

4th August 2017

Mr D Vallieres
Ministry for Primary Industries
PO Box 2526
Wellington 6140

Attention: Highly Migratory Species Team

Dear Dominic

COMMENTS ON NATIONAL FISHERIES PLAN FOR HIGHLY MIGRATORY SPECIES

Introduction

1. Thank you for the opportunity to comment on the consultation paper regarding the National Fisheries Plan for Highly Migratory Species released for consultation on 4 July 2017 (MPI Discussion Paper No. 2017/27).
2. Fisheries Inshore NZ Limited (FINZ) represents 80% by value and volume of the inshore finfish, pelagic and tuna fisheries of New Zealand. Its role is to deal with national issues on behalf of the sector and to work directly with and on behalf of its quota owners, fishers and affiliated Commercial Stakeholder Organisations (CSOs). As part of that it works collaboratively with other industry organisations and Sector Representative Entities (SREs), Seafood New Zealand, Ministry for Primary Industries (MPI) and Department of Conservation.
3. FINZ has a mandate from the HMS Committee to work directly with and on behalf of its quota owners for the management of fisheries within the region. The HMS Committee is a committee representing the interests of HMS quota owners and fishers.
4. FINZ has prepared this submission on behalf of the HMS Committee representing the interests of HMS quota owners and fishers.

General comments

5. We support the concept of fisheries plans and appreciate the collaborative approach of the HMS section to fisheries planning. Fisheries plans are the foundation block for the management of fishstocks. They need to be based on assessment of the current situation of the fisheries and an understanding of current or emerging issues to be addressed. As the basis for the management of a fishery, their fundamental touchstone must be the provisions of the Fisheries Act 1996. Fisheries plans need to clearly define the management strategies to achieve their desired outcomes. The desired outcomes should seek to guide the management framework for the stocks and the desired Harvest Strategy Standard settings. Fisheries plans are the translation of how stocks will be managed within the context of the Fisheries Act to achieve the desired outcomes for stakeholders.
6. The FMP is currently missing the key elements of identifying where the fisheries currently are, where the issues are and what the target status for the fishery. This is vital for an effective management plan. MPI are encouraged to share their assessments of current management gaps more frequently with stakeholders.
7. A gap analysis that clearly identifies the current management gaps and associated management issues is required in the document and should summarise management initiatives that are intended to address these. This provides the basis for knowing where the fishery is at, what gaps there are and where it is going.

8. The fisheries plan should guide the development of the annual operating plans and the research plans. Performance indicators should be established to monitor the status of the fishery and the progress to obtaining desired outcomes. A medium-term research plan consistent with the fishery plan should provide some certainty as to the future information needs and future expenditure.
9. The inclusion of Key Performance Indicators (KPIs) in the Fisheries Plan is necessary. There is concern that the KPIs should be, where possible, measurable outcomes.
10. An example of well written KPI's is apparent in Objective 5.2 (page 24). These KPI's provide for indicators that can be measured and therefore the level of performance can be monitored and addressed as needed. Objective 5.4 (page 26) also provides for measurable KPIs in terms of seabird proxy targets.
11. We recognise the advancements made since the draft National Fisheries Plan to develop a more consistent approach between the National Fisheries Plans. However, it is still apparent that further standardisation of the document structure is required.
12. We consider that both fisheries plans have positives that the other would benefit from. Notably the Overview for the HMS Plan Structure is not clear. This section would benefit from utilising the way that the National Fisheries Plan for Deepwater and Middle-depth Fisheries presents the Wider Context and Structure on page 2 of their document.
13. The structure of the Management Objectives should also include a description section for each of the objectives, as used in the National Fisheries Plan for Deepwater and Middle-depth Fisheries. This will provide additional context to the objectives prior to providing a summary of the current status.

Section specific comments

14. The section specific comments provided highlight key areas that we wish to raise in this document. The specific comments reflect the general comments above. No comment has been made on formatting and spelling.

Section 2.2

15. Page 10 under National Plans of Action it states "The focus on limiting captures of high-risk seabird species..." The wording limiting could be interpreted as referring to a specific cap. The preference would be for the wording to be mitigate which is in line with the work that is currently being conducted in the Surface Longline fleet.

Section 3.2

Objective 1.1

16. Fishery catch rates and key economic indicators and the ratio of levies to returns from fishery are stated as the KPIs for this objective. These KPIs require more detail to define the key economic indicators that are being reviewed as a KPI. There is also no context for the ratio of levies KPI nor the expectation for these.

Objective 1.2

17. We support MPI's position to advocate for all mortality to be accounted for by Members and for non-Member catch to be taken into account when setting global catch allocations. This is consistent with responsible fisheries management. The concern being that whilst MPI advocates all mortality to be accounted for at international meetings, there is inadequate monitoring of recreational catch within NZ waters. The most recent STN fishery in Waihou Bay provides an example of this. We are concerned that the inconsistency between national management and international advocacy could be detrimental to New Zealand's international position.

Objective 1.3

18. Information on the current status of access to key markets should be provided so that the KPI of 'Continued access to key markets' can be viewed in context.

Objective 1.4

19. The first management initiative bullet point should state 'MPI will ensure that the views of all HMS stakeholders are taken into account in matters relating to' This wording is more commensurate with the reality of MPI consultation and engagement.
20. KPIs should provide the ability to review the performance of HMS fisheries management. The third KPI 'Threats and opportunities are identified' is a very hard KPI to demonstrate and the wording should be changed to a measurable indicator.

Objective 2.1

21. The concern with this objective is that maintaining and enhancing recreational catch rates for HMS game fisheries requires a good understanding of the current catch rates. It is important that the current status of these catch rates and the status of our knowledge is reflected in the Fisheries Plan.
22. The second management initiative for objective 2.1 needs refining. Reference points alone do not maintain the natural distribution and range of HMS stocks so more detailed information is required. If New Zealand is advocating for reference points for HMS game fisheries the species that MPI is advocating this for should be detailed.
23. The third bullet point makes reference to commercial skipjack fisheries impacting on yellowfin catches. This management initiative requires more context to support this statement. Information should be provided in the current status to do this.
24. The KPIs provided for this objective are statements that annual catch reporting should be reported. A more appropriate and measurable KPI would reflect the need for NZSFC to be providing robust representative data that can be used in the management of the stocks.

Section 3.3

Objective 4.1

25. The current status text makes reference to Skipjack and Albacore with regards to the development of a target reference point. There is no comment made on the other tuna species that are under the WCPFC mandate. A summary table indicating reference points or a link to the appropriate WCPFC page would be beneficial.
26. The first bullet point for the Management initiatives needs amending to state 'limits for all HMS species'. Whilst the second bullet point should state 'Implement the targets in accordance with the HSS. Where there is no specific HS or HCR, manage stocks as per HSS'. This would provide consistency with the National Fisheries Plan for Deepwater and Middle-depth Fisheries.
27. The terminology used in the KPIs for this Objective implies that New Zealand will identify reference points. Whilst New Zealand will contribute to the process it is the Regional Fisheries Management Organisations (RFMOs) that will decide these.

Objective 4.2

28. FINZ supports the use of evidence based fisheries management. Anecdotal information should not be used as the basis of making informed fisheries management decisions and the reference to use anecdotal reports in the Management initiatives should be amended.

Objective 4.3

29. The current status text provides prominent level information on the current controls adopted by the different RFMOs. Aligned with our general comments regarding the need for a management gap analysis, a comprehensive current status would enable management initiatives and subsequent KPIs to be developed against.

30. The first KPI should be explicit in listing the species that are required to be consistent with MPI's Harvest Strategy Standard (HSS). The second KPI should also clearly define those species that New Zealand will engage with WCPFC on to identify reference points and targets.

Objective 5.1

31. The second KPI provided for in this objective should be moved as it can be considered a management initiative as opposed to a KPI. Achieving awareness should be the management initiative. Identifying the level of increased awareness, however measured, is the KPI.

Objective 5.2

32. The management initiatives should be developed so that they state that observer coverage provides representative coverage of the HMS fleet and meets New Zealand's international obligations.

Objective 5.3

33. There is repetition within the current status with the final sentence of the first paragraph covered in the following paragraph. This sentence should be removed. Bullet point 1 and 5 in the management initiatives are also repetition and need addressing.
34. The current status refers to 'the latest risk assessment' without providing a reference. Whilst FINZ are aware of the document a reference should be provided to readers.
35. The management initiatives note that an annual review of mitigation methods will be conducted. The scope of this review should be expanded to account for a review of the applicability of the regulations to ensure that the regulations are enabling fishers to mitigate adverse effects.
36. The footnote on page 25 needs updating. The wording implies that the New Zealand SLL fishery poses a substantial risk to Antipodean Albatross. This is contrary to current information that shows that the risk to Antipodean Albatross is an out of zone issue that needs addressing. This should be reflected in the text as currently it is inaccurate.

Objective 5.4

37. The current status section outlines that there are regulatory mitigation focusses and identifies that there have historically been poor levels of compliance. The section does not reflect the current status in terms of the existing mitigation work that is currently in place through the Liaison Officer project. This text needs updating to reflect this.
38. The objective is to support the objectives of the NPOA Seabirds. It is important therefore that the current status reflects the current status of the NPOA Seabirds objectives relevant to HMS. The text currently used should be framed so that it relates to the NPOA Seabirds objectives. This will enable the management initiatives to be aligned with the NPOA objectives.
39. The third KPI refers to the use rates of voluntary mitigation practices and innovation in mitigation gear. It is unclear from this what the anticipated use rates are and how this is being measured. It is intuitive that the KPI would be an increased use of mitigation but this is not implicit in the text.

Section 3.4

Objective 7.1

40. Satisfaction is an extremely subjective term. The KPI for this objective implies satisfaction is used to demonstrate success. How do MPI intend to measure satisfaction and what is the result if the feedback is unsatisfactory? We instead propose that the KPIs should be
- *FPAG attendance is representative of all stakeholder groups.*
 - *Documentation and information is provided to stakeholders and the wider public through a recognised consultation process*
 - *Two FPAG workshops are held per annum*

Objective 9.2

41. A cross reference is made to Management Objective 13 in the second paragraph of the current status. This cross-reference needs correcting.

Section 4.4

42. The text provided indicates that “Recreational fishing generates significant economic benefits to New Zealand.” The use of the term significant needs to be defined.
43. The footnote references (8 – 10) provided as part of this section on page 37 references Statistics New Zealand but does not provide any additional information as to the source. This referencing should be more detailed to allow readers to read the source document for further information.
44. The biological overview provided for HMS Species should also include Yellowfin for completeness.

Section 4.5

45. Footnote 18 refers to Antipodean albatross. Please refer to point 35 in this submission.



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