

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

By email: [csp@doc.govt.nz](mailto:csp@doc.govt.nz)  
Respond to: [Karli Thomas savethefush@gmail.com](mailto:Karli.Thomas.savethefush@gmail.com)

**15 May 2024**

## **Submission on the Conservation Services Programme Plan 2024/25**

### **Introduction**

The Deep Sea Conservation Coalition (DSCC) is an alliance of over 100 organisations globally, working to promote the conservation of biodiversity in the deep sea. The DSCC is working with a number of organisations in Aotearoa that are also concerned about bottom trawling, including Greenpeace Aotearoa New Zealand, WWF-NZ, Forest and Bird, Legasea, Our Seas Our Future, Endangered Species Foundation and Environment and Conservation Organisations of Aotearoa New Zealand (ECO), itself an umbrella organisation of about 45 groups. We are seeking an end to bottom trawling on seamounts and similar features by the New Zealand fishing industry, and since 2019 well over 80,000 people have supported a petition to protect these biodiversity hotspots from this destructive form of fishing.

In the context of our work, we wish to make the following comments on the Department of Conservation's [Conservation Services Programme Annual Plan 2024/25](#). We are only making comments on those items of the Annual Plan that are of direct relevance to our work, and our lack of feedback on other proposed projects does not indicate a view that they are not also important parts of the DoC CSP.

### **Overall input**

- The DSCC supports the programme of research and considers it vital to New Zealand's fishery management regime to avoid, remedy, or mitigate the adverse effects of commercial fisheries on protected species.

- The Annual CSP Report produced by DoC is a hugely valuable source of information much appreciated by environmental stakeholders, and provides more useful and clear information than reporting by Fisheries New Zealand.
- The independence of research is critical, and industry funding or confidentiality requirements should not interfere with conducting and publishing sound, independent research on the impacts of fisheries on protected species and other marine biodiversity. Transparency is critical to the sustainable management of our fisheries.
- We note with concern the shrinking industry contribution through cost recovery levies. In real terms the current cost-recovery levies are below half the value of what they were 25 years ago, and there are a lot more issues that need to be covered now than there were then, so a shrinking fund is being stretched even further.
- We also convey our concern at cost savings mandated by the current government and the impact that these could have on the work of the Department of Conservation, flow-on impacts on the independent research conducted by NIWA, and potential impacts on the deployment of observers and cameras on boats.
- We recommend that New Zealand develops a National Plan of Action (NPOA) on corals and other vulnerable benthic species.

### **Observer coverage and camera roll-out**

Section 1.4 outlines observer planning and the roll-out of cameras on boats, and Section 2.1 mentions observing commercial fisheries. The DSCC is concerned that the deployment of cameras on deep water bottom trawlers is not considered a high priority, despite their interactions with protected species and current lack of measures to avoid, remedy or mitigate those interactions. This has been justified on the basis of the level of observer coverage on these vessels being considered (by MPI) to be high. These vessels differ from the inshore fleet in their capacity to accommodate observers on board, however the rate of observer coverage on deep water bottom trawl vessels in NZ waters has ranged from around 25-30% in recent years (and has fallen below 10% in some years and reached closer to 40% in others). This is inadequate, not high, patchy, and is well below the 100% observer coverage that deep-water bottom trawl vessels and others of similar size (e.g. purse seiners) are required to have in the international waters of the South Pacific. All vessels should be required to have cameras and/or human observers on board and operating during fishing.

### **Identification, storage, and genetics of cold-water coral bycatch**

Section 2.3 / project INT2022-03 We support this ongoing project, and note that it is crucially important that Aotearoa retains its taxonomists. We note there were taxonomists lost from Te Papa in 2018, and now NIWA and DoC are impacted by cost-cutting and restructuring. We cannot risk losing this as a fundamental discipline for our understanding of the natural world. Identifying and classifying corals is also important as an information basis for protecting endemic, rare and cryptic species in the deep sea.

## Determining the resilience of Fiordland corals to fisheries impacts

Section 2.4 / project INT2022-05 Determining the resilience of Fiordland corals to fisheries impacts. This is an important ongoing project, and it is good to see some focus on corals in the inshore as well as deep water given the lack of observer coverage in inshore fisheries.

## Impacts and recovery potential of protected deep-sea stony corals

Section 2.9 / project 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. The DSCC strongly supports this collaborative research programme, as an opportunity to study corals alive and in-situ rather than in fishery bycatch. This information will also be important in identifying vulnerable marine ecosystems in our EEZ. Where populations of protected benthic taxa are identified by this research, the information should be used to 'avoid, remedy or mitigate' the impacts of fishing on these protected species, by closing areas where protected species are found to avoid further accidental or incidental bycatch. We specifically support the comparison of untrawled and previously bottom trawled sites in the research, and the continued study of coral recovery on previously trawled, now closed seamounts on the Chatham Rise creating an ongoing data set.

## Bycatch mitigation scenarios for protected corals

Section 2.10 / project INT2024-05 Testing bycatch mitigation scenarios for protected corals in New Zealand using best available information appears to (in part) follow up from the EEZ benthic forum that the DSCC and other stakeholders engaged in through 2022 and into 2023. We are disappointed that the forum did not progress through to consultation and decisions on measures to avoid, remedy or mitigate coral bycatch (and that of other vulnerable benthic species such as sponges and sea pens).

We urge DoC and other agencies to see this work through to completion, including actually closing areas where protected taxa are found, such as seamounts and similar features. Significant work was done towards this in the EEZ benthic forum, and we ask that this work is not lost - and seek to have eNGO representatives included in the group of 'subject matter experts' specified in this project, having followed the process to date in the EEZ benthic forum.

Ngā mihi,



Karli Thomas  
Deep Sea Conservation Coalition