

Royal Forest and Bird Protection  
Society of New Zealand Inc.

National Office:  
Level One, 90 Ghuznee St  
PO Box 631, Wellington 6140  
New Zealand

P: +64 4 385 7374

F: +64 4 385 7373

[www.forestandbird.org.nz](http://www.forestandbird.org.nz)

The Director General of Conservation  
Department of Conservation  
PO Box 10 420  
WELLINGTON

27 April 2016

Dear Sir

**Submission to: DRAFT Conservation Service Programme Annual Plan 2016/17**

F&B appreciates the opportunity to provide some brief comments on seabird aspects of this draft plan.

Congratulations to the CSP team for a well put together annual plan.

**2.1 & 2.1.1 Observing Commercial Fisheries.**

An additional factor that should be taken into account when planning observer coverage relates to the objective under the NPOA-Seabirds to set target bycatch reduction rates. One of the issues we found in the SAG group (Capture Rates Reduction Targets Working Group) when looking at this objective was that observer coverage rates were only of sufficient level for very few fisheries to be able to detect changes in bycatch rate from one year to the next or even over 3 years. It is particularly important for those fisheries that interact with species identified at commercial risks of very high, high and moderate, that effort is made to ensure that observer coverage in those fisheries will be sufficient to detect improvements in bycatch rates, so that we can actually set bycatch rate reduction targets. We recommend cross checking with all very high, high and medium risk species to make sure observer coverage will be sufficient to detect changes in bycatch rates in those fisheries that contribute the most risk.

Proposed observer projects. Good to see some increased proposed effort on set nets in Otago, Southland, Stewart Island and Fiordland to look for possible interactions with penguins. However I am not convinced that even a 65% coverage will be sufficient to detect captures and that as for the West Coast of the North Island to detect dolphin captures there is a proposal to have 100% observer coverage, this should be the case for set nets in the south as well.

West Coast South Island - Good to see this project here. Agree that Salvin's are a likely risk for this fishery despite recent questions about the identification of this species in bycatch here! Inshore

trawl on it's own is sufficient to contribute to the very high risk to Salvin's albatross (latest iteration of the risk assessment)

Snapper Trawl – NE North Island. How is this project related to the current roll-out of cameras on inshore trawl vessels?

Bottom longline – Bluenose – good to see an estimate of 50% coverage proposed and intention to spread spatially and temporally, especially given very low coverage in 2014/15 – just 2.41% in AKE, and only birds caught – although just 2 were black petrel. It will be important to include all vessel types and refusal to allow observers should result in some sort of penalty. How will observers be evaluating the likely fate of birds released alive? This has received a lot of discussion in recent years. Banding has been one potential method of verifying predictions of survivorship. Where has this idea got to? I still think colour banding would be useful as there are many people out on the Hauraki Gulf during the summer who could record presence of colour banded birds, including fishermen.

Snapper bottom long line – Again – good to see target observer coverage of 300 days – but it is essential to make sure this target is met and also met spatially and temporally. I am hoping that our (BPWG) efforts with Dave Turner will result in cameras also being deployed on some or all of these vessels this year so that there may need to be some adjustment to the objectives of the observers to monitor/compare the effectiveness of cameras with observers.

**2.1.2 Offshore fisheries.** Will the proposed increase in observer coverage to 20% for scampi, southern blue whiting and squid trawl be sufficient to detect changes in bycatch rate in subsequent years? All of these fisheries as well as hoki contribute substantially to risk to NZ's albatrosses. Addressing this risk effectively may require much higher levels of observer coverage than proposed.

It is clear that we have insufficient observer time to enable us to effectively manage our fisheries for bycatch in NZ. Despite best of intentions observers get diverted to perceived more high priority tasks and our ability to meet observer targets is often compromised. While we accept that this may at times be due to the unwillingness or inability of fishing vessels to have observers, we do not find this an acceptable reason. If a vessel is on the water catching quota species can potentially interact with protected species then they have a legal obligation to accept observers and if they can't or won't, then they shouldn't be allowed to fish until they do. We suggest that more resources must be put into achieving levels of observer coverage that are going to enable us to meet our objectives under the NPOA-Seabirds. This may require increasing funding into this area to translate into more observers.

## **2.4 Identification of seabirds captured in NZ fisheries.**

While we understand the logic for not returning all seabirds for necropsy, we continue to advocate for this to happen so that the best identification of birds can be achieved – many photos are still not good enough to enable this to happen. Furthermore there is a loss of potential data on age, sex and breeding status of birds which may contribute to understanding more about the risk to each species across NZ.

## **2.6 Indirect effects of commercial fishing on Buller's shearwater and red-billed gull**

Great to see this project here to gather preliminary information on the potential impacts to these species. We strongly support this project going ahead and hope it may lead in the future to a more in depth study, such as by a doctoral and post -doctoral student.

**3.2 Chatham Island birds.** Good to see this work going ahead as previously planned. For the Chatham Island shag species it will be important for the researchers to also take the opportunity to assess what on-going risks there are to these populations from land-based causes.

**3.3 Auckland Islands seabirds.** Again – good to see these projects going ahead and support their implementation.

### **3.6 Yellow-eyed penguin foraging and indirect effects.**

This is another high priority indirect impacts study. Fully support this project going ahead. It is essential to inform our understanding of the multitude of issues which seem to be affecting YEPs to gather information on the potential impacts of trawling on biogenic habitats, but equally to understand how important these habitats are for YEP's.

**3.7 Salvin's albatross.** I am assuming that because we want to get an estimate of the population trend that we would want to use the same methodology for the survey as was used by Baker *et al* 2014. However we understand there were issues with the number of non-breeding birds present so the recommendation was to undertake the survey earlier in the breeding season. I am not sure why this will take another year to agree on the methodology, when we really need to know ASAP what the population trend is likely to be as this bird is so highly bycaught. Can we just not agree on a methodology by an exchange of emails and get this work done this summer? Or is this delay necessary due to lack of funds from industry this year?

**4.1 Seabird bycatch reduction Liaison Officers.** This work appears to be progressing well and we certainly support its continuance and indeed extension into other fleets and for subsequent years.

There are also some issues raised in the LO report which are of some concern to us. I'm not aware that there has been an opportunity to discuss this report yet? One resolves around 'strategic offal discharge', although the report does suggest that caution is required when using this technique. It has been used specifically in the Hawaiian SLL fishery, but there is evidence that it causes more problems than it resolves. A focus on retaining unused baits and trying to reduce offal discharge is likely to be the best long term solution.

There was also the issue around 'floaters' on the bluenose lines and I wonder whether the use of weights at the hook would resolve this issue, preventing the baits from floating up? It would be useful to have an opportunity to discuss on-going bycatch issues with the LO's, possibly at the BPWG meetings.

Also mentioned under this project is the potential extension into recreational/ charter sector – something that F&B, through BirdLife International has been doing in combination with SSST, by employing Emma Cronin. Our funding for this project is now nearly finished and we are seeking funding support through some other mechanism – such as central government (DOC or MPI).

Regional Coordinator BirdLife International Marine Programme

F&B Seabird Advocate.