

27 April 2016

SANFORD SUBMISSION ON CONSERVATION SERVICES PLAN 2016 - 2017

Thank you for the opportunity to comment on your draft Conservation Services Plan (**CSP**). We welcome an opportunity to sit down together and talk through some of your proposed projects – so that we better understand what your concerns are and, so we are more able and open to take on board the learnings that come flow from the research.

Sanford has contributed to and is supportive of the Fisheries Inshore and Deepwater submission also lodged on the CSP plan. We echo their concern that an increasing number of CSP projects seem to be justified on the back of very conservative risk assessments. These assessments use historical data and were not intended to drive research. They are often out of date and have not taken into account the significant commitments made by quota owners and vessel operators into bycatch mitigation techniques or new technologies.

This submission formally records our objection to several proposed inshore North Island projects, which in our view need more through consideration and industry consultation, specifically:

- WC NI inshore trawl (350 days)
- SNA1 trawl (150 days)
- NE NI BLL SNA1 (300 days)
- SNA1 Danish seine (100 days)

In the lead up to lodging this submission we requested more information from MPI and DOC, while some answers were given there was insufficient detail provided to resolve our doubts. Sanford therefore requests an opportunity for industry representatives to meet with MPI and DOC officials to discuss these projects, we believe that either we are already delivering or it would be possible to deliver on many of the CSP objectives in more cost efficient and, useful ways.

FMA1, SNA 1

In total a proposed 550 days of additional observer cover

Trawl vessels catching more than 5 tonne of snapper in FMA 1 have become increasingly monitored following a Ministerial directive in 2013 that required first 25%, then 50% then 100% observer cover. Observers were taken off other inshore programmes to ensure that this project delivered on its planned days. The cost of this cover has been met by the SNA1 quota owner.

In 2015 the Minister agreed to an industry request to move from human to 100% electronic monitoring on the trawl fleet and signed a three year service agreement with Trident Systems for a monitoring programme that will cost in excess of \$1 million. 100% of this cost will be met by the quota owner. Working towards this goal, since January 2016 cameras have been installed on 100% of the SNA1 trawl fleet.

The 2016-17 CSP plan now proposes an additional 150 days of new human observer cover on the SNA1 trawl fleet to monitor the efficacy of the electronic cover already in place, we believe this is excessive and duplicates a proven process.

Back in the 2014-15 the CSP plan included a FMA1 (snapper one) project to monitor the industry led snapper agreements including developing monitoring standards, monitoring the move-on rule and monitoring the efficacy of VMS. In 2014-15 SNA1 quota owners were levied 600 days for this research. The target days were met and included a technical EM advisory meeting. To date there has been little tangible progress towards developing the EM standard and, the need for one in our view is likely now surpassed with the appointment of Dean Baigent's role (from our discussions with him, we don't think he is asking for research). We note that the minutes from the MPI technical review 'standards' workshop have not yet been published despite the group making a series of recommendations. Now the current CSP proposes two new projects, NE NI trawl (150 days) and NE NI Danish seine (100 days) for the development of standards for implementation ongoing monitoring of SNA1 and to review the efficacy of VMS. This appears an excessive cost for something which has no clear end use on a group of quota owners who are already footing a hefty monitoring/research bill and who are expected to contribute at least 50% towards a major upcoming snapper tagging programme.

During this same time, from the latter half of 2014 onwards Trident Systems has regularly reported on SNX bycatch, the move-on rule and VMS efficacy – by vessel, by method and by fleet. These reports have been provided to fishers, discussed in workshops (several with MPI staff present) and presented under scrutiny to the Northern Inshore working group. Trident analysis was done on land, to a science standard. It is unclear why MPI observers need to go to sea to do this work and, what new information (if any) they can add to these already comprehensive, data rich reports.

We urge you to sit down with us for a conversation – there is a need for the Ministry, the Department of Conservation and Trident Systems to sit with SNA1 Commercial and discuss what is already being monitored and reported on and where (and if any) gaps exist before these CSP projects are locked down.

Furthermore, given the extensive human observer cover on the SNA1 trawl fleet over the last four years it is unclear why there is a need for further human observer cover to estimate capture rates of black petrel across the trawl fleet (a further 150 days is proposed split 50:50 between DOC and MPI) – surely seabird and Black petrel capture rates on trawl vessels are already well understood as they would have been reported over the last three years as part of the Minister's SNA1 directive.

WC NI (trawl)

This is an ongoing CSP proposal for 350 days split 50:50 between DOC and MPI for the purposes of assessing Maui dolphin capture and as a secondary purpose to observe the nature of warp strikes and spatial distribution of seabirds and marine mammals.

We note that observer cover on this project in the previous two years has been difficult to achieve. We continue to advocate for the use of cameras in this fishery. The nature of warp strikes on this fleet is already well understood and has been the subject of several earlier CSP projects.

NE NI (BLL snapper target)

The CSP proposal is for 300 days split 50:50 between DOC and MPI (levied on SNA1) for the purposes of i) estimating capture rates of black petrel ii) review of mortality of live-releases survival and iii) efficacy of mitigation methods (focus Black petrel)

We are unclear what additional information is required around the efficacy of mitigation methods on the BLL fleet. This was a problem that has been well researched and largely resolved – the solution includes a four year investment into seabird liaison officers who have prepared 41 vessel specific seabird management plans and visited vessels both wharf side and while fishing.

While we are aware of a discussion currently occurring with Southern Seabirds Black Petrel Working Group and MPI around the use of electronic monitoring across the BLL fleet to monitor seabird captures, we urge for there to be a conversation with quota owners about the cost of this project, the need and the best way to deliver it.

Sincerely

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For Sanford Limited