

## CSP Annual Plan 2018/19 Summary of Submissions

This document provides a summary of the written feedback received during the consultation period for the CSP Annual Plan 2018/19 as well as DOC's responses to the feedback received.

### List of Submitters

| <b>Feedback</b>                                     | <b>Shown in Comment Summary as:</b> |
|---|-------------------------------------|
| West Coast Tai Poutini Conservation Board           | WCTPCB                              |
| Southern Seabird Solutions Trust                    | SSST                                |
| Yellow-eyed penguin trust                           | YEPT                                |
| Te Ohu Kaimoana                                     | TOKM                                |
| WWF-New Zealand                                     | WWF                                 |
| Elisabeth Slooten - University of Otago             | UOO                                 |
| Fisheries Inshore New Zealand &<br>Deepwater Group  | FINZ&DWG                            |
| Environment and Conservation<br>Organisations of NZ | ECO                                 |
| Vita Maris  | VM                                  |
| Forest & Bird                                       | F&B                                 |

## Summary of feedback during consultation of CSP Annual Plan 2018/19

### PART A: General comments

| Submitter | Feedback  | DOC response  |
|-----------|---|---|
| WCTPCB    | <p>Support the Conservation Services Programme (CSP).</p> <p>Note a significant improvement in the structure of the programme in comparison to previous CSP programmes and notes it provides a clear and logical process.</p>   | Noted.  |
| WCTPCB    | The board is concerned that international research is demonstrating significant shifts in both ranges and breeding areas of fish and other marine species. Climate change will not only impact commercial fisheries, but also the availability of food sources for both marine mammals and seabirds. Note that climate change is not an integral part of CSP. | Noted. Climate change falls outside of the scope of CSP.  |
| WCTPCB    | Note that there are no specific population-based projects indicated for Fiordland crested penguins that will have an interaction with fisheries in both FMA 5 and FMA 7.  | Noted. Fiordland crested penguin were assessed as being at negligible risk from commercial fisheries in the latest risk assessment. In addition, no project proposals for Fiordland crested penguins were received this year.     |
| SSST      | Note that additional mitigation tools will likely be required for longline fisheries to meet the government's 'best practice' mitigation standards, and underwater setting is worth investigating further.  | Noted. Project MIT2018-03 has the objective of testing one or more devices for underwater setting.  |
| YEPT      | The Trust would like to see specific research on hoiho funded, as well as broader programmes which have potential implications for hoiho, other species, and the marine ecosystem in general.   | <p>Noted.</p> <p>Conservation services are intended to address the adverse effects of commercial fishing on 'protected species' and is restricted to the consideration of those projects that are by definition 'conservation</p> |

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|      |   | <p>services'. Broader ecosystem monitoring programmes are outside of the scope of CSP. However, POP2016-05 looked into the potential indirect effects of commercial fisheries on hoiho, outputs and recommendations of the projects will be available in the coming month.</p>  |
| TOKM | <p>Endorses the views expressed by DWG and FINZ in their detailed submission on the plan.</p> <p>There are conservation initiatives that are supported, however, they do not fit under the scope of CSP. In these circumstances, projects need to be funded by the Crown; although involvement with other parties is encouraged.</p> <p>Generation of long-term management plans to guide the projects under CSP would be valuable to track progress and set out priority research. TOKM feels this would give clarity to species-specific objectives and assist in aligning initiatives from multiple parties. Regardless of how a project is resourced, we suggest collaboration as a way to increase the capacity of conservation efforts.</p> | <p>Noted.</p> <p>DOC considers that all projects in the annual plan are aligned with the CSP Strategic Statement, meet the definition of a Conservation Service, and that the application of cost recovery principles and rules is correct.</p> <p>Noted CSP and DOC more widely is constantly working to improve alignment between conservation actions and improve synergies, examples include Threat Management Plans and the development of the Threatened Species Strategy</p> |
| WWF  | <p>'Deeply disappointed' to see MIT-4 Development of modified fishing gear to reduce the effects of inshore trawling, and MIT-5 Review of mitigation techniques to reduce benthic impacts of trawling, removed from the CSP plan.</p> <p>Believe that the Department of Conservation failed to prioritise research that is urgently needed to inform the Māui and Hector's dolphin Threat Management Plan Review.</p>   | <p>Noted. During the prioritisation process, a fourfold scoring criterion is used to assess the relative priority of each project proposed, these are: contribution to CSP objectives, Fisheries risk and/or threat status, cost effectiveness and leverage. Due to the finite capacity of CSP, not all project proposals can be delivered upon each year.</p>  |

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| WWF | <p>Suggest the inclusion of a project that models the ecological effect on seabirds resulting from gear switching from net fishing to longlining to remove fishing threats to Māui dolphins.</p>  | <p>DOC supports such work in principle however to make an informed assessment of the risks and benefits of such a transition) would require a series of simulations to be run whereby setnetting is replaced at differing scales / intensities by other methods to assess how that increased / decreased the likelihood of capture of other protected species. In particular, longlining has a high rate of seabird interactions. The most appropriate tool for this would be 'Risk Atlas' (under development by MPI) which uses their Spatially Explicit Fisheries Risk Assessment methodologies and build s them into a package which allows such simulations to be run. However, this tool is not yet ready to undertake such simulations on multiple species. MPI have indicated this will be in place by the end of the 2018/19 financial year. Therefore should timeline be met such a project could be considered for inclusion in the 2019/20 annual plan.</p> |
| UOO | <p>Believes CSP needs a review in light of the US fish import ruling and requires more scientifically robust observer data and population size estimates with aid from independent scientific sources.</p> <p>Suggests that considering CSP's aim, it would be rationale to fund a study focusing on exploring the potential transition to selective, sustainable fishing methods and how that change could be implemented.</p> | <p>Conservation services are intended to address the adverse effects of commercial fishing on 'protected species' and is restricted to the consideration of those projects that are by definition 'conservation services'. Responding to requirements of fish import rules is not a driver of CSP.</p> <p>DOC believes that this work would be feasible through the SEFRA and Risk Atlas tool, which is currently in development.</p>  |

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| <p>FINZ&amp;DWG</p> | <p>Repeatedly sought a definition of “adverse effect” to clarify what constitutes a conservation service; has not been responded to adequately on this matter. The CSP strategic statement does not contain a definition of adverse effect.</p> <p>The definition of adverse effect must be seen in the context of the Fisheries Act Section 8 &amp; 9 (ensuring sustainability and maintaining protected species about a level to ensure their long-term viability).</p> <p>Adverse effect can then be considered as a negative impact on the long-term viability of a protected species. An adverse impact on an individual does not equal an adverse effect on a species.</p> | <p>DOC considers “adverse effect” to be defined and described in the CSP Strategic Statement 2015, which was developed as part of a multi stakeholder process over several years.</p> <p>For clarification, the scope of the CSP includes actual and potential adverse effects on protected species arising from direct or indirect effects of commercial fishing and arising from activities associated with commercial fishing including:</p> <ul style="list-style-type: none"> <li>i. any temporary or permanent effect;</li> <li>ii. any past, present, or future effect;</li> <li>iii. any cumulative effect which arises over time or in combination with other effects - regardless of the scale, intensity, duration, or frequency of the effect;</li> <li>iv. any potential effect of high probability; and</li> <li>v. any potential effect of low probability which has a high potential impact.</li> </ul> |
| <p>FINZ&amp;DWG</p> | <p>The cost recovery principles and the cost recovery rules cannot be used as the sole justification for recovering the costs of protected species research.</p> <p>If a proposed research project does not meet the statutory definition of a conservation service, it simply cannot be a conservation service and cannot be cost recovered.</p> <p>DOC appears to see cost recovery through conservation services as a mainstream funding opportunity for marine protected species work. The inclusion of an activity in conservation services does not automatically make the cost of that activity recoverable by the industry. In all instances,</p>                        | <p>DOC considers that all projects in the Conservation Services Programme Annual Plan meet the relevant statutory definitions and criteria for a Conservation Service, and that the application of cost recovery principles and rules is correct, with rationale further outlined in the CSP Strategic Statement 2015.</p> <p>DOC undertakes a hierarchical decision-making process whereby projects must first meet the test against the statutory definition of a Conservation Service before going on to apply the relevant cost recovery principles and then the cost recovery</p>  |

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|          | <p>an adverse effect must be demonstrated and the decision must be consistent with section 262.</p>   | <p>rules.</p>   |
|          | <p>MPI has initiated a “First Principles” review of cost recovery. Industry is unaware of whether DOC has contributed to or been engaged in that review, and has serious concerns as to the quality of the review outputs and engagement processes to date.</p> <p>Industry wishes to agree a position with DOC on the cost recovery of conservation services and provide it to MPI for the review.</p> | <p>CSP is engaged in supporting MPI undertake this review and has had the opportunity to comment.</p> <p>Reviewing the principles for cost recovery of conservation services is outside the scope of the Annual Plans 2018/19 consultation. Officials will engage with FINZ and DWG on this matter separately as appropriate.</p>   |
| FINZ&DWG | <p>Note the absence of (and lack of progress to develop) strategic management plans for the management of marine protected species. Consider that neither Threat Management Plans nor Population Management Plans are appropriate for the strategic management of protected species.</p>  | <p>The development of a seabird medium term research plan was requested at the CSP Research Advisory Group (RAG) meeting on the 3rd of December 2013. A protected fish medium term research plan was developed shortly thereafter. A draft marine mammal medium-term research plan has been developed and work is underway on a coral medium-term research plan.</p> <p>These medium-term research plans are intended to function as tools to develop and prioritise protected species-focused research proposals for consideration by the CSP RAG.</p> <p>CSP and DOC more widely is constantly working to improve alignment between conservation actions and improve synergies.</p> |
| FINZ&DWG | <p>Concerns were raised about what appears to be a CSP commissioned series of alternative risk assessments. Industry</p>  | <p>The threat evaluation work referred to was not commissioned as part of CSP and has not been</p>  |

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|          | does not see the report as being a replacement for the semi-quantitative L2 risk assessment or the L3 assessments and does not see the value in the work.   | used to inform the development of the CSP Annual Plan 2018/19. It forms part of DOC's wider work to prioritise research and management actions related to at-sea threats to marine species.  |
| FINZ&DWG | CSP is placing increasing reliance on indirect effects (i.e. dietary impacts) of commercial fishing to support its research activities and cost recovery. Industry rejects the claim that adverse effects exist from indirect fishing effects.  | The indirect effects of commercial fishing have always fallen within the scope of the CSP. All CSP projects are focused on achieving the CSP objectives.   |
| FINZ&DWG | Concerns raised with regards to the Seabird Medium Term Research Plan and its Risk Assessment. Industry does not believe all species that fit within the mandate are eligible for CSP funding.<br><br>The inclusion of a seabird species or a research programme in the seabird medium term research plan does not confirm the research should be a conservation service or eligible for cost recovery. | The seabird medium term research plan was developed at the request of the CSP RAG and is intended as a tool to develop and prioritise seabird-focused research proposals for consideration by the CSP RAG.<br><br>DOC does not use the classifications in the seabird Level 2 Risk Assessment as the test of adverse effect; instead it is used as a tool in the prioritisation between species. |
| FINZ&DWG | Disagree with CSP approach to spread work across wide range of project areas. In line with CSP's mandate to reduce adverse effects, funds should be allocated to priority species, irrespective of the spread between activity areas.   | Within each activity area projects are prioritised to address the highest risk species, guided by medium term research plans where these have been developed.  |
| ECO      | Welcomes the ongoing development of the CSP programme.<br><br>Acknowledges importance of long-term research plans for marine research and management.   | Noted.   |
| ECO      | Suggests a review of the strategic statement adopted in 2015.   | Noted. Review of the strategic statement is planned to be carried out by December 2018. The review   |

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|     |   | will consider any relevant changes in NPOAs and other relevant management plans.   |
| ECO | Expresses concern for projects with delays and fails such as camera trials assessing black petrel bycatch, strengthening view that projects such as this should be covered by CSP and not be funded separately.   | Noted. The black petrel camera trial was a project undertaken outside of CSP. The annual plan includes a project on trialling innovative camera systems for small vessels. |
| F&B | Support the prioritisation process that has been necessary as a result of the ongoing lack of investment by government in critical research of protected species and habitats that are at risk from commercial fishing in NZ. Lack of investment has resulted in key projects being dropped which should be funded. | Noted.   |

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## Summary of feedback during consultation of CSP Annual Plan 2018/19

### **PART B: Comments specific to INT2018-01 – Observing commercial fisheries**

| 2.1 Observing Commercial fisheries |  |   |
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| Submitter                          | Submission   | DOC Response  |
| WCTPCB                             | <p>Notes an overall reduction in the total number of observer days from the previous year.</p> <p>The board notes a concern over the decrease in observer coverage on the West Coast of the South Island (FMA7), as well as in setnet fisheries in the East and South coast of the South Island. This reduction will place both marine mammals and seabirds at increased risk of non-reporting.</p>  | <p>Noted. The reduction was based on a limited resource pool of observers and is the result of trade-offs to maximise data collection across all fisheries.</p> <p>CSP is confident that this will not result in a reduction in quantity or quality of observer derived bycatch data.</p>   |
| YEPT                               | <p>The Trust supports the project overall.</p> <p>Note that the development of effective mitigation methods alongside the fishers, whether it is through the use of specific types of fishing gear, fishing activities, times or places, should be a top priority.</p>   | <p>Noted development and deployment of mitigation strategies is also scheduled through other projects in the Annual Plan</p>  |
| UOO                                | <p>Recognizes importance and urgency of the observer programme.</p> <p>Recommends placing cameras on all vessels, and observers on 20% of vessels to provide scientifically robust estimates of bycatch, with funding from the fishing industry.</p> <p>Suggests that total fishing effort and an estimate of the precision on the bycatch estimate should also be provided in the plan for science-based allocation of observer coverage.</p> <p>Believes that having low observer coverage spread across several areas is not ideal and suggests having an intensive programme in one area and then moving it to another one would be more</p> | <p>Observer placement faces various logistical challenges and the placement of observers is not solely based on funding, but also, among other things, the number of available observers. Prioritisation of observer coverage within different fisheries sectors is carried out by Fisheries New Zealand and CSP.</p> <p>For each inshore fishery, intended coverage levels are identified where appropriate and these are set based upon information needs and probability of encounters. In many of these low information fisheries meaningful calculation on C.V. is often not possible.</p> |

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|          | <p>efficient. Suggestions around re-allocation of observer days in different areas, based on achieving 65% observer coverage.</p> <p>Expresses concerns that the observer resources estimating Maui dolphin bycatch is wasteful and should be spent protecting them.</p>   | <p>Electronic monitoring of commercial fisheries is currently being implemented. However, it is of high importance that systems put in place are fit for monitoring protected species interaction and allow for identification of species. The efficiency of the systems is currently being assessed,</p> <p>Noted. Coverage in West Coast North Island rea area was implemented as a ministerial commitment by the previous government.</p> |
| FINZ&DWG | <p>Supports the continuation of this project.</p> <p>Given the initiatives to implement risk mitigation in inshore fleets FINZ&amp;DWG wishes to see an active observer programme in those fleets.</p>   | Noted.   |
| FINZ&DWG | <p>Expresses concerns that although the programme has provided robust information to inform the Maui TMP review, it is ineffective in respect of the biopsy objective. Any continuation of the programme should be re-visited as a consequence of the TMP review.</p>      | Noted.   |
| ECO      | <p>Supports this project and its allocation process, but recommends coverage into fisheries, seasons and methods that have been poorly observed.</p> <p>Welcomes the ongoing development of inshore monitoring programmes, and the monitoring of the trial PHS system.</p> | Noted.   |
| F&B      | <p>We estimate a doubling of observer coverage overall is needed for protected species and increases in some critical areas to 100%</p>  | Noted.   |

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|  | <p>coverage to protect endangered and threatened species such as Antipodean albatross, yellow-eyed penguin and Maui's dolphin.</p> <p>Finally, we recognize that the CSP team is unable to allocate additional funding as we suggest and request that our concerns are conveyed to appropriate managers and the Minister of Conservation.</p> |  |
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**PART C: Comments specific to other projects**

| <b>Submitter</b>   | <b>Submission</b>  | <b>DOC Response</b>   |
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| <b>2.2 Identification of seabirds in New Zealand fisheries</b>   |  |   |
| WCTPCB   | Raised it was disappointing not seeing any tables of seabird interactions with fisheries in the document.  | Noted. CSP does not report on seabird interactions in the Annual Plan, these are reported on in the Annual Research Summary, as well as yearly reports from the project.  |
| YEPT   | Fully support the continuation of the project.<br><br>The Trust suggest that dead hoiho specimens should be returned to land to enable a detailed examination and the gathering of important data on individual birds. | Noted.<br><br>DOC is currently looking into the ability and legislation for fishers to be able to bring back to land certain protected species that have been bycaught.   |
| ECO  | Fully supports this project.   | Noted.  |
| <b>2.3 Supporting the utility of electronic monitoring to identify protected species interacting with commercial fisheries</b> |  |   |
| WCTPCB   | Fully support the project.<br><br>Note that the text was a 'cut and paste' from the previous annual plan and it should be noted that the project is in its second year.  | Noted.<br><br>The annual plan clearly states above the section for the project that the project was consulted on in 2017/18 and is included in the plan for completeness. |
| YEPT   | Continuation of this multi-year project is fully supported.  | Noted.  |
| ECO  | Fully supports this project.   | Noted.  |
| <b>2.4 Identification of marine mammals, turtles and protected fish captures in New Zealand fisheries</b>                      |  |   |
| WCTPCB   | Fully support the project.   | Noted.  |
| YEPT   | Continuation of this multi-year project is fully supported.  | Noted.  |

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| FINZ&DWG   | Cost recovery should be lower than 100% (due to the results of the marine mammal risk assessment) yet support the continuation of the programme and voluntarily agree to the full cost recovery as long as the information generated significantly informs the management of the species necropsied. | Noted. DOC considers this project is aligned with the CSP Strategic Statement, meets the definition of a Conservation Service, and that the application of cost recovery principles and rules is correct.   |
| FINZ&DWG   | Seek clarification of whether CSP considers any merit in retention and landing of any additional small protected species, (i.e. Hector's or Māui dolphins), where observers are not present, and retention is currently illegal.   | DOC and CSP remain open to consideration of the retention of certain protected species, for the purpose of necropsy, in certain fisheries, on a case by case basis.<br><br>DOC is currently looking into the ability and legislation for fishers to be able to bring back to land certain protected species that have been bycaught.  |
| ECO  | Fully supports this project.   | Noted.  |
| <b>2.5 Trailing innovative Electronic Monitoring (EM) systems for small vessels.</b> |  |   |
| WCTPCB   | Fully support the project and consider 100% industry funding appropriate.  | Noted.  |
| YEPT   | Fully support the project and note that this is essential work to ensure camera systems on small vessels are used effectively to collect robust data on protected species.   | Noted.  |
| FINZ&DWG   | Supports the trialling of EM systems, but does not agree it should be cost recovered from the industry.<br><br>Believes the government's decision to implement EM for some or all of the fleet does not assess the efficacy of digital monitoring for fisheries                                      | Noted. DOC considers this project is aligned with the CSP Strategic Statement, meets the definition of a Conservation Service, and that the application of cost recovery principles and rules is correct.<br><br>DOC considers that the project will support more accurate estimates of bycatch levels of priority species in fisheries that have had historically low observer coverage due to various |

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|  | <p>management but is more related to proving the capability of systems on small vessels.</p> <p>Voluntary assistance from the industry will be required as DOC has no power to enforce carrying the equipment. FINZ&amp;DWG will work with DOC to progress the trial but maintain the belief that it should not be cost recovered.</p> | <p>logistical challenges.</p> <p>Noted.</p>  |
| ECO  | <p>Fully supports this project.</p> <p>Agree that EM requires further research and supports the use of trialling paired coverage with human observers and EM.</p> <p>Suggests the trial be carried out in other areas in future years.</p>   | <p>Noted.</p>  |
| 2.6 Development of observer photograph protocols and curation. |  |  |
| WCTPCB   | <p>Fully support the project and consider 100% industry funding appropriate.</p>   | <p>Noted.</p>  |
| YEPT   | <p>Support the project.</p> <p>Note that the budget allocated seems a little excessive.</p>  | <p>Noted.</p>  |
| FINZ&DWG   | <p>Does not support this project being funded from conservation levies or being cost recovered.</p> <p>Recognises the benefits to CSP in terms of efficiency but fails to see contribution to research of adverse effects.</p>   | <p>Noted. DOC considers that the project meets the relevant statutory definitions and criteria for Conservation Service, as outlined in the CSP Strategic Statement 2015.</p> <p>Data collected by observers directly feeds into projects such as the liaison programme and DOC considers that fisheries</p> |

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|   |  | <p>data must be managed and analysed in an efficient way in order to provide timely, accurate and reliable information for management of protected species interactions with commercial fisheries.</p> <p>This relatively small project will assist in delivering significant increased value from observer derived data</p> |
| ECO   | Supports this project.   | Noted.   |
| <b>2.7 Improving the collection of data and samples from bycaught basking sharks.</b> |  |  |
| WCTPCB  | <p>Fully support the project and consider 100% industry funding appropriate.</p> <p>Note a concern that a single vessel was responsible for over half of reported basking shark captures and considers it appropriate to have an indication of the remedial action taken for that particular vessel.</p> | Noted.   |
| YEPT  | Fully support the project.   | Noted.   |
| FINZ&DWG  | Supports the project in principle but doesn't believe the project is within the scope of CSP or should be cost recovered.  | Noted. DOC considers that the project meets the relevant statutory definitions and criteria for Conservation Service, as outlined in the CSP Strategic Statement 2015.   |
| ECO   | Supports this project.   | Noted.   |
| <b>2.8 Updated analysis of spine-tailed devil ray post release survival</b>           |  |  |
| YEPT  | Fully support the project.   | Noted.   |
| FINZ&DWG  | Does not support this project. Does not believe it addresses an adverse effect with minimal scientific contribution.   | Noted. DOC considers this project is aligned with the CSP Strategic Statement, meets the definition of a Conservation Service, and that the application of cost recovery principles and rules is correct.  |

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|   | Recommends DOC engages with purse seine vessel operators to implement improved release procedures.   | Assessing the post release survival of protected species will support the development of improved handling procedures.<br><br>DOC notes that the development of an updated code of practice for purse seine fisheries will be carried out this year. |
| ECO   | Supports this project.   |  |
| <b>3.1 Seabird population research: Auckland Islands 2017-20</b>                                      |  |  |
| YEPT  | Fully support the continuation of this multi-year project.   | Noted.   |
| ECO   | Supports this project.   | Noted.   |
| <b>3.2 Indirect effects on seabirds in north-east North Island region</b>                             |  |  |
| YEPT  | Fully support the continuation of this multi-year project.   | Noted.   |
| ECO   | Supports this project.   | Noted,   |
| <b>3.3 The age and growth of New Zealand corals at high risk</b>                                      |  |  |
| YEPT  | Fully support the continuation of this multi-year project.   | Noted.   |
| FINZ&DWG  | Project not supported. No basis for any assertion that commercial fishing is posing an adverse indirect effect on cold water corals. Project does not legally meet the definition of a conservation service. | DOC considers this project is aligned with the CSP Strategic Statement, meets the definition of a Conservation Service, and that the application of cost recovery principles and rules is correct.   |
| ECO   | Supports this project.   | Noted.   |
| <b>3.4 Improved habitat suitability modelling for protected deep sea corals in New Zealand waters</b> |  |  |
| YEPT  | Fully support the project.   | Noted.   |



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| FINZ&DWG  | <p>Recognizes that updating models as new information becomes available is important but does not believe enough new evidence has been found to support this.</p> <p>Suggests that the government invests in establishing a baseline of information in areas not previously sampled.</p> <p>Recommends removal of output 3 as it is too broad and unconnected with the project.</p>   | <p>Noted.</p> <p>During the prioritisation process at the RAG, stakeholders raised that there were new data sources that could be incorporated into the model. This included additional shallow water datasets as well as recent biodiversity trawl surveys.</p> |
| ECO   | <p>Supports this project. Acknowledges importance of also assessing refugia from impacts of fishing.</p>  | <p>Noted.</p>  |
| <p><b>3.5 Hoiho population and tracking project</b></p> |   |  |
| YEPT  | <p>Fully support the project.</p> <p>Recommend that specific objectives of this project to be considered with further consultation from conservation managers, researchers and in association with the wider hoiho management process.</p> <p>The project is extensive and wide ranging, determining which of the regions are to be included will affect the scope and cost of the project.</p> <p>Further recommendations for defining the research questions for the project are provided in the submission document.</p> | <p>Noted.</p> <p>Specific objectives of the project will be further refined during the procurement stage.</p>  |
| ECO   | <p>Supports this project.</p>   | <p>Noted.</p>  |

| 3.6 New Zealand Sea Lion: Auckland Island pup count |   |  |
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| YEPT  | Fully support the project.  | Noted.   |
| FINZ&DWG  | <p>Fully support the project but do not believe it should be cost recovered.</p> <p>Low impacts of fishing on sea lion populations and the low number of mortalities relative to the limits leads FINZ&amp;DWG to believe there is also no need to set fisheries impact limits.</p> | <p>Noted. DOC considers this project is aligned with the CSP Strategic Statement, meets the definition of a Conservation Service, and that the application of cost recovery principles and rules is correct.</p> <p>Setting of fisheries limits is outside the scope of this consultation process.</p>   |
| ECO   | Supports this project.  | Noted.   |
| 3.7 Flesh-footed shearwater: Population monitoring  |   |  |
| YEPT  | Fully support the project.  | Noted.   |
| FINZ&DWG  | <p>Does not support the project or the cost recovery.</p> <p>The risk score indicates that fishing does not pose an adverse effect to the viability of the species. A more appropriate management response would be to increase observer coverage to reduce uncertainty.</p>        | <p>Noted. DOC considers this project is aligned with the CSP Strategic Statement, meets the definition of a Conservation Service, and that the application of cost recovery principles and rules is correct.</p> <p>Flesh-footed shearwaters have high risk scores and uncertainty around abundance and reproduction performance. DOC believes this project will help refine future estimates of these key parameters.</p> |
| ECO   | Supports this project.  | Noted.   |
| 3.8 Westland petrel population estimate             |   |  |
| YEPT  | Fully support the project.  | Noted.   |
| FINZ&DWG  | Does not support the project or the cost recovery.  | Noted.   |

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|  | <p>Recognizes high risk assessment ranking but also recognises the low level of uncertainty and suggests a more appropriate management response would be to ensure mitigation methods are operating on all vessels.</p> <p>View this project as another where DOC seeks to monitor the population from CSP funding.</p>  | <p>In previous submission to inform the draft annual plan, FINZ&amp;DWG expressed their support of this project and pushed for a higher priority ranking.</p> <p>In parallel to this populations study CSP is undertaking a range of projects which directly address the development and implementation of mitigation within the fleets adversely affecting westland petrels</p> |
| ECO  | Supports this project.   | Noted.   |
| <b>3.9 Protected coral connectivity in New Zealand</b> |  |  |
| YEPT   | Fully support the project.   | Noted.   |
| FINZ&DWG   | <p>Recognises the benefits of this project but cannot support that the project is within the scope of CSP or should be cost recovered.</p> <p>Supports the coral literature review already being carried out by DOC, and notes objective 1 is already being carried out by this project.</p>   | <p>Noted. DOC considers this project is aligned with the CSP Strategic Statement, meets the definition of a Conservation Service, and that the application of cost recovery principles and rules is correct.</p> <p>Coral literature review is being carried out outside of CSP.</p>   |
| ECO  | Supports this project.   |  |
| <b>4.1 Protected species Liaison Project</b>           |  |  |
| SSST   | Suggest that the liaison officers carry out a simple 'bottle test' on longliners to ensure baited hooks have a sufficient sink rate. This is suggested to be in cooperation with "Seabird Smart Fishing Assurance Programme", and if agreed to be incorporated to the liaison project, SSST will endeavour to secure additional funds to augment the current CSP budget. | Noted.   |
| YEPT   | Fully support the continuation of this multi-year project.   | Noted.   |

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| FINZ&DWG   | <p>Fully supports this project, considers it to be a priority.</p> <p>Notes that most vessels operate with more than one fishing method and with the current implementation approach, fishers would be required to implement separate plans for each method through multiple LOs.</p> <p>Proposes to change the implementation model to a port/regional based approach with Los responsible for a vessel and implementing plans for those vessels.</p> <p>Raises concerns that the funding requirements will be more than the current budget. Would prefer that the budget be cost recovered across all the major finfish targets to accommodate any change in the implementation programme.</p> | <p>Noted.</p> <p>DOC considers that having a clear steer from NPOAs will be beneficial to the future development of the liaison project, and that until that is available, the liaison programme should follow the currently proposed plan.</p> <p>DOC suggests a review of the project and its scope and scale when the NPOA- Seabirds has been finalised and welcome further discussions with industry.</p> |
| ECO  | <p>Supports this project.</p> <p>Suggests that benefits would come from using liaison officers to help assess the use and effects of cameras on inshore vessels.</p>   | Noted.  |
| 4.2 Characterisation and development of offal management for small vessels |  |   |
| YEPT   | Fully support the continuation of this multi-year project.   | Noted.  |
| FINZ&DWG   | Project not supported, the seabird risk assessment indicates that coastal trawl activities do not pose an adverse effect or risk thereof to seabirds.  | DOC considers this project is aligned with the CSP Strategic Statement, meets the definition of a Conservation Service, and that the application of cost recovery principles and rules is correct. As outlined in the project description, DOC  |

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|  | <p>Recent review of offal management states that it is widespread in the fleet. The process of establishing vessel management plans in the South Island trawl fleet is underway.</p> <p>Favour the implementation of existing mitigation measures on all vessels as a priority over further research, if current measures are shown to be inadequate, then would review the offal management options.</p> | <p>considers that a better understanding of offal management practices will allow for more effective mitigation strategies to be developed and implemented (for example, through vessel management plans).</p>  |
| 4.3 Protected species bycatch media            |   |   |
| WCTPCB   | <p>Note that the production of an electronic newsletter is also a part of project MIT2016-01 and that it would have been expected that an update on the proposal would have been provided.</p>  | <p>Noted. The completion date for project MIT2016-01 is 30 June 2018. MIT2018-01 is a proposed continuation of the project with a few amendments to the scope and objectives.</p>   |
| YEPT   | <p>Fully support the project.</p> <p>Note that any media should be written in an accurate and concise manner and make use of range maps and images where possible.</p>  | <p>Noted.</p>   |
| FINZ&DWG                                       | <p>Do not support this project. Oppose the update of the material as a conservation service and object to proceeding this year.</p>   | <p>Noted. DOC considers that the project meets the relevant statutory definitions and criteria for a Conservation Service, as outlined in the CSP Strategic Statement 2015.</p> <p>The project objectives have been amended to include workshops for handling procedures of protected species and use of mitigation gear. These changes provide further alignment with initiatives underway such as the Liaison Programme</p> |
| 4.4 Haul mitigation for small longline vessels |   |   |
| YEPT   | <p>Fully support the project.</p>   | <p>Noted.</p>   |

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|  | Suggest that any information resulting from this project should be passed on to fishers to enable them to put mitigation methods in practice.                                   |  |
| FINZ&DWG   | Consider the dangler should be adopted and implemented in preference to researching further options.  | Previous work undertaken on the 'dangler' provided a preliminary assessment which indicated its potential utility however also highlighted that further testing and refinement of haul mitigation was also necessary.  |
| 4.5 Setting mitigation for small longline vessels  |   |  |
| YEPT   | Fully support the project.<br><br>Suggest that any information resulting from this project should be passed on to fishers to enable them to put mitigation methods in practice. | Noted.   |
| FINZ&DWG   | Does not support the project.<br><br>Disagrees that testing and contributing to the development of line setter devices is CSP service to be cost recovered.                     | DOC considers that understanding the effects of commercial fishing on protected species is critical, but, on its own, will not contribute to a reduction of those effects. Effort must be made to mitigate adverse effects.<br><br>Research on measures to mitigate the adverse effects of commercial fishing on protected species is outlined as a conservation services in the CSP Strategic Statement 2015. DOC considers that the project meets the relevant statutory definitions and criteria for a Conservation Service, as outlined in the CSP Strategic Statement 2015. |
| 4.6 Options for temporal and spatial management of key fisheries to reduce risk of interactions with protected species |   |  |

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| VM       | Suggests it would be beneficial to make the project a two-year term project, to run across two summer seasons.  | Noted.  |
| YEPT     | Fully support the project.<br><br>Suggest that any information resulting from this project should be passed on to fishers to enable them to put mitigation methods in practice.   | Noted.  |
| FINZ&DWG | Does not support the project.<br><br>Believes it is an unsubtle attempt to pre-empt the Hoiho TMP process and sees no reason why CSP should be seeking advice on such measure in advance of any determination that set-netting constitutes an adverse effect for Hoiho. | Noted. DOC considers that the project meets the relevant statutory definitions and criteria for a Conservation Service, as outlined in the CSP Strategic Statement 2015.<br>This project will provide a suite of management options which can be implemented through any relevant threat management been proposed. or other management process. |