

Email to:

seabirdpolicy@fish.govt.nz

SUBMISSION ON SEABIRD BYCATCH MANAGEMENT POLICY

Thank you for the opportunity to comment. As stated in the draft policy, New Zealand is required to implement a National Plan of Action for seabirds under its international obligations. We are concerned that:

- the proposed framework for managing seabird bycatch in New Zealand fisheries does not constitute a national plan of action, that
- the current levels of seabird bycatch in New Zealand waters is not sustainable and will lead to further declines in several species.

New Zealand is a world-renowned for its seabird biodiversity. Eighty-four species of seabirds breed in New Zealand, more than a quarter of the world's diversity of these species. A high proportion of these species breed only in the New Zealand region. This means New Zealand has a global responsibility to conserve seabirds. Twenty-three species of New Zealand breeding seabirds are currently listed by the IUCN and Department of Conservation as threatened.

New Zealand has a particularly diverse range of albatross species. This is the most threatened family of birds in the world, with 17 of 22 species threatened with extinction. Aside from New Zealand legislative requirements, as a signatory to the Agreement on the Conservation of Albatrosses and Petrels, New Zealand has responsibilities to the international community to conserve these species. Petrels, shags and penguins are also under severe threat, with significant proportions of their biodiversity in New Zealand, and are known to occur periodically in New Zealand fisheries bycatch. For example, 5 out of 6 species of penguin breeding in New Zealand are currently in decline.

We are concerned that the proposed policy does not adequately address the need to reduce seabird bycatch in fisheries. It is estimated that 22,000-40,000 seabirds are killed annually in New Zealand's monitored fisheries, including many threatened species. We note that:

- the policy does not explicitly name a bycatch reduction objective, but only aims for risk minimisation;
- the most effective way to immunise risk for rare species, which are naturally difficult to monitor, is through overall bycatch reduction;
- specific targets and timelines for bycatch reduction are urgently required.

For certain threatened species, e.g. Chatham Island Taiko, Stewart Island Shag, even a very small catch is a threat to the species population viability. All seabirds have high natural survival rates, being typical K-selected species with long life spans, high natural survival and a low reproductive rate. For threatened seabirds, even a very small increase in adult mortality (e.g. 10 additional adults killed) can tip a stable population into decline.

Under the UN Fish Stocks Agreement, to which New Zealand is a signatory, management of fisheries resources is required to be precautionary, and the policy set out clearly is not. The burden of proof in assessing effects of fishing mortality should rest with the fishing industry and government as regulators of that industry, to ensure that fishing does not have adverse environmental effects. The policy as it stands implies that groups, other than those causing the risk, will need to demonstrate that population effects are occurring, and that the risk can be linked to New Zealand fisheries activity, before management of the issue is to be undertaken. This is clearly not a precautionary approach to managing threats to protected and threatened wildlife.

Recent risk assessments show that simply monitoring capture rates leads to a significant risk of population collapse for seabirds. For example, a decreased bycatch in monitored fisheries may be due to a declining bird population, as well as or instead of reduced bycatch. The proposed management framework is focused on species 'vulnerability'. This is not a substitute for robust population monitoring.

We recommend that:

- to implement a best-practice model of management of seabird bycatch, government should follow the methods set out in the FAO Best "Practice Guideline for Managing the Incidental Mortality of Seabirds In Fisheries";
- a precautionary approach to managing risk should be an essential component of bycatch management.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Colin McLay". The signature is written in a cursive style with a large, looping flourish at the end.

Associate Professor Colin McLay
President
New Zealand Marine Sciences Society
Biological Sciences, Canterbury University
Christchurch PB4800.
Email Address: colin.mclay@canterbury.ac.nz