

10 March 2016

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### **Comments on Draft 2016/17 CSP Programme**

While we provided comments on the draft CSP programme at the RAG on 25 February, we take this opportunity to comment further on the draft 2016/17 CSP research programme.

#### **Strategic Plans for Protected Species**

We note that CSP has made real progress in providing a strategic approach to its activities but the absence of strategic management plans for protected species dealing with all threats, not just impacts of fishing, still impedes the ability of the RAG and other stakeholders to assess the value of proposed research projects. Discussion in the medium term research plan goes some way to informing stakeholders as to the strategic objectives for species but those plans have insufficient detail to support the research plan as set out in Table 5 of the seabird plan. We would like to see some discussion by the RAG of those plans to set the context of the annual CSP programme. Many of the disagreements as to priority projects stem from the lack of definitive guidance in strategic seabird population management plans.

#### **Reliance on Risk Assessments**

There is a strong reliance on the L2 semi-quantitative risk assessment to drive CSP activity. While we support a risk based analysis, we are concerned that the risk assessments must be used in an informed and purposive manner, recognising the fundamentals and limitations of the risk assessments. For example the L2 assessment:

- is fitted to data on captures, not fatalities, and thus provides an inflated assessment of the risk to seabirds from commercial fishing;
- is based on historical data rather than residual risk and may not adequately reflect the impact of recent management measures; and
- fails to incorporate the outcomes of Level 3 population modelling where this has been undertaken.

The Level 2 risk assessment serves 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 score is most sensitive (which can, in turn, contribute to planning research activity).

However, the risk assessments have tended to assume a life of their own. "Feeding the machine", to address apparent issues and achieve greater precision, has become more determinative of programmes rather than an informed discussion of the real research needs.

For example, where Level 3 risk assessments have been undertaken, and indicate that populations are not currently at adverse risk from the commercial fishing sector, there should be no need for further CSP activity on that species, notwithstanding the simplified L2 risk assessment outcome. 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.

### **Funding of Protected Species Research**

We recognise that DOC has budget constraints and the Marine Species and Threats group find it difficult to access funding from wider DOC appropriations and to that extent primarily use the CSP programme to fund any marine protected species activities. We have no objection to the CSP appropriation being used to fund such activities, our objection is to recovering the cost from commercial fishing when no adverse effect exists.

You will note that this was our approach at the RAG. We did not raise the cost recovery aspect of the projects but instead focused on their contribution to the management of the protected species. However in finalising the programme and proving for cost recovery input, the points made above and the absence of adverse effect from commercial fishing must be taken properly into account.

### **Definition of Risk**

We have raised with you the need to review the risk definitions used in the L2 semi-quantitative risk assessments. Those definitions are critical to the interpretation of the risk assessments and provide the basis for further research. In our opinion, the risk definitions used are very conservative to the point of being misleading. We consider that species with a risk ratio in excess of 1 should be defined as “high risk” (as opposed to “very high risk”) and be the focus of CSP and MPI activities. However, we disagree that the next class, with a risk ratio of less than 1 but over 0.3 and an upper 95% confidence interval over 1, should be classified as “high risk”. Species in that band effectively require a fatality rate over 3 times the estimated APF to pose an adverse effect and may not have an upper 95% confidence level that exceeds 1. We suggest that this band should be labelled as “medium risk” and exclude any cases that have an upper 95% c.i. of less than 1. The current band labelled as medium should be redefined as to be low and the current low band as minimal.

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; rather the correction factor ( $\rho$ ) and the use of  $N_{min}$  means that this assessment deals with a “recovery factor” differently than a traditional PBR approach..

We would expect CSP to focus its activities on the high risk species, as defined above. Should CSP wish to undertake projects related to species with less than a high risk status, the project would not be cost recovered.

### **Implementation of Mitigation Trumps Research**

Insofar as industry is concerned, the benefits of implementing appropriate baseline mitigation on every vessel far outweigh any benefits that might accrue from researching further mitigation options as proposed in project MIT-2. In 2014/15, CSP funded the first of a seabird liaison officer programme targeting the bottom long line snapper and bluenose fleets. We note the assistance provided to those fleets to improve seabird mitigation.

The project also involved assistance to the surface long line fleet. The results in that fleet were far below expected benefits. The officers visited 12 vessels, none of which had seabird management plans either when they arrived or after the officers left.

We consider there would be significant benefits if the seabird liaison officers observed the surface longline fleet at sea and worked with each vessel and the crew to prepare a seabird mitigation plan for those vessels and provided for fleet managers a summary of the issues encountered on those vessels.

We would prefer that the funding for MIT-2 be applied to implementing appropriate mitigation on every inshore trawl vessel. Industry is currently directly funding such a project in the South Island inshore trawl fleet. That activity is focused on the fleet assessed to pose problems to Salvin’s albatross. It is being supported by observer coverage to gauge the actual rather than the assumed level of risk to seabirds. However focus on all inshore trawl activity would be beneficial to seabird populations.

### **Allocation of Funding to Programme Types**

At the RAG, CSP indicated that they would apportion the available funds over the three areas of CSP activity – Interactions, Population and Mitigation – and use the scores to prioritise within those areas. We cannot support that approach. Given the scarce amount of funding available, it is imperative that the funds are provided to those areas which provide the greatest value. Given that the scoring matrix applies equally to all areas of activity, we see no reason for CSP to make an a priori allocation of funds to areas. The application of scores should determine which projects should proceed and which should not, irrespective of their area of interest. In that respect, we would expect hereafter to see the observer activity detailed as to its objective and scored alongside all other projects.

Yours

A handwritten signature in black ink that reads "Tom Clark". The signature is written in a cursive, slightly slanted style.

Tom Clark  
Policy Manager  
Fisheries Inshore New Zealand Limited

Proposal	Title	Duration	Cost per annum (\$ 000s)	CSP Project Score	Industry Score	Comments
<b>Existing</b>						
INT-2015-2	Identification of marine mammals, turtles and protected fish captured in New Zealand fisheries	2	\$15			Last year \$15k
INT-2015-3	Identification and storage of cold-water coral bycatch specimens	3	\$40			Last year \$40k
POP-2015-2	Flesh-footed shearwater: Various locations population project	3	\$80			Last year \$80k
MIT-2015-1	Seabird bycatch reduction (small vessel longline fisheries)	2	\$150			Priority to get effective mitigation
MIT-2015-2	Small vessel surface longline: seabird mitigation	2	\$100			Priority to get effective mitigation
INT-1	Observing Commercial Fisheries	1	N/A			What is the objective of the programmes? Are they targeted to areas of adverse effect to improve information base and robustness of RA scores or to mitigation efficacy-
<b>New Bids</b>						
INT-2	Identification of seabirds captured in New Zealand fisheries	3	\$80	4.8	4.8	BAU – needed to identify species for capture estimates – observers unable to conclusively identify in field. But majority of birds not at risk
MIT-2	Inshore small vessel trawl: seabird mitigation	2	\$100	4.8	2.2 (4.8)	Absolutely oppose – no evidence that current mitigation options failing – problem is lack of implementation of existing on all vessels and lack of observers to give reliable risk assessment results. Score in brackets if programme re-defined to provide for seabird liaison to address inshore trawl
INT-3	Identification tools for seabirds, marine mammals, turtles and protected fish captured in New Zealand fisheries	3	\$10	4.65	4.65	Why identification tool for fishers when the Non-Fish By-Catch returns are not used? Data not used in capture estimates. Fishers worry about the aggregate bird issue, not the species. This is reprinting only, work as normal. Again adverse effects cf cost recovery
POP-9	Cetacean habitat suitability modelling project	1	\$30	4.65	4.2	NIWA project already part funded from MPI –have a problem in that we have not seen the MMRA results nor 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.
POP-11	Updated basking shark bycatch review	1	\$15	4.65	4.65	While on the protected species, not seen as high risk (RA score 13.5 – lower than QMS) – migrant. Reviewed in 2012 – any new information? Any reliable information? No adverse effect
MIT-1	Protected species bycatch newsletter	2	\$20	4.65	2.2	Not valued, not even distributed, last edition August 2015 uploaded; most fishers unaware and not sufficiently interested to download. Opposed
POP-5	Seabird population research: Chatham Islands 2016-2017	1	\$120	4.55	4.55	Probably worth doing but not all species are at high risk, population estimates.
POP-6	Seabird population research: Auckland Islands 2016-2017	1	\$100	4.55	4.55	Probably worth doing but not all species are at high risk, population estimates.
POP-2	Black petrel: Aotea/Great Barrier Island & Hauturu/Little Barrier Island population project	3	\$100	4.45	4.45	Recognise the need for better population data but observations indicating low impact from fishing.
	Antipodean albatross			4.35	4.35	
POP-3	Salvin's albatross: Bounty Islands population project	2	\$110	4.35	?	Given L3RA, no need to continue data collection
POP-7	Yellow-eyed penguin foraging distribution	2	\$20	4.3	3.4	YEP has low L2RA risk. New tracking data on foraging patterns – useful DOC may wish to do work but not under levied CSP
POP-8-1	New Zealand Sea Lion: Auckland Islands Population Project- Status quo	3	\$250	4.15	4.15	
POP-4	Southern Buller's albatross: Snares/Tini Heke population project	3	\$50	4	3.3	L3RA not adverse effect but DOC needs to get better feel of adult survival for strategic population management
MIT-3	Entanglement of whales in pot/trap lines and setnets and a review of potential mitigation methods	1	\$30	4	2.6	Annual chestnut and no adverse effect
INT-5	Indirect effects of commercial fishing on yellow-eyed penguins	1	\$30	3.95	3.2	This is a research scoping exercise. No adverse effect. Current flavour of the month bird
INT-4	Post release survival of white pointer sharks in New Zealand setnet fisheries	2	\$40	3.9	3.1	Practicality? Great white risk assessment score does not support research. Research fun but value and practicality?
POP-8-2	New Zealand Sea Lion: Auckland Islands	3	\$150	3.9	3.9	

	Population Project- Pup count only					
POP-12	The age and growth of New Zealand protected corals at high risk	1	\$50	3.65	2.3	No adverse effect demonstrated – low percentage of bottom trawl and low prospect of contact
POP-13	Cold-water coral connectivity in New Zealand	1	\$50	3.65	2.3	No adverse effect demonstrated – low percentage of bottom trawl and low prospect of contact -
INT-6	Indirect effects of commercial fishing on Buller's shearwater and red-billed gulls	1	\$30	3.6	2.2	No adverse effect Buller's APF 10, PBR 14,800
POP-1	Grey petrel: Antipodes Island population project	3	\$120	3.6	2.2	No adverse effect APF 247, PBR 2170 Score 0.12 (0.06-0.27)
POP-10	NZ fur seal: Bounty Islands population assessment	1	\$20	2.9	2.9	No adverse effect
MIT-4	Review of mitigation techniques in pelagic trawl fisheries: marine mammal mitigation	1	\$40	2.3	2.2	
	<b>Subtotal excluding admin charges</b>		<b>\$1,565</b>			