

26 April 2016

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

Dear Mr Sanson

**DRAFT CONSERVATION SERVICES PROGRAMME
2016/17**

1. Thank you for the opportunity to consult on the draft Conservation Services Programme (CSP) for 2016/17.
2. Fisheries Inshore NZ 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 behalf of its quota owners, fishers and affiliated Commercial Stakeholder Organisations (CSOs). As part of that work it will also work collaboratively with other industry organisations and SREs, Seafood New Zealand, Ministry for Primary Industries (MPI) and Department of Conservation.
3. 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.
4. FINZ works closely with other commercial stakeholder organisations that focus on regional and operational issues, including the Northern Fisheries Management Stakeholder Company Ltd, Area 2 Inshore Finfish Management Company and Southern Inshore Fisheries Management Company, which are the mandated organisations for the management of the regional fishstocks as well as Deepwater Group Ltd where there is overlap in issues.
5. Deepwater Group Limited (DWG) is a non-profit organisation that works in partnership with the Ministry for Primary Industries to ensure that New Zealand gains the maximum economic yields from their deepwater fisheries resources, managed within a long-term sustainable framework.
6. Their mission is to optimise the sustainable economic value of our deepwater fisheries. Their vision is to be recognised as the best managed deepwater fisheries in the world.
7. They represent participants in New Zealand's major deepwater commercial fisheries, including hake, hoki, jack mackerel, ling, orange roughy, oreos, scampi, southern blue

whiting and squid. Shareholders of Deepwater Group hold around 96% of the entire deepwater fish quota in New Zealand.

Our Concerns

8. Our concerns in this matter relate to:
 - a. The failure to demonstrate adverse effects or risk of adverse effect;
 - b. The failure to use latest information available; and
 - c. The failure to evaluate existing data and information.

Failure to Demonstrate Adverse Effect

9. We have raised this matter for at least the last decade and have yet to see the Department formally and properly address the issue. The proper interpretation and application of the legislative intent for CSP underlies industry's submissions and concerns with the CSP programme. CSP will be aware that wider fisheries service cost recovery is under review and CSP cost recovery will be included in that review.
10. We request that you provide a fulsome response to the issues raised to ensure FINZ understands DOC's perspective and to allow FINZ to consider its options to resolve this issue.

Legislative Scope of Conservation Services

11. In general, industry has no issue with the principles of cost recovery as set out in section 262 of the Fisheries Act. The principles provide a well-balanced rationale for cost recovery and are related to the interests of the commercial fishing sector as both a beneficiary and risk exacerbator. The CSP programme specifically relates to the adverse effects on protected species, posed by commercial fishing.
12. Section 2 of the Fisheries Act defines conservation services as outputs in relation to the adverse effects of commercial fishing on protected species. While conservation services are defined in section 2 of the Act to include:
 - 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,section 262 of the Fisheries Act applies to both fisheries and conservation services and 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.
13. It is thus possible that some services that DOC seeks to fund through cost recovery are not cost recoverable under section 262 as they do not meet the definition of a conservation service in section 2 of the fisheries Act. . It is not sufficient for DOC to seek to recover its costs merely because that work relates to a protected species and DOC undertakes an activity in respect of that species. In all instances, an adverse effect must be demonstrated and the decision must be consistent with section 262.

14. The 2002 review by the Office of the Controller and Auditor General under section 18 of the Public Audit Act 2001¹ concluded that DOC needed to “*provide clear justification of the relationship between a research project and the effects of commercial fishing on the particular protected species, and the levy associated with the research*” p10 of that report. In discussion of the matter, the report refers to the need for evidence, rather than beliefs or assertions. In order for cost recovery to be justified, a transparent and informed case needs to exist that an adverse effect exists. Cost recovery is not otherwise justified.
15. While adverse effect is not defined in the Fisheries Act, the term needs to be viewed in the context of the long-term viability of protected species. That analysis must be based on the impact on the population, not an individual within that population. Our position is that an adverse effect occurs only when there is a decrease in, or a compromising of, the long term viability of a protected species population. If DOC has an alternative position on this matter, they need to advise that position and the basis for that position.
16. While we accept and endorse the principles of cost recovery as legislated in the Fisheries Act, we cannot accept the legality of some provisions of the Fisheries (Cost Recovery) Rules 2001. As secondary and enabling legislation, the rules cannot extend cost recoverability to activities beyond the scope and nature of the provisions in the Fisheries Act, the primary legislation. To do so is ultra vires.
17. For this reason, the definition of “Research relating to the protected species population” contained in the regulations is invalid in that it seeks to validate research required or carried out in the interests of effective management of protected species – a reflection of the general public interest in population management, rather than demonstrating an adherence to the adverse effect criterion.
18. For this reason, we also consider the cost recovery formulae as set out in items 2 and 3 the Schedule to the Cost Recovery Regulations are invalid. Cost recoverability relates to adverse effect from commercial fishing. In some cases the effect of human intervention may not be adverse, for example the risk to common dolphins, bottlenose dolphins, fur seals, may be assessed as negative but since none of those species are subject to an adverse effect (in Fisheries Act terms) from human intervention or more particularly from commercial fishing, cost recovery of any DOC research expenditure on those species is not legal.
19. There may be occasions where there are no adverse effects from commercial fishing but industry might wish to voluntarily support the funding of projects in the wider public interest. These are consented to on a specific basis and should not be taken as precedent setting.

Use of Risk Assessments

20. In the context of protected species management in New Zealand, risk assessments are increasingly being used to assess the direct effects of fishing on seabirds, sharks, marine mammals and corals. New Zealand uses a mixture of qualitative Level 1, semi-quantitative Level 2 and quantitative Level 3 risk assessments in respect of protected species. Risk assessments can serve to identify the level of risk to species from NZ commercial fisheries, the principal components of the risk, the sector assessed to be generating the risk and the components of the model to which the risk measure is most sensitive. These outputs can contribute to planning research activity. While we support a risk-based analysis, we are

¹ Department of Conservation, Administration of the Conservation Services Programme, December 2002

concerned that the risk assessments must be used in an informed and purposive manner, recognising the fundamentals and limitations of the risk assessments.

21. However, the risk assessments have tended to become the focus of research programmes. “Feeding the machine”, to address apparent data issues and achieve greater precision in assessments, has become more determinative of research programmes rather than the risk assessments contributing to an informed discussion of the real research needs.

Risk Assessments – Seabirds

22. A semi-quantitative Level 2 risk assessment providing a comparison of estimated mortalities and Potential Biological Removals (PBRs) has been undertaken for protected seabirds. This is supplemented by a number of Level 3 risk assessments for species with significant concerns and sufficient data to support higher definition evaluation.
23. We submit that the L2 seabird assessment provides very conservative (pessimistic) estimates of risk in that it:
- a. is fitted to data on captures, not fatalities, and thus provides an inflated assessment of the risk to seabirds from commercial fishing especially where as in some instances more than 50% of birds are released alive;
 - b. uses scalars for multiplying up captures to account for cryptic (unobservable) captures. Thus with the last two processes, one trawl net captured bird released alive results in two fatalities in the risk assessment
 - c. is based on N_{MIN} as against N even where accurate census data are available;
 - d. uses conservative assumptions for vulnerability where they are not specifically estimated from observed data;
 - e. is based on historical data and may not adequately reflect the impact of recent management measures in reducing fatalities or captures and current level of residual risk; and
 - f. fails to incorporate the outcomes of Level 3 population modelling where this has been undertaken.
24. We submit that the risk assessment methodology needs to address the above factors as a matter of urgency. It is also necessary for the L2RA to be recognised as pessimistic and whilst giving a reasonable and useable hierarchy of risk and priority, overplays actual population impacts. This is demonstrated for example by the L3 Assessments of Southern Buller’s albatross (Snare’s population²) and Westland petrels³ which whilst listed as high and very high risk in the L2RA are not deemed to be with more detailed analyses. A failure to consider and address these matters will impose unnecessary and unwarranted costs on commercial fishing.
25. We have raised with the Department the need to review the risk definitions used in the L2 semi-quantitative seabird risk assessment reports. Those definitions are critical to the interpretation of the risk assessments. In our opinion, the risk definitions used are very conservative to the point of being misleading. The methodology provides:
- a. estimates of the risk with an “ r ” or recovery factor of 1,

² D.Fu, P.Sagar, The 2014 demographic assessment of the Snares Islands population of Southern Buller’s albatross (*Diomedea bulleri bulleri*) New Zealand Aquatic Environment and Biodiversity Report No. 165 March 2016

³ Susan M. Waugh et al., Modelling the demography and population dynamics of a subtropical seabird and the influence of environmental factors, Ornithological Society Volume 117, 2015, pp. 147–164

- b. 95% confidence intervals about those estimates, and
- c. supplementary analyses with “r” equal to 0.5 and 0.1.

26. The current risk definitions are as follows:

RISK CATEGORIES - SEABIRDS		
Class	Range of Median Ratio of APF to PBR	Confidence Limit
Very High Risk	Median > 1	Upper 95%c.i. > 2
High Risk	0.3 < median <1	1<Upper 95%c.i. < 2
Medium	0.1 < median <0.3	0.3<Upper 95%c.i. < 1
Low		Upper 95%c.i. > 0.3

27. Our concerns relate to the definitions for high, medium and low and in particular to the use of the 0.3 and 0.1 thresholds and the failure to recognise the extremely conservative nature of the risk assessment methodology.
28. We have no significant problem with the thresholds for the top risk class. However, we cannot agree that a seabird species can be defined as being at “high risk” when the estimated median mortality rate will need to be increased by a factor of three times before the PBR is exceeded or a species could be at “medium risk” when the estimated median mortality rate will need to be increased by a factor of ten times before the PBR is exceeded. The description of the risk is disproportional to the increase required in the median mortality rate to exceed the PBR.
29. The key point in this analysis is that the categorisation of risk cannot be equated to an adverse effect just through the application of the risk class description. The existence of an adverse effect must be assessed in the context of the fisheries Act and while the Seabird Risk Assessment can usefully inform that process, the risk category cannot be determinative of an adverse effect..
30. We are aware of your contention that the risk assessment does not utilise an appropriate recovery factor for every species and in particular for those species that have been depleted. It is not correct to say that the risk assessment uses a recovery factor of 1 and omit any discussion of the impact of the calibration factor (ρ) and the use of N_{MIN} . Those inputs mean that this assessment deals with a “recovery factor” differently but no less effectively than a traditional PBR approach by adjusting the calculation of the maximum growth rate and total population size and ensuring that the population goals are met in the presence of environmental uncertainty. The primary estimates of the risks to seabirds provided with “r” set at 1 and the confidence levels for that estimate can be used as reliable but conservative indicators of the level of direct risk posed by the commercial fishing sector.
31. Any definition of risk needs to take into account the generally conservative nature of the current methodology and would need to be re-assessed if the methodology is significantly modified, particularly in respect of captures vs mortalities. A re-consideration of those thresholds is warranted and can be tested and calibrated against existing L3 assessments.
32. We would expect CSP cost recovery to be applicable only to its activities in the top risk species class where adverse effect is demonstrable. Should CSP wish to undertake projects related to species with lesser risk status, the project would not be cost recovered.
33. Furthermore, where Level 3 risk assessments have been undertaken, and indicate that commercial fishing is not having an adverse effect on a protected species, there should be

no cost recovery of further CSP activity on that species, notwithstanding the simplified L2 risk assessment indicator. That is not to say that DOC in its wider role as protected species manager should not undertake such research into the species as it deems appropriate for its species management role. That is entirely appropriate and is a matter for DOC to decide. However, that work should not be cost recovered from the commercial fishery and should be funded outside the CSP programme.

Risk Assessment – Marine Mammals

34. While PBRs have been estimated for Maui and Hector's dolphins and significantly more sophisticated model exists for sea lions (with international review), we are still awaiting the overdue provision of the semi-quantitative L2 risk assessment for marine mammals. We have long held reservations that a L2 assessment would not be possible for those mammals where demographic and distributional data are not available. We understand the Marine Mammal Risk Assessment is to be presented to the Aquatic Environmental Working Group on 31 May 2016.
35. With respect to Maui dolphins, we attach no credibility to the 2012 Currey risk assessment⁴. We maintain our assertion that the expert panel was biased in their estimation of risk, the information presented was incomplete, the distribution map of dolphins incorrect, the process was poor, the assessments of risks was not properly justified and the overall standard of the assessment was low.

Risk Assessment – Chondrichthyans

36. A Level 1 risk assessment for sharks, rays and skates has been published⁵. The Shark Assessment panel commented that *"The panel allocated intensity scores across the full range (1–6), based on fisheries capturing taxa over time periods ranging from decadal to daily, and over a spatial distribution ranging between less than 1% to greater than 60% of their range. 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)."*
37. We submit that there can be no assertion that commercial fishing poses an adverse effect or risk thereof to sharks, rays, skates and Chimaera species and therefore DOC cannot recover the costs of related research.

Increasing Reliance on Indirect Effects

38. We note that CSP is placing an increasing reliance on indirect effects of commercial fishing to support its research activities and cost recovery. For example, in the proposed programme, there are two projects targeting indirect effects:
- a. INT2016-04-04 Indirect Effects of commercial fishing on Buller's shearwater and red-billed gulls; and
 - b. POP2016-05 Yellow-eyed penguin foraging and indirect effects.

⁴ Currey, R.J.C.; Boren, L.J.; Sharp, B.R.; Peterson, D. 2012: A risk assessment of threats to Maui's dolphins, Ministry for Primary Industries and Department of Conservation, Wellington. 51 p

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.

39. While the first project is not proposed to be cost-recovered in that Buller's shearwater has a risk ratio effectively of 0 and red-billed gulls are not protected species, the second project is 50% cost recovered with yellow-eyed penguins having a risk ratio of 0.23, a c.i. of 0.1 and 0.6. At a recovery factor of 1.0, that corresponds to a 0.4% prospect of the risk ratio exceeding 1.0. at a recovery factor of 0.5, the prospect of the risk score exceeding 1.0 was 0.8%. Such a low probability of impact cannot reasonably constitute an adverse effect and as such the costs cannot be recovered.
40. The focus of both these projects is to assess using correlation or spatial overlap methods whether there are any grounds to assert indirect effects from fishing and then develop research projects which might further investigate any causal relationships. In neither instance is there any rationale and evidence that commercial fishing poses an adverse effect on the species. In the absence of that evidence, neither project should be cost recovered and in fact given more pressing issues should not be undertaken at all.

Responsibilities for Protected Species Interactions

41. We see the management of protected species interactions in the provisions of Fisheries Act, the Wildlife Act and the Marine Mammals Protection Act as being:
- a. The monitoring and verification of fisheries interactions with protected species is a general fisheries management role, and may involve a number of tools, including statutory reporting requirements and the work of the observer programme, both established under the Fisheries Act. The appropriate approach in particular fisheries is best addressed in Fisheries Plans;
 - b. If those interactions are not deemed to have an adverse effect on a protected species, no conservation service activity is permitted under the Fisheries Act in respect of those interactions.
 - c. If DOC can demonstrate that commercial fishing is having an adverse effect, they may under the conservation services programme:
 - i. initiate research into those effects if the effects are considered adverse and such a course of action is appropriate to defining management or mitigation of the effect;
 - ii. initiate research into mitigation of the adverse effects; or
 - iii. prepare a population or threat management plan.

However any such research must be related to the adverse effects of commercial fishing. It is the wider fisheries management responsibility under the Fisheries Act to implement and monitor appropriate measures.

Use of Electronic Monitoring

42. The plans for monitoring of protected species interactions are focused solely on the use of observers. We consider that monitoring should also take advantage of the benefits of electronic monitoring where it is suitable. Electronic monitoring offers the possibility of cost savings, continuous and comprehensive monitoring and the absence of health and safety issues.
43. Electronic monitoring is not suitable for all monitoring and observer functions but should be employed where the focus is the recording of protected species interactions. We recognise that observers placed on vessels for that purpose may also undertake other observer functions which could not be provided if electronic monitoring was to be used. Thus the deployment of EM needs to be objective(s) based, relevant to data required and able to

collect said data, and considers all other aspects of other data requirements and possibilities. Put simply, use EM where it can deliver robust information and it makes sense to do so.

PART II THE CSP 2016/17 ANNUAL PLAN

44. It is against the above framework that we provide our comments on the projects contained in the draft plan for CSP activities for 2016/17.
45. While we can support aspects of the plan, we cannot support the plan in toto. We do not believe the programme constitutes an effective and efficient spend of Crown and industry resources towards the better conservation of marine protected species. We have proposed alternative projects where we consider the proposed CSP draft plan is not preferred.
46. We have previously proposed that greater resources be applied to the implementation of protected species mitigation on the inshore and HMS fleets (e.g. training, outreach, improved tools). We would again advocate expenditure should be transferred to such projects rather than the projects as proposed by DOC.

Comments on Proposed Projects

47. The following table contains comments on the proposed observer coverage and specific projects. We have indicated those projects which we believe have merit to be implemented, and those which could be cost recovered.
48. We have not provided comments on the fishstocks for cost recovery in this submission but seek the opportunity to work through that matter directly around the table. Misallocation of costs has been an ongoing bugbear every year and a thorough reconciling of rationale and de-bugging the process would reduce friction and improve costs falling where costs should lie. We would prefer to work directly with CSP on the allocation to stocks once the projects have been finalised.

Programme	Observer Days	Stocks	Industry assessment
Setnet ECSI	There has been previous observer coverage from 2007 to 2015, which recorded a low level of captures of protected species. Commercial setnet fishing does not pose an adverse effect risk to any of the species in consideration – Hector dolphins, yellow-eyed penguins, fur seals and shags. Reliable Hector dolphin capture rates have been obtained from previous observer activity. The recent delivery rate for inshore observers is less than 25% of levied totals. Placement problems in recent past have not been overcome.		While the project should be scheduled at a lower level of observing consistent with the ability to deliver services, the previous observer activity and the risk assessments do not support a contention of adverse effect. Industry does not support the programme
Setnet SCSi	The SCSi setnet fishery has had previous observer coverage from 2006 to 2009 and recorded low captures of protected species. Commercial setnet fishing does not pose adverse effect risk to any of the species in consideration – white pointer sharks, Hector dolphins, yellow-eyed penguins, Fiordland penguins, bottlenose dolphins, fur seals and shags. The recent delivery rate for inshore observers is less than 25% of levied totals. Placement problems in recent past have not been overcome.		While the project should be scheduled at a lower level of observing consistent with the ability to deliver services, the previous observer activity and the risk assessments do not support a contention of adverse effect. Industry does not support the programme
Setnet WCSI	Over four and a half year's coverage, no Hector dolphins have been sighted or captured. Continued observer activity not productive. Electronic monitoring could reduce the cost to Government		Not supported
Trawl WCNI	Previous observation of the inshore trawl sector has not demonstrated an adverse effect to Hector dolphins. However the Maui population is at such high risk that monitoring is voluntarily supported by industry. Electronic monitoring would provide more cost effective coverage.		No adverse effect but voluntarily supported if camera coverage for MDO and protected species captures.
Trawl WCSI	Mitigation being deployed but the risk of interactions with white-capped and Salvin's albatross warrant monitoring.		Support as proposed but camera coverage would be the preferred option
Trawl ECSI	Mitigation being deployed but interactions with white-capped and Salvin's albatross warrant monitoring.		Support as proposed but camera coverage would be the preferred option
Trawl NENI Snapper	Companion to electronic monitoring programme. Focus on Black Petrel and SNX. .		The proposal is not supported and MPI needs to discuss the need with the SNA1 commercial group.
Danish Seine NENI	Focus on Black Petrel and SNX. An adverse effect is demonstrated by the risk assessment.		The proposal is not supported and MPI needs to discuss the need with the SNA1 commercial group
BLL - BNS	Focus on black petrel. An adverse effect is demonstrated by the risk assessment		Support as proposed but camera coverage would be the preferred option
BLL - SNA	Focus on Black Petrel and SNX. An adverse effect is demonstrated by the risk		Support as proposed but camera coverage would be the preferred

	assessment.		option
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NEW RESEARCH PROPOSALS				
Proposal	Title	Comments	Cost Recovery	
INT2016-02	Identification of seabirds captured in New Zealand fisheries	Needed to identify species for capture estimates – observers unable to conclusively identify in field. Not all seabirds captured are assessed to be at adverse risk from commercial fishing. However, we consider this to be a relevant project.	While not all seabirds are at adverse risk from commercial fishing, we voluntarily support the ongoing monitoring of the level of risk.	
INT2016-03	Post release survival of white pointer sharks in New Zealand setnet fisheries	The low risk assessment score indicates that fishing is not posing an adverse effect on this species. Prior research indicates only 17 WPS were caught in setnets over a twenty year period. The low number of captures mean the research is not likely to yield reliable or indicative data. DOC has not described what sample size (and predicted effort) will lead to robust result. We do not see the project as relevant to the management of marine protected species. Not relevant	We do not support cost recovery of the project but could support further research if an adverse effect can be demonstrated.	
INT2016-04	Indirect effects of commercial fishing on Buller's shearwater and red-billed gulls	The risk assessment demonstrates no adverse effect on Buller's shearwater (APF 10, PBR 14,800) or red-billed gulls. It is difficult to understand priority being given to this project regardless of funding source. We do not see this research as relevant	Not to be cost recovered	
POP2016-01	Seabird population research: Chatham Islands 2016-2017	Population estimates for range of species but not all species are at high risk. 50% cost recovered. Concerned that existing datasets eg Chatham albatross are not as yet analysed and yet further field work proposed to collect more information. Also concerned at anecdotal reports of ongoing harvesting of albatross pre-fledge chicks at sites in this region. The research is relevant.	Support but adjust stocks to remove SQU1J (see general comment above regarding allocation of costs to fishstocks and need for general review before this plan finalised).	
POP2016-02	Seabird population research: Auckland Islands 2016-2017	Population estimates for range of species but not all species are at high risk. 50% cost recovered. Pursuit of demographic data for whitecapped albatross (Plan A) is a waste of resources. The complete lack of acknowledgement of information from other long term demographic studies (eg black petrel, Southern Buller's and Westland petrel, and other extant yet unanalysed datasets (eg Chatham albatross) calls into question the motive for this work. Whitecapped census data should continue to be collected	While we can voluntarily support the project, we cannot do so for the pursuit of more demographic data for whitecapped albatrosses.	
POP2016-03	Updated basking shark bycatch review	While a protected species, commercial fisheries do not pose an adverse effect (RA score 13.5 – lower than QMS stocks). Reviewed in 2012. International literature review. We view the research as being relevant to fisheries.	We do not support cost recovery of the project but could support further research if an adverse effect can be	

			demonstrated.
POP2016-09	Cetacean habitat suitability modelling project	NIWA project already part funded from MPI –however we have not yet seen the MMRA results or the report which would allow us to understand whether a distribution problem exists. NIWAs work on TTR saw them achieving good fits when they tuned the analyses to existing distributions. Used 7 environmental variables but gave false positives. The bulk of the project seems to be a consolidation of distribution data of cetacean sightings rather than a predictive model of distribution. Risk of adverse effect to a limited number of species.	We can voluntarily support the project and could support further research if an adverse effect is demonstrated
POP2016-05	Yellow-eyed penguin foraging and indirect effects	YEP has low L2RA risk (score 0.23 with c.i. 0.1-0.6). New tracking data on foraging patterns – useful. No rationale or evidence of adverse effect	We support DOC undertaking work but not cost recovered.
POP2016-06	Salvin's albatross: Bounty Islands methodology development	Salvin's are the highest risk albatross, least tractable and affordable to study (logistics) and represented in incidental captures in a number of fisheries. Developing and agreeing a long term practicable methodology to monitor this population is required. Relevant.	We support DOC undertaking work but not cost recovered.
POP2016-07	New Zealand Sea Lion: Auckland Islands Population Project- Pup count only	No adverse effect from commercial fishing. DOC should not levy industry for 2016-17 and await finalisation of NZSL TMP. Then discussions with all Govt departments and parties can occur to determine work required <u>based on TMP outputs</u> and with resourcing a part of those discussions. Neither DOC nor MPI are proposing a disease study of any consequence yet preliminary TMP work suggest this as high priority.	We support the need for ongoing sea lion monitoring and research based on the TMP. This may not need to be annual but pup counts, demographic data and disease data will be integral to future understanding and management under the TMP.
MIT2016-1	Protected species bycatch media	A composite programme with: <ol style="list-style-type: none"> 1. Newsletter not valued, most fishers unaware and not sufficiently interested to download. Not supported 2. Identification tools – reprint –supported with cost recovery Not relevant in current form	We do not support either project or cost recovery.
MIT2016-02	Entanglement of whales in pot/trap lines and setnets and a review of potential mitigation methods	No adverse effect	We do not support either the project or cost recovery.