

## CSP Annual Plan 2019/20 Summary of Submissions

This document provides a summary of the written feedback received during the consultation period for the CSP Annual Plan 2019/20 as well as DOC's responses to the feedback received.

### List of Submitters

<b>Submitter</b>	<b>Shown in Comment Summary as:</b>
Te Ohu Kaimoana	TOKM
Fisheries Inshore New Zealand & Deepwater Group	FINZ & DWG
Southern Seabirds Solutions Trust	SSST
Cawthron Institute	CI
WWF New Zealand	WWF

**PART A: General comments**

Submitter	Submission	DOC response
TOKM	Suggest there is room to enhance the relationship between the Department of Conservation and Te Ohu Kaimoana in the CSP space. Suggest an engaged kanohi ki te kanohi approach to consultation for the development of the Annual Plan and determination of conservation costs to quota owners.	DOC is always open to building stronger stakeholder relationships and growing engagement during the planning process. The CSP Research Advisory Group meetings are held during the planning phase of CSP research projects for the coming year, allowing for face to face conversations between DOC staff and stakeholders. Written comments can also be submitted, and they supplement those given at the RAG meetings. All comments and minutes are publicly available on the CSP website. This process allows fair discussion and collaboration across all stakeholders, providing multiple opportunities and mechanisms to input into the planning process.
TOKM	Express concern regarding the lack of an overarching strategic approach toward the generation and prioritisation of research projects. Consider identification of long-term objectives and planning research consistent with that direction a necessary precondition.	Please refer to the CSP Strategic Statement 2018 for information on the strategic approach for research planning. Medium term research plans and risk assessments are amongst the tools used to inform the overall research planning.
FINZ & DWG	Express concern over lack of a strategic analysis that identifies the priorities, management and research approach for high priority aquatic protected species.  Existing medium-term plans have no population management objectives to guide them and are population monitoring plans – not research plans focused on understanding and resolving issues.	As above.  Medium term research plans consider population status and fisheries risk and prioritise actions to better understand the adverse effects on protected species populations.

**PART B: Comments specific to INT2019-01 Observing commercial fisheries**

Submitter	Submission	DOC response
2.1 Observing commercial fisheries		
FINZ & DWG	<p>Consider the per unit costs for observer coverage in the inshore to be excessive and would support the targeted use of electronic monitoring where appropriate. Existing electronic monitoring work has been conducted by Fisheries New Zealand. Urge DOC to actively engage in the FNZ scientific working group process so that the learnings of these EM projects can benefit any future projects and facilitate engagement with industry.</p> <p>Monitoring coverage in 2019/20 should be focused on:</p> <ul style="list-style-type: none"> <li>a. confirming the level of risk to Hector’s and Maui dolphins;</li> <li>b. confirming the level of interactions with seabirds with high risk scores; and</li> <li>c. evaluating the utilisation and performance of mitigation measures in the bottom longline and surface longline fleets.</li> </ul> <p>Do not agree with the operational 2019/20 approach for assessing the risk to Maui and Hector’s dolphins from commercial set-netting and trawling.</p> <p><i>Inshore set-netting:</i> East coast South Island, would prefer to see coverage focused on Banks Peninsula and Kaikoura regions. Suggest observers photograph fins for potential later research on survival rates.</p>	<p>The cost of observer services is beyond the scope of submissions on the CSP Annual Plan 2019/20. DOC supports the use of digital monitoring and agrees that learning and outcomes of existing programmes should help to inform future projects.</p> <p>There are a number of competing priorities in the 2019/20 observer seadays plan. While DOC are involved in the process, observer days are ultimately decided by FNZ.</p> <p>Noted. See above.</p> <p>Observers are currently asked to take photos and videos of marine mammals such as Hector’s and Maui’s dolphins.</p> <p>Additional monitoring methods are being explored.</p>

	<p>Consider Southland and Otago coast observer coverage given past 4 years coverage has provided robust information on protected species captures. Do not support setnet coverage in Taranaki, in preference to observer coverage, satellite tagging, or aerial surveys should be explored</p> <p><i>Inshore trawl:</i> Do not support 100% coverage of WCNI trawl due to high costs. Urge DOC to look into voluntary video monitoring that is ongoing in the area.</p> <p><i>Inshore bottom longline:</i> Agree with planned coverage.</p> <p><i>HMS Surface longline:</i> Higher coverage would be beneficial.</p>	<p>Noted. See above.</p>
<p>CI</p>	<p>Overall supportive of approach.</p> <p>Cook Strait Hoki fishery observer coverage has been very low and high fur seal captures and almost all are mortalities, strongly recommend increased observer coverage to &gt;50% for 2-3 years to establish an understanding of the fishery and factors influencing bycatch. Level of bycatch could be unsustainable for local populations of fur seals if all the bycatch is coming from a single or small number of colonies.</p>	<p>Noted.</p> <p>There are a number of competing priorities in the 2019/20 observer seadays plan. While DOC is involved in the process, observer days are ultimately decided by FNZ.</p>

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

Submitter	Submission	DOC response
2.5 Characterisation of marine mammal interactions		
<p>TOKM [Comment submitted during proposal phase and comments still stand]</p>	<p>Request that data not be extrapolated but presented as is. Support identification of mitigation techniques.</p>	<p>Noted. The focus of this study is characterisation of interactions rather than extrapolation of data.</p>
<p>FINZ &amp; DWG</p>	<p>Note the overlap that will exist in the data collection phase with the FNZ project to establish a database of protected species and consider the project should be deferred until that database is completed, thereby decreasing the cost of the project. Unable to support the project at the current cost.</p> <p>Consider that the 2018 FAO report (<i>Expert Workshop on Means and methods of Reducing Marine Mammal Mortality in Fishing and Aquaculture Operations 2018 FAO ISSN 2070-6987</i>) on marine mammal mitigation measures should be the primary source of information and reduce the resources needed for that aspect of the project.</p> <p>Unable to reconcile the stocks to be cost recovered with the captures of marine mammals. Request re-consideration of stocks for greater alignment with marine mammal captures.</p>	<p>Long term observer data is already available for this project. The implementation of this project will consider any work undertaken by FNZ and will be timed accordingly.</p> <p>Noted and agree.</p> <p>Cost recovery was based on the capture of marine mammals over a long-term dataset. Stocks levied have observed marine mammal interactions.</p>

CI	Support this project and suggest that the budget is increased to \$35k reflect the amount of data and the complexity of the analysis.	DOC believes the price is commensurate to other projects of a similar nature.
2.6 Identification and storage of cold-water coral bycatch specimens		
FINZ & DWG	Do not support the project cost increase from \$40,000 to \$60,000 per annum without a clear explanation of additional work.	The budget for previous coral ID work has not been inflation adjusted. The new costing reflects predicted true costs and includes additional elements, e.g.: attendance at observer training.
2.8 Post-release survival of seabirds		
TOKM [Comment submitted during proposal phase and comments still stand]	Would prefer a project over the desktop study proposal as is. Agreed that more information is needed to inform cryptic mortality estimates, but this project does not achieve it.	This is a preliminary project to ascertain the best method for assessing post release survival. If an adequate method is recommended, a research project would then be put forward for CSP stakeholder consultation.
FINZ & DWG	Do not support this project due to low survival rates of live captured seabirds highlighted in the seabird risk assessment. Unclear on the relative conservation costs or benefits of the project.	DOC considers that substantial uncertainty remains around the fate of seabirds post interaction.
3.7 Investigation of electronic device options to assess distribution, diving and foraging behaviour of Hector's dolphins		
TOKM [Comment submitted during proposal phase and comments still stand]	Support project.	Noted.

FINZ & DWG	<p>Support project and view it as the highest priority for population research.</p> <p>Expect the project to be completed in sufficient time (since the project is a literature review) so as to allow contracts to be let for a 2020/21 implementation of the devices.</p>	Noted.
WWF	Support this project. Would suggest a tagging study be included. Not only builds knowledge around habitat use but also enables a health assessment. Previous tagging study (Stone et al. 2005) highlighted tagging is safe and useful for multiple purposes.	This is a preliminary project to ascertain the best method currently available for assessing the fine scale distribution, diving, and foraging behaviour of Hector's dolphins. If an adequate method is recommended, a research project would then be put forward for CSP/TMP stakeholder consultation.
3.8 Fish shoal dynamics in North-eastern New Zealand		
TOKM [Comment submitted during proposal phase and comments still stand]	<p>Interesting however, not sure if CSP. Seems fisheries management outcomes rather than conservation.</p> <p>Knowledge around inshore productivity and connections between shoaling and protected species would be helpful.</p>	DOC considers there to be a high likelihood of indirect adverse effects on food availability.
FINZ & DWG	No linkage to protected species impacts.	As above.
3.9 Antipodes Island seabird research		
TOKM [Comment submitted during proposal phase and comments still stand]	Support extending use of funds by additional projects while conducting Antipodean albatross work however, these projects are out of CSP scope.	Northern giant petrel is assessed at moderate risk in the Seabird Level 2 Risk Assessment, for which routine population monitoring is identified as an appropriate response in the CSP Seabird Medium Term Research Plan. White-chinned petrel has a lower risk score, but the potential for cryptic taxon between island groups exists which may elevate risk scores if treated separately in future assessments.

FINZ & DWG	Do not support research into Northern giant and white-chinned petrels as Antipodean albatross are priority.	As above.
3.10 Southern Buller's albatross: Snare/Tini Heke population project		
SSST	Based on the fact that that survivorship of adults has declined, it would be really great to track some birds to understand/rule out some causes for this - perhaps they have altered their foraging area for instance.	Noted, DOC will consider options for instigating tracking.
3.11 New Zealand fur seal: Bounty Islands population assessment		
CI	Support this project. Important given level of bycatch around the Bounties. Exploring existing available data is sensible and cost effective.	Noted.
3.12 Spotted shag population review		
TOKM [Comment submitted during proposal phase and comments still stand]	Do not support, low risk. Project is interesting and see the conservation value, however it is out of CSP scope. CSP need to provide rationale around how this is associated with fisheries risk.  Understand that the northern populations are declining, however, this desktop study needs to be core funded. If relevant information from this project determines a fisheries risk to northern populations then support funding a field study.	Noted. The northern population likely represents a cryptic taxon, possibly a cryptic species, thus likely to be much more vulnerable to the adverse effects of fishing than for the current spotted shag taxon. This project will be reduced in budget and 100% Crown funded to conduct the initial phase of assessment and make recommendations for any future projects required.
FINZ & DWG	Do not support.	Noted. This project will be reduced in budget and 100% Crown funded to conduct the initial phase of assessment and make recommendations for any future projects required.
4.1 Protected species liaison project		
FINZ & DWG	Support, though concerned with level of funding allocated to this project. Requires ongoing engagement with vessel operators not just the generation of vessel specific plans.	Noted. The liaison programme will be expanded in the 2019/20 year via increased Crown funding.



4.2 Dolphin dissuasive device mitigation in inshore fisheries		
FINZ & DWG	Consider the scope of the project should be limited to only assessing the potential to mitigate Hector's and Maui dolphin captures and should be extended beyond the development of a methodology to include the completed research project, including the field research. Hence, do not support the project as currently scoped, would support an integrated evaluation of the potential to decrease interactions for Hector's and Maui dolphins.	Given that adverse impacts have been described in some dolphin dissuasive device research worldwide, we would not include field research until the mitigation measure is fully investigated for use in the specific context of inshore New Zealand fisheries. This requires an evaluation of the potential impacts on other marine species.
CI	Support this project.	Noted.
4.3 Review of mitigation techniques to reduce benthic impacts of trawling		
TOKM [Comment submitted during proposal phase and comments still stand]	Support.	Noted.
FINZ & DWG	Support.	Noted.
4.4 Lighting adjustments to mitigate against deck strikes/vessel impacts		
FINZ & DWG	Of the observed seabird captures contained on the Dragonfly website, deck captures account for 18% of the total captures but only 1.3% of the deaths. There were no deck captures of black petrels and flesh-footed shearwaters that resulted in deaths. Do not support this project.	DOC considers vessel impacts to represent a substantive proportion of fisheries interactions therefore requiring mitigation research. Post release survival remains a large uncertainty.

4.5 Optimum batching interval for discharge management on vessels in the scampi fishery

<p>TOKM [Comment submitted during proposal phase and comments still stand]</p>	<p>Caution over trying to prescribe considering the variability across fleets regarding the amount of offal fishing methods. Would support addressing priority fisheries and investigating best practice offal management for a fishery e.g. scampi.</p>	<p>Based on feedback from multiple stakeholders this project is presented in the Annual Plan with a focus on the scampi fishery.</p>
<p>FINZ &amp; DWG</p>	<p>Do not support project. Same output could be achieved by liaison officers working with the fleet and FNZ observers to determine appropriate protocols for the vessels. An operational mitigation setting shouldn't require a research project of the nature proposed.</p>	<p>This project was formulated based on prior CSP work on discharge management which highlighted that batching is poorly recorded and poorly understood, though has the potential of being a simple measure to reduce protected species interactions. The increase in data gathered by observers and liaison officers around vessel discharging would be an important component of this project.</p>