

Draft Submission letter

Re: Marine Mammal Sanctuary Submission

Dear Minister,

Thank you for giving me the opportunity to make a formal submission on a partial extension of fisheries restrictions on the West Coast North Island for the benefit of Maui's dolphins.

With less than 55 individuals, Maui's dolphins are the world's rarest marine dolphin species. To ensure the survival of such a small and declining population a zero tolerance approach to any fishing-related mortality and the strict avoidance of other threats is essential.

Recent independent expert opinion has again confirmed that gill netting and trawling poses by far the greatest threat to the survival of Maui's and Hector's dolphins.

You acknowledge that Maui's dolphins can sustain only a single human induced mortality every 10-23 years. You also acknowledge that there have been at least three confirmed and two likely Maui's dolphin fatalities as a result of gillnetting alone since 2000 – more than the sustainable limit for 50-115 years for all sources of human induced mortality combined.

In the Question and Answer section of your consultation document you refer to the Risk Assessment of Threats to Maui's dolphins, which was carried out for your Department and the Ministry of Primary Industries (MPI) to inform their decisions relating to Maui's dolphin protection. This risk assessment estimates that a total of five Maui's dolphins die in fishing nets each year: 2.33-2.48 per year in commercial gillnets, 0.88-0.97 per year in recreational and customary gillnets, and 1.13-1.21 per year in commercial trawl nets. Trawling alone therefore extensively exceeds the sustainable bycatch limit for Maui's dolphins. Yet neither MPI's consultation on the outstanding decision on fisheries closures around Taranaki, nor the current consultation include comprehensive restrictions related to trawling. Unless the last Maui's dolphins are fully protected against all harmful nets, extinction remains the most likely outcome.

Only recently, the Scientific Committee of the International Whaling Commission (IWC SC) stated that the human-caused death of even one individual would increase the extinction risk for Maui's dolphins. The IWC SC recommended that the "highest priority should be given to immediate management actions that will lead to the elimination of bycatch of Maui's dolphins". The Committee specified that this should include "full closures of any fisheries" within Maui's dolphin range" that are known to pose a risk of bycatch of small cetaceans", including trawling.

The consultation document under review does not include the range of management options necessary to protect Maui's dolphins against further decline and fails to provide a scientific rationale for the chosen option. In doing so the consultation document ignores the best available scientific advice. The document also does not provide any qualitative or quantitative assessments of the effectiveness and anticipated conservation outcome associated with the proposed measures.

In summary, I partially support the variation to the West Coast North Island Marine Mammal Sanctuary, but in light of the best available science, I consider them insufficient to arrest the further decline of Maui's dolphins towards extinction. In line with urgent IUCN recommendations from September 2012, we urge the New Zealand government to afford Maui's dolphins immediate and full protection against gill netting and trawling throughout their habitat to avert their extinction. This means a ban of these fishing methods and effective management of all other threats in waters up to a depth of 100 meters, including harbours.

Sincerely,
[Your name]