17 June 2015

Dr Robert J. Trumble
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Dear Bob,

Information in Response to WWF's Submission on Orange Roughy Assessments

Following on from our letter of 15 June 2015 we provide you with our further response to matters raised by WWF on the P2 aspects of the orange roughy assessments.

Bycatch

The submission from WWF on the additional information provided in support of the MSC assessment of New Zealand orange roughy fisheries discusses and comments on the scoring of bycatch species, considered by WWF to be less resilient.

We note that WWF does not define the terms used (i.e. resilience, low productivity and vulnerability) or indicate the source of the ratings given. Not all authors define these terms in a similar way or allocate species to the same categories.

Their submission lists four species as examples of species they assess to have low reproductive capacity, high to very high vulnerability, and low resilience. Of these four, three are species managed under the Quota Management System (i.e. pale ghost shark, dark ghost shark, and smooth skate). For each of these three species catch limits and monitoring regimes (through trawl surveys and stock assessments) are in place. In addition, the catches of each of these species make up very low proportions of the catch from the relevant orange roughy UoCs (less than 0.15% of the total catch from ORH3B NWCR; and, less than 0.02% of the catch from each of ORH7A and ORH3B ESCR), and an insignificant proportion of the total overall catch of these species in New Zealand fisheries as a whole. The catch levels of these species do not warrant any of them being described as main bycatch species even if they were to be accepted as being vulnerable. This issue was addressed by MPI and DWG in response to an earlier submission by WWF.

The fourth species used as an example of a species with low reproductive capacity, high to very high vulnerability, and low resilience is the shovelnose dogfish. This species makes up a very small proportion of the overall catch (less than 0.3% in each UoC and less than 10% from the UoCs of the overall catch of shovelnose dogfish in New Zealand waters). Again, the catch level of this species does not warrant it being described as a main bycatch species even if the designation of vulnerable were to be accepted.

The submission also notes a concern regarding the level of catch of Baxter's lantern dogfish in the UoC and the perceived lack of a 'strategy' to maintain Baxter's and other species with similar life history characteristics within biologically based limits and not hinder recovery. This raises a number of points that we will address in turn.

Designation of Baxter's lantern dogfish as main or minor bycatch species

The five year average catch levels of Baxter's lantern dogfish (ETB) in each of the UoCs do not exceed the 1% threshold for designation this species as a main bycatch species (ORH7A <0.04%; ORH3B NWCR <0.6%; and ORH3B ESCR 1.0%).

A relatively high proportion of the overall catch of this species is taken by the orange roughy fisheries. This is because of the overlapping depth distribution of the two species and the lack of fishing elsewhere in the spatial/depth distribution of ETB by other fisheries.

ETB is a widespread species (Anderson et al., 1998) that is only taken to any extent in the localised orange roughy fishery on the ESCR. This leaves most of the distribution of this species lightly fished and as such the risk of over exploitation is relatively low, especially on the Southern Plateau and to the west of New Zealand.

More importantly, and specifically addressing WWF's comment, there is a clear, implemented, monitored and effective strategy for managing fishing effects on this species. This strategy comprises monitoring, research surveys, assessment of the stock status, biological data, and management responses.

Monitoring

MPI monitors and records catches of ETB annually both from required catch reporting and also from Ministry observers.

Research surveys

Fishery independent abundance data are available and continue to be collected for a large number of bycatch species including ETB through research trawl surveys on the Chatham Rise and on the Southern Plateau. These trawl surveys have occurred for a number of years and trends for all regularly caught species are published in recently released review reports. Relevant reports are available on the Deepwater Group website.

Assessment of stock status

The most recent review for the Chatham Rise survey (O'Driscoll et al., 2011) shows no trend in the abundance of ETB over two decades while the review for the Sub-Antarctic survey (Bagley et al., 2013) shows a long-term, slow increase in abundance.

In relation to ETB in particular, the Chatham Rise survey is considered to estimate the biomass moderately well and has a time series of over twenty years of surveys. In recent years, deeper strata have been added to the trawl survey to provide additional monitoring of species that occur deeper than 800 m. The biomass trend from these deeper strata reflect the trend shown in the core strata for ETB and shows no clear trend since the beginning of the survey time series (i.e. period from 1992 to 2014), suggesting a stable population.

Biological data

Length frequencies of samples taken during the surveys have not shown any significant changes since the beginning of the survey series, showing both old individuals (evidence of modest fishing pressure) and juveniles (evidence of continued reproductive success and recruitment). The data from the Sub-Antarctic survey, as noted above, show a trend of slow increase in ETB over the duration of the time series and also a stable length frequency of animals over time. Data from these on-going survey series provide consistent evidence of a lack of adverse impacts on the population of ETB as a result of fishing.

Management responses

The ministerial approved National Fisheries Plan for Deepwater and Middle-depth Fisheries recommends a risk-based approach to be taken to prioritise management actions for bycatch species. Work is underway on a risk assessment which will guide management action.

Concerns about lack of understanding and lower levels of management directed at the four elasmobranch stocks is being addressed though on-going data collection and analysis, specific research projects on rare sharks, as well as a risk-based assessment of fishing and other human impacts on sharks under the NPOA Sharks 2013.

Should the information from monitoring, research, assessment and biological data indicate that the existing management regime set for ETB be deemed inadequate, the species may be introduced into the QMS under the provisions of the New Zealand Fisheries Act 1996.

To date, all of the scientific information indicates no need for further direct management.

Taken together, these different elements of monitoring, control, research, and management represent a coherent strategy as defined by the MSC standard.

Habitat

WWF appears, to some extent, to be confusing different P2 elements in this section. Reference to a specific group of corals as a 'habitat' in the context of the MSC standard is misleading in the context of deepwater habitat, such corals being one small component of the UTF habitat. As corals are protected they must be dealt with under the ETP PIs not the habitat PIs, as we understood MRAG-Americas to be doing.

We look forward to viewing any satellite data and analyses of fishing operations from WWF when these are available.

Regards,

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