FISHERIES
INSHORE NEW ZEALAND

Committed to Healthy Oceans; Sustainable Fisheries

11 April 2016

Mr S Halley
Ministry for Primary Industries
PO Box 5620
Wellington

Attention Laura Furneaux

Dear Steve

DRAFT INSHORE FINFISH RESEARCH PLAN
2016/17

1. Thank you for the opportunity to consult on the draft Inshore Finfish Research Plan for 2016/17.

2. Fisheries Inshore NZ Limited (FINZ) is commenting on the generic aspects of the draft research programme. Comments on the specific programmes are being presented by the regional inshore fisheries representatives and companies. FINZ endorses those comments.

3. Our concerns with the plan relate to:
    a. The reliance on and validity of the Medium Term Research Plan;
    b. The failure of fisheries management processes to identify new research needs; and
    c. The use of electronic monitoring as an alternative to observers.

The Medium Term Research Plan

4. The draft 2016/17 research programme is drawn exclusively from the Medium Term Research Plan for the inshore finfish fisheries ("MTRP"). The MTRP was compiled by fisheries scientists to give effect to the draft National Fisheries Plan for Inshore Finfish, produced in 2011 by the Ministry. While that process is intuitively appropriate, the reality is that the draft National Plan has never been consulted with other stakeholders nor accepted/approved by the stakeholders or the Minister. That applies equally to the MTRP. The reliance on the MTRP for the 2016/17 inshore fisheries research programme does not give the draft research programme a solid fisheries management underpinning.

5. Further to that point, the MTRP now assumed a role and status in its own right with projects being proposed as a consequence of their inclusion in the MTRP but having no fisheries management drivers. We have seen projects that have been determined appropriate by science working groups, such as Moki sampling, Tarakihi sampling and snapper tagging, without their being the requisite management need and management support.

6. In looking at the management of inshore finfish stocks under the MPI Pathways initiative, FINZ considers that significant modifications are needed to the groups and the service strategies in the draft National Plan to:
    a. better reflect the recreational and customary sector interests by using the 2011 national survey of recreational fishing and customary fishing returns; and

b. import an affordability consideration into the selection of service strategies and management frameworks.

7. The issue of the affordability of research can be highlighted in this programme by the following examples:

    a. Collectively, the target stocks for the West Coast Trawl Survey have an annual capacity to spend in the order of $135,000 (being 2% of gross stock revenue) on stock assessment research. The imposition of a biennial trawl survey costing in the vicinity of $800,000 is unrealistic.

    b. TRE7 has an annual research capacity of approximately $51,000 to spend on stock assessment research. The project seeks to annually spend in excess of that amount on catch sampling.

8. Such outcomes are not acceptable and merely serve to demonstrate the need to develop management frameworks that are appropriate to the risks and size of the fishstocks and the complexes in which they are caught.

9. Such considerations may significantly modify the structure of the groups, the allocation of stocks within the groups and the service strategies for the groups. The MTRP would be changed to accommodate the changes in management and research needs for the stocks. The re-development of the management and research plans should be undertaken through a collaborative stakeholder process that results in an agreed management and research framework for inshore stocks.

10. FINZ recommends that the re-development of the national inshore fisheries management plan and research plan should be accorded top priority in the allocation of MPI resources.

Lack of Research into New and Emerging Issues

11. Of more concern is that the programme fails to adopt a pro-active stance toward new and emerging issues for stocks. This programme is essentially "Business As Usual" as per the MTRP and proposes no projects to pro-actively research potential or emerging issues. On that reading, there are no stocks that require additional research or management attention.

12. We see this as a consequence of the low level of engagement of MPI with stakeholders on the full range of stocks and the concentration of such engagement as there is on politically sensitive stocks. The general absence of engagement with stakeholders on inshore fisheries management limits the ability of MPI fisheries managers to keep abreast of developments and issues potentially arising in inshore stocks and establish strategies and research needs to address issues before they escalate to require drastic action as in the case of bluenose stocks.

13. While the Ministry may have a tendency to concentrate on sustainability issues, as might be the case in HPB stocks, for industry those issues relate to both potential sustainability issues and to potential utilisation opportunities, as might be the case in GMU1 and KIN stocks.

14. We would advocate MPI look to at an inshore fisheries management resource structure that maps resources to fisheries and management requirements that provides MPI with greater insight into fishery developments.

Consideration of the Observer Programme

15. We note that, while the draft CSP programme includes the draft observer programme, there is no formal engagement with MPI in respect of the observer programme. This is not acceptable.

16. Our particular concern relates to the apparent preference for observers over electronic monitoring. Notwithstanding the successful implementation of electronic monitoring on vessels and the inability of MPI to achieve the observer programme, MPI continues to prepare observer programmes that are

expensive and appear to have little prospect of success. We see no value in maintaining that approach.

17. The majority of the inshore observer projects have the recording of protected species interactions as the primary focus of activity and no specific biological sampling objectives, e.g. ECSI setnet, SCSI setnet, WCNI setnet, WCNI trawl, WCSI trawl and all BLL. Those interaction objectives could be met by installing cameras on vessels and permitting fishers to retain any caught protected species and forward them to DOC for identification. Placement of a camera should be less problematic on smaller fishing vessels than placement of an observer and should result in better coverage levels for management of protected species' interactions.

18. In the absence of defined objectives for biological sampling or where placement of observers is problematic, electronic monitoring should be the preferred option for observing fisheries. We acknowledge that electronic monitoring cannot be cost recovered under the existing cost recovery rules as Observer Services but see no reason why the costs could not be recovered under Schedule Item 4 *Services (including research) provided to avoid, remedy, or mitigate that portion of the risk to, or adverse effect on, the aquatic environment*, particularly if industry raises no objection to the cost recovery.

19. Despite the observation of setnet activity in south Taranaki for Maui's dolphin over four years and the complete absence of any sightings or captures of Hector's dolphins, we note MPI wishes to continue with observation of that fishing activity. We understand the rationale for the coverage and the prospects of observing or capturing of a dolphin. However after four years of coverage and no sightings, the question needs to be asked whether the non-sighting is reflective of the absence of dolphins from the area. Notwithstanding the programme being 100% Crown funded, we consider that the expenditure is unwarranted and should be curtailed, releasing funds and observers for re-deployment for priority tasks.

20. We note that 2,235 days are required in the inshore observer programme. We also note the ongoing inability of MPI to provide the coverage level sought. In the recent past, actual coverage is approximately 25-30% of the scheduled and levied amount. The reasons for that under-performance are many and various and include issues both on the supply and placement of observers. While those matters need to be addressed, it would be appropriate to approach the deployment of observers from a more strategic perspective. Continually promoting and levying for an observer programme that has little prospect of achieving any set objectives and cannot provide reliable information for fisheries management is futile. Programmes are re-scheduled on the basis that previous coverage was inadequate but without any prospect of the re-scheduled programme providing a better outcome than the previous year's outcome. It would be more beneficial for MPI and stakeholders to determine the priority areas for deployment of the scarce observer resources and ensure that the objectives for at least some fisheries are attained. The current approach results in an ongoing but unreliable and ineffective monitoring of fisheries.

Determination of Target Reference Points

21. While not pertaining to the selection of the projects, we are perturbed by the common statement that target reference points will be determined by the Working Groups. MPI's Harvest Strategy Standards documents state that :
    a. *18. In general, scientific working groups will estimate MSY-compatible reference points, and management working groups will set fishery or stock targets that consider these estimates as an input, along with other relevant factors. The respective roles and responsibilities of managers, scientists and stakeholders are outlined in more detail in the sections on implementation guidelines in the Operational Guidelines*[1]; and

[1] Harvest Strategy Standards for New Zealand Fisheries, Ministry of Fisheries, 2008

b. ***Roles and Responsibilities of Science Working Groups (SWGs) 13 and Fisheries Managers***

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Targets

1. SWGs will be asked to provide their best estimate, or range of estimates, of BMSY, FMSY, MSY, or relevant proxies for each of these.

2. Targets will be set by fisheries managers based on estimates of MSY-compatible reference points, but modified by relevant factors.[2]

22. The Harvest Strategy documents make it quite clear that fisheries managers have the role of setting targets, not Working Groups. Science working groups are expected to provide information to assist the selection of target reference points but the targets are set taking into account how a fishery is to be managed and consideration of the cultural and socio-economic wellbeing. What we need to see is the initiation of a Fisheries Management Working Group (FMWG) that seeks to involve fisheries managers, scientists and industry representatives that seek to form a management process and framework to enhance ongoing long-term fisheries management decision making.

23. The Terms of Reference for Fisheries Assessment Working Groups as set out on page 11 of the 2014 Plenary document[3] confirms the role of such groups as providers of information and not decision-makers

    Fisheries Assessment Working Groups (FAWGs) evaluate relevant research, determine the status of fisheries and fish stocks and evaluate the consequences of alternative future management scenarios. They do not make management recommendations or decisions (this responsibility lies with MPI fisheries managers and the Minister responsible for Fisheries).

24. While not material to the selection of projects, we have noted this misrepresentation of the roles and responsibilities in wider MPI documentation and consider the matter to be of sufficient concern to warrant inclusion in this response. We trust this will be addressed in future documents and fisheries management decision-making.

Yours sincerely

Tom Clark
Policy Manager
Fisheries Inshore New Zealand

[2] Operational Guidelines For New Zealand's Harvest Strategy Standard, Revision 1, Ministry Of Fisheries June 2011

[3] Fisheries Assessment Plenary: Stock Assessments and Stock Status November 2014 Volume 1: Introductory Sections to Ray's Bream