



23 November 2018

Submission on summary of the Draft Convention on Biological Diversity National Report

The New Zealand Marine Sciences Society (NZMSS) is a professional society affiliated to the Royal Society of New Zealand with a membership of approximately 200 New Zealand's marine scientists. We are a non-profit organisation that provides access to, and within, the marine science community, and we identify emerging issues through annual conferences, annual reviews, a list serve and a website www.nzmss.org.nz. NZMSS membership covers all aspects of scientific interest in the marine environment and extends to the uptake of science in marine policy, resource management, conservation and the marine business sector. We speak for members of the society and we engage with other scientific societies as appropriate.

Our submission below provides comments on the following targets:

- National targets – 5, 12 and 13;
- Aichi Biodiversity targets – 6; 8; 11; 12 and 19.

National Target 5: "Biodiversity is integrated into New Zealand's fisheries management system".

Comment:

Much more work is needed to ensure that biodiversity is "integrated into New Zealand's fisheries management system". Very little progress has been made in aligning the setting of fisheries quotas with data on the biodiversity impacts on fishing. One of the most serious challenges is that monitoring of bycatch of protected species and non-target fish species is still well below the levels that would be needed to "ensure fishing-related impacts are sustainable". Inshore fisheries have observer coverage well below 5% in most years and most areas. For many areas, the last time fisheries observers were used is two decades ago (e.g. Banks Peninsula) and for many areas there has never been a robust observer or video monitoring programme (e.g. west coast and north coast of South Island). Insufficient information is available to provide scientifically robust estimates of bycatch of our two endemic marine mammals, New Zealand sealion and New Zealand dolphin (Hector's and Maui dolphin).

There are no statutory "Recovery Plans" for any marine mammals. The "Threat Management Plans" for New Zealand sealion and New Zealand dolphin are non-statutory. The lack of measurable targets and timelines in these plans has meant that there has been little if any progress towards fisheries impacts being estimated, let alone managed to ensure sustainability.

Fisheries management also continues to have no consideration of the effects of fishing on biodiversity driven through changes in food web structure. A clear and well established example of this are the extensive areas of sea urchin barren habitat on shallow reefs in many parts of New Zealand, e.g. northeastern NZ and top of the South Island.

Accordingly, NZMSS disagrees with the assessment that progress is on track to achieve this target.

National target 12: “More Threatened, At Risk, or Declining species are managed to the extent necessary to minimise extinction risk and ensure genetic diversity is maintained.”

Comment:

NZMSS agrees with the report’s assessment that “progress has been made towards this target, but at an insufficient rate”.

Almost all of the work in the Conservation Services Programme projects, referred to under National Target 12, focus on researching impacts. None of the CSP projects have led to any demonstrable progress in avoiding, remedying or mitigating impacts. For example, Maui dolphin is at an extremely high risk of extinction, as indicated by its conservation status of Critically Endangered on both international (IUCN) and national (DOC) lists of threatened species. The International Whaling Commission and IUCN have urged NZ to protect Hector's and Maui dolphins since 2012. No action has been taken. The Hector's and Maui dolphin threat management plan was due for review in 2013. The Maui dolphin portion of the plan was reviewed in 2013. The Hector's dolphin portion is now being reviewed, 11 years after the release of the draft threat management plan for the species. Monitoring (observer coverage and video monitoring) in inshore fisheries is extremely poor, at well below 5% of vessels in most areas and most years. There is no evidence that impacts on threatened species are sustainable.

Commercially fished species of concern that warrant greater management intervention include hapuku and crayfish in northeastern New Zealand.

National target 13: “A growing nationwide network of marine protected areas, representing more of New Zealand’s marine ecosystems.”

Comment:

NZMSS agrees with the report’s assessment that “progress has been made towards this target, but at an insufficient rate”. We submit that there are a number of long outstanding actions that should be addressed urgently, including:

- Completion of the review of an extension of Moutere Ihupuka/Campbell Island Marine Reserve (Subantarctic Islands Marine Reserves Act 2014)
- Declaration of the Kermadec Rangitahua Ocean Sanctuary
- Establishment of a network of MPAs in the South Island’s Southeastern biogeographic region
- Establishment of MPAs identified in the Hauraki Gulf Marine Spatial Plan
- Adequate representation of marine habitats in networks of fully protected marine reserves in the following biogeographic regions/subregions:
Three Kings Islands; all North Island bioregions, South Island east coast, Fiordland coast, Chatham Islands and Snares Islands.

- Increasing the area of some of New Zealand's oldest marine reserves, the Cape Rodney – Okakari Pt (Goat Island, Leigh) and Tawharanui Marine Reserve's to provide improved protection for species such as rock lobster and snapper.
- Establishing a network of fully protected MPAs in the EEZ and Extended Continental Shelf that represents all deepwater habitats including the ocean above the seabed. This would include full protection of the existing Benthic Protected Areas (also refer to our comments in relation to [Aichi Target 11](#))
- Pass Marine Protected Areas legislation that enables networks of MPAs to be established in both the Territorial Sea, the EEZ and the Extended Continental Shelf (ECS).

NZMSS would also like to see [greater scientific guidance in MPA processes](#). Considerable efforts were previously put into developing guidelines based on best available science in the MPA Policy and Implementation Plan. These have largely been ignored in recent MPA processes and consequently the biodiversity and conservation value of resulting areas have been considerably compromised (e.g. the Hikurangi Marine Reserve).

Aichi Target 6: “By 2020 all fish and invertebrate stocks and aquatic plants are managed and harvested sustainably, legally and applying ecosystem based approaches, so that overfishing is avoided, recovery plans and measures are in place for all depleted species, fisheries have no significant adverse impacts on threatened species and vulnerable ecosystems and the impacts of fisheries on stocks, species and ecosystems are within safe ecological limits.”

Comment:

NZMSS is concerned that there are no statutory "Recovery Plans" for any marine mammals [or threatened fish species](#). The "Threat Management Plans" are non-statutory and are failing to ensure fisheries impacts are estimated, let alone managed to ensure sustainability.

Monitoring (observer coverage and video monitoring) in inshore fisheries is extremely poor, at well below 5% of vessels in most areas and over most years. There is no evidence that captures of marine mammals have declined, nor that impacts on threatened species are sustainable. There is no evidence of improvement during the reporting period (2014-2018). Captures are likely to be lower than in the 1970s and 1980s. However, fishing impacts have left marine mammal populations severely depleted. In the absence of statutory Recovery Plans, mandating recovery of these populations, little if any progress is being made.

The only chance of New Zealand meeting this target by 2020 would be if decisive action is taken on marine mammal bycatch as a matter of urgency.

Also refer to our comments in relation to Benthic Protected Areas and the use of fisheries management tools under [Aichi Target 11](#).

Aichi Target 8: “By 2020, pollution, including from excess nutrients, has been brought to levels that are not detrimental to ecosystem function and biodiversity.”

Comment:

Sediment runoff into the coastal marine area has been identified as one of the major contributing influences of change to marine biodiversity and habitats by smothering and reducing water clarity. The impact of sediment runoff should be reported against this target.

Aichi Target 11: “By 2020, at least 10 per cent of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem services, are conserved through effectively and equitably managed, ecologically representative and well connected systems of protected areas and other effective area-based conservation measures, integrated into the wider landscapes and seascapes.”

Comment:

NZMSS considers the coastal marine section of the report incorrectly presents the area under protection measures other than no-take marine reserves by including areas protected from fishing impacts on the benthic marine environment (including on seamounts) under this Target. In particular, there are no areas in the EEZ where all habitats (i.e. water column and benthic features) and species are fully protected. Because Benthic Protected Areas (BPAs) are established using fisheries management measures, they should be reported under Aichi Target 6.

We acknowledge that the Kermadec/Rangitahua Ocean Sanctuary, when finally established, will include full protection of marine habitats and biodiversity in the Kermadec region.

NZMSS agrees with the report’s statement that the distribution of marine protection is uneven across the Territorial Sea’s 14 coastal marine biogeographic regions and we have commented about under-representation in National Target 13, accordingly. Overall, we are concerned at the slow rate of progress/lack of progress in implementing networks of fully protected MPAs in the Territorial Sea, EEZ and ECS with the current suite of MPAs falling far short of the Aichi Target. NZMSS hopes that plans are developed and implemented in the near future which outline tangible outcomes and milestones for meeting the national and Aichi global targets in 2020.

Aichi Target 12: “By 2020 the extinction of known threatened species has been prevented and their conservation status, particularly of those most in decline, has been improved and sustained.”

Comment:

NZMSS asserts there has been no progress on Aichi Target 12 for any marine mammal species. The Department of Conservation proposed downlisting Hector's dolphin from Endangered to Vulnerable, despite strong evidence that this is not warranted. Under New Zealand's criteria for listing threatened species, which are very different from the IUCN criteria, Hector's dolphin may well be uplisted from Endangered to Critically Endangered. The IUCN listing is due to be reviewed, but very unlikely to change from Endangered. No new information has become available that would suggest Hector's dolphin no longer fits the IUCN criteria for Endangered.

Aichi Target 19: “By 2020, knowledge, the science base and technologies relating to biodiversity, its values, functioning, status and trends, and the consequences of its loss, are improved, widely shared and transferred, and applied.”

Comment:

Marine biodiversity should be reported against this target.

Other comments:

We note that national and Aichi targets incorporating marine biodiversity are few and relatively narrow in scope. Further, where some targets could include marine, these have not been reported.

NZMSS also notes that the Minister of Conservation has announced plans to prepare a new New Zealand Biodiversity Strategy. We are of the view this is an opportunity to incorporate more marine biodiversity national targets that better reflect the wide range of marine species, habitats and biogeographic regions that make up this massive marine area and the ecosystem services that it provides to New Zealanders and globally.

Please contact me at the email address provided below for any further information regarding this matter.

Dr Nick Shears

A handwritten signature in black ink, appearing to read 'N Shears', written in a cursive style.

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