

14 March 2017

Mr L Sanson
Department of Conservation
PO Box 10 420
Wellington 6143

Dear Mr Sanson

**COMMENTS ON THE PROPOSED CONSERVATION SERVICES PROGRAMME
PROJECTS FOR 2017/18**

1. These comments are provided by Fisheries Inshore and the Deepwater Group in respect of the projects presented by CSP for consideration in the Conservation Services Programme (CSP) projects for 2017/18 at the CSP RAG meeting on 1 March 2017.
2. We provide comments on both wider management matters and the specifics of the projects.

LEGISLATIVE SCOPE OF CONSERVATION SERVICES

3. Conservation services are defined in section 2 of the Act as follows:
 - a. research relating to those adverse effects on protected species;
 - b. research on measures to mitigate the adverse effects of commercial fishing on protected species; and
 - c. the development of population management plans under the Wildlife Act 1953 and the Marine Mammals Protection Act 1978,
4. Section 262 of the Fisheries Act (FA) which applies to conservation services confines the services that can be cost recovered to those provided:
 - a. to manage or administer the harvesting or farming of fisheries resources; and
 - b. to avoid, remedy or mitigate a risk to, or an adverse effect on, the aquatic environment.
5. In section 1.3 of the CSP Strategic Plan, the scope of CSP is defined as being restricted to the consideration of those projects that are by definition conservation services as defined in section 2 of the Fisheries Act 1996. That definition refers to services in relation to the adverse effect of commercial fishing on protected species. The FA defines effect to include both actual and potential effects but does not define what constitutes an adverse effect. Equally, the CSP strategic statement does not contain a definition of adverse effect. Industry has repeatedly sought a clarification or definition of "adverse effect" and the definition of conservation services but the matter has been assiduously avoided by CSP.
6. We consider the definition of adverse effect needs to be seen in the context of the Fisheries Act and, in particular, section 8 Purpose of the Act to ensure sustainability and section 9 the

environmental principles to ensure long term viability. Adverse effect can then be defined as a negative impact on the long term viability of a protected species.

7. This raises the question of DOC recognising their mandated scope through CSP. DOC is the manager of New Zealand's natural heritage and just as it accepts responsibility for the sustainability and management of terrestrial and avian species, so too it has that same responsibility to marine species. Conservation services is defined with a limited role to protect marine species against the adverse effects or material risk posed by commercial fishing. As protection measures are enacted and the risk to marine protected species reduced to non-adverse effects, the need for conservation services should decrease. That is the objective and the measure of success of the programme.
8. In recent years, DOC appears to have seen conservation services as a mainstream funding opportunity for any marine protected species to be utilised by DOC for its natural heritage objective. We have sought information on the wider inputs of DOC into the management of marine protected species but no information has been forthcoming. We have also sought information from the Ministry for Primary Industries on the inputs and rationale for protected species activities undertaken by that Ministry.
9. In our opinion, if adverse effect or material risk of such an effect cannot be demonstrated, then a project cannot be eligible for CSP funding. However, because of the public good interest and the need for research into some protected species to be undertaken, industry is willing to permit some projects to be undertaken from CSP funding which would not otherwise be eligible. That might or might not include an industry contribution. The concession to permit such projects is made on a without prejudice basis.

ABSENCE OF STRATEGIC POPULATION MANAGEMENT PLANS

10. In previous submissions, we have noted the absence of current plans for the management of aquatic protected species or threats to those species. The latest plan for seabirds is dated from 2010. Such plans would normally contain an assessment of threats and strategies to address those threats and thus give rise to a research plan. While such documentation would underpin CSP activity, it would also provide an opportunity for interested parties to meet and discuss and hopefully come to a common agreement on the future management of the species.
11. There appears to have been no progress to develop such plans even for those species acknowledged to be at significant risk. For example, no DOC/CSP plan has been developed for the black petrel which has consistently emerged as the seabird most at risk from New Zealand fishing. It has been left to other organisations and groupings of interested parties to establish action plans and plan strategic initiatives. The only Threat Management Plans developed by DOC have been in respect of the Maui and Hector dolphins and the New Zealand sea-lion, those plans being triggered by the need for urgent crisis management action rather than a DOC initiative to improve the management of aquatic protected species.

CLASSIFICATION OF RISK

12. In our submission of last year, we raised the issue of the definition of risk classification in seabird risk assessments as the classes of risk – very high, high, medium, low, and negligible – were being used to determine management action but the definition of the classes was not appropriate. We have raised this matter with CSP and wish to have it discussed in the context of defining the legitimate scope of CSP activities.

13. The seabird risk assessment uses the current definitions:

| SEABIRD RISK CLASSIFICATIONS | | |
|------------------------------|-------------------|-------------------------------------|
| Classification | Median Risk Limit | Upper 95% Confidence Interval Limit |
| Very high | Above 1 | Above 2 |
| High | Above 0.3 | Above 1 |
| Medium | Above 0.1 | Above 0.3 |
| Low | n/s | Above 0.1 |
| Negligible | n/s | Less than 0.1 |

14. Our concerns with the settings relate to the thresholds for the “high” risk and those below that class. We cannot agree or support that a median threshold of 0.3, which effectively requires a three-fold increase in the annual potential fatalities before impacting on the sustainability and long-term viability of the species, can be said to constitute a high risk. Such high levels of mortality were not recorded even under non-mitigated fishing. Where Level 3 assessments are undertaken it has been shown that APFs are pessimistic. Equally a setting that requires mortality rates to rise tenfold cannot be characterised as medium risk.

15. We recognise that the existing risk scores are established with a constant recovery factor but that alternative settings would be more appropriate in assessing the risks from a management perspective. Those settings would naturally arise from any management strategies and statements for the species. As noted earlier, those management statements/strategies/plans have not been prepared for protected marine species.

THE SEABIRD MEDIUM TERM RESEARCH PLAN 2017

16. CSP provided an updated seabird medium term research plan at short notice for consideration by the CSP RAG. The document states *“it (the plan) has been developed as part of the work of the CSP Research Advisory Group (CSP RAG) and will be used by the Group as tool to develop and prioritise seabird-focused research proposals”*.

17. We absolutely refute that statement. The plan was not developed by the RAG, was not discussed by the RAG and does not represent views of the RAG. The plan is a CSP-developed document, prepared without reference to or discussion with the group or consideration of the role of DOC and CSP. If CSP wish to have the endorsement of the RAG, then it needs to be formally discussed and adopted by the RAG. Otherwise the document should be attributed only to CSP or DOC.

18. The plan adopts the Richards and Abraham 2017 risk assessment¹ as being the guiding basis for the plan. The plan includes research activities for:

- a. 17 seabird taxa that have a risk ratio with the 95% confidence interval greater than 0.1;
- b. 13 seabird taxa that had a risk status of low to high in the previous 2015 assessment² but have been reassessed as negligible risk in the 2017 assessment; and

¹ 2017 Risk Assessment in preparation

² Richards Y; Abraham E R 2015 Assessment of the risk of commercial fisheries to New Zealand seabirds, 2006-07 to 2012-13, New Zealand Aquatic Environment and Biodiversity Report no 162

- c. 5 taxa where Rowe³ identified a moderate to high risk from commercial fishing methods other than those analysed in the L2 risk assessment.
19. CSP asserts that all 35 species fit within its mandate and are eligible for CSP funding.
 20. Industry absolutely rejects that proposition. As discussed in earlier paragraphs, the scope of CSP is constrained by the definition of conservation services in the Fisheries Act. CSP's assertion that taxa with a 95% confidence level risk score of 0.1 is at risk of an adverse effect from commercial fishing is clearly inappropriate. The species with that risk score have median scores of 0.04, that is the estimated annual potential fatalities attributable to commercial fishing are 4% of the estimated annual population increase that is not required to ensure a growing sustainable population. In simple terms, commercial fishing will need to increase the potential fatality rate by 25 times before the population is reduced to the extent that any additional fatalities will impact on the sustainability and growth capacity of the seabird population. That cannot be said to be likely or realistic and would far exceed the fatality rate from even an unmitigated fishery. To consider that such taxa are at risk of an adverse effect from commercial fishing and are within the mandate of conservation services activity cannot reasonably be said to be consistent with the Fisheries Act.
 21. We note the plan makes no reference to Level 3 stock assessments undertaken for a range of taxa including Antipodean, Black Petrel, and Westland petrel. We also note that none of those assessments found commercial fishing poses a material risk to the sustainability of the taxa. Such assessments must be used as they are best available information.
 22. Insofar as industry is concerned, DOC needs to have a management process that focuses on the birds whose sustainability is considered to be at material risk from any source and develops management and research plans to seek mitigation of those risks.
 23. We recognise that a semi-quantitative or fully quantitative risk assessment may not be possible for all taxa at risk and that an expert opinion base may be appropriate to identify the principal non-fishing risks such as predators, disease and environmental factors.

CSP APPROACH TO PROGRAMME

24. CSP have not yet provided to stakeholders any indication of the funds available for new projects. Based on the following estimates:

| | |
|---------------------------------|---------|
| a. Observer costs | \$1.12m |
| b. Existing research programmes | \$0.27m |
| c. Overhead charge | \$0.11m |
| d. Total CSP budget | \$2.40m |

CSP has a budget of \$900,000 available for new projects in 2017/18. That is comparable to other years.

25. At the CSP RAG meeting, in response to stakeholders querying how funds would be allocated, CSP indicated it was not prepared to allocate the funding based solely on the priority scoring. Rather CSP indicated a preference to spread the available funds over a range of interaction, population and mitigation projects based on an allocation to each of those activity areas and the priorities within those areas. No rationale was provided for this.

³ Rowe S 2013 Level 1 risk assessment for incidental seabird mortality associated with fisheries in New Zealand's Exclusive Economic Zone, DOC Marine Conservation Services Series 10, Department of Conservation Wellington 58 p

26. We disagree with the CSP approach to spread work across the wide range of project areas. In line with CSP's mandate to reduce adverse effects, we consider that funds should be allocated to priority projects irrespective of the spread between activity areas.
27. Given the objective of CSP, we consider that projects which result in immediate reductions of protected species mortalities should be favoured over long-term population research and that research into mitigation of impacts is preferable to long-term population research and that funding can only be allocated to projects where there is a strong nexus with adverse effect unless industry is willing to support the project.
28. We are concerned that the absence of a strategic plan for the management of marine protected species does not provide strong guidance as to the allocation of available funds. We were also concerned at the quality of the proposals presented by CSP for consideration.
29. We believe that the RAG discussions on Antipodean albatross highlighted these deficiencies. CSP proposed a programme to collect information on adult survival and estimate the size of the population. A population estimate of white-chinned petrels and Northern giant petrels would be undertaken at the same time. The project ranked 11th in the CSP scoring. Antipodean albatross rank 10th in the latest seabird risk assessment and had a recent Level 3 risk assessment released in early February 2017. That assessment indicated that Antipodean albatross population was expected to continue to decline as a result of demographic factors and was not sensitive to New Zealand commercial fishing related mortalities. The CSP project proposal made no reference to the report or its findings and sought only to continue the previous management approach. Kath Walker spoke to the proposal and indicated that nutritional reasons appeared to underlie demographic changes and there was a possible mortality problem outside the NZ EEZ. We would have expected that the risk assessment findings to have guided CSP in determining an appropriate research programme for Antipodeans and a higher ranking for research for the species.
30. We also note the absence of any research proposals in respect of Maui and Hector dolphins, notwithstanding the TMPs being due for review in 2018 and the iconic nature of those species in the New Zealand aquatic environment. We note that MPI has traditionally funded all research into the dolphins, notwithstanding DOC's role as managing New Zealand's natural heritage and protected species and DOC being the sponsor of the Maui Research Advisory Group. We note that the Maui Dolphin 5 Year Strategy and Research Plan⁴ was published in June 2014 but the proposed CSP programme makes no mention of Maui or Hector dolphin research.

OUR PROPOSAL

31. We provide comments on the projects grouped according to those we would support, additional projects we would support and those projects we do not support. While project reports have yet to be presented on some of the related earlier projects, we have provided comments on those projects based on our assessments of eligibility.

Supported Projects

INT1 Observing commercial fisheries

⁴ <http://www.doc.govt.nz/Documents/conservation/native-animals/marine-mammals/mauis/maui-dolphin-five-year-strategy-and-research-plan.pdf>

32. We support the continuation of the observer programme, at least until any alternative electronic monitoring option has proved effective.
33. Given the initiatives to implement vessel risk mitigation plans in the inshore trawl, surface and bottom long line sectors, we would wish to see an active observer programme in those fleets to report on performance of the fleet and identify any remaining issues with protected species mitigation. We recognise the need for greater monitoring of the West Coast North Island trawl fleet for interactions with Maui dolphins and seabirds. The northern fleets have proved receptive to electronic monitoring and we propose that electronic monitoring should be used for that fleet. The availability of electronic monitoring for trawl operations will assist CSP and MPI to evaluate the efficacy of EM for that fleet.
34. We do not consider continued observer monitoring of the Taranaki setnet fleet to be warranted or appropriate. Over 1000 days of fishing have been observed with no Maui or Hector dolphins seen or captured. In addition to the absence of dolphins, the practicality of a vessel sighting and following a dolphin while awaiting the arrival of a DOC vessel with a biopsy dart gun precludes any reasonable prospect of obtaining a biopsy sample. The programme is ineffective and does not provide a justifiable return on scarce resources.

INT2 Identification of Marine Mammals, Turtles and Protected Fish

35. We support the continuation of this programme. We consider that, while photographs may be able to establish the species, necropsy analysis of the captured animals can provide additional information critical to understanding the population and the mitigation of any fishing related risks.
36. Notwithstanding the risk assessment indicating an absence of adverse effect or risk thereof to most marine mammals, industry supports the continuation of this programme.
37. We do however seek some indication of whether CSP considers there to any merit in the retention on board and the landing of any additional small protected species, particularly Hector or Maui dolphins, where observers are not present on vessels and retention of the carcass is currently illegal.

POP2 Salvin's Albatross - Bounty Islands

38. Salvin's albatross ranks as the seabird with the second highest risk score but has significant uncertainty in respect of both population and demographic variables and incidental capture estimates.
39. Recent abundance surveys of the Bounty Island population have provided conflicting estimates from aerial and ground surveys. The divergence needs to be resolved to ensure integrity in future results. This will reduce the uncertainty in current abundance estimates. We also note the need for greater information on the foraging and at sea movements of Salvin's albatross. This will enable industry to better address mitigation options to reduce the catch of Salvin's albatross.
40. We support this project but would prefer to see a higher level of deployment of tracking devices to obtain a more robust pattern of at sea movements if work undertaken.

POP3 Auckland Islands Seabird Research

41. Gibson's albatross currently have the 8th highest risk score and white capped albatross the 7th highest. Both a median risk score of around .34 and a 95% confidence interval of 0.2 to 0.6.

42. Gibson's albatross has had recent declines in abundance and should therefore be a matter of concern. We have boosted the budget for this project to include aerial support for the white capped albatross abundance survey .

43. We support the project.

POP4 Antipodes Island Seabird Research

44. As discussed previously, we consider there is a need for an expert group to consider the position of the wandering albatross including the Antipodean Island albatross. We note that the population has declined significantly since 2006 but appears to have settled at the level that pertained prior to 2000. We note the concern raised in the work of Elliot and Walker in respect of population and demographic changes and consider those matters need to be firstly discussed and if appropriate researched in greater detail.

45. Given the declining population and the recent assessment that the population would continue to decline and notwithstanding that the Antipodean albatross has a risk score of 0.2 and a 95% confidence interval of 0.1 to 0.36, we are in support of this project (qualifications regarding funding below). However, we would like to propose that the project be extended to include the deployment of trackers on young birds and female birds to provide some better indication of the movements of these birds.

46. It has also been suggested that a dietary analysis be undertaken. We would support that extension.

47. We see the trip to the Antipodes Islands as focusing primarily on the Antipodean albatross. We could only support the additional work proposed for the estimate of population numbers of the white chinned petrel and the Northern giant petrels if time permitted. If time is short, we would prefer to see the Northern Giant petrel work done in priority to the white-chinned petrel research.

48. As such, we would however not support this research being cost recovered from the industry given there is no adverse effect. We consider funding the research from the CSP budget provides a suitable contribution to the research which would otherwise need to be funded from the DOC Natural Heritage appropriation.

POP7 Sea-Lion Auckland Island Pup Count

49. While the New Zealand sea-lion was assessed as being at a low level of risk from commercial fishing, we would nevertheless be prepared to support this project and ensure that research scientists have a presence on the Auckland islands to undertake a pup count, undertake a pup rescue programme if required and collect material to assess the impact of klebsiella and other diseases.

MIT1 Protected Species Liaison

50. While we have completed the implementation of vessel mitigation plans on the surface longline fleet, we would like to see the programme continue for the next 2 years to ensure that the programmes are implemented appropriately on vessels and an outreach process is available for vessels in the event of significant seabird captures. We would also like to take the opportunity to work with fishers on mitigation measures for turtles and sharks. We have become aware that the turtle captures may be more extensive than understood but that release procedures are less than optimal. We would welcome the opportunity to extend the programme into that additional area.

51. Industry has undertaken a programme to install vessel mitigation plans on all South Island trawl vessels. We would like to see that programme extended to provide an outreach facility for fishers and to extend the same programme into North Island trawl fishers. We would expect to work with the East Coast North Island fleet where we have an ongoing strong relationship with the fishers and then extend into the northern area. We recognise that the risk posed to seabirds from trawlers based on observer monitoring is significantly lower than in other trawl fleets but would support the programme on the basis of completeness and the wider protected species coverage of the programme.
52. The experience of the last year has demonstrated the benefits of having liaison projects managed and provided by industry representatives. We wish to discuss with CSP the possibility of contracting industry services under a Memorandum of Understanding with DOC/MPI set objectives and KPIs rather than a tender process. This would necessarily report back to either DOC or MPI such that interested parties can be confident of the programme's delivery. We have been disappointed by the performance of other liaison officer projects and prefer to see an industry sponsored and provided approach to this programme.

New Project Common Dolphin Demographic Parameters

53. Common dolphins had the highest median risk score (median score 1.03, 95% c.i. 0.29 to 2.91) in the recently released marine mammal risk assessment. They also had the highest level of uncertainty in the population estimate of all small marine mammals with a co-efficient of variation of 0.33. We consider that the Marine Mammal Risk Assessment indicates that additional:
- a. Research to obtain a more robust estimate of the population of common dolphins; and
 - b. Observer monitoring to provide a more robust estimate of potential fatalities
- are the appropriate management response to the risk score.
54. We note that MPI has a research proposal into demographic parameters for the common dolphin and will focus observer coverage in fisheries with high (or were once high) common dolphin interactions. We consider it is more appropriate that CSP fund the population research to reflect their role as manager of protected species and MPI focus on the provision of observer services. Accordingly, we have proposed a new project for 2017/18.

Summary

55. In summary, rather than disperse the available funding between a range of research projects, industry would favour concentrating the effort on the following strategic issues:
- a. Implementing effective vessel mitigation plans on all inshore surface long line and high risk trawl vessels;
 - b. Establishing a strategic approach to the management and development of a Threat Management Plan for wandering albatross (Antipodeans and Gibson's);
 - c. Resolving the conflicting population estimates for Salvin's;
 - d. Continuing sea-lion pup counts comparable to previous work; and
 - e. Addressing uncertainty in the common dolphin risk score noting improvement in capture rates in the JMA fleet.
56. Our preference for the 2017/18 CSP programme would be as follows:

| Project | Description | Estimated Cost |
|----------------|---|-----------------------|
| INT1 | Observing commercial fisheries – for inshore focus on SLL and inshore trawl | \$1,100,000 |
| INT2 | Identification of Marine Mammals, Turtles and Protected Fish | \$15,000 |
| POP2 | <u>Salvin’s Albatross - Bounty Islands</u> | \$150,000 |
| POP3 | Auckland Islands seabird research | \$225,000 |
| POP4 | Antipodes Island Seabird Research | \$150,000 |
| POP7 | Auckland Islands – Sea-lion Pup Count | \$100,000 |
| MIT1 | Protected Species Liaison Project – SLL and inshore trawl | \$100,000 |
| NEW | Population Estimate – Common dolphins | \$150,000 |
| | Existing commitments | \$300,000 |
| | Administrative Overhead | \$120,000 |
| | TOTAL | \$2,410,000 |

57. The principal change is the re-direction of resources to the wandering albatrosses and the implementation of protected species mitigation plans on inshore SLL and trawl vessels.

58. We consider that the above research programme would have more beneficial conservation outcomes than that proposed initially by CSP.

PROJECTS NOT SUPPORTED

59. We are unable to support the following proposed programmes. In most cases, the absence of an adverse effect or the risk thereof disqualifies the projects from being considered for funding as conservation services. For some project, whilst we might see value in the outcomes for protected species management purposes, we consider they ought to be funded from the wider DOC appropriation for Natural Heritage.

INT3 – Supporting the Utility of Electronic Monitoring

60. While we support the need for an evaluation plan for the efficacy of electronic monitoring for CSP purposes, we cannot support the project as proposed. Given that the functionality and performance standards for electronic monitoring systems have yet to be defined, we consider it is premature for the development of tools and training materials in 2017.

61. MPI has been unable as yet to provide industry with any information on the policy, capability or capacity of this concept and has not yet received any Cabinet approval or funding for the proposal. It would be premature to initiate the development of tools and training procedures until the concept is approved and the capability of the system established.

62. In addition, we cannot see how CSP is able to draw a connection from an electronic monitoring system to the existence of adverse effect.

INT4 Post Release survival of white pointer sharks

63. The project is provisionally scored by CSP as being the 6th equal highest ranking project.

64. While we have not seen the report and recommendations from INT2016-03, we opposed the project in 2016 on the basis of there being no adverse effect and the operational impracticality (the vast amount of technician time required at sea to tag a suitable sample size of live GWS) of the project. We see no reason to change our opinion on those matters.
65. In the shark risk assessment, great white sharks were assessed as having risk score of 12, equal to the lowest ranking QMS sharks species (blue shark) and 34th equal of all 85 species assessed. In their conclusions of the assessment⁵, the expert panel stated:

“No consequence score greater than 4.5 was allocated (out of a maximum possible of 6) because available information did not suggest that commercial fishing is currently causing, or in the near future could cause, serious unsustainable impacts (the description of a score of 5 for total consequence)”.
66. The panel achieved consensus on the scoring but were not entirely confident that all captures were reported. We do not consider that commercial fishing poses an adverse effect, or risk thereof, to great white sharks.
67. We are not convinced as to the practicality of the research and the level of tagging events needed to provide robust estimates of survivability.
68. We are not of the view that CSP activity should in any way be influenced by or be related to the NPOA sharks. Although the NPOA contains a request for additional shark research, that request needs to be conditioned by the existence of adverse effect and the need for the work from a fisheries management perspective. Neither of those factors necessitates the work being undertaken by CSP as a priority.
69. We consider that a more appropriate response to the risk assessment would be to ensure quality reporting and then assess the need for any further research, such as survival rates. Moving to research survival rates at this time would be premature.

POP5- Campbell Island seabird research

70. This project is ranked number 15 by CSP.
71. While there is uncertainty as to the population of the Campbell Island albatross and Northern giant petrel, the uncertainty is no worse for the species than most other species in the risk assessment. The Campbell Island albatross has a median risk score of 0.08 (95% c.i. 0.04 – 0.18) and a probability of the APF exceeding the PBR at a recovery factor of 0.1 being 27% and Northern giant petrel having a median score of 0.14, a 95% confidence interval 0.03 to 0.47 and a 0.1 recovery percentage of 43%. Those estimates do not support any assertion that the birds are at risk of an adverse effect from commercial fishing.
72. We concur with the project having a low ranking and do not support the project for 2017/18.

POP6 Indirect Effects on seabirds in North East North Island

73. While we have not seen the results of INT2016-04 and understand the situation concerning red-billed gulls, the absence of adverse risk from the fishing sector means we do not support this project.

⁵ Ford, R.B.; Galland, A.; Clark, M.R.; Crozier, P.; Duffy, C.A.J.; Dunn, M.R.; Francis, M.P., Wells, R. (2015). Qualitative (Level 1) Risk Assessment of the impact of commercial fishing on New Zealand Chondrichthyans. New Zealand Aquatic Environment and Biodiversity Report No. 157. 111 p.

74. The indirect effects of fishing activity on seabird populations and in particular dietary impacts is becoming widely advocated as a source of concern and the basis for research proposals. However, we have yet to see any robust or authoritative research linking fishing activity and dietary impacts that substantiate the claims and there are documented examples where such hypotheses have been disproved. Until that linkage is proven, we oppose the claim that an adverse effect exists and that such projects should be undertaken by CSP.
75. However if DOC considers that such projects are appropriate and necessary to underpin their management of seabirds, then it is entirely appropriate that they should fund the research from the appropriation to Natural Heritage.

POP8 New Zealand Fur Seal – Bounty Islands

76. This project ranks number 16 in CSP's provisional rankings.
77. The New Zealand fur seal scored 7th highest in the marine mammal risk assessment with a median score of 0.4 and a 95% confidence interval of 0.2 to 0.6. Industry considers that the population estimate used in the assessment is very conservative. Any increase in the population would only serve to lower the risk score.
78. There is evidence that industry has reduced fur seal captures over the last decade as a consequence of reduced trawl activity and the adoption of mitigation measures to reduce captures. 2014 represented an aberration with a high catch of fur seals by one vessel. That has been addressed.
79. While improved information on the abundance of fur seals would support the industry's view of the current risk assessment, the benefits of the research would only marginally improve the abundance estimate and is therefore not warranted.
80. There is no evidence to suggest that fishing in New Zealand has an adverse effect and industry cannot support the project.

POP9 New Zealand Fur Seal – Cook Strait Habitat Use

81. This project ranks number 14 in CSP's provisional rankings. See POP8 above for our comments re the absence of adverse effect for fur seals.
82. While we understand the interest in understanding the foraging patterns of fur seals in the Cook Strait region for the management of the colonies in the vicinity of Cook Strait, we cannot support this project for CSP in 2017/18.

POP11 Age and Growth of Protected Corals

83. Existing research demonstrates that corals are not at risk of adverse effect from commercial fishing. We therefore concur with the low priority ranking of this project and cannot support it being undertaken in 2017/18.

POP12 Cold Water coral connectivity

84. As per the previous project, cold water corals are not at adverse effect from fishing and in the absence of adverse effect we cannot support this project.

MIT02 Characterisation and development of offal management for small vessels

85. While we recognise that offal and small fish are an attractant for seabirds to small vessels, most small New Zealand vessels are known to treat the disposal of offal with care so as not to place seabirds at risk.
86. We are in the process of establishing vessel management plans for the South Island inshore trawl fleet and in 2016 have covered approximately 88% of that fleet. We wish to complete the project and will look to extend that programme into the North Island fleet next year. The cost of the South Island trawl fleet initiative is being borne only by Southern Inshore members at present. Undertaking the project under CSP funding would ensure all quota holders contribute to the project and the project is adequately funded.
87. For 2017 and 2018, we favour the implementation of existing mitigation measures on all vessels as a priority over further research. If the current measures are shown by observer monitoring to be inadequate or are capable of significant improvement, then we would review the offal management options. However, we do not support that research at present.

MIT03 Mitigation of Fur Seal Captures

88. This project is provisionally ranked 6th in the provisional CSP rankings.
89. We note that there has been a significant reduction in the capture of fur seals by the New Zealand fishing industry in the past decade as a result of decreased trawl efforts and measures put in place to reduce captures. These measures have included removing stickers from nets, move on rules, avoiding setting when seals are actively present, reducing time when the net is on the surface, and reducing the number of turns in a tow.
90. It is unlikely that analyses of observer records will add to current knowledge, the MPI seabird trawl net capture project has highlighted the problems with this approach.
91. The New Zealand fur seal scored 7th highest in the marine mammal risk assessment with a median score of 0.4 and a 95% confidence interval of 0.2 to 0.6. Industry considers that the population estimate used in the assessment is very conservative. Any increase in the population would only serve to lower the risk score.
92. As noted in the comments for MIT02, industry is implementing mitigation programmes in all inshore trawl vessels and this will include mitigation of the capture of fur seals and safe release of any captured seals.
93. We consider commercial fishing does not pose adverse effects to the New Zealand fur seal population. Industry is well aware of mitigation options for the reduction of fur seal and reviews its operating procedures on a regular basis.
94. We cannot support this programme.

MIT4 Dolphin Interactions with trawl fisheries

95. While common dolphins had the highest risk score in the recent risk assessment for marine mammals, industry has already moved to ensure better performance in the avoidance of the captures of common dolphins. This can be seen in the reducing capture rates of the more recent past.
96. Current mitigation measures include not shooting of gear when dolphins are present, using dolphin dissuasive devices (acoustic deterrents), avoiding shooting nets during the early hours of the day, turning with nets closed and a reduction in the tow times of nets and quicker hauling of nets.

97. As part of the programme to implement vessel mitigation plans on all inshore trawl vessels, industry is already expressly addressing the issue on smaller vessels. There is no need for the project at this point in time.
98. If monitoring and risk assessments indicate that a problem still exists with mitigation plans in place, then it would be appropriate to review mitigation options. However at this stage, industry favours implementing mitigation plans to actively reduce captures rather than investing in additional research as to mitigation options.