



Submission on the Draft Fisheries Industry Transformation Plan

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Introduction

As one of the leading environmental Non-Governmental Organisations (eNGOs) in New Zealand, World Wide Fund for Nature – New Zealand (WWF-NZ) would like to thank Fisheries New Zealand (FNZ) for the opportunity to provide input on the Draft Fisheries Industry Transformation Plan and allowing us to participate in the Leadership Group.

WWF-NZ supports science-based, pragmatic solutions that can deliver a future where humanity lives in harmony with nature. WWF-New Zealand has been working in Aotearoa since 1975. We work with iwi, hapū, communities, eNGOs, government, and industry, using the best possible science to advocate change and effective conservation policy.

WWF-New Zealand would like to see the fishing industry prioritising ocean health and sustainability over short-term capital gains. Aotearoa New Zealand has immense potential to be a global leader in sustainable fisheries management, utilising modern innovation and technology. To achieve this, the fishing industry needs to be managed by an ecosystem-based approach that preserves the mauri of our ocean. New Zealanders cherish the intrinsic values and not just the extrinsic values of our ocean and we need to conserve our ocean for future generations.

Sustainable fisheries are a key area of focus for our work here in Aotearoa and a priority of Fisheries NZ. Therefore, we see the Draft Fisheries Industry Transformation Plan (ITP) as an opportunity for some major actions towards that common goal. The draft in its current state is a step in the right direction but misses some opportunities to genuinely transform New Zealand's fishing industry for the better. All the actions that fall under "strengthening environmental performance" are critical to address. However, the actions within this section are overall vague and not sufficient enough to secure and maintain long-term sustainability. We wish to offer some high-level points of how to improve these actions to truly transform New Zealand fisheries to better preserve our marine environments.

General Remarks

1. There is a lack of clear targets and timeframes in the action points. This ambiguity implies a lack of commitment to properly address the issues and represents a more reactive approach than a proactive one. The ITP should consider including more actions with specific activities and timelines as to what will be done in the interim while we investigate more selective, environmentally friendly methods of fishing.
2. The actions need to demonstrate a priority of avoiding adverse effects on the marine environment entirely and not just minimising it as they currently establish. The language of the ITP indicates reluctance to making any big changes that disturb the "status quo" of the industry, which further demonstrates that the priority is not sustainability, but rather profitability.

Strengthening Environmental Performance Proposed Actions

3. WWF-NZ supports the need to invest in innovation that allows for more selective fishing and reduces benthic impacts and protected species interactions, but there is a lack of meaningful action and environmental bottom lines. An example of this would be if the number of seabird bycatch exceeds X amount then specific action will be taken to address this, giving detail to what those actions would be and in what timeframe. We also believe that the ITP must establish more specific monitoring and evaluation standards, so that the success rate of any actions to reduce benthic impacts and protected species interactions can be measured.
4. In addition to investing in selective fishing methods, the ITP should also proactively consider potential regulatory changes that support bycatch mitigation measures already available to reduce protected species interactions. The plan mentions reviewing regulatory settings to identify barriers to fishing innovation but not addressing regulatory gaps that currently exist in legislation.
5. This plan currently fails to address the impacts of mobile bottom contact gear, which damages benthic ecosystems and contributes to negative climate impacts as well as ocean acidification. Subtidal marine sediments are one of the planet's primary carbon stores for atmospheric CO₂.¹ Several studies suggest that disturbing the benthic sediments can release the organic carbon within, which then can be converted to CO₂ with a portion released into the atmosphere, contributing to climate change.^{2,3,4} No restriction on the use of mobile bottom contact gear is proposed in the plan. Regulations that restrict mobile bottom contact gear and set a timeframe for development and implementation of technology/alternative fishing gear would help incentivise investment into alternatives.
6. WWF-NZ supports that new methods of habitat restoration be investigated, but also that current restoration and enhancement methods be supported and prioritised in the interim. This includes establishing new marine protected areas (MPAs), which is an effective approach to restoring habitats and preventing biodiversity decline. Currently less than 0.5% of New Zealand's waters are protected, and we do not have a representative network of MPAs. Further action should include the creation of new MPAs with a timeline supporting New Zealand's expressed commitment to the 30% protection by 2030 target set out by the Kunming-Montreal Global Biodiversity Framework (GBF) adopted by Parties to the Convention on Biological Diversity (CBD).

1. Epstein *et al.*, (2022). The impact of mobile demersal fishing on carbon storage in seabed sediments. *Global Change Biology*, 28 (9):2875-2894, <https://doi.org/10.1111/gcb.16105>.

2. Black *et al.*, (2022) Assessing the Potential Vulnerability of Sedimentary Carbon Stores to Benthic Trawling within the UK EEZ, *EGU General Assembly 2022, Vienna, Austria*, 23–27 May 2022, EGU22-103, <https://doi.org/10.5194/egusphere-egu22-103>, 2022.

3. Paradis *et al.*, (2021). Persistence of Biogeochemical Alterations of Deep-Sea Sediments by Bottom Trawling. *Geophysical Research Letters*, 48 (2): <https://doi.org/10.1029/2020GL091279>.

4. Smeaton & Austin, (2022). Quality Not Quantity: Prioritizing the Management of Sedimentary Organic Matter Across Continental Shelf Seas. *Geophysical Research Letters*, 49 (5): <https://doi.org/10.1029/2021GL097481>

7. There is no mention to ecosystem-based management in the plan. Sustainability of stocks alone is misleading and fails to account for ecosystem-based performance measures, such as habitat impacts and food web dynamics. We also believe the precautionary principle should be specifically referenced. The precautionary principle is analogous to a Hippocratic Oath for the marine environment in that a principal tenet is, “first, do no harm.” We should not wait until evidence arises that species or environments are negatively affected before implementing conservation measures.
8. WWF-NZ supports the actions under “utilising data to fish selectively and with least effort.” However, WWF-NZ believes that release of all data on public resources like fisheries should be public by default. In the rare instances where the industry claims data is commercially sensitive or a trade secret, the burden should be on the claimant to prove that case. When access to public resource information is restricted, such as how it is restrained in New Zealand, it denies transparency and accountability into the impacts of the fishing industry on those shared public resources, inhibits full supply chain transparency that would support informed purchasing, and, ultimately, diminishes public trust in and the social license of the fishing industry. Unnecessary restrictions on data access also inhibits data sharing between governing bodies, such as the Ministry for Primary Industries (MPI) and the Department of Conservation (DOC), which further hinders effective environmental management.
9. WWF-NZ supports the proposed actions supporting decarbonising the fishing sector. However, the ITP should also reference actions addressing the potential of high emissions caused by mobile bottom contact fishing gear.¹⁻⁴ Additionally, the ITP should recommend additional actions that support the roles that habitat restoration and MPAs play in the ocean’s resilience to climate change.

Improving Profitability and Productivity Proposed Actions

10. The ITP highlights traceability and transparency as key to promote the New Zealand seafood story internationally and help confirm compliance with export market requirements. However, if government and industry offered more publicly available data this could improve incentives for both domestic and international markets receptive to transparent and traceable seafood, which currently remains virtually untapped. Consumers can then make informed choices to purchase more sustainably sourced seafood and further support New Zealand sustainable seafood stories both domestically and internationally. Moreover, improvements to operational efficiency as a result of full supply chain traceability could increase profitability and productivity.

Conclusion

Overall, WWF-NZ supports the plan to develop the ITP and transition the fishing industry into a 21st century model for how fisheries can and should be prosecuted with the environmental impacts as a first priority. However, WWF-NZ believes the plan needs to be much more ambitious to achieve this goal and genuinely address the significant environmental impacts of fishing. The plan as currently drafted appears tailored more to support the status quo of current industry dynamics rather than consider a genuinely transformational approach that

places the environment in the forefront. Consistent with our recommendations above, we believe that some minor changes could help balance the priorities more appropriately. WWF-NZ looks forward to further progress with the advancement of the ITP, recognising the important step it offers in developing a sustainable vision for the future of our fisheries.