Review

Proposed Regional Coastal Plan: Kermadec and Subantarctic Islands

March 2011
Prepared for

Prepared by

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Independent report on proposed RCP March 2011
EXECUTIVE SUMMARY

This report has been prepared for Heritage Expedition by Tourism Resource Consultants (TRC) as an independent review of the Proposed Regional Coastal Plan: Kermadec and Subantarctic Islands (RCP).

The purpose of the plan is supported, especially noting the isolation of these islands and the importance of retaining the natural character of remote marine wilderness, and the abundant and unique biodiversity of this marine environment.

We have included comments, on the approach taken, specifics within the plan and made recommendations for changes. It is noted that the rationale for some polices and rules is implied rather than stated.

Our key concerns are:

- Overstatement of tourism growth for the Subantarctic Islands
- Omission of management of fishing fleet sheltering
- Definitions including:
  - Vessel
  - Harbour
- Biosecurity management practicalities
- Links to other government processes especially the CMS and MAF Biosecurity New Zealand
- Enabling of sustainable use for existing tourism - expeditionary
- No provision for monitoring or review
- Omissions and errors within the rules and maps

This summary should not be considered in isolation from the attached report.
# TABLE OF CONTENTS

**EXECUTIVE SUMMARY** ................................................................. II

**TABLE OF CONTENTS** ................................................................. III

1. **BACKGROUND** ............................................................... 4
   1.1. Purpose of the plan – p3 .................................................. 4
   1.2. Jurisdiction - p4 .......................................................... 4
   1.3. Values – p6, and current use values of Subantarctic Islands - p12, and current use of Kermadec Islands p14 ................. 5
   1.4. Current use values analysed in the RCP for the Kermadecs ....... 8

2. **ISSUES (P22)** ................................................................. 9
   2.2. Control of surface water activities (p25) paragraph 1. ........... 10
   2.3. Other methods (p28) ....................................................... 11
   2.4. Issue 2 Kaitiakitangi of the coastal marine area (p29) .......... 11
   2.5. Issue 3 Cultural and Historic heritage (p31) ....................... 11

3. **RULES** ........................................................................... 11

4. **OTHER MATTERS** ......................................................... 14
   4.1. Omissions .................................................................. 15
   4.2. Review Provision .......................................................... 15

5. **APPENDIX: CRUISE SHIP TOURIST LANDINGS** .............. 16

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**Disclaimer**
Although every effort has been made to ensure accuracy and reliability of the information contained in this report TRC shall not be held liable for the information, opinions and forecasts expressed in this report.
1. BACKGROUND

Tourism Resource Consultants (TRC) was commissioned by Heritage Expeditions to undertake an independent review of the proposed Regional Coastal Plan: Kermadecs and Subantarctic Islands (RCP).

Tourism Resource Consultants began 25 years ago and have been at the forefront of ecotourism development across New Zealand and Asia Pacific and works at the intersection of conservation, business and community. Our approach is to add value to communities, businesses and organisations at the interface of tourism and conservation.

We understand the special qualities of the Subantarctic Islands and the Kermadec Islands and the challenges associated with the management of these remote islands and their surrounding marine environment.

Jo Breese, Senior Associate, has led this independent review and Dave Bamford has also contributed. Both Jo and Dave have a long standing commitment to conservation management. Jo has been working as a Senior Associate of TRC’s for the past 5 years and previously was CEO of WWF-New Zealand for over 7 years. She has worked for much of her professional life in conservation of both natural and cultural resources including marine protected areas and remote locations. Dave is the founding partner of TRC and began his career in conservation as a national park ranger. He has have worked on protected areas, conservation, recreation, tourism and related business projects throughout New Zealand. Both have extensive international experience.

1.1. Purpose of the plan – p3

It is noted that the plan gives effect to the RMA, and in doing so contains objectives, policies and methods including rules, which establish the framework within which certain uses are permitted and proposals for activities can be assessed. The plan’s intention is to provide certainty for existing and potential users of the coastal marine area (Mean High Water mark to the outer limits of the territorial sea) through the provision of these rules. This approach is supported. The need for certainty for existing and potential users is supported and explored later in this document.

1.2. Jurisdiction - p4

While the plan is focussed on the management activities within the coastal marine area it acknowledges that there will be some management issues that cross the MHWS boundary, and because of the interconnectedness of the land and the sea management will need to be integrated. Further there is also recognition of the Conservation Management Strategy and its role in the islands’ management and
the need for integration.¹ The recognition of the link is important. However this plan must remain focused on the coastal marine area.

The connection of this document to the CMS is not very clearly articulated in this proposed plan. Accordingly it is suggested that a more explicit statement about the relationship between the two is required, especially when the interconnectedness of the land and the sea, and the need for integrated management is mentioned several times. Greater clarity over the area of overlap between the CMS and the RCP and what jurisdiction applies is required. It is assumed that the CMS will align with the RCP. There is no mention of the Marine Reserves Act. There are further government processes that impact upon this plan and should be mentioned e.g. Marine Protected Area Policy for Southern Oceans, the review of MAFBiosecurity New Zealand of the import health standard for Vessel Biofouling and the Science Strategy for the Subantarctic Islands.

1.2.1. Recommendation: clarify related government jurisdictions and processes

That page 6 and page 54 include references to, and clarify the relationship between these various government jurisdictions, processes and any others that are relevant.

1.3. Values – p6, and current use values of Subantarctic Islands - p12, and current use of Kermadec Islands p14

The values of Subantarctic and Keramdec Islands including natural character, Maori, cultural and historic values etc are well articulated.

The current use values analysed in the RCP for the Subantarctic Islands (SI) are limited to:

- Conservation management
- Scientific research and monitoring
- Tourism
- Fishing
- Wreck exploration and salvage

The conservation management of SI (p11) is focused on terrestrial floral and fauna and pest eradication and no mention is made of the marine environment and how it is managed.

1.3.1. Recommendation:

Specific inclusion of how the marine environment is currently managed, include that the remote and wild character helps protect the marine environment and the surveillance provided is designed to ensure that the marine coastal area is well protected from illegal use.

¹ The current CMS is due for review in 2012.
The research (p12) notes themes, including the marine environment. However there is no mention of any system for the monitoring of ecosystem health and human impacts — bench marking or state of the environment monitoring (as distinct from research).

The permit process and minimum impact code are mentioned implying that these mechanisms are sufficient to protect the environment. Without any monitoring the effectiveness of management cannot be ascertained. Simply you struggle to manage what you don’t measure. Unless measuring something you don’t know if it is getting better or worse. It is difficult to manage for improvement if you don’t have any measures to indicate what is getting better and what isn’t.

1.3.2. Recommendation: Specific statement about monitoring of the RCP areas is required and if no monitoring is undertaken an explicit statement to this effect is required.

Tourism (p12) use analysis is general and it states there is “major growth in tourism demand over the last 5 years.” This is an overstatement of what is understood to be the position in the SI. It is curious that this myth is perpetuated, as there is no specific evidence to support this conjecture. Visitor permit information made available by DOC shows a steady demand and does not support this statement. See Appendix: Cruise ship tourist landings.

Perhaps there is confusion with tourism to the Antarctic Peninsula that was growing, peaking in 07-08. Subsequently this has declined somewhat. There is debate about the role of the heavy fuel oil ban and the economic downturn in this change. Perhaps the prior growth reported in tourism to the Antarctic Peninsula has been extrapolated to the SI. Although conjecture, this confusion may result from SI being part of expeditionary cruise itineraries to Antarctica from New Zealand — Heritage Expeditions typically have 3 expeditionary trips to Antarctica via SI annually. This co-joining of SI tourism with Antarctic tourism is a phenomenon that was noted some years ago in a report edited by Paul Dingwell.

The SI is a highly niched market that sees some operators enter the market for short periods, and then withdrawing as the economics and operation of this niche market is very demanding e.g. Orion, Aurora, Quark, Hapag-Lloyd, and Zegrahm Expeditions. In the last 5 years several operators have arrived and left. As such, sporadic or occasional entrants are not considered as a major growth in demand, rather they should be considered as experimental commercial activity to assess

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2 IATO http://www.iaato.org/tourism stats.html

3 June 2009 ASOC Press Briefing IMO to Consider Ban on Heavy Fuel Oil in Antarctic Waters

4 NZ based vessels are very small component of Antarctic tourism — several expeditions take place outside the Peninsula region each season. Since 1992, the icebreaker Kapitan Khlebikov has conducted voyages to the Weddell Sea, Ross Sea region and, on occasion, East Antarctica including islands of the Indian Ocean sector. These expeditions have uniquely included visits to Emperor Penguin colonies, historical huts in the Dry Valleys and other remote areas. Icebreakers also routinely carry helicopters for tourist visits and ice reconnaissance. The Spirit of Enderby, has been operating voyages in the Ross Sea Region and the New Zealand and Sub-Antarctic Islands for many years, departing out of Bluff, New Zealand. Since the 1970s there have been occasional voyages from the Peninsula to the Ross Sea, usually including New Zealand and Australian Sub-Antarctic Islands. Hobart (Australia), Bluff and Christchurch (New Zealand) and the most common gateway cities to the Ross Sea Region and East Antarctica. Occasionally there have been departures from Cape Town and Port Elizabeth (South Africa) and Fremantle/Perth (Australia). http://www.iaato.org/country/au/overview.html

5 Antarctica in the environmental era, edited by Paul Dingwell, DOC 1997
demand. The reality of not establishing ongoing operations for the SI indicates the demanding nature of this niche and the relatively flat demand.

Each expedition involves a significant marketing effort over several years. It is this accumulated effort that supports the commercial success of a SI niche operator. This is supported by TRC's experience in nature based tourism to islands and remote locations. The market is primarily out of Europe, the UK and the US and these markets have all had significant long term investment in marketing of New Zealand nature based tourism. They have declined or remained flat in response to the global recession. Further Milford Sound numbers have declined and Stewart Island numbers are flat.

![Trends in International Visitors to New Zealand](image)

The above graph demonstrates the decline and flattening in the overseas markets. Therefore it is very challenging to predict a major growth scenario for nature based tourism in the next 5 years.

1.3.3. **Recommendation: revise tourism text on page 12**

Page 12 Paragraph 2 be rewritten as follows - *There has been sustained tourism by 1 highly niched operator over the last 25 years. The remoteness of these rugged windswept islands, set amongst some of the wildest oceans in the world, combined with superb wildlife viewing opportunities make these islands key attractions for ecotourists or tourists seeking remote destinations with a focus on nature tourism. However the wild oceans, remoteness and associated operational requirements have made it too challenging for new entrants to establish. There has been some*

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market testing through occasional nature based cruises but this has not been sustained over time. It remains difficult to predict sustained growth in the current economic climate and for the next 5 years and is most likely to be minimal.

Fishing (p13) analysis provides a general context. However it does not include the dynamics of the fishing fleets that may seek shelter within the territorial sea. It is understood that this is common practise for the scampi fishery off the Auckland Islands. When rough weather lasts for weeks in the winter they may "holeup" for as long as 3-4 weeks. The other main fishing fleet, ling, have larger vessels and ride out storms at sea rather than seek sheltered anchorage.

1.3.4. Recommendation: include fishing boat sheltering in Auckland Islands

P13, paragraph 5 that the extent of scampi boats sheltering for safe anchorage be stated more explicitly as follows by adding, for the duration of rough weather and in the winter this can be up to 3-4 weeks at a time. The bulk of the vessels typically range between 10-20m in length.⁷

Wreck exploration and salvage (p13) focuses on the General Grant yet there are many other wrecks.

1.3.5. Recommendation: Ship wrecks

All known sites of wrecks are shown on the maps

1.4. Current use values analysed in the RCP for the Kermadecs

These are limited to:
- Conservation and restoration
- Research
- Tourism

The conservation and restoration p20 is focussed on terrestrial floral and fauna and pest eradication and no mention is made of the marine environment and how it is managed.

1.4.1. Recommendation: include remote and wild character assists protection

Specific inclusion of how the marine environment is currently managed should include that the remote and wild character helps protect the marine environment and the surveillance provided is designed to ensure that the marine coastal area is well protected from illegal use.

The research use value p20 includes a paragraph on archaeological research and notes the vulnerability of the sites within the active coastal zone. No mention is made of whether they are within the jurisdiction of the RCP.

⁷ from Min Fish, CRA8, data from 06/07 and 07/08 fishing years
1.4.2. **Recommendation:** show sites in coastal zone on maps

Those sites that have been surveyed, and in particular those that occur in the coastal zone should be marked on the maps in this plan to ensure they are readily identified, assuming there is no cultural impediment to doing so.

**The tourism use value p21**

The section correctly recognises the challenges and the “fairly limited niche market” for the Kermadec Islands.

1.4.3. **Recommendation:** Tourism in the Kermadecs

Similar recognition be made for the SI - see Section 1.3 of this report for further comment on this point.

2. **ISSUES (P22)**

It is noted that the greatest risks to the SI and Kermadec Islands are biosecurity breeches and oil spills. This assessment of the key risks is supported.

2.1.1. **Issue 1 Natural character**

The natural character objectives are supported. It suggested that greater clarity could be given to 1.3 (p23) through “community types” being replaced by “flora and fauna communities.”

**Policies (p24)**

The policies place a clear focus on biosecurtly and the management of biofouling on vessels. This preventive approach encouraging good practise is supported although it is noted that additional costs will be incurred by operators who do not currently comply. Those who currently meet or exceed the standard will already be carrying such costs.

**Policy 2 (p24) includes a reference to checking prior to departure, particularly for rodents, and insects.** The former is accepted, however further clarity on insect control is necessary as approaches to this are not well understood as compared to rodent controls. (See comment on rule 26 etc) Further the point of departure is unclear and how these checks will be undertaken and by whom.
2.1.2. **Recommendation:** (p24) clarify the meaning of point of departure and process of checking

2.1.3. **Recommendation:** An addition to Policy 2 (p24) stating that a good practice guideline will be developed to cover checks on departure for rodents and insects, and this be carried through into the rules

**Rationale for distance Policy 3 (p25)** states “maintain and protect biodiversity... via hull fouling “by restricting access inside 1000m from MHWS.” The rationale for this distance is not stated. If a pragmatic management approach is being applied this should be stated as such and if there is scientific evidence to support why this is useful it should be referenced.

2.1.4. **Recommendation:** include rationale for distance restrictions

Policy 6 (p25) encourages “appropriate” research - greater clarity of what is considered appropriate would be helpful. Science Strategy could be referenced here.

2.1.5. **Recommendation:** Clarify definition of “appropriate” research.

2.2. **Control of surface water activities (p25) paragraph 1.**

The users listed exclude fishing boats sheltering in SI in rough weather. The policies are supported

2.2.1. **Recommendation:** Insert fishing boats or other boats sheltering in rough weather.

The threat of oil spill from large vessels is noted (p27) paragraph 2 and 4. It would be helpful to have large vessels defined. This paragraph includes a reference to “the number/and or size of vessels interested in visiting the islands increases” and continues and states the risk of oil spill increases. Interest does not increase risk – nor does interest equate with use. Further, increased size does not necessarily increase risk of oil spill. It is noted that poor management and/or maintenance are referenced as possible causes also.

2.2.2. **Recommendation:** define larger vessels

Define *large vessels* as over 150 m

P27 Delete the remainder of the sentence 4 in paragraph 2. Instead simply state “The threat of an oil spill from any one of the vessels that visit the islands is ever present.”
2.3. **Other methods (p28)**

It is noted that the management mechanism of guidelines is suggested as a means to manage artificial light and noise. This is positive. However an explanation of when guidelines are appropriate would be helpful. By implication guidelines could be developed for management of issues that are adequately managed through voluntary compliance or where this is a pragmatic management approach.

2.4. **Issue 2 Kaitiakitangi of the coastal marine area (p29)**

The objectives and policies are supported.

2.5. **Issue 3 Cultural and Historic heritage (p31)**

The objectives and policies are supported. However in the interests of reducing the potential for damage to these sites all should be shown on the maps thereby informing managers especially, and visitors.

2.5.1. **Recommendation:**

All plan users, managers especially and visitors to these sites should all be able to easily find information on location of cultural and historic heritage sites and accordingly should be shown on the maps. A reference to this could be included in the Notes.

3. **RULES**

Comment is made on the main rules where changes are recommended. Some of these comments and recommendations relate to multiple rules. Whilst every effort has been made to cross reference these the listing may not be exhaustive.

**A&B Temporary rule for hull and niche area fouling (p42)**

This rule description is complex and a flow chart illustrating and describing the process and decision pathways would be helpful. It is noted that the onus is placed on the user to ensure the hull is clean and this is transitionary.

3.1.1. **Recommendation:** express this rule as a flow chart as well, for ease of understanding, and also for rules 26-28.

**Rule 26 - 28(p 43-44) Controls on hull and niche area fouling**

The need for controls is not in question.

The understood best practise to minimise hull and niche fouling is through regular cleaning, inspection, removal of any incursion, safe disposal (after identification) and reapplication of anti-foul paint, ideally on an annual basis. The RCP makes no
mention of good practise or of the extensive standard development work being undertaken by MAF Biosecurity New Zealand on this and the related timetable. The MAFBSNZ process should drive the RCP rules and not vice versa – as MAFBSNZ are the expert lead agency in this matter. The RCP is getting ahead of MAFBSNZ and neither does the RCP refer to this process.

Based on our knowledge there is a related issue that requires careful consideration and impacts on the practicality of the rules - the shortage of marine taxonomic advice that is readily available in New Zealand to identify marine organisms. Any situation of hull fouling requires a rapid response and baseline information is limited and identification can be time consuming. The relevant government agencies could develop a reference database of biofouling that would enable faster identification of the more common species to ensure that in the event of a relatively routine fouling a rapid, pragmatic and biosecure response is feasible. The intention to have a response system that is able to be mobilised with urgency and apply such an approach could be signalled in the RCP. This would indicate the intention of a prompt response ensuring those permitted to travel to these islands are not unduly delayed from sailing once they have met the biosecurity requirements.

3.1.2. Recommendation:

The rules (pages 42 – 44) on controls of hull and niche fouling defer to the MAF Biosecurity New Zealand standard.

The policies should note an appropriate reference to the taxonomic reality and the rules to be practical reflect this reality.

Vessel length as a control for safety Rule 29 – 31, and the associated maps of Surface water activities in S1 and Kermadecs.

These three rules all allow access close in shore for management operations, re-supply of fuel stores and management activities and research permitted activities without any access restrictions – i.e. no boat length requirements. Biosecurity measures apply.

However the focus in the RCP is on reducing the risk of maritime incident and oil spill. This risk mitigation proposed through the rules is by ship length. There is no justification given for why the risk is reduced in the circumstances of management operations, re-supply of fuel stores, management activities and research permitted activities. Nor is the rationale for waiver of access restriction included.

Without an explicit rationale given for these exceptions it remains difficult to understand the application of vessel length as the criteria for safety. For example a research vessel of any length is permitted. The difference in risk profile with other vessels is unclear. For example and as a comparison, if an expedition cruise vessel (of more than 75m) was carrying supplies for the Department of Conservation operations it would not be required to comply with Rule 33 in the particular instance of re-supply, when coming in closer – the risk has not reduced because it is

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8 And also from pers com Dr Graeme Inglis, Principal Scientist, National Centre for Aquatic Biodiversity and Biosecurity, NIWA
resupplying. This is inconsistent and it is difficult to understand these exceptions without a clear rationale in the RCP.

Vessel length of up to about 150 metres if motorised is considered to be low risk. If vessel length is the criteria to be applied the rationale for the break points in length need to be spelt out – particularly for the relatively fine scale of 25-75 metres and then 75-125 metres. Today there are many variables that determine the criteria for vessel safety. These include the skills and experience of the Captain and the crew, the management of the vessel, its manoeuvring ability and its technological competence. Vessel safety is also connected to and relative to the length of stay at any given anchorage. Expedition vessels generally only spend limited time at certain anchorages – mainly during daylight hours – thereby significantly reducing the risk. The days of these vessels being remote from information are over as most have virtually real time forecasting of weather, currents, depth, waves and wind.

3.1.3. Recommendation: vessel length as the criteria for vessel safety

That vessel length as the sole criteria for vessel safety be rethought in the light of technological and associated safety trends and other relevant maritime trends.

If ship length is used as a pragmatic way of categorising vessels this should be explicitly stated and also state the risk factors taken into account in determining the categories.

Rules 26, 27, 29, 35, 36, 38, 40, 44, 49, 53 and 58 (p44-51.) include mention of “harmful plants and animals (including insects)”. In the RCP what is acceptable below the water line is defined in some detail and that same rigour of standards, terms and conditions has not been applied to harmful plants, animals and insects – above water line. The breadth of the challenge of creating such standards/terms/conditions is recognised. Good practice includes inspection, and removal/eradication if found, boat and clothing protocols etc. providing a sound approach to be applied. It is suggested that a pragmatic guideline approach be taken to this that is based on good practices. This could also be used to help educate all users e.g. yachts and sheltering fishing boats.

3.1.4. Recommendation: That the reference to insects be removed (or qualified with the intention to prepare and provide guidelines on insects) from the rules and guidelines be prepared based on good practices.

Rule 36, 38, 40, 41, 45 and 46 No more than 1 cruise ship is in a bay at any one time. There is no definition of a “bay.” The eastern coastline of the Auckland Islands especially is complex with harbours and bays and accordingly greater clarity is required. For example it is possible under this wording that ships could be in 2 bays within a Port or Harbour. Further this standard specifies cruise ships only and is silent on research and management vessels. The preservation of the remoteness and wilderness experience is not supported by this standard as drafted. The intention to ensure no sightings of other vessels and removing this impact on the wilderness experience is supported.
3.1.5. Recommendation:

"Bay" is changed to "harbour."
The Standard be rewritten as: No more than one ship in a harbour at any one time

Rule 37 (p47) it is unclear what this means and it is discretionary. There is no explanation in S32 report and this suggests this is an error.

3.1.6. Recommendation:

That this rule if in error be deleted and if not be better described

Rule 40 (p47) Location error

It is noted that this rule is for the Subantarctic Islands, and presumably in error it includes an offloading for northeast of Macauley Island (Kermadec Islands).

3.1.7. Recommendation:

This error be corrected

Rule 46 Anchoring (p49) Error

Without detailed field experience it is not possible to comment on these anchoring except to note that vessels over 75metres in length are not permitted to anchor although on the maps this is shown as possible.

3.1.8. Recommendation

That the error is corrected and anchoring as an activity is allowed out to 600 metres and by vessels up to 125 metres.

4. OTHER MATTERS

In some parts of the plan and the section 32 report there is a mention of terrestrial management focused activities – e.g. cultural sites that are land based, eradication programmes for terrestrial species which in themselves are important, but the connection to the management of the marine environment is not made. Perhaps these examples are used as an implicit proxy rationale for active marine management. If this is the case then the use of these examples as proxies should be explicit. The focus of this plan is on the coastal marine area and if there is a lack of information to inform management this should be clearly stated.
4.1. Omissions

4.1.1. Business certainty

Business certainty for the expeditionary cruise sector is vital for their sustainability. Significant investment is made years ahead to secure clients, capital invested in the purchase and or charter of vessels and this should be recognised by increased certainty of access and reflecting the practical needs of the industry, providing the resource is not adversely impacted. This is only mentioned in passing in the purpose of the plan – page 3.

However very tight controls on vessel length and "permitted" only at the 25-75 metre end of the scale does not provide for certainty. If a vessel is 75-125 metres it is classified as discretionary, without any clear rationale given. This precludes the potential for some change. Growth requires some certainty about key business requirements - access in these cases. Ironically in the CMS there is provision for permitted visitors of up to 150 per permit. It is understood that a vessel of 125 metres is likely to have no more that 120 berths and under the proposed RCP this is discretionary whereas under the current CMS landing of this number is permitted.

Consequently the proposed RCP may potentially have a negative business impact on the future of expedition cruising operations to the Subantarctics and Kermadec Islands.

4.1.2. Recommendation: Business certainty

That the proposed plan be very explicit about its intention to create a climate for business certainty, thereby contributing to business sustainability over time.

4.2. Review Provision

There is no provision for review of this plan.

4.2.1. Recommendation: Review

This plan be reviewed in 5 years
5. **APPENDIX: CRUISE SHIP TOURIST LANDINGS**

Note: Omission of 2010-11 figures

Note: very little information has been collected for the Kermadecs

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<th>Total person visits</th>
<th>Total land</th>
<th>Total duration</th>
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Pers com Sarah Hucker
### Subantarctic Islands: Summary of Cruise Ship Tourist Landings - Concessions 1 October 2004 to 30 June 2011

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<th>Landing Sites</th>
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