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Dear Ian

DRAFT CSP PROGRAMME 2021-22

1. Fisheries Inshore New Zealand Ltd (FINZ) and Deepwater Group Ltd (DWG) represent the majority of quota-owners and operators in the finfish sectors of the NZ commercial sector.
2. Both organisations are committed to working with our members to mitigate the effects of our fishing activities on the environment including, in particular, protected species. We have ongoing programmes with our fleets and a history of innovation to improve the effectiveness of the measures applied on boats. Aligned with these as stated previously we have a history of both constructive criticism of proposed CSP projects and, equally, support for relevant and deliverable workstreams that will materially reduce risk or our knowledge of risk. In particular, we believe research or monitoring must feed directly into extant risk assessments or other such processes or significantly change what we know and can therefore change what we implement if required. The focus at all times must be the reduction of material risk to protected species. With only a limited budget available, we consider the programme must focus on maximising conservation value.
3. The Department of Conservation has sought feedback on the draft CSP programme for 2021-22. Fisheries Inshore New Zealand and Deepwater Group have attended the planning meetings and provided submissions on projects in the preparation of the programme.
4. We advocated in previous submissions that DOC needed to shift the emphasis to mitigation and species at risk consistent with the purpose of the Conservation Services Programme. We maintain that opinion.

Lack of Strategic Plan

5. We have raised the lack of a strategic plan for protected species populations on a number of previous occasions and disappointingly note again the absence of any development in that domain.
6. A strategic plan would allow CSP to identify the research to be undertaken in this and coming years and preclude the annual need for the unseemly scramble for funding by research providers.

Nature of Research

7. We have raised previously our concern relating to the funding of population projects. Disappointingly, this year contains eight new population projects at the expense of other more mitigation-based research. While we recognise the individual project expenditures are not large, it is nevertheless funding that could have been spent on mitigation projects with greater conservation value and more conservation benefit to protected species.

The Draft 2021-22 CSP Programme

8. We support the use of new funding available to the CSP Programme being directed toward mitigation projects but would prefer to see more funding in that area.

Observer Programme

9. CSP have been unable to provide information as to the observer programme for the coming year. We are aware that the cost of an observer day has increased markedly as a consequence of the MPI settlement with observers in respect of pay and conditions. If CSP is to stay within its historical budget range of \$2.5-\$2.8 million, there will need to be reductions to the number of days of observer coverage.
10. In the inshore and HMS sectors, observer services primarily undertake protected species interaction activities. With cameras installed on vessels operating on the west coast North Island fleet and with cameras to be implemented for the east coast South Island fleet, observer resources could be better applied to areas of risk. We see those as including the Kaikoura fleet, the South Coast South Island trawl fleet and the surface long line fleet. In respect of the SLL fleet, we would like to discuss the use of the observers to provide additional information on the fishing practices and protected species interactions as the basis for reviewing mitigation measures. FINZ would like to be engaged in the development of the observer programme.

Interaction Projects

11. We agree with the projects related to the identification of by-catch including seabirds, marine mammals, corals and reptiles and the review of interactions with turtles particularly as they seem to be increasing. Climate change might see an ongoing increase in turtle interactions and industry wishes to be prepared for further interactions with appropriate mitigation measures.
12. We have no interest in the collection and curation of tissue samples from protected fish species and turtles. We consider this to be preparatory for taxonomic research with no nexus to the CSP focus of mitigation. The project should not be financed from the CSP budget but if it is to be so funded, it should not be cost recovered.
13. With respect to protected corals, we agree with the premise that *'there is a lack of data on the status of protected coral population in New Zealand'*, however it is difficult to agree with the premise that the *"limited number of taxa that have a conservation classification"* as a reflection of this – when the rationale is predicated on the gathering of *"information to determine their threat status."* It is evident that the lack of information is so vast that it is not even possible to ascertain whether the taxa of interest are threatened at all. It is well understood that for the most part the majority of information that is known about protected corals is fishery related information. Information known about the biomass, distribution, abundance and extent of protected corals in areas that are not fished is not well understood.
14. Until coral baseline work is undertaken that provides requisite understanding of key species in non-fished areas, work that is independent of the CSP program, it is not possible to know whether fishing interaction is having an adverse effect at the habitat or population level. Nor can we understand how best to understand the nature of the interactions with a view to minimising or mitigating them. It would follow then that of highest priority would be a project that supported the taking of an inventory of protected corals distribution in the New Zealand Waters outside areas commercially fished.
15. It is also noted that the CSP Research Priorities for New Zealand Protected Corals are categorised into 3 study areas;
 - a. Interaction Studies,
 - b. Population Studies, &
 - c. Mitigation Studies.

are all prioritised as either Medium-High or High, this implies that at least in order of priority they are concomitant in terms of operational status. Again, this is difficult to support entirely. It would be better to see projects and topics prioritised in a linear context where each project is dependent on extant data (or indeed requires more data). We note that current legislation

requires reporting of interactions with protected species including corals, and that monitoring of the nature and extent of these interactions is ongoing.

16. Fisheries New Zealand is investing significantly in coral distribution and by-catch research. We need to see a co-ordinated research strategy from the two organisations to be able to assess the worth of the proposed research.
17. We cannot agree with the decision to fully cost recover the coral and turtle related research. While the research is focused on commercial fishing impacts, there has been no assessment that commercial fishing constitutes an adverse risk to either corals or turtles.¹ Until that risk is assessed and proven, cost recovery levels should be held at 50%.

Population Projects

18. We consider that funding for population projects is still excessive.
19. Whilst we note the importance of continuing to monitor Auckland Island sea lion pup production, we do not accept that commercial fishing should continue to be levied for 90% of the cost of the field work. The risk assessment has demonstrated that commercial fishing is not having an adverse or indeed even a significant effect on the Auckland Island sea lion population. With a high level of observer coverage, industry is paying an excessive amount for monitoring the sealion population. We consider the cost recovery level for the pup count should be decreased to 50% or less.
20. Of concern to us is the use of the CSP budget for research of a population nature for species which are not at significant risk from commercial fishing. Activities such as the age estimation of great white sharks, fur seal population estimates, black petrel survival and juvenile return rates and the cause of low burrow occupancy rates for Westland petrels should be financed from other DOC appropriations and not CSP.
21. We are particularly concerned with the lack of an agreed strategy in respect of Black Petrels. Black Petrels have featured annually in CSP programmes but there has been little progress achieved in identifying and recognising the changes in the commercial fishing pressures through this programme. Industry has led a number of developments to provide better and lower estimates of the level of captures, which have still not been incorporated into the broader assessment of commercial fishing risk to Black Petrels. Notwithstanding those results, DOC continues to pour and cost recover a disproportionate share of its resources into research relating to Black Petrels. We acknowledge that black petrels remain the highest risk scoring seabird but that does not of itself justify ongoing research.
22. We wish to see an independent review of the black petrel research to date, a review of the population modelling and the development of a research strategy, informed by a management strategy, to provide a comprehensive resolution of population modelling for black petrels. Until that review is completed, research into Black Petrel population issues should be funded from other DOC appropriations rather than drawing needed resources from CSP.

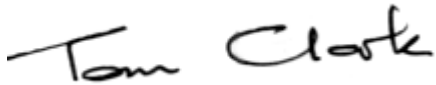
Mitigation Projects

23. We continue to support the protected species liaison programme but are concerned that CSP has focused the project to have input outcomes and have lost the focus of the programme to be to reduce protected species captures. We request that the principal stakeholders – FNZ, CSP and industry – have a candid discussion on the strategy and performance of the programme.
24. We agree that there appear to be issues in the surface longline fleet for the uptake of the hook pods. If the project is going to be undertaken, we request that a project sponsor group with CSP, FNZ HMS and FINZ be established to ensure the project provides informative and constructive outcomes.

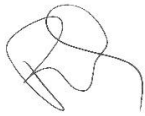
¹ The Western Central Pacific Fisheries Commission (SC05 2009) reviewed an assessment of risk posed by New Zealand fishing vessels and determined that New Zealand fishers posed a minimal risk to sea turtles.

25. We can support the concept of a workshop with fishers and experts to assist methods to increase the sink rates of the bottom longline sector. However, we believe there would be greater value in re-thinking the framework of appropriate seabird mitigation for the bottom longline sector.
26. We are concerned by the absence of funding for field research for Dolphin Dissuasive Devices and trialling dolphin tagging although we understand DOC is to trial the use of suction cup technology to obtain additional data on dolphin behaviour.

Yours



Tom Clark
Policy Manager
Fisheries Inshore New Zealand



Richard Wells
Deepwater Group Ltd