

BCO5 ASSOCIATION INC

PO Box 113, Bluff, Southland
Ph (03) 212 7957 (021) 226 1258

Email: Rodney.tribe@ngaitahu.iwi.nz

Conservation Services Programme,
Department of Conservation,
PO Box 10-420,
Wellington 6143.

15th May 2024

Dear Sir/Madam

Re: Submission from the BCO5 Association (BCO5) on the draft Conservation Services Programme Annual Plan 2024/25

The BCO5 Association (BCO5) represents all commercial fishermen and quota owners who utilise the blue cod resource in Fisheries Management Area 5 (FMA5). The objectives of BCO5 are to promote sustainable management of FMA 5 blue cod stocks, protect harvest and access rights and protect/enhance quota value. All commercial blue cod fishing in BCO5 is done by cod-potting.

The address for service for this submission is: Attn: Bill Chisholm, Chisholm Associates, PO Box 125, Manapouri. Ph (027) 2214739, email bill@chisholm.co.nz

Submission

This submission relates only to the proposed study: **INT2022-05** Determining the resilience of Fiordland corals to fisheries impacts. Project Code: INT2022-05

BCO5 cannot contribute to this proposed study.

The reasons why BCO5 cannot contribute to this study are discussed below:

The “rationale” for this project being funded in part by BCO5 is :

*Rock lobster potting and trawl fishing for blue cod is known to occur in the outer areas of the fiords, where *A. fiordensis* is abundant and there is virtually no Fisheries Observer presence.*

This is demonstrably incorrect. There is no trawling for blue cod in the internal waters of Fiordland. If trawling for other species occurred in Fiordland, blue cod would be a very inconsequential bycatch, as they typically live over foul ground where trawlers cannot operate. Potting for blue cod in areas where black coral are present is also inconsequential. This was pointed out in our previous submission dated 27th May 2022 (copy attached), and nothing has changed in the meantime. Consequently, all points made in our submission dated 27th May 2022 are repeated for this submission. In the absence of any meaningful data

implicating commercial blue cod activities on black coral survival, BCO5 has no intention of contributing to this study.

It would appear that the “rationale” for this study is merely a copy/paste of the earlier 2022 CSP rationale, which BCO5 disproved. BCO5 is disappointed with this situation whereby the CSP Draft Annual Plan 2024/25 “rationale” merely repeats incorrect statements from the earlier CSP Draft Annual Plan 2022/23, with no attempt to justify this with meaningful data or updated information. Given this copy/paste “rationale” in the CSP, BCO5 hereby provides a copy/paste of our May 2022 submission which disproved it. Unless further information is provided to justify this study’s “rationale”, no further arguments are necessary.

Summary

In summary, BCO5 cannot contribute to funding the proposed study INT2022-05 because no information has been provided since May 2022 which justifies it. Accordingly, BCO5 rejects any premise that the proposal should be funded in any way by commercial blue cod fishermen.

Yours faithfully



Bill Chisholm

Secretary – BCO5 Association Inc.

(see below for BCO5 submission dated 27th May 2022)

BCO5 ASSOCIATION INC

PO Box 113, Bluff, Southland
Ph (03) 212 7957 (021) 226 1258

Email: Rodney.tribe@ngaitahu.iwi.nz

Conservation Services Programme,
Department of Conservation,
PO Box 10-420,
Wellington 6143.

27th May 2022

Dear Sir/Madam

Re: Submission from the BCO5 Association (BCO5) on the draft Conservation Services Programme Annual Plan 2022/23

The BCO5 Association (BCO5) represents all commercial fishermen and quota owners who utilise the blue cod resource in Fisheries Management Area 5 (FMA5). The objectives of BCO5 are to promote sustainable management of FMA 5 blue cod stocks, protect harvest and access rights and protect/enhance quota value. All commercial blue cod fishing in BCO5 is done by cod-potting.

The address for service for this submission is: Attn: Bill Chisholm, Chisholm Associates, PO Box 125, Manapouri. Ph (027) 2214739, email bill@chisholm.co.nz

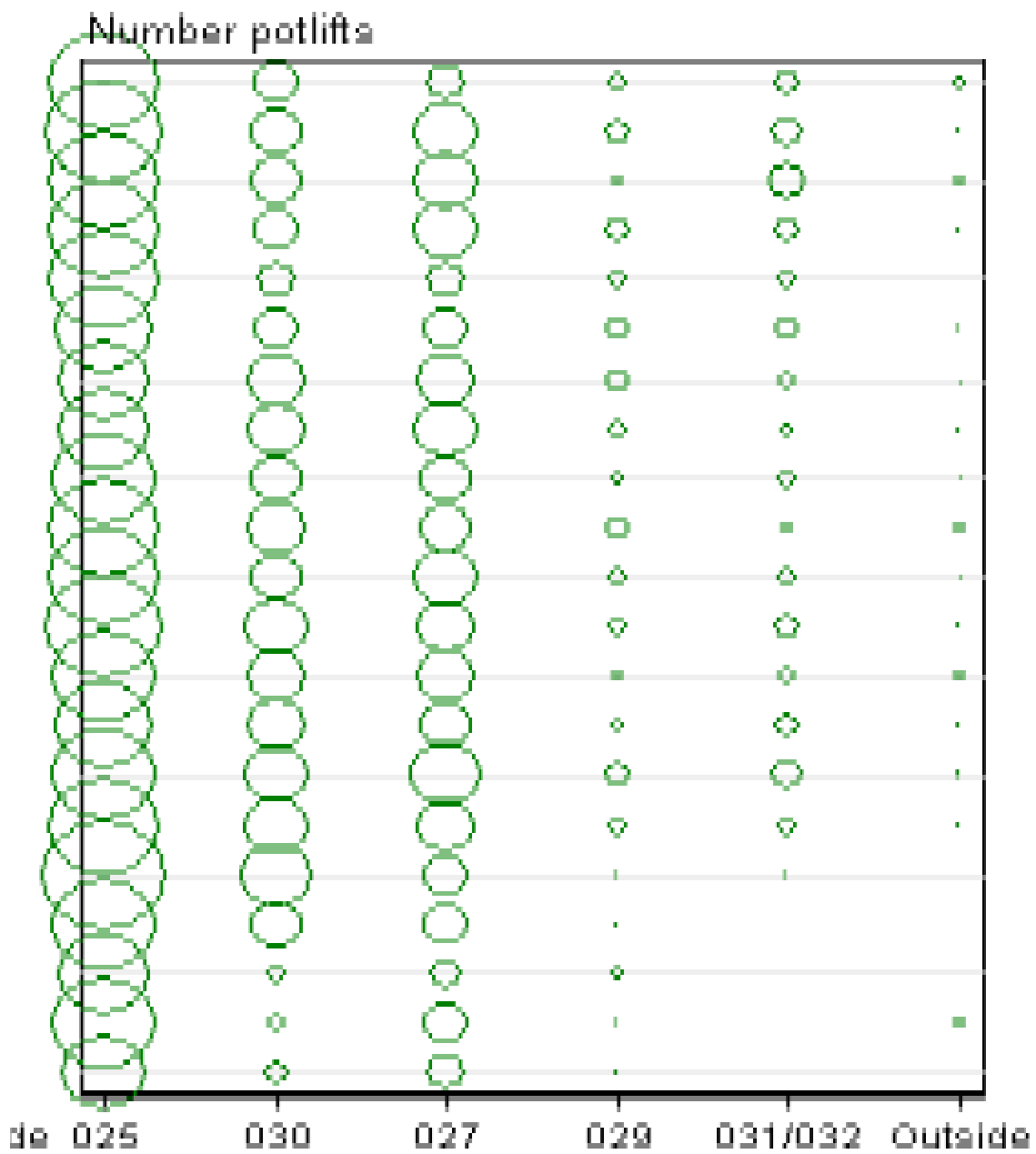
BCO5 is concerned with Section 2.7 of the proposed Plan, whereby a Project is outlined with title “*Determining the Resilience of Fiordland Corals to Fisheries Impacts – Project Code INT 2022-05*”. This project budgets \$30,000 per year for three years (total \$90,000), with 100% cost recovery imposed on BCO5 and CRA8 fish stocks. The rationale for this appears to be principally based on:

Commercial fishing is prohibited in the inner waters of Fiordland, however, rock lobster potting and trawl fishing for blue cod is known to occur in the outer areas of the fiords, where A. fiordensis is abundant and there is virtually no fisheries observer presence.

The proposal suggests that BCO5 should co-fund this project along with CRA8.

However, BCO5 cannot contribute to this proposed study for the following reasons:

1. Nearly 100% of the commercial catch is done by cod-potting, not trawling. While a miniscule amount of BCO is caught as a by-catch in trawl vessels, they are never targeted via trawling. No information is provided by the proposal which demonstrates that setting or retrieving cod pots is likely to have a significant adverse effect on *A. fiordensis* populations.
2. The figure below (from Starr 2012) shows the extent of blue cod potting in FMA5 by sub-statistical area. Fiordland is “Sub-statistical area 031/032”. It can be seen that there is comparatively little commercial blue cod fishing in Fiordland waters.



The recorded catch in 031/032 is insignificant and is not generally used in stock assessment calculations for BCO5. Any effect on *A. fiordensis* of this small amount of commercial blue cod fishing would be correspondingly minor.

3. The map below shows the extent of the blue cod commercial harvest by habitat type (from Pomerade 2012).

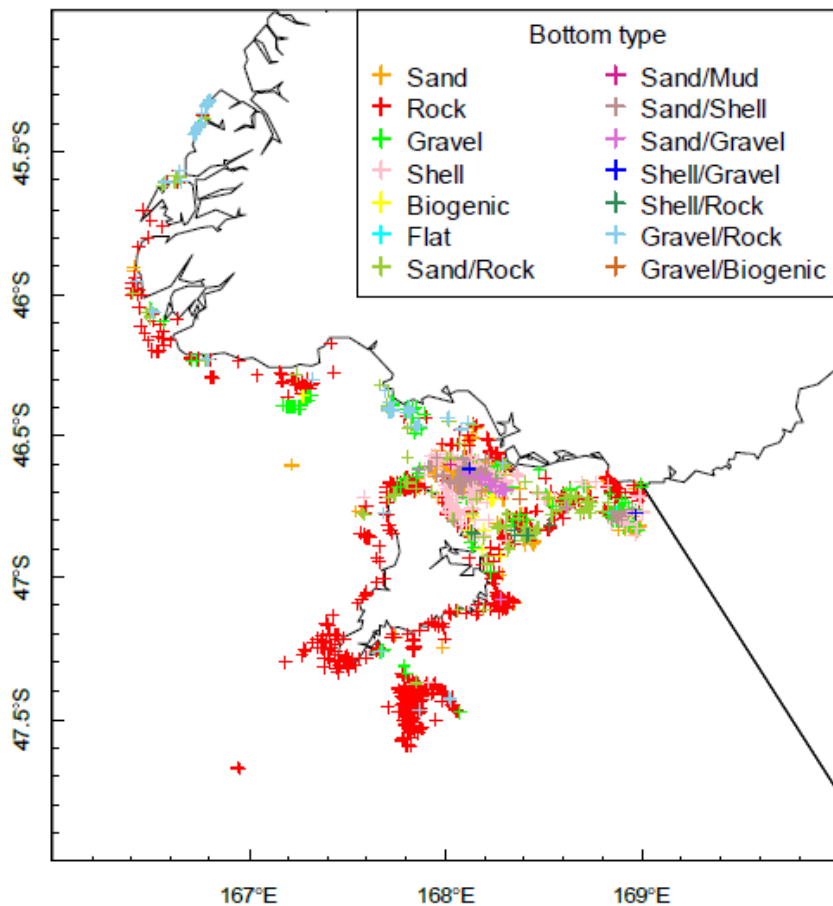


Figure 14: Bottom complexity for the full diary dataset.

This map shows that commercial cod potters generally do not set their pots in sheltered Fiordland waters where *A. fiordensis* is likely to be present. In Fiordland, pots are mostly set in open waters on “rock” or “sand/rock” habitats. These open-water habitats are not typical habitats of *A. fiordensis*.

Furthermore, Carbines & Usmar (2012) studied blue cod benthic habitat preferences in Foveaux Strait. They found that blue cod were observed most often with cobble/macroalgae/sea tulip/sponge and macroalgae/sponge. These habitats are more associated with open coastline habitats, not the more sheltered habitats frequented by *A. fiordensis*.

General comment:

It is disappointing that the proposal shows so little understanding of the BCO5 commercial fishery, including a complete lack of knowledge on BCO5 fishing methods and (un)likely interactions with *A. fiordensis*. This wholesale lack of knowledge could have been quickly cleared up by the proponents contacting BCO5 directly (contact details are readily available from Fisheries New Zealand’s Dunedin office). The fact that this wasn’t done reflects poorly on the Conservation Services Programme and those involved with this proposal.

BCO5 wholly rejects the notion that its fishing activities have any actual or potential adverse effect(s) on *A. fiordensis*. Accordingly, BCO5 will not contribute to this proposed research in any way. In short, BCO5 has no intention of funding make-work schemes for otherwise-redundant Marine Science graduates.

Yours faithfully

Bill Chisholm

PP: Rodney Tribe – chairman, BCO5 Association Incorporated

References

(NB: Copies of all references are available from BCO5 on request).

Carbines, G.D.; Usmar, N.R. 2012. Comparative estimates of abundance and size of blue cod derived concurrently from potting and flown video methods at fixed sites in Foveaux Strait 2009. Video derived descriptions of benthic habitat and blue cod utilisation. Saltwater Science Client Report 2012-02. 23 p.

In : Middleton, D. 2012 (compiler): Ecosystem Spatial Management for Blue Cod. Seafood Innovations Ltd Project 0903

Pomarede, M. 2012. Mapping of habitat data from the BCO 5 fishers' diary programme.

In : Middleton, D. 2012 (compiler): Ecosystem Spatial Management for Blue Cod. Seafood Innovations Ltd Project 0903

Starr, P.; Kendrick, T. 2012. Review of the BCO5 fishery.

In : Middleton, D. 2012 (compiler): Ecosystem Spatial Management for Blue Cod. Seafood Innovations Ltd Project 0903