:253-27
- Row, W.D., and Meynier, L., 2012, Review of necropsy records for by caught New Zealand sea lions (Phocarctos hookeri), 2000–2008

We would like to opportunity to talk with you further about these points, and are happy to provide any additional information or analysis. Please let us know if these recommendations are helpful or if there are other forums that we should be making these points in.

Many	thanks,

Amanda