



International Consultations on the Establishment of the  
South Pacific Regional Fisheries Management Organisation

## **Collated comments by Participants on the New Zealand Bottom Fishery Impact Assessment**

In his letter of 5 March the Chair of the Science WG noted that in the absence of a Chair for the Deepwater Sub-Group it was necessary to postpone SWG comment on the New Zealand assessment until the meeting of the Deepwater Sub-Group in Lima during the week of 11 - 15 May 2009, and proposed the following process to scientifically review the NZ bottom fishing impact assessment:

- All participants wishing to provide comment, criticism or proposals for improvement to the New Zealand Bottom Fishery Impact Assessment should provide these comments directly to the SPRFMO Executive Secretary no later than Friday 13 March 2009.
- The SPRFMO Secretariat will collate all received comments into a single document, and forward this collated document to all SPRFMO participants for their information, in preparation for critical scientific review of these comments at the Science Working Group - Deepwater Sub-Group meeting in Lima.

Two delegations, the United States and Australia made comments on the Assessment by 13 March and these are collated below.

### **United States comments**

The Bottom Fishery Impact Assessment New Zealand has provided contains the elements outlined in the "Interim Benthic Assessment Framework" in a comprehensive manner. The detail provided with regards to the description of fishing activities and footprint maps combined with the management and mitigation measures and environmental impact section clearly articulate the scientific rationale for the management choices New Zealand has made. The use of observer data to support the scientific analysis was particularly compelling. The United States also supports the concept of closing representative areas, and has employed such a methodology in waters under our national jurisdiction.

The United States would like to have seen more detailed information on the specific impacts of fishing gear types on the seabed; however, given limited availability of data on such impacts we understand why only general information was provided. Taking into account the cost of such endeavors, we hope the need for this type of scientific information will encourage all participants in the SPRFMO to pursue options for collecting such data in the future. Further, we would like to have seen more detailed information regarding the impacts of bottom fishing on secondary targets, and on bycatch species, both fish and those species which are considered part of vulnerable marine ecosystems. For example, black oreo is listed as the second most caught species in New Zealand's bottom trawl fishery, which is targeting orange roughy, yet there is no discussion of the impact of this catch on the status of black oreo.

The United States would like to express some concern regarding the effectiveness of some of the mitigation measures that have been implemented, particularly the use of the encounter clause in

only the “Moderately Trawled Blocks”. That said, the United States thinks that the concept of incorporating species diversity into evidence of an encounter is a valuable approach, particularly since inclusion of species diversity increases the probability evidence of a vulnerable marine ecosystem will be recorded. We note from New Zealand’s assessment that these measures will be reviewed once more data is available. We look forward to the results of such a review.

On a general note, while the United States agreed to the “Interim Benthic Assessment Framework”, including the use of 20 minute blocks to measure the bottom fishing footprint, its implementation causes us some concern. Specifically, the United States is concerned that 20 minute blocks allow the incorporation of large swaths of “new” areas that would not otherwise be included in the SPRFMO bottom fishing footprint if a smaller block area was used. Our concern is that the size of the 20 minute blocks allows bottom fishing in “new” or previously unfished areas, even in “heavily trawled blocks”. This has the effect of allowing bottom fishing to occur in such “new” areas that are then not subject to the encounter clause. This is clearly evidenced by the fact that New Zealand skippers reported finding and fishing new, previously unfished features in “existing” areas defined by the footprint. The United States would be interested in revisiting this issue during the next interim Science Working Group meeting, if time allows, recognizing that one potential item on the agenda for the SWG meeting is consideration of a revised Interim Benthic Assessment Framework.

The United States looks forward to reviewing the additional Benthic Assessments that will be provided by other participants should those participants wish to undertake bottom fishing activities in the high seas areas of the South Pacific covered by the SPRFMO Interim Measures.

### **Australian Comments**

Thank you for the letter regarding the review of New Zealand's bottom fishery impact assessment. The steps you suggest are a sound way forward. At this time Australia doesn't have any detailed comments on the New Zealand assessment. The New Zealand assessment is comprehensive and appropriate for the scale of the New Zealand fishery. We are looking forward to reviewing New Zealand's and other assessments at the next Deepwater Sub-Group. In reviewing the assessments, we think it would be valuable to discuss a risk based approach, given the differences in scale of fisheries in the region.