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COMMENTS ON FISHERIES RESEARCH LONG LIST

1. Fisheries Inshore New Zealand (Fisheries Inshore) thanks you for the opportunity to comment on the long list of possible Fisheries New Zealand (FNZ) research proposals for 2023/24.
2. While we appreciate the opportunity to comment, we note there are some 128 projects in the longlist and that on average less than 50 new projects are commissioned each year and the amount of funding available for new projects totals around \$6m, the remainder of the research funds committed to existing projects.

Research Group	Number of Listed Projects
Aquatic Environment	54
Cross-Area Research	4
Deepwater	11
Highly Migratory Species	4
Inshore Eel	2
Inshore finfish	25
Inshore Shellfish	14
Recreational	10
Shellfish	4
Grand Total	128

Research Funding Inadequate

3. Fisheries Inshore is on record as recommending a greater spend on research services. We repeat that comment.
4. We believe that an excessive proportion of the funding available to Fisheries New Zealand is expended on Compliance and Monitoring relative to the need for science that underpins the

resource management objective of FNZ. Despite that issue being raised by all stakeholders – industry, stock management scientists, environmental scientists, environmental lobbyists and the Prime Minister’s Chief Scientific Adviser – the spend on research by FNZ continues to go backwards in real terms. We are doubtful that an effective resource management activity should be based on a \$67m spend on enforcement and compliance and a \$35m spend on science when the QMS is dependent on sustainability information. The enforcement budget will continue to rise as the operational costs of electronic monitoring, i.e. cameras, result in an additional annual enforcement spend of \$10m.

5. Industry’s preference would be for a reversal of the spend on enforcement and science on the basis that is better to have expenditure to set catch limits appropriate to the abundance levels of fish rather than have expenditure to enforce inappropriately set catch levels.

FISHERIES NEW ZEALAND APPROPRIATIONS 2018/19 to 2022/23						
\$million						
Activity	2018/19	2019/20	2020/21	2021/22	2022/23	2018-23 % Increase
Policy Advice	12.02	13.72	9.73	6.94	8.25	-31.4
Sustainability Research	30.37	32.13	33.65	35.26	35.8	+17.8
Enforcement	39.24	45.32	49.63	56.32	65.36	+66.6
Fisheries Management	13.62	14.73	13.62	12.82	12.96	-4.8
Total	95.25	105.9	106.63	111.34	122.37	+28.5

Lack of Strategic Approach

6. We have commented in the past as to the lack of a strategic focus for FNZ. The formation of an appropriate and prioritised research programme requires a current strategic plan / vision statement, a statement of priorities, strategic and management plans to be in place. The Inshore Finfish Fisheries Plan has just been released after two decades in the making. No research or business plan has been released to give effect to the Plan. We have seen a draft research plan for the Benthic Environment activity. There are no strategic plan / vision statement, a statement of priorities, strategic and management plans in place for the protected species activities and no accepted research plans for those activities. We are continually advised that such documents are under preparation and have seen some draft material for those activities, but none have seen the light of day to engender any confidence that FNZ is properly focused on management of the New Zealand’s fisheries resources and is not an ad-hoc, reactive organisation.
7. Stakeholders have no statement as to the resource management priorities of Fisheries New Zealand. Without a strong strategic and structured approach to the application of resources, the resources available to FNZ are seemingly distributed thinly to satisfy appearances of research spread but at the cost of achieving progress towards FNZ being an effectively operating resource manager. The creation and existence of strategic documents and stated priorities

would provide some discipline in the application of FNZ research resources and avoid the bidding processes of research providers as currently occurs.

8. The management of the inshore fisheries is handicapped by the absence of comprehensive information as to the catch and the stocks we fish. The advent of cameras or electronic monitoring on inshore vessels has the potential to significantly increase the volume of data and information for the management of fishstocks in the inshore fishery. We have expressed our deep disappointment that there is no workstream to realise any research benefits from the implementation of cameras. We can see a future where the footage from the cameras on the vessels can be used with Artificial Intelligence technology to provide improved information on our catches, our returns to the sea and cameras being installed in processing facilities to capture information on the retained catch. We would like to explore that avenue with Fisheries New Zealand.
9. Fisheries Inshore has previously voiced its concern over the lack of clarity and the overlap that exists between FNZ and the Department of Conservation (DoC). While FNZ is limited in its funding, so too is the DoC funding available for marine protected species. In our opinion, information on the abundance and population characteristics of marine protected species should be funded from the mainline \$400m DoC appropriation for Natural Heritage and the Conservation Services Programme (CSP) funding of \$3m confined to interactions and mitigation research. Equally, we see FNZ's role in the aquatic environment sector as relating to fisheries impacts rather than baseline population and demographic research. On occasions, we have seen an overlap and replication of projects between FNZ and CSP and suspect that FNZ funding is used as a contingency for limited CSP funding. One output of considering a strategic approach to FNZ research activity would be to confirm the roles of the two parties in any aquatic environmental research.
10. Fisheries Inshore would like to discuss further with you as the incoming director the need to address this void and provide a strong strategic underpinning and the grounds for increased funding in research activities. We recognise the research function is a supplier of information to the fisheries managers and would want to see them adopt a higher profile in resource planning activities to underpin their operational roles.

Comments on Sector Research Priorities

11. To provide context to the comments on individual project proposals, we consider it appropriate to provide our perspective on the priorities for the different research groupings. Our comments on individual projects follow. We have made no comments on stocks for which we have no mandate or aquatic environment projects relating principally to the deepwater sector.

Inshore Finfish

12. There is no and never has been an Inshore Finfish Fisheries Plan. A draft plan was consulted in 2010 but not finalised. A plan has been in preparation for the past five years but has yet to be provided for feedback. While a Medium Term Research Plan was constructed by the fish stock scientists, it has little context and little influence on what research is undertaken.
13. Using the draft fisheries plan as a guide, Fisheries Inshore can see a future research strategy for inshore finfish stocks focused on a five-year rolling programme of independent trawl surveys in:
 - i. FMA1 North Island,
 - ii. FMA2 North Island,

- iii. East Coast and South Coast South Island
- iv. West Coast and North Coast South Island
- v. West Coast North Island

for the target stocks with CPUE or catch based analyses in the intervening years and stock assessments/CPUE analyses for the longlined and setnet stocks.

14. We need more regular monitoring and assessments of our inshore stocks, particularly those in the North Island where trawl surveys are not regularly undertaken. We are keen to discuss with fisheries managers and stock scientists how stocks can be more regularly assessed, e.g. raw CPUE or catch trends, to provide triggers for early management interventions.

Aquatic Environment

15. Our assessment is that the priority area for research is related to the impacts of fishing activity on the benthic environment.
16. There has been increased expenditure in assessing the risk to the benthos and, while this is currently focused on the impact on corals, there is a wider need to assess the level of impact of mobile bottom contact gear on soft sediments. We note and support the 2022 research project on re-suspension effects. Fisheries Inshore will be undertaking an inventory of bottom trawling and Danish seining to improve our understanding of benthic impacts. For the inshore, the area of interest is to understand the nature of the habitat impacted. Estimates of overall trawl footprints are important in the wider scheme but increasingly we are facing claims for exclusion at finer spatial scales. The focal point is normally protection of reef biodiversity. The need is to know and be able to demonstrate the habitat where bottom contacting fishing occurs. We are aware of the absence of fine resolution detail on the benthic habitat but do not see that as being eligible for FNZ research funding. We would support any push for more detailed mapping to be obtained. Fisheries Inshore is not happy with the use of modelled benthic habitats where management interventions are planned.
17. The seabird risk assessment process needs to be stabilised. We face ongoing methodology changes, which preclude being able to use the assessments to monitor any progress in mitigation performance. We do not see the need to provide improved website and accessibility of the assessments drawing on limited research funds. As indicated earlier, we view the provision of population and demographic information to inform assessments we consider to be a DOC activity. We would not see the fisheries risk assessment needs annual updating as any changes in risk profiles take time to be reflected in the duration of capture history.
18. On the face of the assessments, there is no particular pressing need for further research related to the risk of fishing activity on marine mammals or sharks. The risk to the most at risk mammal species – Maui dolphins, Hector dolphins and sealions – has been mitigated below material levels and further research is not warranted while funds remain limited. No sharks are assessed as being at material levels of risk from fishing and expenditure is not warranted notwithstanding calls for research from the National Plan of Action for Sharks. Undertaking research with limited funding to maintain appearances in the absence of critical adverse risk is not warranted.
19. Climate change remains an area of increasing interest to all. Monitoring the impact of climate change on ocean environments should be the domain of the Ministry for the Environment, not FNZ. Monitoring how fishstocks react to such change is within the ambit of FNZ but the strategic poser is with a QMS that can allow for changing abundance and distribution of species do we

manage to the outcomes or try to assess the potential impacts before the outcomes result. For mobile stocks, the impacts outcomes may be less disruptive than sessile species.

20. We note a number of projects included in the Aquatic Environment projects which are focused on aquaculture issues. Given the level of Government support to that sector, we see no justification for any research related to aquaculture to be funded by Fisheries New Zealand.

Overall

21. Fisheries Inshore agrees with the majority of research funds being spent on fish stock sustainability research compared to aquatic environment research.

Regards

A handwritten signature in blue ink, appearing to read 'Laws', with a long horizontal flourish extending to the right.

Laws Lawson
Fisheries Inshore NZ