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Submission on Conservation Services Programme, DRAFT Annual Plan 2024/25

1. Introduction

The Environment and Conservation Organisations of NZ (ECO) is the national alliance of 43 groups with a concern for the environment and conservation. We were established in 1971-72. Some of our member bodies are themselves federations or multiple groups. Many are area- based, some are focused on specific species or activities or impacts, some are not actually environmental groups but share our concerns.

ECO has followed issues of conservation and environmental management and practice, law and policy since our formation in 1971-2. We have member groups from all around New Zealand. We are by constitution and inclination non-partisan.

We have considerable experience and deep knowledge of New Zealand conservation and environmental law, the principles and practice of conservation and environmental management internationally, nationally and in other jurisdictions. We have followed issues relating to resource management, protection of nature, protected areas and species since the 1970s, and have pressed for any use of the environment to be sustainable.

2. Key Points

ECO supports research and 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.

ECO supports: “The CSP planning considers and works in parallel with other relevant planning and management processes such as the National Plans of Action (NPOAs) for seabirds and sharks, Threat Management Plans (TMPs) for the Hector’s and Māui dolphin and the New Zealand sea lion, and Te Kaweka Takohaka mō te Hoiho. The iterative and inclusive planning process ensures that gaps are identified, and research synergies are maximised.”

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, including turtles;
- 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.

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

ECO hopes that aggressive bird flu (H5N1) will not arrive in the New Zealand realm in the period involving these projects. This aggressive flu which has affected birds and mammal populations in the Atlantic would create new challenges to undertaking some of these projects and the need to fund biosecurity measures to ensure the safety of researchers and the animals being monitored.

3. Project commentary

Annual Reporting

ECO welcomes the annual reporting (Research Summaries) by the Department as this is a very important complementary report to those of the Ministry of Primary Industry (MPI). This report is in a form that is more useful than those produced by the MPI as it documents the problem fisheries and the changes over time.

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.

3. Project Commentary

3.1 Interaction Projects

2.1 Observing commercial fisheries

ECO notes that the full details on the observer coverage planned for the financial year 2024/25 are to be finalised shortly and consulted on separately.

As ECO and other ENGOs are not involved in the Fisheries New Zealand consultation on fisheries and conservation services levies, which is restricted to the fishing industry, this process is not a consultation process that we recognise.

ECO supports the observer coverage programme to provide essential information on the number or quantum and species of protected marine animals caught annually in fisheries by New Zealand flagged vessels. This information is not available through the camera programme.

ECO supports the implementation of cameras on all fishing vessels, especially those not covered by observers in inshore fisheries, to assist in identifying the scale of protected animals caught in different fisheries. The recent documentation of Hector's dolphin captures in South Island set net and trawl fisheries have provided new information on the scale of the problem.

2.2 INT2022-02 Identification of seabirds captured in New Zealand fisheries

ECO supports the continuation of this project identifying what seabirds are caught in NZ Fisheries.

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

2.3 INT2022-03 Identification, storage, and genetics of cold-water coral bycatch specimens

ECO supports the continuation of this project on the identification, storage and genetics of cold water corals.

ECO supports DSCC comments on the need for Aotearoa to retain its taxonomic capability. Taxonomists have been described as an endangered species globally.

2.4 INT2022-05 Determining the resilience of Fiordland corals to fisheries impacts

ECO supports the continuation of this project looking at Fiordland corals resilience to fisheries impacts. These are long-lived taxa which are impacted by fishing both inside and outside the New Zealand EEZ.

Given the patchy and small amount of data in inshore fisheries bycatch of corals makes this project more important so as to inform future management.

2.5 INT2023-04 Identification of marine mammals, turtles and protected fish captured in New Zealand fisheries

ECO supports the continuation of this multi-year project identifying marine mammals, turtles and protected fish species.

This project helps implement the NPOA Seabird and the NPOA Sharks.

2.6 INT2023-06 Investigating the impact of fisheries on endangered hoiho diet, microbiome, and disease susceptibility

ECO supports the continuation of this multi-year project on endangered hoiho mainland and Rakiura populations.

Changes in prey species, the impacts of fishing and nutritional issues are relevant to management decisions.

This project covers strategic priorities of the Te Mahere Rima Tau, the five-year action plan, in support of Te Kaweka Takohaka mō te Hoiho.

2.7 INT2024-02 Port-based audit and protected species retention programme

ECO supports this crucial project. Given the roll out of cameras it is essential there are measures to address data gaps and enhance verification of reporting. The collection of additional protected species captures is an important element of this project which will be in inshore fisheries where observer coverage has been low or non-existent.

2.8 INT2024-03 Understanding the effects of fishing depth on turtle and seabird bycatch

ECO supports this important project. We agree that leatherback turtles should be the priority but it is important to assess the impact on other turtle species- this is covered by project objective 2.

The gear setting and depth profile information are important elements of considering measures to avoid seabird and turtle capture. ECO recommends looking at spatial and temporal issues as part of this research to see if there are other important elements in understanding bycatch.

This project will aid implementation of the National Plan of Action on Seabirds.

2.9 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

ECO supports this collaborative research programme involving the RV Sonne to study corals. This research is important in informing management decisions on protecting VMEs and coral species from the impacts of bottom trawling.

ECO supports both objectives for this project.

2.10 INT2024-05 Testing bycatch mitigation scenarios for protected corals in New Zealand using best available information

ECO supports further research on the coral overlap with commercial fishering and options to reduce coral bycatch in the EEZ. This research should include consideration of recovery from impacted coral species and identified coral hot spots that have been bottom trawled.

This scenario work is an important project for future management options of protected corals.

2.11 INT2024-06 Interaction of spotted shags with northern North Island set net fisheries

ECO supports this project and its focus on the impact of set nets on the declining spotted shag population. Shag are reported caught in set nets and some other fisheries.

This project will aid implementation of the National Plan of Action on Seabirds.

2.12 INT2024-07 Collection and curation of tissue samples from protected fishes and turtles

ECO supports this 3 year project to store and collate tissue samples from protected fish and turtles. This information will allow better documentation of species bycatch where the animals are large and difficult to return back to poor or store.

This project will allow future assessment of protected fish and turtle populations impacted by fishing in New Zealand. This is likely to reduce costs in the long run by having curated samples that are available for analysis.

2.13 INT2024-08 Westland petrel overlap with commercial fishing effort

ECO supports this project looking at overlap between commercial fishing effort and Westland black petrel. This petrel breeds at one site on the West Coast and is vulnerable to being caught in a range of fisheries. This project will enable the analysis of already collected GLS and GPS tracking data. The recent improvements in fisheries reporting will allow for more detailed analysis of overlap.

This project will aid implementation of the National Plan of Action on Seabirds.

3.2 Population Projects

3.1 POP2022-01 Black petrel population monitoring

ECO supports the continuation of the multi-year project and the project objectives. The multi-year at sea sampling will add to information already collected.

This project will aid implementation of the National Plan of Action on Seabirds.

3.2 POP2022-08 Auckland Islands seabird research: Gibson's and white-capped albatross

ECO supports the continuation of the multi-year project and the project objectives. This research is providing key demographic information on both the endangered Gibson's albatross and Auckland Islands white capped albatross.

This project will aid implementation of the National Plan of Action on Seabirds.

3.3 POP2022-10 Antipodes Island seabird research: Antipodean albatross and white chinned petrel

ECO supports the continuation of the multi-year project and the project objectives. This research is providing key demographic information on both the endangered Antipodean albatross and white chinned petrel. Given they breed at a similar time on Antipodes Island and the difficulty of accessing the island, it is efficient to pair research on these species into one project.

This project will aid implementation of the National Plan of Action on Seabirds.

3.4 POP2023-01 Aerial survey of leatherback turtles off Northeast North Island

ECO supports the continuation of the multi-year project and the project objectives to assess the use of aerial surveys to monitor leatherback turtles in NZ. The high numbers of turtles killed by NZ longline fisheries makes this a high priority project.

3.5 POP2023-02 Southern Buller's population study

ECO supports the continuation of the multi-year project and the project objectives on Southern Buller's albatross on Snares and Solander Island.

This project will aid implementation of the National Plan of Action on Seabirds.

3.6 POP2023-03 Updated population estimate and marine habitat utilisation of yellow-eyed penguins/hoiho breeding on Campbell Island

ECO supports the continuation of the multi-year project and the project objectives on population and and marine habitat use by Southern population of Hoiho on Campbell Island.

This project covers strategic priorities of the Te Mahere Rima Tau, the five-year action plan, in support of Te Kaweka Takohaka mō te Hoiho. This project will aid implementation of the National Plan of Action on Seabirds.

3.7 POP2023-04 Campbell Island seabird research

ECO supports the continuation of the multi-year project and the project objectives involving combined research on Southern Royal albatross, Grey-headed albatross and Northern Giant petrels. Given they are found on Campbell Island and the difficulty of accessing the island, it is efficient to group research on these species into one project with priority given to the declining Southern Royal Albatross.

This project will aid implementation of the National Plan of Action on Seabirds.

3.8 POP2023-05 Auckland Islands New Zealand sea lions

ECO supports the continuation of the multi-year project and the project objectives.

ECO recommends that the season be extended to obtain additional information on pupping success.

3.9 POP2024-01 Flesh-footed Shearwater population monitoring

ECO supports this project which is part of ongoing monitoring of the flesh-footed shearwater at Lady Alice/Mauimua and Ohinau Island populations. This research is within the Hauraki Gulf Marine Park. These birds are caught by a number of fisheries in FMA1.

This project will aid implementation of the National Plan of Action on Seabirds.

3.10 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

ECO supports this project on improving knowledge on coral life history traits. The collaboration with the collection of live-specimens with the RV Sonne is an important synergy for this project.

Coral life history traits are important to understand when considering resilience and recovery of corals from the impact of bottom trawling. ECO endorses the focal species proposed in this project.

3.3 Mitigation Projects

4.1 MIT2023-06 Underwater line setting devices for bottom longline vessels

ECO supports the continuation of the multi-year project and the project objectives to further advance underwater line setting devices on bottom longline vessels.

This project will aid implementation of the National Plan of Action on Seabirds.

4.2 MIT2024-01 Protected Species Liaison Project

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

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

4.3 MIT2024-02 Enhancing seabird bycatch mitigation across the set and soak periods in surface longline fisheries

ECO welcomes this project looking at bycatch during the set and soak periods of surface longline operations. The use of hook pods and the increase in effort targeting southern bluefin tuna means research into different mitigation strategies is essential.

This project may take longer than a year to provide results and may need to be developed over several years.

This project will aid implementation of the National Plan of Action on Seabirds.

4.4 MIT2024-03 Assessment of weighted hooks as a seabird bycatch mitigation option for surface longline fisheries

ECO supports the development of effective mitigation technology. Weighted hooks are a method that could be developed further to provide more effective results.

The project should also look at whether there is any impact on bycatch species.

This project will aid implementation of the National Plan of Action on Seabirds.

4.5 MIT2024-04 Adaptive management tool for small vessel bottom longline

ECO is interested in this project but not there are 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.

This project will aid implementation of the National Plan of Action on Seabirds.

4.6 MIT2024-05 Testing the utility of visual deterrent options to mitigate incidental bycatch of protected species in set nets

ECO supports the development of effective mitigation technology. The proposal to look at different lights below and on the water will provide some information. The question over whether birds are attracted to the lights or herded by the lights need to be considered. The impact of other protected bycatch species need to be considered and assessed.

This project will aid implementation of the National Plan of Action on Seabirds.

4.7 MIT2024-06 Efficacy of seabird mitigation in large vessel trawl

ECO supports the development of effective mitigation technology. The impacts of trawling including warp strike, net capture, and cryptic mortality is a major issue which needs an effective mitigation response.

There are a range of warp mitigation measures being looked at in other fisheries in the Southern Ocean which should be considered.

Seabird mitigation on trawl vessels should include analysis of the use of temporal and spatial closures.

This project will aid implementation of the National Plan of Action on Seabirds.

4.8 MIT2024-07 Hector's dolphin acoustic deterrence devices in trawl fisheries

ECO supports the development of effective mitigation technology. ECO is supportive of measures to prevent Hector's dolphin being caught by trawl vessels. Given the past poor performance of acoustic deterrences it would be important that if this project proceeds to look at recent reported captures and assess effects: spatial, temporal, target species, size of gear (eg headline height), water depths, etc. Given trawl gear set up it would be crucial that any acoustic device doesn't have the effect of herding dolphins in to the next

4.0 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