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Tēnā koutou,

Canterbury Regional Council (Environment Canterbury) submission on the Wider rollout of on-board cameras consultation document

Environment Canterbury welcomes the opportunity to provide feedback on the 'Wider rollout of on-board cameras' consultation document.

The coastline of Canterbury is an important habitat for Upokohue/Hector's Dolphins and their declining population, along with other marine species is of immense concern to Environment Canterbury. Upokohue/Hector's Dolphins are a taonga species for Papatipu Rūnanga, they are endemic to our waters and require protection from many activities, including fishing. The provision on on-board cameras is a vital part of protecting our marine taonga species.

Environment Canterbury provided a submission on the Hector's and Māui Dolphin Threat Management Plan (TMP) in 2019 and are supportive of the introduction of on-board cameras. In 2020, Environment Canterbury also provided a letter to Minister Sage asking that the TMP be urgently implemented. Alongside this submission on the wider rollout of on-board cameras, Environment Canterbury has also made a submission regarding the protection of South Island's Upokohue/Hector's Dolphins.

Finally, Environment Canterbury would welcome further discussion on the proposed changes for the Canterbury region, and opportunities to review draft wording prior to amendments being made.

Principles that have guided the development of Environment Canterbury's submission

In preparing its submission, Environment Canterbury's feedback has been guided by the following principles:

- The proposed changes should achieve the Government's desire to avoid all protected species bycatch over the long-term.
- The proposed changes should be consistent with the 'sustainable management' purpose of the Resource Management Act and give effect to the goals of Te Mana o te Taiao-Aotearoa New Zealand Biodiversity Strategy 2020.

- As far as practicable, responses should enhance or assist with achieving outcomes promoted in the Council's strategic direction.
- The proposed changes should provide certainty to resource users and be able to be implemented effectively and efficiently.

Structure of our submission

Environment Canterbury's submission is separated into two parts:

- Part 1 of our submission includes our over-arching comments.
- Part 2 of our submission provides feedback to the questions in the consultation document.

Yours sincerely

A handwritten signature in cursive script, reading "Jenny Hughey". The signature is written in dark ink on a light-colored, textured background.

Jenny Hughey
Chair, Environment Canterbury

Part 1 – Overarching comments and key points

1.1 Environment Canterbury agrees with Fisheries New Zealand that on-board cameras will provide numerous benefits that will help to: inform decision making, improve information and intelligence of what is happening at sea, improve species protection, maintain market access, improve the industry's reputation, and change behaviours at sea.

1.2 Environment Canterbury supports the objective of moving towards zero Hector's dolphin deaths. Utilising technology and on-board cameras are a critical part of this.

1.3 Environment Canterbury supports vessels having on-board cameras and would like to see on-board cameras extended to all fishing vessels in New Zealand waters.

1.4 Environment Canterbury would like to note that the use of on-board cameras and the proposed bycatch reduction plan (protected species risk management plans) are interlinked. Environment Canterbury understands that the sustainable fishing practices of each vessel are to be set out in the protected species risk management plans and that the on-board cameras will then monitor fishing practices and fish catch, including by catch.

1.5 The proposed on-board camera rollout is very much related to species protection. Environment Canterbury would like to know if there is any current workplan in place to integrate habitat protection, such as benthic sea bed protection through fisheries measures.

Part 2- Responding to feedback on specific consultation questions

Environment Canterbury's feedback to specific consultation questions is provided below:

Question 1 *What are your views on the proposed scope for the wider rollout of on-board cameras?*

2.1 Environment Canterbury believes that the proposed scope is not sufficiently wide. To ensure the protection of Upokohue/Hector's Dolphins, the rollout of on-board cameras should apply to all commercial fishing vessels in New Zealand waters. The proposed 300 inshore vessels specified as being in scope does not sufficiently mitigate the threat.

2.2 It would be useful to clarify how frequently each vessel will have its camera data and recordings checked. It would also be useful to provide clarity about the on-board camera data review process.

2.3 The consultation document states that 20% of footage will be reviewed from areas where vessels may interact with Upokohue/Hector's Dolphins. Environment Canterbury believes that the percentage of footage reviewed needs to be greater than this along the Canterbury coastline, as this is where the largest population of Upokohue/Hector's Dolphins is located. The footage reviewed needs to be at least 80% and preferably 100% to ensure sustainable fishing methods are in place to protect Upokohue/Hector's Dolphins.

2.4 Environment Canterbury suggests that vessels with a history of unsustainable practices and those known to have previously caught Upokohue/Hector's Dolphins be monitored closely.

Question 2 *Do you consider it appropriate to require all in-scope vessels to operate on-board cameras? If not, what other factors should be considered?*

2.5 Environment Canterbury would like to see the rollout of on-board cameras extended to all commercial fishing vessels in New Zealand waters, not just the 300 inshore vessels proposed in the consultation document. This should be a mandatory part of fishing in New Zealand waters to ensure sustainable fishing practices to protect not only Upokohue/Hector's Dolphins but other marine species too.

2.6 Are cameras required on tender boats that haul in the catch too? If not, then these boats should be included.

Question 3 *Do you agree with the proposed deployment schedule? Are there alternatives that should be considered?*

2.7 It is proposed that the rollout of on-board cameras will need to be phased. Environment Canterbury is unsure as to the reasons for this. As currently set out, this will take until 2024, however, all vessels spend time in dock and therefore would regularly have the chance to be fitted with on-board cameras. The consultation document states that in some areas there are only 7 vessels that will require cameras and, in some areas, 30. Because of these small numbers Environment Canterbury does not believe that there is a need for a phased process. The sooner these cameras are operating, the better the outcome for marine species.

2.8 Environment Canterbury support all fishing vessels to have on-board cameras, not just the 300 inshore vessels identified in the consultation document.

Question 4 *Do you agree that industry should contribute to the costs of the wider rollout of on-board cameras?*

2.9 Environment Canterbury believes that the fishing industry should cover their environmental costs. Farmers on land must pay for all costs associated with the environment.

Question 5 *Do you agree that it is appropriate to recover costs for the installation and maintenance of on-board cameras, submission, storage and review of footage and additional fisheries officers?*

2.10 No comment

Question 6 *Do you agree with the proposed option to recover at least \$10M from the fishing industry over the first four years?*

2.11 No comment

Question 7 *Do you agree with the proposed option for how these costs are phased across the four years?*

2.12 No comment

Question 8 *Do you agree that costs should be recovered from quota owners? If not, who else in the industry should costs be recovered from?*

2.13 No comment

Question 9 *How do you think costs should be levied? Do you agree with the proposal to use a stock specific levy?*

2.14 No comment

Question 10 *How do you think the cost recovery proposals will impact your business?*

2.15 No comment

Question 11 *Do you have any other comments on the proposals outlined in this consultation document?*

2.16 See Part 1 of this submission

2.17 Reduction of trawling activity is also beneficial to climate change mitigation goals by avoiding the resuspension of marine sediments, a link is provided below:
<https://www.theguardian.com/environment/2021/mar/17/trawling-for-fish-releases-as-much-carbon-as-air-travel-report-finds-climate-crisis>. Government policies should be cross-cutting

and this is an opportunity to develop enhanced ecosystem, climate, and threatened species outcomes.

