

**SUBMISSION ON CONSULTATION DOCUMENT ON FISHERIES RESEARCH SERVICES PROPOSED FOR 2004/05 AND 2004/08 STATEMENT OF INTENT INCLUDING OUTPUT PLAN FOR 2004/05**

Submission to: Ministry of Fisheries, 25 May 2004

From: Fisheries Audit Services (NZ) Ltd.

**Re: 2004/08 Statement of Intent and Fisheries and Research Services Proposed for 2004/05**

1. Fisheries Audit Services (NZ) Ltd (FAS) is an independent observer provider owned and operated for the last eight years by John and Pat Reid. FAS provides an “audit and act” model of observer services and regards its observers as at sea field workers. Their aim is to inform and promote compliance with regulations, preferred practices and codes of practice.

To help achieve this, FAS is increasingly involved in formal training and in the development of evaluation tools of fishing practices against codes and regulations. We have, on average, provided just over 2,400 seadays in each of the past three years. We expect to complete a slightly higher number of seadays this fishing year. Our seadays include high seas, sub Antarctic, hoki, roughy and multi species fisheries. Approximately 75% of our work involves compliance and evaluation and the remainder includes a variety of scientific and environmental data collection.

2. FAS notes that the new framework approach potentially offers stakeholders the opportunity to increase their participation in fisheries management. The success of the framework will depend largely on the uptake of the new standards and specifications. These will be used as a vehicle for discussion of what is and is not going to work or be acceptable.

**FAS would like to see a more detailed “coloured” page (page 30) so stakeholders can identify the person/s, department or unit responsible for a particular process, progress, and implementation of standards and specifications.**

3. FAS notes that it is not clearly spelled out whether the Ministry observer service is attached to enforcement or monitoring or another location. FAS notes that the Ministry intends to release a document relating to observer services in the near future. FAS also notes that to date, our on-going seaday work has not been factored into capacity building for observer services. We wish to become involved in discussions on this topic.

**FAS suggests that all discussion relating to observer services be re-considered after the Ministry Working Group report and all other documents relating to its decisions have been viewed by stakeholders, including ourselves.**

4. FAS believes the overlaps between the Ministry proposed environmental projects under Aquatic Environment research, and the Department of Conservation (DOC) work carried out under the Conservation Services Program (CSP) must be revisited. Industry is now well aware of what costs are recovered from where, and why, so any attempt to levy twice for the same or similar services is unlikely to go unscathed.

**It is essential DOC and MinFish get together and sort out their responsibilities and boundaries for issues relating to threatened species, services and research.**

Thank you for considering this submission. For any further information, please contact Pat Reid, 03 547 2373 or 021 542 543.