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Submission on Conservation Services Annual Plan

1. Introduction

The Environment and Conservation Organisations of NZ (ECO) is the national alliance of 45 groups with a concern for the environment. We welcome this opportunity to make a submission on the ECO has been involved in issues of marine and fisheries policy since its formation 47 years ago. This submission has been prepared by members of the ECO Executive and the marine and fisheries working group. It is in line with ECO Policy that was developed in consultation with ECO member bodies and endorsed by our AGM.

ECO has supported measures to protect threatened species and to sustainably manage fisheries for the present and the future generations.

ECO view is that it is no longer acceptable to claim that fishing on a stock is sustainable on the basis of a harvest goal (ie a single stock standard that the stock is at or above the level that maximises stock growth (the maximum sustainable yield) without researched consideration of impacts, functionality in ecosystems, resilience and how other species are affected by fishing.

2. Generic Issues

ECO supports the CSP vision of “*commercial fishing is undertaken in a manner that does not compromise the protection and recovery of protected species in New Zealand fisheries waters*”.

ECO notes that the definition of protected species may change under the listing provisions for marine species under the Wildlife Act. Protected marine species currently include:

- all marine mammals;
- all seabirds (except black backed gulls);
- all marine reptiles;
- black corals, gorgonian corals, stony corals and hydrocorals;

- nine fish (including deepwater nurse shark, white pointer shark, whale shark, basking shark, and spinetail devil ray).

ECO notes the four medium term research plans developed:

- CSP seabird medium term research plan ('CSP seabird plan');
- CSP protected fish medium term research plan ('CSP fish plan');
- CSP marine mammal medium term research plan ('CSP mammal plan');
- CSP protected coral medium term research plan ('CSP coral plan').

As protected marine species can be threatened by commercial fishing via:

- **Direct impacts** include being caught, injured, or killed in nets or on hooks and benthic species impacted by bottom trawlers and other bottom fishing methods.
- **Indirect impacts** such as habitat modification, food competition and behaviour modification of protected species may also occur.

3. Non CSP Funding and relationship to CSP?

The DoC website states that: *“DOC has established a more extensive fisheries bycatch programme as a result of the availability of additional funding through [Biodiversity Budget 2018](#).”*

That funding is being used to undertake non CSP funded relevant research:

- Auckland Island priority seabird research (e.g. Gibson’s albatross, white-capped albatross, and light mantled sooty albatross);
- Campbell Island priority seabird research (e.g. Southern royal albatross);
- Protected fish & marine reptile priority research;
- Protected coral priority research;
- Priority work on the indirect effects of fishing on protected species;
- Hoiho priority recovery work;
- Antipodean albatross priority recovery work;
- Māui & Hector’s dolphin priority recovery work;
- Expansion of the existing protected species liaison officer work;
- Work on a recreational fishing bycatch programme;
- Additional research into improved bycatch mitigation;
- Expanded international collaboration to enhance complementary bycatch reduction initiatives beyond New Zealand waters, such as support of Pacific port-based bycatch outreach programmes.

ECO welcomes this research being undertaken but request more details on the budget allocated to each project, the research to be undertaken and how DoC sees it interacting with the CSP project. The information available in the Biodiversity Budget is only of a general nature and some of it was not allocated to specific work in 2018.

ECO notes the objective agreed in Te Mana o te Taiao – Aotearoa NZ Biodiversity Strategy for protected species bycatch in 2025, 2030 and 2050.

4. CSP Funded Proposed projects

Annual Reporting

ECO welcomes the annual reporting (Research Summaries) by the Department this is a very important complementary report to those of the Ministry of Primary Industry.

We welcome the information being published by the CSP programme and the availability of reports on the DoC/CSP website.

ECO welcomes the reporting of observed protected species bycatch (including corals and fish species) by different fisheries and commentary of changes between years.

This reporting is critical so that it can be included in decision making on catch limits and fisheries sustainability measures, and other management changes.

4.2. Interaction Projects

4.2.1 Observing commercial fisheries

ECO supports the observer coverage programme to provide information on the number and species of protected marine species caught annually in fisheries by New Zealand flagged vessels.

In addition, ECO support the early implementation of cameras on all fishing vessels, especially those not covered by observers to assist in identifying the species caught in different fisheries.

Observing fisheries is an essential part of the CSP programme. We acknowledge that observers on vessels provide much greater information and feedback than will be provided by camera system on vessels.

The CSP programme has worked well being integrated with MPI Observer Services.

ECO notes that this project is to be consulted on later.

4.2.2 Identification of seabirds captured in New Zealand fisheries

ECO supports this project and notes that this is a 3 year *multi-year project (INT2019-02) which was consulted on in 2019/20.*

We note this is required for the implementation of the National Plan of Action on Seabirds.

4.2.3 Identification and storage of cold-water coral bycatch specimens

ECO supports this project and notes that this is a 3 year multi-year project (INT2019-04) which was consulted on in 2019/20. These are long-lived taxa which are impacted by fishing both inside and outside the New Zealand EEZ.

4.2.4 Identification of marine mammals, turtles and protected fish captured in New Zealand fisheries

ECO supports this project and notes that this is a 3 year multi-year project (INT2020-02) which was consulted on in 2020/21.

4.2.5 Characterisation of protected coral interactions

ECO supports this project and the project objectives. These are long-lived taxa which are impacted by fishing both inside and outside the New Zealand EEZ.

4.2.6 Review of commercial fishing interactions with marine reptiles

ECO supports this project and the project objectives. It is over-due to analyse the interaction of marine reptiles and commercial fisheries.

4.2.7 Collection and curation of tissues samples from protected fishes and turtles

ECO supports this project and the project objectives and the proposed three-year term.

4.3. Population Projects

4.3.1 New Zealand Sea Lion: Auckland Islands pup count

ECO supports this project and notes that this is a 4 year multi-year project (POP2018-03) which was consulted on in 2018.

ECO notes that some of the research has been postponed due to covid and recommends that the season be extended in final year of the project to obtain additional information on pupping success.

4.3.2 Southern Buller's albatross: Snares/Tini Heke population project

ECO supports this project and notes that this is a 4 year multi-year project (POP2019-04) which was consulted on in 2019.

ECO notes that the second year of this project was postponed due to COVID-19. As a result, no funds will be cost recovered this year. Year 3 of the project will be cost recovered in 22/23.

We note this will aid implementation of the National Plan of Action on Seabirds.

4.3.3 Black petrel research

ECO supports this project and the project objectives but question whether it will be possible to complete the project in one year for the at sea sampling. The at sea sampling is a major undertaking.

We note this will aid implementation of the National Plan of Action on Seabirds.

4.3.4 Identification of protected coral hotspots using species distribution modelling

ECO supports this project and the project objectives and the proposed two-year term. ECO supports the use of non-destructive methods like cameras to analyse coral species.

This project raises the question on definition of what is a hot spot and whether it has similar characteristics to the FAO definition of a vulnerable marine ecosystem. We would question the usefulness of looking at areas which are too deep to bottom trawl like the Kermadecs region.

These are long-lived taxa which are impacted by fishing both inside and outside the New Zealand EEZ.

4.3.5 Seabird population research: Chatham Islands

ECO supports this project and the project objectives and recovering monitoring equipment left on Motuhara Island.

We note this will aid implementation of the National Plan of Action on Seabirds.

4.3.6 Flesh-footed shearwater: Population monitoring

ECO supports this project and the project objectives, coverage, and the proposed three-year term.

We note this will aid implementation of the National Plan of Action on Seabirds.

4.3.7 Age estimation of white sharks

ECO supports this project and the project objectives. This information is also important for the NPOA on Sharks. We note that the project is proposed to be 100% Crown funded.

4.3.8 Fur seal population estimate and bycatch analysis, Cook Strait

ECO supports this project and the project objectives and the proposed two-year term. We note that the project is proposed to be 100% Crown funded.

The references should include previous work on fur seal genetics carried out by researchers at Victoria University and Otago University.

4.3.9 Foveaux and Otago shag population census

ECO supports this project and the project objectives and the proposed three-year term. We note that the project is proposed to be 100% Crown funded.

The references should include past reporting of bycatch in set nets in Otago Harbour.

We note this will aid implementation of the National Plan of Action on Seabirds.

4.3.10 Assessment of causes of low burrow occupancy rates in Westland petrels

ECO supports this project and the project objectives and the proposed two-year term. We note that the project is proposed to be 100% Crown funded.

References should include previous research on Westland petrels.

We note this will aid implementation of the National Plan of Action on Seabirds.

4.4. Mitigation Projects

4.4.1 Hook-shielding use in the surface longline fishery

ECO supports this project and its objectives and notes that this is a 2 year multi-year project (MIT2020-031) which was consulted on in 2020. This is an important project to better determine the efficacy of hook-shielding devices in the surface longline fisheries.

ECO suggest that the efficacy of hook pods in the longline snapper fishery in particular needs to be assessed.

We note this will aid implementation of the National Plan of Action on Seabirds.

4.4.2 Protected Species Liaison Project

ECO supports this project and its objectives and notes that this is a 3 year multi-year project. The protected species liaison positions are essential for the implementation of the NPOA-Seabirds.

The reliance on voluntary mitigation measures in a many fisheries means that the implementation of Protected Species Risk Management Plans and the standards are crucial to obtaining the objectives in the plan.

4.4.3 Cetacean interactions with pot fisheries in New Zealand waters

ECO supports this project and its objectives but note that the rationale also includes set nets. There are a number of interactions between whales and other cetaceans with pot and traps.

As whale numbers recover around New Zealand there may be increased potential for interactions with potlines and set net lines.

The project rationale and the approach uses whales and orcas in some section and then refers to whales in other sections. It also refers to pots in the objective but then refers to set nets in the rationale. Entanglement with buoys and lines should consider all cetaceans and consider lines leading to set nets as well as pots.

4.4.4 Develop methods to increase the sink rate of hooks in small bottom longline fisheries

ECO supports this project and objectives. Improving sink rates in bottom longline fisheries should be able to achieved with relatively simple tests (eg a bottle test) and appropriate weighting of gear.

This project is essential for the implementation of the NPOA-Seabirds.

5.0 CONCLUSIONS

ECO welcomes the opportunity to make this submission. If you require further information could you please contact me on 021-738-807.

Nga Mihi

Barry Weeber
Co-Chairperson