

# CSP Annual Plan 2024/25

## Summary of Submissions

### List of Submitters

<b>Submitter</b>	<b>Shown in Comment Summary as:</b>
Māui and Hector's Dolphin Defenders New Zealand Inc	MHDD
Warwick Lyon (Independent)	WL
BCO5 Association	BCO5
Deep Sea Conservation Coalition	DSCC
New Zealand Rock Lobster Industry Council Ltd	NZRLIC
Seafood New Zealand	SNZ
Environment and Conservation Organisations of New Zealand Inc.	ECO
New Zealand Federation of Commercial Fishermen	NZFCF

**PART A: General comments**

Submitter	Submission Summarised by DOC	DOC response
DSCC	Support the programme. Recommend NZ develops a NPOA for corals and other vulnerable benthic species.	Noted, DOC welcomes this support for the programme. Noted.
SNZ	Endorse submissions made by other fishing industry representative organisations, companies, quota holders and fishers. Dispute application of cost recovery principles relating to certain projects under the definition of “conservation services”. This issue has repeatedly raised by industry representatives in previous submissions and is of increasing concern; they consider it to not have been addressed over the years and remains unresolved.	DOC considers that all projects in the CSP Annual Plan meet the relevant statutory definitions and criteria for a conservation service, and that the application of cost recovery principles is correct, with rationale further outlined in the CSP Strategic Statement 2015. The DOC legal team have advised that for these proposed conservation services, the application of cost recovery rules is appropriate.
ECO	Supportive of research and measures to protect threatened species and sustainably manage fisheries, as well as supportive of the CSP planning process.	Noted, DOC welcomes support for the research and CSP planning process.
NZFCF	Endorse the submissions made by Seafood New Zealand and other industry organisations, companies and fishers. Believe that CSP research should be limited to those species at risk of fisheries bycatch as defined by FNZ-commissioned risk assessments on seabirds, marine mammals, protected sharks and fish, and not the CSP definition of adverse effects or CSP objectives.  Concerned that CSP project funding is biased towards scientists rather than a strategic initiative to reduce the risk of an adverse effect to protected species.	Noted.  DOC considers that all projects in the CSP Annual Plan meet the relevant statutory definitions and criteria for a conservation service, and that the application of cost recovery principles is correct, with rationale further outlined in the CSP Strategic Statement 2015. The DOC legal team have advised that for these proposed conservation services, the application of cost recovery rules is appropriate. Risk assessments are only one of many tools used in the planning and prioritisation of CSP projects.  As part of the research planning process each year, DOC welcomes research submissions from all stakeholders (including industry, universities, and researchers, etc.) and notes that research is prioritised based upon CSP scope, objectives, and CSP medium term research plans.

**PART B: Comments specific to INT2024-01 Observing commercial fisheries**

Submitter	Submission Summarised by DOC	DOC response
<b>INT2024-01 Observing commercial fisheries</b>		
MHDD & ECO	<p>Request to be included the full the list of stakeholders for the observer coverage consultation.</p> <p>Fisheries New Zealand consultation on fisheries and conservation services levies is restricted to the fishing industry, this process is not a consultation process that we recognise.</p>	<p>Noted, however please note that the consultation on observer coverage is managed by Fisheries New Zealand.</p> <p>Noted, DOC recognises that the observer sea day planning consultation could be more transparent and inclusive between FNZ, CSP and stakeholders.</p>

**PART C: Customary practices** - Nil this year

**PART D: Comments specific to proposed projects**

Submitter	Submission Summarised by DOC	DOC response
<b>INT2022-02 Identification of seabirds captured in New Zealand fisheries</b>		
SNZ & NZFCF	<p>Due to EM rollout, a decrease in observer retained specimens in HMS and inshore fisheries is expected. Therefore, SNF requests that total project cost recovered to those fisheries' stocks are revised based on the outputs of INT2023-02. Request DOC to advise how carcasses will continue to be obtained in the event of no observer returns, presuming the research undertaken previously was of value to the conservation of protected species.</p>	<p>DOC is not actively seeking feedback for this project as it was consulted on in 2022/23 and is included in the 2024/25 plan for completeness. However, INT2024-02 has been designed as a supplementary process to compensate for reduced observer placement. While observer coverage is expected to decrease, we do not expect to see a significant decrease in retained specimens. Following the pilot of INT2024-02, we will review the stock allocation for this project.</p>
ECO	<p>Support the continuation of this project to identify which seabirds are caught in NZ Fisheries.</p>	<p>Noted.</p>

<b>INT2022-03 Identification, storage, and genetics of cold-water coral bycatch specimens</b>		
DSCC & ECO	Support.	Noted.
SNZ	<p>Reiterate position from INT2022-02 above.</p> <p>Concerns expressed over the apportioning of levies in this project; believe inshore and HMS stocks should not be cost recovered and request clarification on how stocks to be levied were selected.</p>	<p>See response for INT2022-02.</p> <p>Stock allocation is determined by examining historical bycatch data. Coral bycatch does occur in inshore fisheries (e.g. BLL, SN) as reported by observers. No HMS stocks are levied for this project. DOC welcomes further discussion with industry on the stock allocation process and recognises it needs further review.</p>
<b>INT2022-05 Determining the resilience of Fiordland corals to fisheries impacts</b>		
BCO5, NZRLIC & SNZ	<p>Unsupportive and oppose proposed cost recovery of this project; project does not constitute a conservation service under the Fisheries Act (1996).</p> <p>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. Potting for blue cod in areas where black corals are present is also inconsequential.</p> <p>Consider there to be no demonstrable actual or potential adverse effects of blue cod fishing on the black coral <i>A. fiordensis</i>, and as such BCO5 has no intention of contributing funding to this study.</p>	<p>DOC is not actively seeking feedback for this project as it was consulted on in 2022/23 and is included in the 2024/25 plan for completeness.</p> <p>The first two years of this project were Crown funded to allow sufficient time to investigate the overlap of commercial fisheries with black coral distribution. Coral distribution has been shown to be wider than thought, therefore, it cannot be definitively said that there is no overlap between potting effort and corals.</p> <p>Pots can cause adverse impacts to corals, the observation of pots in 30% of coral survey sites so far in INT2022-05 suggests more overlap with fishing effort than previously known. The project has documented pot lines physically entangled in corals, which clearly constitutes an adverse effect.</p> <p>Having considered feedback and Crown funded the project to better understand the fishing overlap with coral distribution, CSP now considers that full cost recovery of year three is appropriate based on these findings. However, relative to the other blue cod stocks, BCO5 effort is small. We agree to remove BCO5 from this project.</p>
DSCC & ECO	Support.	Noted.

<b>INT2023-04 Identification of marine mammals, turtles and protected fish captured in New Zealand fisheries</b>		
MHDD	Request CSP to confirm what would trigger a revisit of stock allocation for this project in the future, based on the results of the cameras programme.	Stock allocation is currently determined by analyzing historical observer reported bycatch data (see response to SNZ under INT2022-03). Following the completion of the camera implementation programme, DOC will eventually incorporate cameras bycatch data in the stock allocation process.
SNZ	Same concerns as INT2022-02.	See response to SNZ under INT2022-02.
ECO	Support.	Noted.
<b>INT2023-06 Investigating the impact of fisheries on endangered hoiho diet, microbiome, and disease susceptibility</b>		
SNZ	Project description indicates climate change may play a significant role in hoiho diet variation; it is not possible to clearly separate natural environmental variation from indirect effects of fishing with respect to diet, microbiome and disease susceptibility. Therefore, it is inappropriate for this project to be 100% cost recovered from the fishing industry. Recommend the final year of this project is supported by at least 50% crown funding and a maximum of 50% industry funding.	DOC is not actively seeking feedback for this project as it was consulted on in 2023/24 and is included in the 2024/25 plan for completeness.  However, DOC notes that the research will aim to disentangle these two factors. While separating these issues can be challenging, DOC is optimistic that the research will find strong enough patterns to disentangle effects by fishing and climate change.
ECO	Support.	Noted.
<b>INT2024-02 Port-based audit and protected species retention programme</b>		
MHDD & ECO	Support.	Noted.
SNZ & NZFCF	Do not support, oppose full cost recovery from industry. Supportive of EM data being utilised to assist the government in meeting their legislative requirements regarding protected species. Consider outputs of the pilot programme too far removed to be a conservation service. Associated costs of those should be borne by the Crown.	DOC disagrees that this project does not constitute a conservation service. Project description and outputs have been amended to clarify the conservation services value.  Concerns were raised under INT2022-02 how DOC intends to continue the retention of carcasses for research and identification purposes, with a decrease in observer coverage. This project has

	<p>Further, it proposes to audit vessel mitigation and protected species risk management plans, which we consider is a duplication of the core role of the Protected Species Liaison Programme and current work to utilise EM for that purpose. SNZ will continue to work with the protected species liaison team to ensure PSRMPs and mitigation materials are appropriately audited.</p>	<p>been designed to address those activities normally fulfilled by observer services. DOC considers it necessary to confer with experts to ensure the successful delivery of these project objectives. This workshop approach has been well received by industry and other stakeholders in previous CSP projects.</p> <p>The Protected Species Liaison Programme cannot audit itself, there needs to be a sufficient monitoring element to achieve this. EM can achieve this to a certain degree, however, there are still critical elements that are not verifiable without having a physical person present. These elements were previously fulfilled through conservation services via the Observer Programme. With observer coverage decreasing in the inshore fleet, other monitoring solutions need to be explored to fill these information gaps.</p>
<b>INT2024-03 Understanding the effects of fishing depth on turtle and seabird bycatch</b>		
SNZ	<p>Support this project in principle, however, note this project is essentially an expansion of MIT2023-02. Recommend including 'interactions during the soak period' in the title, rather than only refer to depth.</p> <p>Recommend working with SNZ's Inshore Council to refine and combine with MIT2024-02, due to considerable overlap in objectives and research approach.</p> <p>Recommend the impending updates from three current CSP projects are used to assist development of any mitigation options to be tested within this project</p>	<p>Noted, project title has been amended.</p> <p>SNZ was consulted to identify areas for refinement and combination between INT2024-03 and MIT2024-02. Areas of overlap between the two projects, such as TDR data collection, have been consolidated into a single project. This project has been rescoped such that it will be delivered in a different way to the mitigation project, therefore DOC intends to maintain the project separately to MIT2024-02.</p>
ECO	Support.	Noted.
NZFCF	Recognise that the prospect is for an increased catch of turtle with climate change resulting in warmer seas. Support the need for targeted research, however, this project is not appropriate.	DOC considers this work to be a priority conservation service and addressing multi-taxa is a cost-efficient approach.

	See the value in receiving additional information from TDRs and would prefer the project be more focused on the provision of TDRs to support mitigation.	
<b>INT2024-04 Exploring impacts and recovery potential of protected deep-sea stony corals, utilising Remotely Operated Vehicle capability on RV Sonne in the New Zealand region</b>		
DSCC & ECO	Support.	Noted.
SNZ	<p>Agree there is a gap in understanding coral diversity and distribution across the New Zealand EEZ. Support this project as an opportunity for government and researchers to leverage off international resources and technology.</p> <p>Opposed to cost recovery of this project on the basis that there is not sufficient information to demonstrate adverse effects of the commercial fishing industry on corals.</p>	<p>Noted. DOC agrees that there are substantial cost savings in this project.</p> <p>DOC disagrees that there is insufficient information to demonstrate adverse effects of commercial fishing on corals. We have years of coral bycatch data, video surveys, and a plethora of recovery studies demonstrating very limited coral recovery post-trawling. CSP notes that FNZ are also highly supportive of this project and have agreed to collaborate on the post-trip reporting commitments to maximise cost efficiencies.</p>
NZFCF	<p>Note that NIWA has already committed itself to this project with funding from other NIWA sources. While there may be some direct benefits to New Zealand from the survey, the proposed project is essentially to refinance NIWA.</p> <p>With the small trawl footprint in the deep sea, there is no evidence to assert that bottom trawling poses a significant adverse effect on deep-sea stony corals. Until that risk is demonstrable, coral research projects should not be cost recovered.</p>	<p>This is inaccurate. There are substantial cost savings by using an international vessel, and the voyage also includes non-NIWA personnel, government observers, students, and tangata whenua with no links to NIWA.</p> <p>DOC disagrees that there is no demonstrable significant adverse effect from trawling on deep sea stony corals and we have decades of data and imagery to prove otherwise.</p>
<b>INT2024-05 Testing bycatch mitigation scenarios for protected corals in New Zealand using best available information</b>		
SNZ	Any work to investigate coral bycatch mitigation scenarios should be done in conjunction with FNZ and their BRAG	DOC routinely works with FNZ and will continue to do so, regarding developing bycatch mitigation scenarios in light of broader work programmes. FNZ will be key participants in this project.

	<p>programme, to take the wider benthic ecosystem into consideration.</p> <p>Approach must align with broader work programmes looking at benthic impacts and other social and economic considerations. Alternatives may risk confounding outcomes.</p> <p>The outputs of this project are not related to the adverse effects of commercial fishing on coral, and therefore cannot be cost recovered from industry. Even if the project did constitute a conservation service (which is denied) the public interest served by this project should be funded by the Crown.</p>	<p>This project follows CSP coral risk assessment project INT2022-04 and is designed to address the shortfall of management scenarios against which to test risk assessment outcomes. This shortfall was raised by industry during focused technical working groups for that project and CSP is proposing this as a direct result of those conversations. We disagree that this project is not a conservation service - it will directly address the adverse effects of commercial fishing.</p>
DSCC & ECO	Support.	Noted.
NZFCF	<p>With the small trawl footprint in the deep sea, there is no evidence to assert that bottom trawling poses a significant adverse effect on deep-sea stony corals. Until that risk is demonstrable, coral research projects should not be cost recovered.</p>	<p>DOC disagrees that there is no demonstrable significant adverse effect from trawling on deep sea stony corals and we have decades of data and imagery to prove otherwise. There is also substantial risk from trawling on deep sea black corals, lace corals and gorgonians – not just stony corals.</p>
<b>INT2024-06 Interaction of spotted shags with northern North Island set net fisheries</b>		
MHDD	Support.	Noted.
SNZ & NZFCF	<p>Recognise the sub-population of spotted shags has recently been identified as genetically distinct from the wider NZ population.</p> <p>Dispute full cost recovery of this project as it is not a conservation service, and it is yet to be demonstrated whether spotted shags die in set nets. Other factors must have contributed to decline in spotted shag populations.</p>	<p>DOC considers this project to be a conservation service, noting that a lack of historic observer coverage in relevant fisheries has contributed to a lack of documented evidence. For such a vulnerable population any potential effects are likely to have high potential impact. DOC acknowledges the presence of additional potential threats, which act to increase the susceptibility of this population to commercial fisheries bycatch.</p>
ECO	Support.	Noted.



<b>INT2024-07 Collection and curation of tissue samples from protected fishes and turtles</b>		
SNZ	<p>Recognise the need for this project in relation to determining relative risk of potential impacts from commercial fishing to these species and encourage DOC to continue analysing all available samples obtained outside of commercial fishing. However, the curation and storage of those samples serves the public interest, and should be funded by the Crown, not industry.</p> <p>Similarly to INT2022-02, INT2022-03 and INT2023-04, the total project cost should be reviewed based on the expected reduction in observer presence onboard inshore and HMS vessels.</p>	<p>The aim of this project is to collect and store tissue samples for genetic analysis (analysis separate to this project). This is a rollover from the existing 3-year project that is 100% industry funded. Fishers now have DOC authority to collect tissue samples from protected fishes and reptiles on DOC's behalf and we are looking to increase sample collection regardless of any reduced observer coverage.</p>
ECO	Support.	Noted.
NZFCF	Oppose this project. CSP is not to be used as the basis for taxonomic research.	This project has no connection to taxonomic research. All the species involved are taxonomically well known, with accepted scientific names. The samples collected would be used to confirm species identifications, and for assessments of stock structure and population size and trend to improve understanding on impacts of commercial fishing.
<b>INT2024-08 Westland petrel overlap with commercial fishing effort</b>		
SNZ	Support this project in principle but only expect to pay a maximum of 50%, as the risk assessment indicates Westland Petrels are only at medium risk from commercial fisheries.	DOC considers this project a conservation services targeted at understanding risks from commercial fishing, and therefore proposes cost recovery accordingly. Additionally, there is wider interest in Westland petrel research, and additional work areas are being progressed outside of CSP without any industry-levied funding.
ECO	Support.	Noted.

<b>POP2022-01 Black petrel population monitoring</b>		
SNZ	Support the continuation of this research in principle but oppose the application of cost recovery principles. Recommend independent review of population dataset to resolve uncertainties around demographic areas. Repeat previous recommendation for an independent review of the population dataset to help resolve uncertainties around demographic estimates.	Noted, however DOC is not actively seeking feedback for POP2022-01 as this was consulted on in 2022/23 and is included in the 2024/25 plan for completeness.
ECO	Support.	Noted.
<b>POP2022-08 Auckland Islands seabird research: Gibson's and white-capped albatross</b>		
SNZ & ECO	Support.	Noted.
<b>POP2022-10 Antipodes Island seabird research: Antipodean albatross and white chinned petrel</b>		
SNZ & ECO	Support.	Noted.
<b>POP2023-01 Aerial survey of leatherback turtles off Northeast North Island</b>		
SNZ	Disappointed this project has progressed, and not supportive of funding this exploratory aerial survey as no adverse effect has been demonstrated. Highly recommend that DOC explore more cost effective, best practice monitoring tools in future.	DOC is not actively seeking feedback for POP2023-01 as this was consulted on in 2023/24 and is included in the 2024/25 plan for completeness.
ECO	Support.	Noted.
<b>POP2023-02 Southern Buller's population study</b>		
SNZ	Support as high priority. Additionally, recommend developing a chick banding programme to increase long-term understanding of the Southern Buller's population.	Noted.
ECO	Support.	Noted.

<b>POP2023-03 Updated population estimate and marine habitat utilisation of yellow-eyed penguins/hoiho breeding on Campbell Island</b>		
SNZ	Support this project in principle but oppose application of cost recovery principles.	DOC is not actively seeking feedback for POP2023-03 as this was consulted on in 2023/24 and is included in the 2024/25 plan for completeness. However, Preliminary tracking data shows birds foraging up to 120km NNE out of the 12 nm mile area. Therefore, it is important to collect additional data to form a comprehensive picture for marine habitat utilisation of hoiho from Campbell Island, and inform any future multi-threat risk assessments for hoiho in the Campbell Island area.
ECO	Support.	Noted.
<b>POP2023-04 Campbell Island seabird research</b>		
SNZ & ECO	Support.	Noted.
<b>POP2023-05 Auckland Islands New Zealand sea lions</b>		
MHDD	Note this essential work, even more so with the removal of the Fisheries Related Mortality Limit.	Noted.
SNZ	Support the continuation of the sea lion pup count. Disappointed with lack of any action plan by DOC to treat <i>Klebsiella pneumoniae</i> . Opposed to 90% cost recovery by industry; the Minister's recent decision to remove the FRML indicated no adverse effect from fishing on sealions. SNZ would be willing to contribute funding directly to ensure this important work continues.	DOC is not actively seeking feedback for this project as it was consulted on in 2023/24 and is included in the 2024/25 plan for completeness. DOC recommends that this project continue to be cost-recovered at 90% until a review of the NZSL TMP has been completed. Cost recovery for year 3 of this project will be reviewed in the CSP research planning round in 2025. DOC is currently assessing the Ivomec proposal, and associated health and safety concerns, and is intending to hold a workshop in August to plan for the coming season.
ECO	Support.	Noted.
<b>POP2024-01 Flesh-footed Shearwater population monitoring</b>		
SNZ	Support this project in principle but oppose the application of cost recovery principles.	DOC considers there to be a demonstrable adverse effect from commercial fishing on flesh-footed shearwaters therefore

		appropriate cost recovery principles will apply.
ECO	Support.	Noted.
<b>POP2024-02 Improving knowledge on coral life history traits: assessing reproductive capacity to infer productivity, vulnerability and resilience of protected deep sea corals in the New Zealand region.</b>		
SNZ	Support this project in principle, however oppose this project 100% cost recovered to industry, as it does not relate to a known adverse effect of fishing.	DOC disagrees, such projects are the only way to inform risk assessment models that are an important mechanism for understanding commercial fisheries risk to protected corals. Cost recovery rules stipulate this should be fully cost recovered to industry.
ECO	Support.	Noted.
NZFCF	Oppose cost recovery of this project by industry, as no evidence to assert that bottom trawling poses a significant adverse effect on deep-sea stony corals.	DOC disagree that there is no demonstrable significant adverse effect from trawling on deep sea stony corals. Furthermore, there is substantial risk from trawling on deep sea black corals, lace corals and gorgonians.
<b>MIT2023-06 Underwater line setting devices for bottom longline vessels</b>		
SNZ	Only support the continuation of the underwater line depressor device (N. Hollands model), contingent to the device being developed for testing across a variety of inshore BLL gear set ups for multiple target species. Do not support any further testing of the other underwater line setting device. Recommend this project being completed in one year with a total research budget of \$75,000.	Noted, however DOC is not actively seeking feedback for this project as it was consulted on in 2023/24 and is included in the 2024/25 plan for completeness. This will be year two of a two-year project.
ECO	Support.	Noted.
<b>MIT2024-01 Protected Species Liaison Project</b>		
SNZ & NZFCF	Consider programme due for independent review to assess performance, efficiency, and effectiveness. Appreciate DOC willingness to work with SNZ on this. Acknowledge SNZ commitment to absorb some of current work programme hoping to reduce pressure on current LOP resources.	DOC supports ongoing collaboration with SNZ and will consider proposing an independent review of the Liaison Programme in the 2025-26 CSP research planning process. The costs of the programme are determined collectively and then divided amongst fleets as appropriate. Liaison workload has

	Expect cost of programme to decrease over time, and do not support reallocation of Purse Seine costs to other fleets.	increased due to increased reported captures for the SLL, BLL and trawl fleets, and the workload is not expected to decrease over the coming year. DOC is continuously working to maximise cost efficiencies, which has been realised by previous Crown financial contributions as well as in-kind management, coordination, and analyses to deliver this nation-wide Programme.
MHDD & ECO	Support.	Noted.
<b>MIT2024-02 Enhancing seabird bycatch mitigation across the set and soak periods in surface longline fisheries</b>		
SNZ	Support this project in principle. Refer to response under INT2024-03, recommending DOC works with SNZ Inshore Council to refine and combine these two projects.	SNZ has been consulted to identify areas for refinement and combination between INT2024-03 and MIT2024-02. Areas of overlap between the two projects, such as TDR data collection, have been consolidated into a single project.
ECO	Support this project. Project duration may need to be extended across several years.	Noted. The need for additional research will be considered in the 2025-26 research planning process.
NZFCF	Support intent to measure effectiveness of weighted hooks but doubt around the methodology. Appreciate CSP recognises risk to seabirds during the soak. Suggest funding is reallocated to industry to enable them to work with fishers to promote benefits of weighted hooks.	Noted. DOC supports the ongoing collaboration with SNZ. Methodology will be presented at a CSP Technical Working Group.
<b>MIT2024-03 Assessment of weighted hooks as a seabird bycatch mitigation option for surface longline fisheries</b>		
SNZ	Support this project. Funding should be used primarily to support data collation and analysis of impact of Procella 2.0 hooks on target catch rate and NFPS interaction rate. 3,000 hooks should be purchased and provided for trials. Methodology should include at-sea testing of a second model of weighted hook, that is currently in use by a small number of vessels in the fishery.	Noted. The trial of a second model will be considered.
ECO	Support this project. Suggest the project looks at impacts on bycatch species.	Noted. Impact on bycatch species has been incorporated into the research approach.

NZFCF	As above for MIT2024-02.	As above.
<b>MIT2024-04 Adaptive management tool for small vessel bottom longline</b>		
SNZ	Support contingent to building on recommendations from SEA2021-34 AEBR. Suggest name of the tool reflects its specific use to avoid confusion e.g. TDR User Interface or Fisher Sink Rate Calculator.	Noted. Title has been adjusted to “Sink rate management tool for small vessel bottom longline”. Relevant findings from SEA2021-34 will be considered.
ECO	Highlight simple bottle tests that have been developed in other bottom longline fisheries to assess and set standards for sink rates. The development of TDRs to monitor sink depths could provide additional data useful to the fisher.	Noted.
<b>MIT2024-05 Testing the utility of visual deterrent options to mitigate incidental bycatch of protected species in set nets</b>		
SNZ	Request that either MIT2024-05 or PRO2024-03 proceeds, not both. If this project proceeds, focus should remain primarily on understanding impacts of LED lights at depth to catch rate of target species. Due to the extremely low interaction rate of hoiho in commercial set nets, it will be unlikely to provide statistically significant outputs.	As per project description, the experiments will take place in a non-fishing context in areas of high bird abundance and diversity (e.g. different penguin species and shags), therefore project outputs will not be impacted by the relatively low interaction rates found in an operational setting. DOC is corresponding with FNZ to ensure both projects complement each other.
ECO	Support this project. Need to consider whether birds are attracted or herded to lights, as well as impacts on other protected species.	Project description has been adjusted to clarify that attraction and herding behaviours will be monitored and impacts on other protected species will be considered and assessed.
NZFCF	Possible benefit to using visual deterrent mitigation options, however given low capture rates of protected species in in set nets, it will not be possible to extract scientifically robust results from this research. Should focus research on impacts to fish catch levels.	Noted, see response to SNZ. This project will not to be conducted in an operational setting, and therefore it will not be possible to incorporate impacts on the catch levels of fish species into the study.
<b>MIT2024-06 Efficacy of seabird mitigation in large vessel trawl</b>		
SNZ	Support. Essential for DOC and research provider to work closely with SNZ and operators to shape methodology.	Noted. DOC supports the ongoing collaboration with SNZ.

ECO	Support this project. Analysis of the use of temporal and spatial closures should be included.	Noted. The objective of this project is on mitigation devices and practices; consideration of spatiotemporal management would be considered as part of wider management under NPOA Seabirds.
NZFCF	Supportive of project however do not think observer programme will achieve outcomes of the project	DOC considers adapting and supplementing observer data collection as the most cost-effective way to establish robust assessment of warp mitigation.
<b>MIT2024-07 Hector's dolphin acoustic deterrence devices in trawl fisheries</b>		
MHDD	Do not support use of ADDs for due to their unintended consequences. Spatiotemporal restrictions are the most efficient and effective way of keeping dolphins safe.	DOC recognises the role of spatiotemporal restrictions, however due to the increasing use of acoustic devices as mitigation in commercial fishing, DOC considers that further research is needed to ensure effective best practice with the use of these devices and limit the unintended consequences on the dolphins.
SNZ	Support this project as placeholder contingent to ongoing collaboration between DOC and SNZIC to determine scope of project. Suggest updating title to include set net.  Oppose cost recovery by industry, noting management measures in place under the TMP and Bycatch Reduction Plan ensure that there is no adverse effect from fishing on HDO.	DOC supports the ongoing collaboration with SNZ. Title has been updated to incorporate setnet, and scope of project has been updated to account for work undertaken by SNZ.  The measures in place under the TMP are intended to ensure there are no adverse effects from fishing on HDO, however, observer & fisher reported bycatch data demonstrates that there is a significant adverse effect from commercial fishing on Hector's dolphins. Cost attribution will be guided by appropriate cost recovery rules.
ECO	Support this project. Recommend assessing impacts of operational and environment factors on Hector's dolphin bycatch risk.	Noted and acknowledge the need to assess operational and environmental variables further, however, will wait another year for camera verified bycatch data before exploring further. DOC is also actively collecting supplementary information on any new bycatch events through the Liaison Programme, and we anticipate putting forward a project proposal that investigates operational and environmental variables for the 2025-26 CSP Annual Plan.
NZFCF	Do not support; SNZ already engaged in project to identify existing use of deterrents. Suggest CSP levy a generic project & redirect funding to SNZ. Encourage SNZ & CSP to collaborate.	Noted, DOC supports the ongoing collaboration with SNZ.