

# New Zealand High Seas Group Incorporated

2 February 2012

The Independent Chair  
Interim Secretariat  
**South Pacific Regional Fisheries Management Organisation**

**Attention: Bill Mansfield**

Honourable Chairman, Ladies and Gentlemen and SPRFMO Members,

**RE: NEW ZEALAND HIGH SEAS FISHERIES GROUP INCORPORATED: MANAGEMENT OF DEEP WATER FISHERIES BY SEAFLOOR FEATURE IN THE SOUTH PACIFIC OCEAN**

On Friday 20 January 2012, in anticipation of this meeting, the New Zealand High Seas Fisheries Group (“the Group”) distributed to Members of SPRFMO, a paper commissioned by them, entitled “*Management of Deep Water Fisheries by Seafloor Feature in the South Pacific Ocean*”. The paper is authored by Ross Shotton who will be known to many of you.

The Group represents almost all New Zealand fishing companies that operate in the high seas in SPRFMO and other RFMO’s. It includes many skippers with considerable “on the grounds” fishing experience gleaned over many years in all oceans of the world. Many of these skippers, like myself, have well over 30 years experience as Skipper on a range of vessels in many oceans. As such, our group is well qualified to comment on the work of this conference and various instruments provided by and to this organisation. Most of us have a deep passion for the sea and all that it represents. The sea is a great mistress but like any mistress, treat her wrong and life will get difficult.

It is our group’s desire to provide clearly articulated and practical information and advice to SPRFMO members in order to assist members in making the best possible decisions on the issues faced by this organisation. In your interim measures you state the aim is to use all best available information and that must include the very people that gather and provide the raw information. This is reflected in the quality of the paper that has been presented and I wish to thank those of you who have already provided such good feedback to me on the paper.

It was not the intention of our group to divert SPRFMO’s attention away from some of the serious issues that have been discussed in the past days and remain to be discussed. In particular, any difference of opinion that our group may have with the New Zealand Ministry of Fisheries should not be used to divert attention from the serious issues around the Jack Mackerel fishery that have arisen.

The primary purpose of the introduction of our paper is to bring a practical, scientific and real-time input into the Science Working Group and to the conference. It is our group’s request that we be permitted to attend the science working groups in order to explain the thinking behind our paper and to answer any questions that may arise from the matters discussed and raised in the paper and to assist in the work of the Group.

We also formally request that our group be recognised as an observer and be permitted to attend all SPRFMO meetings in the future

Our group wishes to have input on a further and related issue, namely the current *“Revised Draft Bottom Fishery Impact Assessment Standard”* that forms part of the papers of this meeting. Earlier drafts of this standard were commented on in our paper. Our group has considered the earlier assessments and has provided point by point comments that have not been incorporated into the current draft. Our group will be making detailed submissions in regard to several aspects of the draft revised standard, including, but not limited to, the definitions of vulnerable marine ecosystems (VMEs), significant adverse impacts, and look forward to being allowed a reasonable opportunity to comment on the latest version.

A quick glance at the members of our group will confirm to SPRFMO that each of these companies are serious operators who emphatically support and endorse sustainable fishing within the bounds of the conservation of fish stocks, biodiversity and rational use. They emphasise their view that the most effective way to achieve this outcome is to work with all officials to arrive at a sensible and workable management regime that can be applied to the high seas fisheries in the SPRFMO area.

Our group is thankful to Chile who approved our group to attend this meeting in order to present its views directly to members with a view to achieving practical and realistic outcomes that can be sensibly and uniformly applied to all members with interests in bottom fishing. In addition to the issues that I referred to earlier, our group wishes to raise further matters that include:

1. The establishment of confidentiality rules to ensure the protection of all data that is to be submitted in support of their proposals;
2. The re-opening of the discussion around the current “footprint” and the closure of significant areas of ocean that have been fished in the past, that have been closed because they are outside the footprint window of 2002 to 2006 on the basis of flawed assumptions;
3. A challenge of the use of unverified computer modelling to protect what may or may not be in an area etc.

Our group has on various occasions engaged the New Zealand Ministry of Fisheries on their management of SPRFMO, and the imposition of extensive conditions on our member’s high seas permits that are out of step with other countries. We have been unable to achieve a consensus position with MFish. As a consequence, New Zealand vessels are operating at a significant operational disadvantage to other SPRFMO members, including Australia. The group reaffirms that the best way forward is to achieve a consensus position with the ministry and will be engaging with them on our return to New Zealand.

It is one thing to criticise the current regime without offering an alternative. The alternative that our group suggests is contained in our paper, and we welcome the opportunity to actively engage with SPRFMO or individual members in the further development of the interim measures in relation to Bottom Trawling, the participation within the scientific working group, and providing input into the revised Benthic Guidelines.

We would be grateful if these comments could be circulated.

Andy Smith  
**Chairman**  
**NZHSG**

*Talley’s Group Limited, Sealord Group Ltd, Richardson Fishing Limited, Endurance Fishing Limited, Pescatore Fishing Limited and Anton’s Trawling Limited.*