

27th July 2018

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

Attention: Highly Migratory Species Team

Dear Dominic

RESPONSE TO THE PROPOSED CHANGES TO THE FISHERIES (SEABIRD MITIGATION MEASURES – SURFACE LONGLINES) CIRCULAR 2014

Introduction

1. FNZ has issued consultation documents on proposed changes to the *Fisheries (Seabird Mitigation Measures – Surface Longline) Circular 2014* and invited responses on the proposals that were released for consultation on 29 June 2018. This response is presented on behalf of FINZ's Highly Migratory Species (HMS) Committee.
2. We note that companies and other quota-holders may also make their own submissions on the proposals and make specific reference to their preferred option as they consider appropriate.

Process comments

3. Whilst we are in principle supportive of New Zealand proposing CMM measures that reflect our operations it is imperative that the process to achieve this is reviewed and improved where possible. The process by which industry were engaged with and able to provide feedback on the CMM changes was limited.
4. This lack of process has been emphasised by the recent WCPFC scientific papers that were submitted by New Zealand without stakeholders being informed of this or indeed given an opportunity to discuss these papers.
5. New Zealand delegates at international meetings represent all New Zealanders and it is important that the appropriate level of engagement and consultation on any CMM changes is undertaken.

Proposed changes

6. We note that the proposed changes to the amended *Fisheries (Seabird Mitigation Measures – Surface Longline) Circular 2018* are to align the current Circular with the new WCPFC Conservation and Management Measure 2017-06.
7. We are cognisant that the CMM 2017-06 was put up to WCPFC by New Zealand with the intention to better reflect research and practices within New Zealand. We are supportive of this and acknowledge the fact that research conducted in New Zealand is being used to make international and subsequent domestic policy changes.
8. We are particularly supportive of the removal of 'best practice guidelines' that were previously used to support the implementation of the requirements of the circular. Their previous inclusion providing no benefit and rather confuses the intention of the domestic circular to align with international obligations.
9. From the documents provided we do not have any major concerns with this alignment and indeed it ensures that New Zealand is meeting its international obligations. Although, we note the following in the proposed circular:
 - a. (8)(3) states "If two streamer lines are used, they must be deployed on opposing lines of the main line of baited hooks." Presumably this is meant to be either side of the main line?

- b. The numbering in the draft is inconsistent and needs addressing. For example (9) starts with number 3 as opposed to 1.



Oliver Wilson
Programmes Manager
Fisheries Inshore New Zealand Ltd