

18 August 2016

Mr L Sanson
Department of Conservation
PO Box 10420
Wellington

Mr M Dunne
Ministry for Primary Industries
PO Box 2526
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Dear Sirs

Comments on New Zealand Sea Lion Threat Management Plan

1. You have asked for comments on the draft New Zealand Sea Lion Threat Management Plan (TMP) dated 20 June 2016. The development of the TMP has been informed by a number of risk assessments, scientific research reports and observer activity reports.
2. This submission reflects the view of Fisheries Inshore New Zealand Ltd and was prepared by Tom Clark of Fisheries Inshore New Zealand Limited. Any queries should be directed to Mr Clark.

The Submitters

Fisheries Inshore New Zealand

3. Fisheries Inshore New Zealand Limited (FINZ) represents 80% by value and volume of the inshore finfish, pelagic and tuna fisheries of New Zealand. It was formed in November 2012 as part of the restructuring of industry organisations. Its role is to deal with national issues on behalf of the sector and to work directly with and on behalf of its nearly 200 quota owners, fishers and affiliated Commercial Stakeholder Organisations (CSOs) which represent inshore and pelagic finfish and some shellfish fishing interests. As part of that work, it also works collaboratively with other industry organisations and Sector Representative Entities (SREs), Seafood New Zealand, Ministry for Primary Industries (MPI) and the Department of Conservation.
4. Its key outputs are the development of, and agreement to, appropriate policy frameworks, processes and tools to assist the sector to more effectively manage inshore, pelagic and tuna fishstocks, to minimise their interactions with the associated ecosystems and work positively with other fishers and users of marine space where we carry out our harvesting activities.
5. We have included comments from major inshore commercial fishing representative bodies, including Northern Inshore, Area 2 and Southern Inshore.
6. While sea lions are commonly perceived and managed as an environmental consideration for the deepwater fleet, the establishment of breeding groups on Stewart and the southeast South Island brings New Zealand sea lions into the realm of the southern inshore fisheries.

General Assessment

7. FINZ supports the concept and development of a TMP to address the range of threats to New Zealand sea lions. We welcome the broadening of the scope of government's actions to consider the variety of threats to the New Zealand sea lion the recent risk assessment has identified and dimensioned.¹ In doing so, it offers guidance as to where the TMP should focus its efforts.
8. We consider that the TMP could be improved by aligning the proposed TMP actions with the newly identified and scientifically-established threats to sea lions. Rather than generating a programme of work to drive further positive actions to directly address high priority threats, the TMP proposes monitoring programmes and further scientific research into the nature and extent of threats. This approach contrasts strongly with the interventionist approach being taken with many avian and terrestrial protected species.
9. We suggest that the strategic approach in the draft TMP is re-directed to achieve more positive action. We believe there would be greater benefits for sea lions if DOC and MPI concentrated their efforts on a few highly-beneficial components and did those well, rather than diluting the available resources over a wide range of initiatives with less beneficial outcomes.
10. While the TMP contains a national programme, regional programme and a research programme, the TMP does not provide a prioritised programme that incorporates all three programmes. In the absence of a prioritised action plan, agencies executing the TMP are free to promote those components that best suit their desires, rather than the needs of the sea-lion population. We have therefore reviewed MPI's risk assessment and prioritised the most important individual components of the proposed TMP to indicate our preference for positive action. They are:
 - a. Reduce the mortality of pups by filling the holes with local materials;
 - b. Support research to mitigate the risk of *Klebsiella pneumoniae*;
 - c. Establish a monitoring programme for pup production in ALL breeding sites; and
 - d. Monitor progress against the TMP population goal.
11. We consider that, for the five-year period to which this TMP applies, the above priorities should apply and available resources should be deployed to achieve those objectives.

TMP Objective and Goals

12. The objective of the TMP is to "*promote the recovery and ensure the long term viability of New Zealand sea lions*". We support that objective.
13. The TMP has four goals— a population goal, a partnership goal, a research and monitoring goal and a community goal. With the exception of the population goal which contains some specificity, we consider the other goals reflect the generally passive approach contained in the TMP. We consider more active and results-focussed goals to be appropriate for a TMP for a species that is classified as "Nationally Critical".
14. Where specific threats are identified, the TMP does not have specific goals that relate to the management of those threats or to threats overall. While it may be premature to specify specific goals for some threats, where it is feasible these should be developed in objective terms such that progress against the goals can be assessed.

¹ Roberts J, Doonan I (2016) Quantitative Risk Assessment of Threats to New Zealand Sea Lions, March 2016, New Zealand Aquatic Environment and Biodiversity Report N0166, Ministry for Primary Industries

National Programme

15. The TMP proposes four major national initiatives – population monitoring, a Sea Lion forum, a national engagement campaign and disease research.
16. Monitoring the performance of the sea lion population is critical to assessing the benefits of the TMP and any improvements in the sustainability of the population. For that reason, we support a monitoring programme and ongoing pup counts. Given the importance of this monitoring, we consider that it important to confirm the use of pup counts as an indicator of population performance and ensure that any changes to pup counts methodology and pup survival rates are minimised or accommodated in the population assessments. Further, we consider it is necessary to monitor the Campbell Island population given it produces around 20-30% of all pup production.
17. *Klebsiella pneumoniae* has been assessed as being the greatest single threat to the sea lion population. We are concerned that the research to be undertaken into the disease has more of a scientific focus rather than a remedial approach. Unless critical to achieving the treatment priority, determining the presence, prevalence, and total mortality of the disease is significantly less important to the sea lion population than addressing how to overcome the disease. To the extent practicable, we would far rather see the scarce resources directed at treatment or cure rather than proving the extent of the disease or determining the vectors or historical paths by which the disease arrived.

Regional Programmes

18. The regional programmes have four primary activity areas:
 - a. reduce the occurrence of pups dying in holes (we consider this should also include Campbell Islands where the threat is the greatest);
 - b. manage non-fishing human interactions;
 - c. review male aggression threats; and
 - d. address fishing threats.
19. Increasing the survival rate of pups by removing the threat of dying in holes should be an easy priority solution. The problem was identified some years ago and we see no reason for any delay in addressing this risk. Holes and wallows do not represent a geologic phenomenon to be protected in priority to sea lions. Accordingly they represent an unnecessary threat that can be easily eliminated by a range of pragmatic actions – they do not need to be mapped, safety fenced or planked – they simply need to be removed by filling. We would support DOC/MPI initiating an urgent programme to remove the threat that should commence with work and development of an ongoing monitoring and remedial action programme should further holes develop. We recognise the need for discussions with iwi on such changes to the environment.
20. With the exception of the need to reduce unnecessary mortality, the management of non-fishing human interactions is essentially focused on increasing awareness rather than mitigating threats. While we can see the wisdom of reducing the stress on sea lions arising from tourism activities, we also recognise that tourism viewing contributes significantly to popularising wildlife.
21. We are also aware of reports of shooting incidents at Steward Island that are of concern to the seafood industry and should be a focus of further investigation and enforcement by the Crown.
22. We are somewhat bemused by the attention to be given to male aggression which is a natural characteristic of sea lions and cannot be moderated as such. The priority being given to the Otago coast is not supported given the low number of pups on the coast. It is unclear whether that priority is because of the interactions with humans or the threat to pups from aggressive males or the accessibility of the coast.
23. We cannot support the need for intensive activity to address the residual risk to sea lions from commercial fishing, as advocated by some interest groups. The seafood industry has invested

significantly in technology and research to mitigate its impact on the sea lion population. We note that impacts from the commercial fishing sector have declined significantly over the last decade to the point where captures are rare events. The seafood industry remains committed to reducing its impact and will participate in the development of operational plans for the relevant fisheries.

24. There is robust scientific evidence as to the efficacy of SLEDs. That research has been contracted by MPI, was subject to extensive national and international peer review, and clearly demonstrates the efficacy of this mitigation measure. Some interest groups appear to be unaware of this extensive body of work and are seeking to re-investigate SLED efficacy. Providing MPI's research in summary form would be useful to ensure that further expenditure on matters thoroughly investigated does not divert funding away from the more critical disease-related research and other direct interventions.
25. We are unable to source any information to support the view that set netting is a major threat to the sea lion populations at either the Otago or Stewart Island localities. We note the suggestion that regulatory options be developed to minimise incidental captures in set net fisheries. We consider that to be premature and would first welcome some engagement with MPI and DOC to determine the nature of the risk and, if necessary, what mitigation options may be available and appropriate.

Research Priorities

26. We have reviewed the research priorities contained within the TMP and suggest a re-prioritisation of the research presented.
27. We consider disease research should be the highest priority however, we cannot agree that treatment should be accorded low priority whilst necropsy analysis and epidemiological modelling should be accorded high and medium priority respectively. We recognise there is value in understanding the disease, the extent of the disease and the transmission vectors but the need for a treatment overshadows the value of those secondary issues. To the extent that they are necessary to assist in the development of the treatment, they should be researched but that need should result from the research for a treatment and not be a pre-cursor.
28. Had we recognised the severity of the disease at some earlier time, then a sequential and comprehensive research programme could have been appropriate. However under the current outlook and the assessed impact of the disease, the priority for research should be a treatment. It is sufficient to know that the disease is the most significant threat to the sustainability of sea lions to warrant high priority being accorded to the development of treatments. That it is expensive should not be a reason to defer treatment research – rather it should be the reason for deferring other initiatives and ensuring development of treatment options is not compromised by a lack of available funding.
29. As stated above, we consider the impacts of commercial fishing have been well researched and mitigated to the point where they do not constitute a significant risk, let alone an adverse effect, to the long term viability of sea-lions. The diversion of funds to further research fishing impacts would be detrimental to ensuring the viability of the sea lion population.
30. We are concerned that the proposed TMP does not identify those projects which should be researched as overall priorities. By grading Forum proposals within research themes, research funding is unnecessarily diluted for all research themes and may make unaffordable those projects that may be most beneficial to the sea lion population.