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22 April 2024

CSP consultation
Department of Conservation
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Re: Draft Conservation Service Programme 2024-25

Māui and Hector's Dolphin Defenders is a non-profit Incorporated Society with the purpose of improving the health and population status of the New Zealand dolphin.

We have been involved in developing the Hector's and Māui Dolphin Research Strategy and we attend the Māui and Hector's Stakeholder Forums every year.

Our specific interest in the Conservation Services Programme 2024-25 relates to Hector's dolphin research.

We make the following points:

1. Administrative costs

We support an increase in budget to deliver the proposed CSP programme. Proper monitoring of fisheries impacts on threatened species needs proper funding. This work should not be at risk because of insufficient funding.

The fishing industry should cover any costs incurred because of fishing impacts. We have heard the Minister of Oceans and Fisheries claim that because fish stocks are a public resource, observer and onboard camera costs should be funded by the public purse. We argue that because the benefits of fishing accrue to the industry, they should pay.

Electronic monitoring and observer coverage are needed because of the impacts of the industry on the oceans commons. The industry is imposing externalities onto the marine ecosystem, and quantifying these and addressing them should be funded by the industry that causes the need for them. So while we agree with an increase in costs to properly manage fisheries impacts, the industry generating those impacts should pay.

2. Observing commercial fisheries

We note that full observer coverage details are still being developed and will be consulted on in the future. We wish to be included in the list of stakeholders for this consultation.

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

This project is based on information on bycatch from the fishing industry provided quarterly and reported annually. However, this may not be often enough to properly respond to high bycatch rates of threatened species.

We also note that the Draft CSP suggests that depending on results from the onboard camera programme, the stocks currently allocated may be revisited in the future. However, there is no detail about what would trigger that 'revisit', what are the processes, thresholds and triggers for change? More clarity is required for transparency and clarity for all stakeholders that bycatch is being managed in light of new (onboard camera) information in a way that meets timely sustainability drivers.

4. INT2024-02 Port-based audit and protected species retention programme

We support this programme on the basis that it will improve timely oversight, collection and identification of bycatch.

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

While not relating specifically to Māui or Hector's dolphins, we support this programme. In some ways, spotted shags are an indicator species of the impacts of set nets on other marine animals including dolphins.

For example, we were interested in the case of the tracked spotted shag 224976 who was monitored for 108 days until caught in a set net off Te Puru then discarded in a ditch. This event happened around the same time that Hector's dolphins were reported visiting the Firth of Thames.

The significant loss of spotted shags in set nets is a tragedy for the species. It also indicates the significant risks of set nets on non-target species, whether they are permanent residents or vagrants.

This spotted shag research programme should reveal important information that can be extrapolated to inform other species' threat management programmes.

6. POP2023-05 Auckland Islands New Zealand sea lions

While not related to our mandate around Māui and Hector's dolphins, we see this work as essential given the decline of NZ sea lions. The trawl and other human caused

threats to sea lions, and their population decline, reflect the threats and population status of Hector's. The removal of the Fisheries Related Mortality Limits makes this work even more important.

7. MIT2024-01 Protected Species Liaison Project

We support this programme. The onboard electronic monitoring is revealing much more bycatch than previously reported. The response to the new data from electronic monitoring must be more efforts to reduce bycatch. This must mean the exclusion of fishing methods in areas where threatened species and indiscriminate and unsustainable fishing overlap. In the meantime however, liaison between officials and fishers is important to reduce bycatch as much as possible. With regard to Hector's this is important for the voluntary low headline height and slow trawl speed practices which are proving ineffective at reducing bycatch.

8. MIT2024-07 Hector's dolphin acoustic deterrent devices in trawl fisheries

We note that there are a range of acoustic deterrent devices across New Zealand fisheries used to dissuade Hector's from approaching nets and becoming bycatch. We also note that the draft CSP recognises that keeping fishing boats out of their habitat (spatiotemporal restrictions) is the most efficient and effective way of keeping dolphins safe.

Interest from the industry is not a good reason to investigate and deploy pingers or Acoustic Deterrent Devices (ADDs) when fishing restrictions are more effective and efficient.

We also note that depending on how they are deployed, ADDs may not be performing as manufacturers expect, and may be unreliable for actually deterring dolphins and keeping them safe.

We agree "It is important for all stakeholders to understand the viability and limitations of using such devices....if they are to be used for mitigating captures of Hector's dolphins in New Zealand fisheries."

We submit that ADDs should not be used because of their unintended consequences. Firstly, they may not deter dolphins at all, giving a false sense of mitigation. Secondly, they might condition the dolphins to associate pingers with food, attracting and habituating the dolphins to the threats they are supposed to avoid, not deterring the dolphins at all. ADDs are no substitute for getting the nets out of the dolphin habitat. Thirdly, if they are effective deterrents, they deter the dolphins from pursuing and catching important prey food.

While we see benefit in quantifying the use and efficacy of ADDs, we are concerned that this programme takes funding away from research projects that have been agreed and prioritised under the Hector's and Māui [Five Year Research Strategy](#).

Any current reliance on ADDs might well be mistaken, and this programme may reveal the limitations of this reliance. However, we already know that too many dolphins are being killed in nets, current mitigation is unsuccessful, and set and trawl nets have no place in Hector's habitat.

We submit that the Draft CSP needs to include research projects that enable the objectives of the Māui and Hector's Threat Management Plan to be met - that means recovery, not just deterrence from important food sources.

Thanks again for the opportunity to submit,

Christine Rose
Chair
Māui and Hector's Dolphin Defenders NZ Inc