

# CSP Annual Plan 2021/22

## Summary of Submissions

### 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
Yellow Eyed Penguin Trust	YEPT
Cawthron Institute	CI
New Zealand Rock Lobster Industry Council	NZRLIC
Environment and Conservation Organisations of NZ INC	ECO

**PART A: General comments**

Submitter	Submission Summarised by DOC	DOC response
YEPT	Supportive overall. Disappointed no hoiho POP or MIT projects, especially given commitment of partners to progress strategic priorities within hoiho strategy and action plan. Project proposal submitted early 2021.	Noted. DOC will continue to investigate avenues to progress such research, including through the hoiho recovery work in the Aquatic Unit and through CSP in 2022-23.
Cawthron	It would be very useful to see a list of priority fisheries that CSP proposes to cover each year so that stakeholders can understand what CSP sees as priorities. This would provide clarity on competing CSP projects.	Noted and agreed. Placing proposed research within a fisheries context rather than species-by-species list could help clarify priority areas and assist with observer planning with FNZ.
Cawthron	Concern expressed over lack of mitigation projects, should be CSP focus to reduce bycatch. Previous CSP projects have recommended future MIT projects – why are they not included (e.g., MIT2019-1, MIT2016-2). Noting that DOC is currently undertaking MIT gaps mitigation project and hope this will result in 22/23 CSP annual plan increase in MIT projects, but also recommend additional MIT projects be brought forward and included in 21/22 plan.	DOC acknowledges concerns over the low number of mitigation projects in the 2021/22 CSP annual plan. DOC is currently undertaking a ‘stocktake’ of mitigation measures used in commercial fisheries to identify gaps and potential opportunities to continue building on efforts to reduce bycatch of protected species. DOC considers this a priority. The outcomes of this work, due for completion in July 2021, will provide a platform to inform joint discussions on the strategic development of appropriate mitigation projects to prioritise for inclusion in future CSP annual plans.
Cawthron	Concern expressed over several key projects missing from annual plan:  (1) Hector’s and Māui dolphin projects (extraordinary given TMP recommendations and threat status) even though several were presented at the CSP RAG for consideration,  (2) Hoiho, even though 2 projects were put forward and scored quite high,  (3) Subant albatross (white-capped, Gibson’s, Southern Royal, light mantled sooty) surprising given previous long term monitoring projects. Why they are no longer being supported.	(1) DOC made the decision to redevelop the proposed Hector’s & Māui dolphin projects so that they were fit for purpose and progress them under the Hector’s & Māui dolphin Threat Management Plan process.  (2) DOC will continue to investigate avenues to progress hoiho research, including through the hoiho recovery work in the Aquatic Unit and through CSP in 2022-23.  (3) Due to the scoring of these projects through the RAG prioritisation process, DOC made the decision to deliver subantarctic seabird research for 2021-22 through DOC’s wider bycatch programme, to enable higher ranked projects to be delivered through CSP.

FINZ & DWG	Concern over repeated lack of CSP strategic plan to identify and prioritise future work and avoid scramble for funds by research providers.	The CSP Strategic Statement outlines the strategic direction of CSP, and the processes used to deliver strategically aligned research plans. As advised to the CSP Research Advisory Group, DOC intends to review the CSP Strategic Statement in late 2021.
FINZ & DWG	<p>Continued dissatisfaction at funding POP projects, including 8 this year at expense of MIT projects which are seen as of greater value; considered excessive.</p> <p>Great concern on absence of funding for research on dolphin dissuasive devices and trialling dolphin tagging – noting DOC suction cup trial.</p> <p>Concern over apparent increase in turtle interactions due to climate change and keen to be prepared with appropriate mitigation – keen to support work.</p>	<p>DOC acknowledges concerns over the low number of mitigation projects in the 2021/22 CSP annual plan and dissatisfaction with the comparatively high number of population projects. However, DOC disagrees that this is at the expense of mitigation projects.</p> <p>DOC is currently undertaking a 'stocktake' of mitigation measures used in commercial fisheries to identify gaps and potential opportunities to continue building on efforts to reduce bycatch of protected species. DOC considers this a priority.</p> <p>The outcomes of this work, due for completion in July 2021, will provide a platform to inform joint discussions on the strategic development of appropriate mitigation projects to prioritise for inclusion in future CSP annual plans.</p> <p>It is intended that a joint approach be taken to use results from this work to create a framework and strategy to develop and prioritise work programmes in the mitigation space for future CSP annual plans.</p> <p>DOC notes the concern over the absence of funding for further mitigation research on dolphin mitigation and also notes the increasing concern around turtle interactions with fisheries and considers these a priority for discussion around future CSP mitigation projects.</p>

TOKM	<p>Cost recovered work must stay within the bounds of the Fisheries Act. Concern expressed over scope creep with NPOAs, threat management plans etc., being used as justification. Integration of these plans can lead to misled research. Clear distinction needed between aspirational goals and legislative obligations.</p> <p>Concerns expressed on use of zero bycatch goal in cost recovered research outputs for CSP, as this is beyond the scope of what the Fisheries Act provides for.</p> <p>Clarification sought on the technical definition of 'zero bycatch' as it is currently unhelpful for understanding how to develop future mitigation. E.g., should we be using tori lines as a mitigation method if it results in seabird deaths and this is counterproductive towards zero bycatch?</p>	<p>DOC is committed to ensuring cost recovery is applied consistent with relevant legislation, as described in the CSP Strategic Statement.</p> <p>DOC has historically received feedback from stakeholders requesting clear linkage between research projects and wider government plans and objectives. These linkages have been provided to facilitate improved understanding of how CSP projects fit into wider processes.</p> <p>The Aotearoa New Zealand Biodiversity Strategy, and other plans such as the NPOA Seabirds 2020, set important national direction and strategy relevant to CSP. These strategies include aspiration zero bycatch goals and are referred to in order to place CSP projects into wider context.</p> <p>Whilst a zero-bycatch goal is aspired to in the long term, the focus of DOC in the short term is to deliver work consistent with intermediate goals of the reducing bycatch, and the focus is on continual improvement including through the use of mitigation measures which may, on their own, not achieve zero bycatch.</p>
TOKM	<p>Hope to see continued improvement in comms and a more proactive approach from DOC towards seeking TOKM input in to CSP long term strategy.</p>	<p>Noted.</p>
TOKM	<p>Support mitigation projects over population in terms of driving change to bycatch rates.</p>	<p>Noted.</p>
ECO	<p>Supportive of all projects. Wants details on Bio18 funded research projects and how they interact with CSP projects. Question ability to complete some of them in allocated time e.g., black petrel. Cetacean interactions should include pots and set net lines and cover all species.</p>	<p>The black petrel work is the first year of the at-sea programme and from this we will get a better understanding of the numbers of birds that can be captured off small vessels and the ratio of marked to unmarked birds. This is effectively a pilot programme and will determine if this approach is useful in answering the questions around apparent low juvenile rates and will help inform estimates of total population size.</p>

**PART B: Comments specific to INT2020-01 Observing commercial fisheries**

Submitter	Submission	DOC response
2.1 Observing commercial fisheries		
YEPT	Strongly request observer coverage continues to be presented within CSP AP.	Noted. The timing delays in the preparation of the observer plan were unfortunate this year. DOC will take steps to help prevent this from happening in the future.
YEPT	At least 50% observer coverage recommended for set nets in 2021/22 East and South Coast SI to provide best inform model estimates (Babcock et al. 2003).	Noted. DOC will record this as a stakeholder priority for observer coverage and will take it into observer planning with FNZ in for 2022-23.
Cawthron	Strongly recommend include common dolphin bycatch in Taranaki trawl fishery (average of 88 2013-15) in observer coverage as FNZ have suggested that bycatch estimates are due to low observer coverage. Strongly recommend increased observer coverage in Cook Strait fisheries to monitor bycatch of fur seals.	
FINZ & DWG	Reduction in number of observer days required to stay within CSP historical budget range of \$2.5-\$2.8 million.	Noted. DOC recognises industry concerns on the increase in the cost of the delivery of the observer programme. These increases are directly attributed to the increased investment in the health and safety of observers, and reflects the full cost associated with the current collective agreement for observers. The increase in cost is being partially offset by a 50% reduction in training days due to decreased observer turnover.
FINZ & DWG	With proposed introduction of EM on boats, observer coverage should be better applied to inshore risk areas including Kaikoura, South Coast SI trawl fleet and SLL.	Noted. DOC welcomes this discussion and a revisit to strategic placement of observers, especially on the inshore fleets and considering the proposed camera deployment schedule.
FINZ & DWG	Would like to discuss use of observers in SLL to provide info on fishing practices and protected species interactions as basis for reviewing mitigation measures.	Noted. DOC recognises that observer coverage is typically low (10%) in this fishery despite the risk to protected species and high rates of seabird bycatch and sees this as a priority area for more coverage where possible.

FINZ & DWG	<p>FINZ wish to be engaged in development of observer programme.</p> <p>Request that the principal stakeholders – FNZ, CSP and industry – have a candid discussion on the strategy and performance of the programme and focus in on reduction of protected species bycatch rather than input outcomes.</p>	<p>As above. DOC welcomes this discussion and a revisit to strategic placement of observers, especially on the inshore fleets and considering the proposed camera deployment schedule.</p> <p>DOC recognises that, to date, observer planning has been constrained by several factors and is not always as agile as it could be. DOC proposes to discuss the development of a more flexible approach to observer planning with FNZ in the coming year to improve upon the recommendations.</p>
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**PART C: Customary practices**

	Nil this year	

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

Submitter	Submission	DOC response
<b>INT2019-02 Identification of seabirds captured in NZ fisheries</b>		
TOKM	Support ongoing research.	Noted.
<b>INT2021-03 2.6 Review of commercial fishing interactions with marine reptiles</b>		
TOKM	Supportive. Need to understand potential risk increase to turtles with climate change and spatial distribution. Concern cost is too high as updating last review should just be four years data.	Where sufficient data exist, this project will involve spatial and temporal analysis of fisheries interactions for individual species over the period 2008/09 to 2019/20. Identification of any climate change signal or other trend in reported catch over this period will require more than a simple update of the bycatch data presented in the last review.
<b>INT2021-04 2.7 Collection and curation of tissues samples from protected fishes and turtles</b>		
FINZ & DWG	No interest. Taxonomic preparatory work. Project should not be financed through CSP budget, or at least not cost	This project has no connection to taxonomic research. All the species involved are taxonomically well known, with

	recovered from industry.	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.
TOKM	Consider this important research. Objective 3 reads like methodology.	Noted, objective 3 has been removed.
<b>POP2018-03 3.1 New Zealand Sea Lion: Auckland Islands pup count</b>		
Cawthron	Suggest DOC develop contingency plan for delivery of NZ sea lion project for 2021/22 in case DOC internal process does not allow it to proceed (POP-2018-03). General comment on support for restart for all subantarctic covid cancelled projects in 2020/21.	Noted. Last year DOC called a “Stop for Safety” on the 20/21 subantarctic research season due to health and safety concerns. The stop was temporary to allow for the review of existing health and safety procedures and the risk of shifting COVID-19 Alert levels. DOC has already begun the planning process for the 21/22 season. The CSP team has been working with the New Zealand sea lion Threat Management Plan team to develop contingency plans for the delivery of POP2018-03 should a “Stop for Safety” be required again.
FINZ & DWG	Commercial fishing should not continue to be levied for 90% of the cost of the field work. The risk assessment has demonstrated that commercial fishing is not having an adverse or indeed even a significant effect on the Auckland Island sea lion population. With a high level of observer coverage, industry is paying an excessive amount for monitoring the sealion population. We consider the cost recovery level for the pup count should be decreased to 50% or less.	This project was consulted on in 2018/19 and was included in the 2021/22 plan for completeness. Cost attribution will next be considered during the development of the next project round in 2022/23.
TOKM	Support continuing this research; however, effective fisheries risk reduction means that 90% industry funding is no longer supported. Understand cost recovery apportionment rules, however, consider that there should be a conversation around how to better reflect the current nature of threats to sea lions with the funding of this research.	
<b>POP2020-01 Black petrel research</b>		

ECO	At sea sampling is a major undertaking. Suggest that a one-year project won't be adequate to complete work.	See comment on black petrels above in the "General Comments" section. This project is effectively a pilot to test out the techniques and see whether at-sea capture is feasible to obtain enough birds to answer the questions around juvenile survival and total population size.
FINZ & DWG	Should not be funded through CSP until better population modelling done. Concern with lack of agreed strategy and repeated research with little progress on identifying changes in fishing pressures in response to industry providing better estimates of capture levels. These have not been incorporated into broader assessment of fishing risk. DOC continues to pour resources (theirs and industry) in to research. Do not believe this being the highest risk species is justification on its own for ongoing research. Request independent review of research to date and modelling, and development of a research strategy to better inform population modelling.	Population modelling in the past has assumed certain black petrel population sizes and low levels of juvenile survival and recruitment. New modelling will not provide different results unless we collect quantitative data that uses a different approach (at-sea sampling) to assess whether the land-based survival and total population estimates are valid.  The land-based work is being scaled back this year to gathering core information on breeding pairs and chick productivity. Current estimates of adult survival rates are lower than in the past and this measure alone will be the best to inform whether current on vessel mitigation practises are having a sufficient impact on reversing the loss of adults from bycatch.
TOKM	Supportive. High risk species. 50% crown, 50% cost recovered.	Noted.
<b>POP2021-02 3.4 Identification of protected coral hotspots using species distribution modelling</b>		
ECO	Query definition of 'marine ecosystem'.  Also, likely not useful to look at areas too deep to bottom trawl e.g., Kermadecs.	We agree that in terms of fisheries bycatch, areas such as the Chatham Rise and Campbell Plateau would be prioritised in this project over the Kermadec region, if budgetary constraints resulted in having to choose. If feasible, however, improved understanding of coral biodiversity and abundance estimates for the Kermadecs would also be useful to better understand coral populations more broadly, and with that the impact of commercial fishing..
FINZ & DWG	Agree with lack of data to inform threat classification, but how can you justify taxa of interest in this project as threatened species without data. Does it fit in CSP? Work first needs to be done on protected coral inventory of distribution in non-fished areas (outside CSP) before it is	The corals of interest are legally protected species, regardless of whether they have a threat status or not, and there is substantial evidence of localised damage to coral habitats and populations, with little recovery, directly attributed to fishing (agreed that the EEZ-wide impacts are



	<p>possible to ascertain whether fishing activity is adversely affecting habitat or population and therefore can't plan for avoidance and mitigation. Also, MIT, POP and INT projects prioritised as Medium-High or High – suggest projects prioritised in a linear context with each dependent on extant data. FNZ is investing heavily into coral distribution and by-catch research. Seek coordinated approach to research strategy from DOC and FNZ for FINZ and DWG to assess proposed work. Do not support 100% cost recovery similar to turtle as no evidence fishing causing adverse effect. Would accept 50% cost recovery until risk is proven.</p>	<p>less understood on a species-by-species basis). Therefore, DOC considers this directly applicable to CSP.</p> <p>Agreed that DOC and FNZ could improve research coordination in this area. DOC will seek to address this in the upcoming year, and note that in the interim, the CSP Coral MTRP is a living document through which strategic goals for coral research can be articulated. This MTRP has recently undergone stakeholder consultation and is being updated; however, DOC also welcomes feedback outside of consultation periods and CSP is developing a more consistent approach to coral research prioritisation than in recent years.</p> <p>DOC also considers that there is a need to amalgamate current and previous coral research, across New Zealand more broadly, into an accessible format as a starting point for an updated gaps analysis and potential risk assessment.</p>
TOKM	Support characterisation to understand extent of potential adverse effects from fishing activity.	Noted.
<b>POP2021-05 3.7 Age estimation of white sharks</b>		
TOKM	Data would be useful in the management of sharks, support 100% crown funding	Noted.
FINZ & DWG	Should not be funded through CSP	This project is 100% Crown funded and not cost-recovered/levied from the fishing industry.
<b>POP2021-06 3.8 Fur seal population estimate and bycatch analysis, Cook Strait</b>		
ECO	Include references from fur seal genetics at Vic and Otago Universities.	Noted.
TOKM	Supportive, but fur seal populations not adversely affected by fishing so projects should be aimed at mitigation non population analyses.	We do not know that the fur seal populations are not adversely affected, and in particular we do not know which ones are impacted. This project would ideally lead to recommendations on mitigation, but to inform that we need to know firstly 1) is the level of bycatch adversely impacting the population? 2) which population is impacted, and 3) whether there is a sex/age bias in the captures. This is

		needed to advise on whether spatial measures would be useful or if SEDs are to be used, what sizing is needed to be most effective.
Cawthron	Significant underfunding (60k proposed) due to number of colonies in Cook Strait and field work logistics involved, cost of sample collection and genetic analysis (cannot be covered by current budget), cost of 3 reports. Would need to be supplemented by DOC vessel, personnel time etc. in order to achieve for 60k. Recommend increase to 100k for year one. Should also be included in discussion of observer coverage.	We are not able to increase the funding, especially in the first year. The project is largely focused on sample analysis and DOC will assist with the field component.
<b>POP2021-07 3.9 Foveaux and Otago shag population census</b>		
ECO	Reference set net bycatch in Otago Harbour	Noted.
TOKM	Important but not urgent as set new risk is lowered in many of the concern areas. Aquaculture effects not warranted under CSP.	Noted and will remove reference to aquaculture.
<b>POP2021-08 3.10 Assessment of causes of low burrow occupancy rates in Westland petrels</b>		
ECO	References should include previous research on Westland petrels.	This will be included.
FINZ & DWG	Should not be funded through CSP.	This project is 100% Crown funded and not cost-recovered/levied from the fishing industry.
TOKM	Supportive, however we question the relative importance researching the burrow occupancy over other adverse effects on Westland petrel.	The current estimate of population size has large uncertainty because burrow occupancy rates have produced very different estimates between different research studies using long term study burrows and random burrow sampling. This research will provide a more robust estimate of occupancy rates and reasons for the apparent low numbers of burrows being used by Westland petrel breeding pairs. This information is needed to update the risk assessment for the species and to understand whether current bycatch rates are sustainable or not. Agree that a wider look at factors that might impact upon these petrels should be progressed and DOC will look at options to progress that work outside of

		CSP.
<b>MIT2020-01 4.1 Hook-shielding use in the surface longline fishery</b>		
ECO	Pay particular attention to longline snapper fishery.	Noted.
FINZ & DWG	Agree on issues in SLL for uptake of Hookpods. Request a project sponsor group with CSP, FNZ HMS and FINZ be established to ensure project outcomes achieved.	DOC agrees with these statements and will explore collaboration between CSP, FNZ-HMS and FINZ to address Hookpod uptake challenges.
TOKM	Supportive.	Noted.
<b>MIT2021-01 4.2 Protected Species Liaison Project</b>		
ECO	Implementation of Protected Species Risk Management Plans and standards is critical to this project's success.	DOC agrees with this statement and has prioritised the continued rollout of PSRMPs and alignment with mitigation standards through the Liaison Project.
FINZ & DWG	Continue to support the project but are concerned about the focus on input outcomes. Request a candid discussion on the strategy and performance between principal stakeholders – FNZ, CSP and industry.	DOC supports the suggestion for a candid discussion between principal stakeholders (FNZ, CSP and industry) regarding the strategy and performance of the Liaison Programme.
YEPT	Set net relevant and to lesser degree trawl fisheries. Good strategic alignment with Te Kaweka Takaohaka mo te Hoiho to mitigate bycatch risk to hoiho.	Noted.
TOKM	Full support of this proposal as mentioned in Te Ohu Kaimoana response to the CSP annual plan 2021/22.	Noted.
<b>MIT2021-02 4.3 Cetacean interactions with pot fisheries in New Zealand waters</b>		
ECO	Be consistent with terminology – whales and orcas in some area then just whales in another. Also refers to pots in the objective but set nets in rationale section. Should consider all cetaceans and all fishing gear with lines i.e., pots and set nets.	Noted – the description has been updated to clarify that Objective 1 will encompass the range of large cetacean species affected and by what fisheries method, but then the workshop will target pot fisheries in Kaikoura as being the hotspot of where the greatest number of entanglements occur. Mitigation options trialled in Kaikoura could then be rolled out nationally.
NZRLIC	Unresolved historical issues with cost recovery principles of the Fisheries Act and how they are applied. 100% cost recovery of POP project from RLIC when very few entanglement incidents attributable to RLIC. Non-	DOC notes the considerable efforts taken by NZRLIC to mitigate against protected species entanglement and encourages continued work by industry in this area. DOC also notes NZRLICs point around impacts from non-commercial fishing gear.

	<p>commercial fishing gear is just as high a risk. Various reasons unhappy about 100% cost recovery.</p> <p>Aware of cetacean entanglement risks with pot lines and have taken steps over past 2 decades including NZ RTLIC WhaleSafe guide, OceanSnap app, GPS tracking buoys to expediate disentanglement. Question whether DOC has demonstrated that commercial rock lobster fishing causes adverse effects, directly or indirectly, on any cetacean population or their long-term viability that is required to justify a cost recovered service.</p> <p>Also, question relevance of 'providing an update of analysis of commercial effort in the lobster pot fishery' and can provide fishing year breakdowns of potlines by stat area on request. Support workshop but should be facilitated by DOC and not cost-recovered by industry.</p> <p>Also, awareness campaign is outside cost recovery scope as no evidence of link between proposed CSP project and adverse effects of fishing on protected species, and this work is already being done by RLIC and CRAMACs.</p>	<p>This Project is a mitigation project which is why it is 100% cost recovered. Most of the project is the workshop which is mitigation focused. Objective 1 is a small component to ensure that the workshop has the most up to date and robust information to hand. There has been an increase in entanglements since the last report was completed and these latter incidents, along with advancements in mitigation research around the world, need to be understood and considered in discussion of mitigation options.</p> <p>The comment regarding the awareness campaign is noted and has been removed to ensure focus of the project is on mitigation actions. We have also updated the description to ensure the mitigation purpose is strengthened.</p> <p>The workshop is designed to work closely with stakeholders, both the industry groups and individual fishers to ensure mitigation options and actions are feasible and appropriate. Therefore, engagement and active participation of RLIC is considered integral to the success of the project.</p>
TOKM	Te Ohu Kaimoana are supportive of this research, however, do not consider this being priority research.	Noted.
Cawthron	<p>Increase budget by 10k for travel costs of fishers and experts to get to Kaikoura (some potentially from Australia). Important so that international development work is incorporated through their attendance.</p> <p>Consider assessing level of interaction rates with humpback whales and southern right whales in New Zealand via analysis of existing photos to assess scars caused by set nets and cray pots (e.g., Robbins 2009; Neilson et al. 2009).</p>	<p>It is acknowledged that face to face workshopping is the best for the purpose of this project, however, we are still dealing with uncertainty of international travel and quarantine and expenses. Where possible travel to attend in person is desirable, though the focus will be on local fishers. Where international engagement is required, if travel is cost prohibitive, we will consider running a virtual symposium option.</p> <p>Regarding the analysis of photos for evidence of scarring, this is acknowledged as a valid consideration, however, may need to be considered as its own project in a following year.</p>
<b>MIT2021-03 4.4 Develop methods to increase the sink rate of hooks in small bottom longline fisheries</b>		

FINZ & DWG	Support workshop on methods to increase sink rates of BLL, but better to rethink framework of appropriate seabird mitigation for BLL	The initial stakeholder workshop will be an opportunity discuss options for seabird mitigation in bottom longline fisheries, including consideration of the variability of the fleet (the need for any further characterisation of the fleet can also be considered).
TOKM	We consider that this project needs an initial objective that seeks to identify the problem in terms of risk and barriers before looking at options. The diversity of our LL fleet means that there is no one size fits all approach, and this will need to be thoroughly understood before embarking on options for increasing sink rate.	