



Submission to Ministry of Foreign Affairs and Trade

Consultation on Post-2020 Global Biodiversity Framework

31st January 2022

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1. Seafood New Zealand welcomes the opportunity to submit on the *Consultation on Post-2020 Global Biodiversity Framework*. We support the purpose of this Consultation as it is important for biodiversity and conservation to be integrated with broader societal needs.
 2. As the users of the marine environment, we are committed to ensuring that marine biodiversity is protected from identified threats and to ensure that the fish stocks remain healthy. To that end, we have undertaken activities like proposing and supporting the implementation of Benthic Protection Areas (BPAs) and participating in measures to ensure that there is ongoing sustainable use and conservation of our fisheries resources through the Fisheries Act and the Quota Management System.
 3. We consider that any further efforts to increase conservation measures must take into account the economic and social benefits derived from commercial fishing and the communities that are most dependent on them.
 4. Further, we note that increased imposition of conservation measures may erode the value of the Fisheries Settlement with Māori, and we defer to the views of Te Ohu Kaimoana and Mandated Iwi Organisations in that regard.
 5. Seafood New Zealand is a professional organisation delivering industry-good services for the wider benefit of the seafood industry, an industry which had an annual export earnings of \$1.8 billion in 2020. Seafood New Zealand plays a role in developing and presenting the seafood industry's response on legislative and regulatory proposals affecting the industry.

Specific comments:

2050 Vision:

To take urgent action across society to conserve and sustainably use biodiversity and ensure the fair and equitable sharing of benefits from the use of genetics resources, to put biodiversity on a path to recovery by 2030 for the benefit of planet and people.

6. Seafood New Zealand would like to reiterate that the OECD and the IUCN consider 29% of New Zealand's Exclusive Economic Zones to be protected due to the creation of the BPAs, which the IUCN considers to be in line with IUCN Categories IV-VI. This 29% is in addition to the marine reserves that currently protect 9.8% of New Zealand's territorial waters.¹
7. The draft of the Post-2020 Global Biodiversity Framework notes that the phrase "take urgent action" refers to the need to address the biodiversity crisis, however, we believe that our marine biodiversity is at a safe and equitable level due to current legislation and because of the actions that the seafood industry has undertaken.
8. Looking specifically at the targets, BPAs and the marine reserves are in alignment with the 2030 Action Target 3, which states that:

Ensure that at least 30 per cent globally of land areas and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes.
9. Seafood New Zealand is of the view that BPAs are effectively and equitably managed as they take into account the need to protect the benthic whilst ensuring that the fishing community is still able to derive financial benefits from the marine environment.
10. Furthermore, BPAs are ecologically representative and where designed represent the natural variation present in Marine Environment Classification (MEC) classes by ensuring that each MEC class was protected by at least two different BPAs and, where possible, on the eastern and western geological/tectonic plates (Figure 1).

¹ DOC, <https://www.doc.govt.nz/globalassets/documents/conservation/marine-and-coastal/marine-protected-areas/mpa-publications/mpa-gaps-analysis-report-2019.pdf>

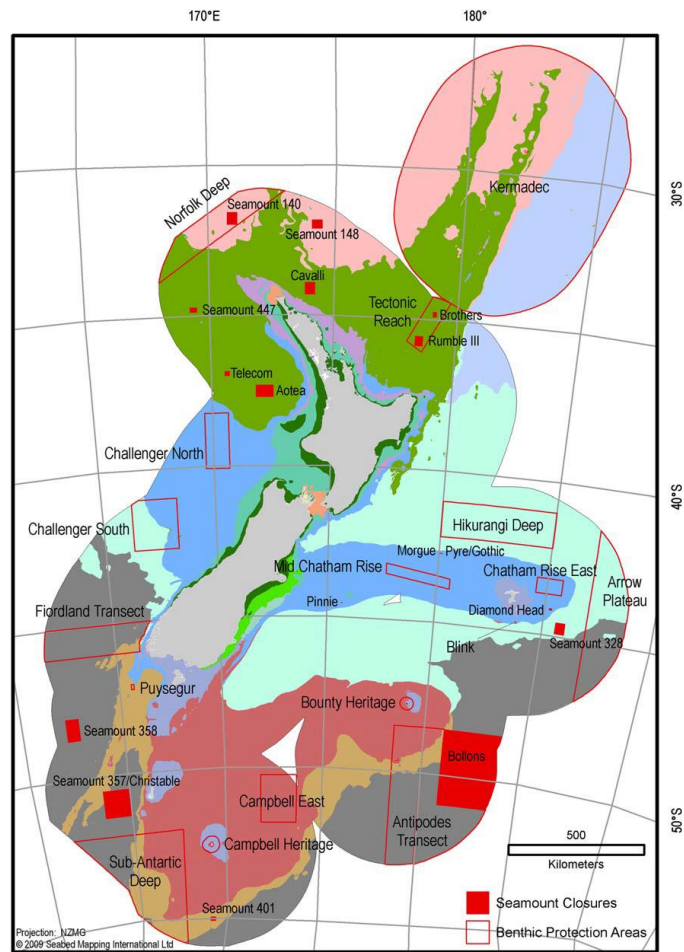


Figure 1: Marine Environmental Classes in New Zealand showing BPAs.

11. Further efforts to protect marine biodiversity must be based on known and targeted responses to identified threats, rather than ad hoc implementation of MPAs or other spatial measures to meet any specific target. Seafood NZ considers that MPAs are not necessarily the most appropriate management tool in many circumstances and their use should be limited to circumstances where a specific threat is identified, and where an MPA will be the most effective management response.

Target 5:

Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health.

12. In New Zealand, the seafood industry operates under the Fisheries Act 1996 and Quota Management System (QMS). The purpose of the Fisheries Act is to provide for utilisation of fisheries resources while ensuring sustainability (see section 8). As part of achieving that purpose, adverse effects on the aquatic environment must be avoided, remedied and mitigated. The broader environmental principles in section 9 also require that decision makers take into account the maintenance of biodiversity and the protection of habitats of particular significance for fisheries management. In fact, the Fisheries Act provides for a

comprehensive ecosystem approach to fisheries management that is detailed in a paper available on the Seafood NZ website.²

13. Under this legal framework, the Fisheries Act is used to manage 98 species in 642 separate stocks areas. Under this system, a Total Allowable Catch (TAC) for each species and area is set by the Minister and is guided by scientific assessments of fish stocks to ensure that they are maintained at a sustainable level. The TAC must maintain the stock at or above a level that can produce the maximum sustainable yield and enable the stock to be rebuilt if it falls below the level.
14. The latest MPI reports indicate that 82% of our fish stocks and 91% of our collective catch are above the “soft limit”, which means that these stocks have no sustainability issues.³ Currently, only 28 fish stocks need to be rebuilt. This is in comparison with the global fish stocks which sit at 65.8% sustainability in 2017.⁴

Target 7:

Reduce pollution from all sources to levels that are not harmful to biodiversity and ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, and pesticides by at least two thirds and eliminating the discharge of plastic waste.

Target 10:

Ensure all areas under agriculture, aquaculture and forestry are managed sustainably, in particular through the conservation and sustainable use of biodiversity, increasing the productivity and resilience of these production systems.

15. We consider that more action needs to be taken with regard to Target 7, that pollution has been brought to levels that are not harmful to biodiversity and ecosystem function; and with Target 10 (areas under agriculture and forestry are managed sustainably). Terrestrial activity has been observed to be detrimental to the health of marine ecosystems.
16. With regard to Target 7, Seafood New Zealand is supportive of any measures to reduce terrestrial pollution that has adverse effects on the marine environment. This may be naturally occurring, but increased levels, of sediment, other pollutants such as plastics. The seafood industry is also currently undertaking endeavours to replace as much plastic as possible whilst adhering to food safety standards.

Target 18:

Redirect, repurpose, reform or eliminate incentives harmful for biodiversity, in a just and equitable way, reducing them by at least US\$ 500 billion per year, including all of the most harmful subsidies, and ensure that incentives, including public and private economic and

² [EAFM and the Fisheries Act 1996 - Fathom.pdf \(seafood.co.nz\)](#)

³ MPI, <https://www.mpi.govt.nz/fishing-aquaculture/fisheries-management/fish-stock-status/>

⁴ FAO, <http://www.fao.org/sustainable-development-goals/indicators/1441/en/>

regulatory incentives, are either positive or neutral for biodiversity.

17. New Zealand's seafood industry does not have access to harmful subsidies and incentives that are prevalent in most other countries. We support efforts to phase out and eliminate harmful subsidies.

General Comments:

18. Seafood New Zealand considers that the current fisheries legislation is fit for purpose in ensuring fisheries are sustainably managed, and the marine environment is protected from the effects of fishing activity. The Fisheries Act considers and reflects the need to both use our fisheries resources for social, cultural, and economic benefit, and to do so in a manner that is sustainable for the fisheries resources themselves and the wider marine environment.
19. We consider broader marine protection initiatives should be focussed on specific and known threats to the marine environment, and those threats managed through targeted management initiatives that are best placed to mitigate or eliminate those threats. In many circumstances, MPAs will not be the appropriate tool, and for that reason we are not supportive of targets that become an end in themselves and do not necessarily deliver good marine management outcomes.
20. We also consider that a greater focus is necessary to ensure terrestrial activity does not adversely impact on the coastal marine environment.