



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

20 February 2004

Ministry of Fisheries
PO Box 1020
WELLINGTON

Attention: Peter Boon

Dear Peter

Draft Statement of Intent for 2004/08 and Fisheries and Research Services Proposed for 2004-05

Introduction

1. Thank you for your letter of the 18 December 2003 inviting participation in the consultation on the draft Statement of Intent for 2004/08 and fisheries and research services proposed for 2004/05.
2. As evidenced many times Sanford Limited (Sanford) has a long-standing involvement and major commitment to the New Zealand seafood industry. The company has been an active participant in the management of New Zealand's fisheries resources being involved in numerous fisheries management forums as well as being a major supporter of the Quota Management System (QMS) that has given New Zealand some of the best managed fisheries in the world.
3. We refer to the draft document dated December 2003 seeking written submissions and we submit the following comments for your consideration.
4. Sanford submission has been developed through attendance at the various Fisheries Assessment Working Groups, the Research Co-ordinating Committee (RCC) and the recent consultation Statement of Intent plenary on the 4th February 2004. We wish to make further comments on the;
 - ⇒ Statement of Intent (SOI)
 - ⇒ Fisheries Research Services – Observer Coverage
 - ⇒ Fisheries Research Services – Recreational Projects
 - ⇒ Research Project ENV2004/06 (Assessment of Maui's Dolphin)
 - ⇒ Research Project STN2004/01 (Movements of Southern Bluefin Tuna)

New Zealand Seafood Industry Council (SeaFIC) Submission

5. Sanford Limited is committed to sustainable development and management of the species it utilises and we are active members of relevant stakeholder and industry organisations and have assisted in and supported the submissions made by those parties.
6. Further, Sanford will not duplicate points raised in the SeaFIC submission as we have been involved in the preparation of this submission, and rather endorse the SeaFIC comments and refer you to their submission.
7. However, we wish to comment on several further points below.

Duplication of Research Services Consultation

8. Sanford are supportive of the Research Services process that the Ministry of Fisheries undertake annually, which includes the annual Fisheries Assessment Working Groups and RCC to discuss the research projects in more detail.
9. However, in a change of process this year, the Research Services were again discussed at the SOI plenary in an almost identical form to the RCC.
10. Ironically, we are commenting on what is perceived to Sanford to be an unnecessary duplicated process with the RCC and the SOI plenary. We would ask that the Ministry of Fisheries define clearly the purposes of both consultation processes, and outline the difference's between the two meetings if they are to both be continued in the future.

Resource Availability

11. Last year we heard from Ministry of Fisheries that several strategies would be placed on hold, delayed or not completed within the expected time frame due to the diversion of resources from projects onto the "scampi" enquiry.
12. Again at this years plenary we are told a similar report, however its not the scampi inquiry this year it is the seabed and foreshore debate.
13. We believe that continued delays in completing strategies are unacceptable and are compromising comprehensive fisheries management. Such strategic projects include developing and implementing the Oceans Policy, National Plans of Action, Environmental Management Strategies, Recreational Policy, and Seamount Strategies just to name a few.
14. The commencement of one strategy before the completion of another is also of concern to Sanford. Sanford also direct a significant amount of resources into participating in the development of these initiatives, only to see one shelved and another commenced without conclusion of the previous. Further the interactions between these strategies is not unique nor stand alone and they all collectively contribute to comprehensive fisheries management.



Recreational Policy Framework

15. The soundings document was consulted on back in 2000, which was in our view a step in the right direction for developing recreational policy framework for which to manage the recreational fishery. The soundings document was an extensive, expensive process with no document nor policy resulting. Sanford submit that in the absence of a management framework to develop well defined recreational policy, good fisheries management collectively is being compromised. This can be seen at all levels, from introducing new species into the QMS, setting sustainability measures, undertaking research and cost recovery attribution. If we are to manage our fisheries in the most sustainable manner we need all sectors participating. This can only happen by giving recreational defined policy.
16. Sanford encourage the Ministry of Fisheries to progress this issue to completion urgently in an open and transparent manner.

Outside the New Zealand Economic Exclusion Zone

17. At the SOI plenary we were advised that the development of a “High Seas Strategy” will commence in the near future (approx. 2 months). Sanford are supportive of the development of such governance structures, provided they are developed through a transparent process which includes all stakeholders.
18. We see significant challenges when developing this strategy, including considering Regional State responsibilities, and the dovetailing of international law without compromising development opportunities for New Zealand *per se*.
19. Sanford welcomes the opportunity to be involved in the development of the High Seas Strategy.

Fisheries Research Services – Project Comments

Fisheries Interactions – Observer Coverage

20. Sanford support the use of observer coverage to provide statically robust data to ensure good fisheries management decisions can be made using this information. We believe observer coverage should be for the purposes of obtaining biological information or for various information gathering for better fisheries management, including compliance.
21. We are concerned about projects using observer coverage proposed for the purposes of defining whether a ‘risk’ or ‘interaction’ occurs with marine mammals or seabirds (protected species) and the fishing industry when there are other tools which currently provide some of this information.
22. There is significant duplication of process which leads to the inefficient costs and increased time. Under the Marine Mammal Protection Act 1978 and the Wildlife Act 1953 fishers are required to complete and return notification of any interactions with protected species. Currently Sanford are completing “Non Fish-Incidental Catch reporting Forms” and return them to the Ministry of Fisheries (Fax 04-470-2686, Attention Bob Johnson).
23. Sanford information provided on these forms is accurate and correct.



24. This is a legal requirement and all our vessels undertake this process.
25. Sanford submit that this information provides a very clear picture of when interactions occur, with what species, and in which fishery. We are concerned that this information is not being used as an appropriate tool, and because of this, costly, unnecessary research projects are being proposed.
26. We submit that the Ministry of Fisheries, in co-operation with the Department of Conservation review the “non fish-incidental catch reporting form”, and in doing so consider how this information can be best used to ensure we are not proposing unnecessary research, nor duplicating research and observer coverage between departments.
27. There are several projects proposed to be undertaken where an assessment of the interaction or risk with the fishing industry and protected species still to be determined. Several examples are in the proposed research services for the 2004/05, which include Assessment of Maui’s Dolphin (ENV2004/06), Research Observer Days for deepwater, hoki and middle depths.
28. A specific example is the Maui’s Dolphin Assessment – Fisheries Interactions, ENV2004/06. This project is proposed to determine the “risk” to dolphins posed by fishing. Quite clearly the set net ban has removed this risk, and the trawl fleet do not interact with the dolphins. This can be confirmed by the non-fish incidental catch reporting forms recording nil dolphin kills or captures over the last four decades.
29. At the RCC Susan Waugh (MFish) clearly outlined that this project would be 100% crown funded because of its nature and extent, yet we find industry are funding it in the SOI.
30. Sanford submit that if MFish wish to undertake risk and interaction observations over and above current reporting requirements they do so at their own cost.
31. Finally, the Department of Conservation are undertaking research on protected species both using the Conservation Services Programme and Crown initiated work. Again we request that the two departments talk to each other to ensure a centralised programme occurs. We use Maui’s dolphin again as an example where DoC have a Maui’s Dolphin Research Programme 2003-2013 which duplicates project ENV2004/06.
32. We submit that project ENV2004/06 should be withdrawn.

Recreational Projects

33. Sanford have commented on the absence of recreational policy above. The research projects proposed in the research plan are reflective of the absence of recreational strategy or policy, with projects lacking strategic focus because of the absence of a strategy driving research needs.
34. We have particular concern with the Recreational Harvest Surveys, and the process for ensuring historical research is robust. We understand that there are difficulties with the results of both the 1996 and 2000 harvest surveys. We believe that lessons learnt from these surveys should be utilised and used for planning for future research, not revisiting, and reanalysing these surveys.



35. Finally we note that Ministry are averaging the two recreational harvest surveys in the absence of robust reliable results, we strongly oppose this practice as it is statistically unacceptable and procedurally incorrect.

Movements of Southern Bluefin Tuna (STN) STN2004/01

36. Sanford have previously commented on our concerns regarding this project. The SeaFIC submission addresses our concerns in detail. In summary, Sanford do not support this project being undertaken in its current form as there are many unconsidered concerns regarding the tagging project which will have an economic effect on fishers. We believe that if this project was undertaken it should be 100% crown funded, but even if this was to occur we have concerns. Such as, would all fishers participate in the tagging, what consideration is given of fishers that don't participate, and the implications under a Total Allowable Commercial Catch. And finally, under the Quota Management System (QMS) the discarding of QMS species is unwarranted – how will this be addressed.

37. Our concerns regarding the absence of consultation are well documented, are still of concern and will not be repeated, but should be noted.

38. Sanford submit that this project should be withdrawn.

Thank you for requesting our comments, and should you wish to discuss any of the above in further detail please contact the undersigned.

King Regards
SANFORD LIMITED

Andrew Bond
Industry Liaison Manager