



Public submissions received on the proposed amendment to Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary

Proposal to improve the effectiveness of the Marine Mammal Sanctuary by removing one of the current management measures: the marine mammal safe zones

Submission period: 2 to 30 March 2026



Department of
Conservation
Te Papa Atawhai

Submission ID	Consultee Name	Select the group(s) that best describe your interest? - Other (describe) (answer recorded via online survey tool only)	Do you support the removal of the safe zones? (answer recorded via online survey tool only)	Do you have any additional comments?
S-2-1	On behalf of Silver Wave Yacht Charters	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator, Commercial maritime vessel operator, Local business owner, Local community group, Member of the New Zealand Public	Yes	I agree with all of the reasons DOC have put forward for the proposed removal. In addition I would also add that very few vessel operators abide by the 5-knot limit. Particularly over the peak of summer when boats from other areas arrive. We very seldomly see marine mammals in these areas.
S-3-1	Rio Greening	Whānau, hapū or iwi affiliation: Ngāpuhi, Local business owner, Science and research, Environmental group	Yes	Will this be reviewed in the next 3 or 5 years if things change? in the near future.
S-4-1	Rochelle Constantine	Science and research	Yes	
S-5-1	Mr Jake Kerr	Recreational maritime vessel operator, Member of the New Zealand Public	Yes	This idea never worked. Dolphins do not stay in one area. Also I have had numerous occasions where Dolphins have come to the boat and hung around for an extended length of time. I challenge the thinking that we are disrupting them.
S-6-1	Mr Dean Farmer	Northland / Te Pēwhairangi Bay of Islands community member	Yes	We strongly support DoC's proposal to remove the MM Safe Zones and the 5knot speed restriction based on the fact that there appears to have been no scientific or practical reason for such regulations.

S-7-1	Bex Walton-Hannay	Recreational maritime vessel operator, Member of the New Zealand Public	Yes	300m from a marine mammal is too far for small vessels under 6m. This distance at sea level means you can 't see the marine mammals. If you can 't see the marine mammals you don 't engage learn about them and want to protect them. It's heart breaking for kids who have a respectful and caring relationship with the dolphins and who consider this area their home not to be able to see the marine mammals. It would be better spending funding on positive education about all Bay of Islands wildlife rather than delivering a bag or bad news to people. There is also no signage in campsites etc which are largely used by boaties. Info on marine mammals and all bay of islands info should be included in campsite bookings.
S-8-1	Mr Max Walton-Hannay	Recreational maritime vessel operator	Yes	I love marine mammals and want to protect them but 300m is too far in a vessel under 6m - you can 't see the marine mammals. If you can 't see them you don 't want to protect them. It made us feel really sad on our annual camping trip. There needs to be more work on educating boat users and campers on urupukapuka about how we can help the environment not just lots of rules.
S-9-1	Mr Philip Kempthorne	Northland / Te Pēwhairangi Bay of Islands community member	Yes	The science was never there to support this rule in the first place. Marine mammals have not used the supposed safe zones and it has not had any impact on dolphin numbers while inconveniencing a large number of boat owners.
S-10-1	Mr Dean Farmer	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator	Yes	
S-11-1	Mr Trevor Farmer	Northland / Te Pēwhairangi Bay of Islands community member	Yes	
S-12-1	Mrs Jan Farmer	Northland / Te Pēwhairangi Bay of Islands community member	Yes	
S-13-1	Mrs Carolyn Simons	Northland / Te Pēwhairangi Bay of Islands community member	Yes	

S-14-1	Mr Kerry Farmer	Northland / Te Pēwhairangi Bay of Islands community member	Yes	
S-15-1	Mrs Laura Martin	Northland / Te Pēwhairangi Bay of Islands community member	Yes	
S-16-1	Mr Stephen Farmer	Northland / Te Pēwhairangi Bay of Islands community member	Yes	
S-17-1	Miss Brooke Farmer	Northland / Te Pēwhairangi Bay of Islands community member	Yes	
S-18-1	Mrs Chanelle Farmer	Northland / Te Pēwhairangi Bay of Islands community member	Yes	
S-19-1	WITHHELD	Recreational maritime vessel operator, Member of the New Zealand Public	No	I do not wish my name or any other personal information to be disclosed. I am supportive of the sanctuary and it's purpose I have had the pleasure of seeing Orca in the sanctuary area twice. However I have seen no monitoring of boat speeds yet many times I have been in the sanctuary area I have seen a lot of boats exceeding the 5 knot limit.
S-20-1	MR James Kempthorne	Northland / Te Pēwhairangi Bay of Islands community member	Yes	I strongly support the Department of Conservation's proposal to remove the Mooring Marine (MM) Safe Zones and the 5-knot speed restriction. Given the absence of any clear scientific or practical justification for these regulations their removal is both reasonable and warranted.
S-21-1	Daniel Hill	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator	Yes	
S-22-1	Mrs Heather Stevens	Northland / Te Pēwhairangi Bay of Islands community member	Yes	Having lived in the area all my life I was horrified that the 5k restriction was put on in the first place. When so many qualified people were against it they should not have been ignored so may be now common sense will prevail. There are hardly any dolphins that come in the safe zones anyway.

S-23-1	Mrs Gillian Strong	Member of the New Zealand Public	Yes	I wish to submit a request to remove the 5kt speed restriction within the Bay of Islands Marine Mammal Sanctuary. I certainly agree it is important to give dolphins space but a blanket speed limit within our area of Manawaora Bay and much of the Eastern Bay of Islands appears to be overkill
S-24-1	Mr Mark Wyborn	Northland / Te Pēwhairangi Bay of Islands community member	Yes	
S-25-1	On behalf of TriOceans	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator, Commercial maritime vessel operator, Local business owner, Local community group, Science and research	Yes	I support the removal of the two safe zones from the Bay of Islands Marine Mammal Sanctuary regulations. Based on the recent bodies of research these zones appear to have limited effectiveness as a conservation tool mostly due to their small size relative to the range of the species of interest. In contrast the dolphin-presence specific regulations introduced alongside the zones apply consistently across the sanctuary and are likely to have greater practical influence on vessel dolphin interactions. More broadly the long-term conservation of this population would benefit significantly from a structured and ongoing monitoring programme. Over the past decades multiple studies have documented concerning trends in the Bay of Islands bottlenose dolphin population including population decline elevated calf mortality and measurable behavioural responses to vessel activity. Continued monitoring is therefore essential to determine whether existing management measures are achieving their intended outcomes and to support adaptive management where necessary. Establishing a regular monitoring framework such as periodic vessel-based surveys incorporating photo-identification behavioural observations and other established research techniques would provide a robust evidence base for future management decisions. TriOceans has conducted long-term research on this population and has the vessels equipment and field expertise required to support such monitoring. We would welcome the opportunity to contribute to a structured monitoring programme and to work alongside DOC and mana whenua to support ongoing research including providing opportunities for kaitiaki to participate in fieldwork and data processing where desired. Ensuring that management decisions continue to be informed by robust locally grounded science will be critical to the long-term protection and recovery of this important dolphin population.

S-26-1	Mr David Greenhalgh	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator	Yes	I strongly support DoC's proposal to remove the MM Safe Zones and the 5knot speed restriction as there appears to be very little scientific or practical reasoning for such regulations to be put in place.
S-27-1	Mrs Michelle Greenhalgh	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator	Yes	I strongly support DoC's proposal to remove the MM Safe Zones and the 5-knot speed restriction as there appears to have been no scientific / practical reason for them
S-28-1	Mr Jonny Manning	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator, Member of the New Zealand Public	Yes	We strongly support DoC 's proposal to remove the MM Safe Zones and the 5knot speed restriction based on the fact that there appears to have been no scientific or practical reason for such regulations
S-29-1	Mr Charles Whitfield	Northland / Te Pēwhairangi Bay of Islands community member	Yes	We are keen supporters of environmental protection in the Russell peninsular and commit considerable resources to native flora and fauna preservation and regeneration in the region. A key part of this effort is getting buy-in from the community. Programs like the safe zones which inconvenience the community but achieve nothing undermine the ability to implement beneficial initiatives as there is additional scepticism about the cost benefit tradeoff of each scheme. This dolphin program based on dogma and self interest rather than science has been extremely damaging to the overall effort to get community engagement in local environmental programs. It never should have been implemented with so little basis or consultation and should be reversed as soon as possible.
S-30-1	Mr Hayden Smith	Recreational maritime vessel operator	Yes	I strongly support the proposal to remove the MM Safe Zones and the 5knot speed restriction in Manawaora Bay. I am a regular visitor to the area and an avid boatee . We all lover seeing mammals occasionally in the water but the safe zones are enormous the 5 knots is very slow and the benefit of the regulations seem extremely limited. Our recent dolphin sitings have often been in different areas anyway so we really do wonder if there is any practical benefit for such an imposition on the users of Manawaora.

S-31-1	Mr Richard Hanson	Northland / Te Pēwhairangi Bay of Islands community member	Yes	I support DoC's proposal to remove the Marine Mammal rest zones and the associated 5knot speed restriction based on the fact that there was no scientific or practical logic for the regulations. Research should also focus on the impact of inshore commercial fishing in the Bay of Islands. The impact of these activities on the Marine Mammal food supply should also be addressed.
S-32-1	Nina Broomfield	Northland / Te Pēwhairangi Bay of Islands community member	Yes	I strongly support DoC's proposal to remove the Marine Mammal rest zones and the associated 5knot speed restriction based on the fact that there was no scientific or practical logic for the regulations. Research should also address the impact of inshore commercial fishing in the Bay of Islands. The impact of these activities on the food supply should also be addressed.
S-33-1	Mr Edward Hanson	Northland / Te Pēwhairangi Bay of Islands community member	Yes	I strongly support DoC's proposal to remove the Marine Mammal rest zones and the associated 5 knot speed restriction based on the fact that there was no scientific or practical logic for the regulations.
S-34-1	Mrs Joan Hanson	Other (please specify) - Owner of a property in the Bay of Islands	Yes	I strongly support Doc removing the marine mammal safe zones within the Bay of Islands and the 5 knot restriction areas. As research has shown there is no scientific basis for the zones
S-35-1	Olaf Hanson	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator, Member of the New Zealand Public	Yes	I strongly support DoC's proposal to remove the Marine Mammal rest zones and the associated 5knot speed restriction based on the fact that there was no scientific or practical logic for the regulations.
S-36-1	Mr Nick Hanson	Recreational maritime vessel operator	Yes	
S-37-1	Mrs Alexandra Hanson	Northland / Te Pēwhairangi Bay of Islands community member	Yes	
S-38-1	Hanneli Hanson	Northland / Te Pēwhairangi Bay of Islands community member	Yes	I strongly support DoC's proposal to remove the Marine Mammal rest zones and the associated 5knot speed restriction based on the fact that there was no scientific or practical logic for the regulations.
S-39-1	Mr Jeremy Hay	Recreational maritime vessel operator	Yes	

S-40-1	Mr Mike Bayley	Northland / Te Pēwhairangi Bay of Islands community member	Yes	We strongly support DoC 's proposal to remove the MM Safe Zones and the 5knot speed restriction based on the fact that there appears to have been no scientific or practical reason for such regulations.
S-41-1	Me Greg Pritchard	Recreational maritime vessel operator	Yes	No scientific evidence that marine mammals are endangered by vessel speed in the BOI. In my 35 years of boating I 've never seen anything to suggest a change in behaviour or even numbers of marine mammals change significantly
S-42-1	Mr David Stevenson	Northland / Te Pēwhairangi Bay of Islands community member	Yes	My family and I who have been in the Orokawa Bay Area for more than 65 years strongly support DoC 's proposal for the removal of MM Safe Zones and especially the 5knot speed restriction based on the facts that there appears to have been no scientific or in fact practical reason for such regulations to be put in place.
S-43-1	Mr Daniel Clarke	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator, Member of the New Zealand Public	Yes	I support the vision of the Bay of Islands Marine Mammal Sanctuary but I disagree with the third management measure: "If 300m is breached STOP AND STAY STOPPED until marine mammals are 300m away." Firstly: Stopping a yacht is difficult and cannot be done in a hurry. It requires planned manoeuvres that if not done correctly can threaten crew safety and damage rigging, as the vessel's momentum, wind, and current continue acting on the hull. Once a yacht has stopped and the dolphins have left, there is a chance they will return to the yacht once it is underway again. Secondly: According to your information: "Research indicates that dolphins rest, forage and travel much less in the presence of vessels." That statement does not include play. There are several studies available discussing the importance of play to dolphins and what are examples of play. Two studies are quoted below. A 2015 study by Vincent Janik, published in Current Biology, titled "Play in Dolphins" asks: What are common forms of play in dolphins? The answer he gives is: "The most common behaviour patterns reported as play in dolphins are play fights/chases; wave riding, including riding on bow waves of ships." The report continues: "As infants develop, their play behavior becomes more complex and inventive. In the wild, play is often involved in learning behavior patterns that are important for survival later in life. Another study in 2025 by Dr. Kathryn Holmes of the Sarasota Dolphin Research Program discussing the purpose of play summarises: "Thus, we provide rare evidence that juvenile social play

				predicts adult reproductive success in a wild animal." Thirdly, in dispute of the statement that dolphins travel much less in the presence of vessels, a 2024 study by Lorenzo Fiori of the Department of Life Sciences Texas, states, "Dolphins may bow-ride to efficiently travel from one location to another²; bottlenose dolphins have been observed riding on the bows of large ships for more than 20 km⁶." I have been sailing for over 30 years in the Bay of Islands and on many occasions had dolphins wave ride or bow ride. These dolphins are not resting, travelling or foraging, but have chosen to alter their course to come and play around my boat. Attempting to stop my yacht is not practical and could be difficult and dangerous. I suggest that the third management measure be changed to: "If 100m is breached the skipper should maintain their course and attempt to slow down to under 5knots".
S-44-1	Mrs Mo Clarke	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator, Member of the New Zealand Public	Yes	Protecting dolphins from disturbance is an important objective but a blanket rule requiring vessels to stop whenever a dolphin is within 300 m is impractical, unsafe, and inconsistent with established scientific understanding of dolphin behaviour. Dolphins frequently and voluntarily approach vessels, often to ride bow waves for play, social interaction, or energy-efficient travel. Requiring vessels to stop whenever dolphins approach would be difficult to comply with, particularly for sailing vessels, and could create safety risks. 1. Dolphins often approach boats intentionally. Research consistently shows dolphins ride the bow waves of vessels for a variety of reasons including play, social interaction, and energy-efficient travel. Researchers also note that bow-riding behaviour likely serves multiple purposes: conserving energy while travelling social interaction within pods play and stimulation opportunistic feeding near vessel-disturbed fish In other words, dolphins often choose to interact with vessels, rather than being disturbed by them. A rule requiring vessels to stop whenever dolphins come within 300m effectively penalises vessels for dolphin behaviour that they neither caused nor can control. 2. Dolphins can swim much faster than most cruising boats. When dolphins decide to interact with a vessel, they frequently approach from outside the vessel's control zone. Even if a vessel slows or stops, dolphins can continue to approach and remain nearby. Therefore, a requirement to stop when dolphins are within 300 m may not actually reduce

				interaction, because the animals may remain within that distance regardless of vessel action. 3. Stopping a yacht is not equivalent to stopping a powered vessel. Sailing vessels cannot simply 'stop' and will continue moving due to: wind pressure on sails wave motion hull momentum current and tide To stop fully, a yacht typically must: drop sails start the engine turn head-to-wind or drift without steerage. These manoeuvres can take significant time and may create safety issues in busy waterways or near hazards. 3. Stopping propulsion means a loss of steerage, making vessels difficult to control. In areas where dolphins are common, vessels may be required to stop repeatedly during a single voyage, making normal navigation impractical. A more workable approach would focus on speed limits and avoidance of deliberate approach, rather than mandatory stopping when dolphins approach vessels on their own.
S-45-1	Monique van Loon	Northland / Te Pēwhairangi Bay of Islands community member, Commercial maritime vessel operator, Local business owner, Member of the New Zealand Public	Yes	
S-46-1	Mr Angus Ross	Northland / Te Pēwhairangi Bay of Islands community member	Yes	We support DOC doing away with the marine mammal sanctuary regulations as the initial implementation was not based on any scientific or sensible data that in practice achieved absolutely nothing other than DOC becoming a laughing stock of the community
S-47-1	Mr Denis Callesen	Recreational maritime vessel operator	Yes	The 5 knot safe zones were always a nonsense. I have reluctantly complied with the speed restrictions but 90% of other boats haven't including sometimes commercial operators. Recreational users particularly from Auckland have/had no knowledge of the restrictions. I have been a recreational boatie for nearly 50 years in/around the BOI and have NEVER seen any marine mammals in the restricted 5 knot areas and I am in these areas probably 50+ times a year. Accordingly I support the removal of the 5 knot zones and support all the other measures. An interesting anecdote though is about 4 years ago at Easter I stopped when observing a pod of Orca near

				Moturoa Island. The orca then herded a school of bait fish up under my boat and spent sometime attacking them under my boat. I have still and video footage of this encounter, if you wish to see them
S-48-1	Mrs Rebecca Verhulst	Northland / Te Pēwhairangi Bay of Islands community member	Yes	I think DOC is right to focus their efforts where they are most effective. I strongly support DoCs proposal to remove the MM Safe Zones and the 5knot speed restriction based on the fact that there appears to have been no scientific or practical reason for such regulations.
S-49-1	Mr Leon Verhulst	Recreational maritime vessel operator	Yes	
S-50-1	Ms Kerry Marinkovich	Northland / Te Pēwhairangi Bay of Islands community member, Member of the New Zealand Public	No	I feel it is very important to leave the limits in place and continue protecting the wildlife. Our impact on the natural environment needs to be kept in check to allow dolphins and other sea creatures to survive and live well in their own ecosystem.
S-51-1	Mr Donald Hanson	Northland / Te Pēwhairangi Bay of Islands community member	Yes	I strongly support DoC's proposal to remove the Marine Mammal rest zones and the associated 5knot speed restriction based on the fact that there was no scientific or practical logic for the regulations.
S-52-1	Mr Scott Anderson	Northland / Te Pēwhairangi Bay of Islands community member	Yes	
S-53-1	Christie Wrightson	Recreational maritime vessel operator, Member of the New Zealand Public, Other (please specify) - We own property in the BOI as well as boating. Have boated and had property for over 40 years in the BOI.	Yes	I strongly support DoC's proposal to remove the Marine Mammal rest zones and the associated 5-knot speed restriction because there was no scientific or practical logic for the regulations.
S-54-email	Grant Cashmore	Emailed submission		I would like to register my strong support DoC's proposal to remove the MM Safe Zones and the 5knot speed restriction based on the fact that there appears to have been no scientific or practical reason for such regulations!
S-55-email	Ian Kempthorne	Emailed submission (duplicate of written submission)		In my submission of 2021, in respect to the proposed Bay of Island Marine Mammal Sanctuary, I opposed the proposal in its entirety. The portion of the

			proposal that I found was aggrieved about, was the speed restriction in the immediate vicinity of my residence in Jacks Bay. What I found incompatible also with the original proposal, was that Rawhiti Channel was not included in the speed restricted zone, a body of water where any dolphin must travel in order to get to the speed restricted area. Any speed restriction in the Rawhiti Channel would have been totally unacceptable to the boating population and to me, demonstrates the absurdity of the original speed restriction proposal. I was further disgusted that there was no advertised public hearing for such a major change to the Bay of Islands so that the concerned people of the district could hear the evidence for such a change. My observation is that there was no such evidence for the proposed change, and the whole consultation process was a “SHAM” As a long term resident of Jacks Bay, which overlooks Manawaora Bay (the largest area of the speed restricted waters), I have not seen any increase in dolphin activity since the introduction of the Bay of Island Marine Mammal Sanctuary regulations (4 years) and standby my statement in my submission of 2021 that; “ I have seen dolphins and orcas come and go, either frolicking or pursuing food but they have never been here (in the bay) on a regular basis. Even with the regulations restricting commercial sightseeing activities in our area, there still has been no increase in dolphin activity. My submission of 2021 highlighted the following; - I am a resident of Jacks Bay and my family have been in residence for almost 80 years. - - We have always used the waters of Manawaora Bay for fishing and pleasure boating. In 76 years of living and visiting the proposed area we have seen dolphins and orcas come and go but they have never been here on a regular or full time basis. - - I am a power boat operator and the current regulations have seriously restricted our boating freedoms and taken away my right of passage, once given to me by my parents for learning to water ski in my “back yard”, and for me to pass that same right of passage to my grandchildren. A more effective approach would be to have a public information campaign to educate boat skippers how to act around marine mammals rather than crushing the rights of NZ citizens of their freedoms to enjoy their surroundings. I totally support the Department of Conservation proposal to remove all speed restrictions in the Bay of Islands Marine Mammal Sanctuary area of 5 Knots,
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			based upon evidence that over the past 4 years there has not been any increased dolphin activity in the bay and there being no scientific evidence for the regulations in the first place.
S-56-email	Nikki Bines	Emailed submission	My family - the Kempthorne family - have been landowners in Jills Bay, Bay of Islands for over 75 years. We strongly support DoC's proposal to remove the MM Safe Zones and the 5knot speed restriction based on the fact that there appears to have been no scientific or practical reason for such regulations. We hope that this speed restriction will be removed so we can enjoy the boating that my family have enjoyed for more than 75 years in the Bay of Islands.
S-57-email	Sir Christopher Mace	Emailed submission	I strongly support the removal of the two Marine Mammal "safe zones", along with the 5-knot speed restriction, and support the Department of Conservation's proposed amendment to remove these "safe zones" and speed restrictions from the Bay of Islands Marine Mammal Sanctuary regulations gazetted in December 2021. Matters of concern relating to the establishment of the Marine Mammal Sanctuary regulations: a) Acknowledgement by the Department of Conservation of serious failings in the process leading to the establishment of the Bay of Islands Marine Mammal Sanctuary. b) Submissions from respected and experienced marine mammal scientists raising concern about the efficacy of the science as justification for the proposed regulations were ignored. c) Misleading media reports quoting a department employee, targeted at an uninformed audience, lauded the success of the safe zones and speed restrictions as saving the dolphins from extinction in the Bay of Islands. As the Marine Mammal Sanctuary has proved to be an unenforceable management approach, education and enforcement relating to marine mammals, in accordance with the Marine Mammal Protection Regulations (1992), would seem to be a more pragmatic and effective approach. In summary, there was no scientific or practical justification for the so-called safe zones and speed restrictions, and removal from the regulations will go some way to restoring the Department of Conservation's credibility with regard to protecting marine mammals in the Bay of Islands.

S-58-email	Jonny Reid	Emailed submission		We strongly support DoC's proposal to remove the MM Safe Zones and the 5knot speed restriction based on the fact that there appears to have been no scientific or practical reason for such regulations.
S-59-1	Mr Thomas Richwhite	Recreational maritime vessel operator	Yes	In my recent 3 or so years of considerable boating (liveaboard and trailer boating) I have literally not seen a dolphin within the protection zone, hence I am fully supportive of DOC's proposal to remove the limitations.
S-60-1	On behalf of Northland Inc	Other (please specify) - Regional Tourism organisation	Yes	We support the amendments to the Te Pewhairangi Marine Mammal Sanctuary rules as we understand that Dolphins are rarely seen in these areas. We support the continual education, on-water enforcement and monitoring of all vessel operators (commercial and recreational) to ensure they are aware of the rules and following them to support the Dolphin populations in this region. This would include: a) The need for greater compliance monitoring and enforcement of the Marine Mammal Protection Regulations and Marine Mammal Sanctuary rules b) Increased education around the regulations for non-permitted commercial and recreational vessels c) Recognition of the important role permitted operators play in educating visitors and acting as an eyes-on-the-water presence.
S-61-1	Mrs Wendy Butler	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator, Member of the New Zealand Public	Yes	I am disappointed that at the time the Mammal Sanctuary Rules were implemented DOC had a public meeting to tick boxes and asked for submissions but local knowledge was totally ignored along with a number of others thoughts and insights offered by locals. You were told at the time that the mammals did not often frequent this area. What a dreadful waste of public funds and your time . But relieved that sense has at last prevailed!
S-62-1	On behalf of Earl Grey Fishing	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator, Member of the New Zealand Public	Yes	
S-63-1	On behalf of Clendon Lodge	Local business owner	Yes	The rule about stopping and waiting on becoming aware of a dolphin lacks common sense. Why is there not an option to move away? Much more sensible. We find that this sort of rule makes people including our guests and visitors ridicule DOC and Nga Hapu o Pewhairangi Marin Mammal Protection

				Advisory Committee Ropu. They are quite happy to their common sense to observe the marine environment around them while travelling at greater speeds than 5 knots while still respecting any dolphins should they see any.
S-64-email	Fi Smith	Emailed submission		I am in favour for the removal of the two safe zones. Research has shown that the two safe zones where 5 knots needs to be adhered to are NOT proving effective as the safe zones are changing throughout the seasons due to weather and food source for the dolphins. Therefore, it seems ineffective to label these zones when they are not static. Secondly, people are not adhering to the 5 knt rule and thus man power and money spent policing this, could be spent elsewhere more effectively. Thirdly. Research has found that the public is more likely to adhere to the 300 m rule and this is very beneficial to the dolphins. Ingrid Visse, the well noted NZ orca specialist stated back in 2021 when first put in place that it was not an effective measure. There is now no safe area for waterskiing. The Dicks bay ski lane was removed and with the current 5 knt limit there is no where to ski, apart out in the more exposed (less sheltered) and more highly trafficked areas. I am not prepared to let my children learn to ski in such an environment. Sadly we know all too well with the death of an associates child getting hit by a boat after waiting in the water for a pick up. We need a designated area, or safe spaces to do such activities. In today's society we should encouraging all children and families to be outside and active and not on screens. I would love to see the Bay of islands enjoyed by all - dolphins and people. Isn't it wonderful to see boats of families out and about and safely watching the magic of the dolphins from 300m.
S-65-1	Mr Philip Thornton	Recreational maritime vessel operator, Member of the New Zealand Public	Yes	I support the proposal to remove the Bay of Islands speed restrictions and rest zones for the following reasons: 1. Lack of Scientific Basis: Recent NIWA and Tri-Oceans reports confirm that dolphins are not frequently using these designated areas. 2. Economic Inefficiency: The resources required to police these zones far exceed any purported benefits to the marine population. 3. Regulatory Logic: The original provisions were based on flawed data; removing them ensures that marine regulations remain practical and evidence-led.
S-66-1	Mr Eric John FaesenKloet	Northland / Te Pēwhairangi Bay of Islands community	Yes	

		member, Recreational maritime vessel operator		
S-67-1	Mr David Mather	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator, Member of the New Zealand Public	Yes	I support DoCs proposal to remove the safe zones and the ridiculous 5 knots speed limit as this regulation decision wasn't based on scientific research. I've fished and operated boats in these area's for over 30 years and rarely see dolphins. I do agree with the regulation for boats not to approach dolphins if spotted and let them come to you if they're interested, which sometimes they are.
S-68-1	Mr Paul Guinibert	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator	Yes	My name is Paul Guinibert and I have regularly been visiting Jacks/Jills bay for 20 years for holidays and to now regularly visit family who live in the bay. During this time I have spent a lot of time on the water and in recent years spent a lot more time on the water exploring the bay of Islands. I strongly support DoCs proposal to remove the MM Safe Zones and the 5knot speed restriction. Over the last 5 years I have not noticed a change in dolphin activity based on this change and the fact that there appears to have been no scientific or practical reason for such regulations. I agree that lifting this regulation would allow DOC to focus compliance and enforcement resources on the remaining dolphin-centric high-value management measures and enable us to provide protection where it matters most: around the dolphins wherever they go. I am happy for my name to be published however ask that you do not publish my email address.
S-69-1	On behalf of Captain Bucko Fishing Charters	Northland / Te Pēwhairangi Bay of Islands community member	Yes	The entire set of regulations are rubbish and of no benefit to the dolphins This has all been put in place by a bunch of karens.
S-70-1	Mr Raymond McPherson Te Rāwhiti Marae	Whānau, hapū or iwi affiliation: Ngāti Kuta, Ngāpuhi, Ngāti Wai, Local community group, Member of the New Zealand Public	No	Where are the porpois the papahu they are one of our guardians in the bay
S-71-1	Mr Jeff Douglas	Recreational maritime vessel operator	Yes	I travel through the current safe Zones on a regular basis and seldom see Dolphin in this area. I have fished for 50 years in the bay of Islands and note

				that Dolphin are attracted by boats and obviously enjoy riding their wakes. I have never witnessed or heard of any boat having any negative effects on Dolphin.
S-72-1	Mr Robert Adams	Northland / Te Pēwhairangi Bay of Islands community member	No	The monitoring data may not be accurate as to dolphin movement. We live at Long Beach (10 years) We observed significant numbers of sightings of dolphins close to shore and surfing the eaves. We also saw a pod of orcas (5) in the shallows of Long brach All sightings were between 2016 and 2019.....after that nothing until feb 2026.... What changed....fish stocks disappeared due to overfishing of young fish in the shallow bays and extensive overfishing of legal fish by trawlers which we hear at night coming close to shore.....We believe the dolphins left to find food and calf mortaloty was high due to lack of food. It wasnt until a Rahui placed on nursery arreas over the last few years that for the first time this year there are legal fish about in Long Beach. Dolphins came back in feb. Keep the safe areas for another 3 years before making a rash decision. Long beach is a popular beach and is the ideal place for the public to view dolphins when they come to feed. Wake boarding and jet skis will turn the dolphins away. What I suggest makes sense and keeps at least one area for dolphins.
S-73-1	Mr Bruce Rogers	Recreational maritime vessel operator, Local business owner	Yes	I have been a Recreational and Commercial user of the Bay of Islands for over 50+ Years. Has any thought been given to the fact that the Orca are responsible for the Decline in the Dolphin population. On many occasions Orca have been Videoed and seen Killing off the resident Dolphin population. I have never witnessed Bottlenose Dolphin being Hit by a marine craft but am aware it may happen. How do you Monitor Speed restrictions at Night. How do you stop the Bottlenose Dolphin engaging with anchored Craft. Where is the evidence that human reaction is decimating the Pod
S-74-1	Mr Jarrad Urwin	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator	Yes	
S-75-1	Mr Stephen Mason	Northland / Te Pēwhairangi Bay of Islands community	Yes	I have operated recreational boats in the Bay of Islands and Hauraki Gulf for 35 years and have had many encounters with Bottle Nose Dolphins and Orca. In all this time I have seen no adverse effects due to this interaction. Most times

		member, Recreational maritime vessel operator		the mammals have sought out interaction with the vessel rather than operators looking for them. I have personally never heard of anyone hitting a dolphin or orca and I believe the ban on any interaction is not necessary and may even be a negative to the positive interaction between human and marine mammal. It can be argued that the extremely positive attitude NZers have with these mammals is due to their previous interactions and limiting this may diminish this attitude as they are forced to be kept at arms length. I challenge the research that boat interaction interferes with the mammals in a negative fashion. DOC quote unspecified research as showing there is a negative impact on breeding and feeding habits due to boat interaction but do not easily publish that information. Not being able to view or challenge these research reports gives me very little confidence that they are in any way robust. I submit that this proposed amendment does not extend far enough for changes required to the Te Pēwhairangi Marine Mammal Sanctuary Rules and that it should, in its entirety, be abandoned.
S-76-1	Mr Laurence Roberts	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator	Yes	I strongly support DoCs proposal to remove the Marine Mammal rest zones and the 5knot speed restriction based on the fact that there was no scientific or practical reason for such regulations. We are residents in the surrounding safe zone and seldom see dolphins in the area,
S-77-1	Brigid Roberts	Northland / Te Pēwhairangi Bay of Islands community member, Recreational maritime vessel operator, Member of the New Zealand Public	Yes	Our whānau exercises kaitiakitanga in the sanctuary area, and we support the REMOVAL of the marine mammal safe zones in the Bay of Islands/Te Pēwhairangi. Restricting speed to 5 knots in those zones has not led to an increase in marine mammal presence in the area. Monitoring has chewed up valuable resources. The restrictions have had a negative impact on local and visiting whānau keen to enjoy general water-based activities in Te Pēwhairangi. Adhering to the 5 knot speed restrictions has been impractical and at times unsafe. As stated in DOC's supporting information, areas of importance for the dolphins in the Bay have remained relatively stable over decades. From the press release dated 2 March 2026: Recent surveys and scientific studies found dolphins in the Sanctuary were rarely present in the two safe zones. High-use areas are largely outside the safe zones but still within the Sanctuary. This suggests DOC focusing its efforts on other management measures will be a more effective way to support the recovery of dolphin populations. An off-

				water public education programme around what to do if you encounter marine mammals in the Bay would be a better use of resources. In conclusion we support the proposed improvement of the effectiveness of the Marine Mammal Sanctuary by REMOVING the marine mammal safe zones."
S-78-1	Mr Murray Hansen	Recreational maritime vessel operator	Yes	I have been boating through this area since 1993 and on the occasional time mammals have been in this area they may swim towards the boat and seem to enjoy playing in the wake and swimming next to the hull. Other times they don't even approach the boat and aren't interested so keep to themselves. Why was the safe area put there in the first place? These mammals do what they want to do. Please get rid of the safe area and return it to how it always was and should be. Thanks
S-79-1	On behalf of Carino Wildlife Cruises	Commercial maritime vessel operator	Yes	Carino Wildlife Cruises has operated in Te Pēwhairangi (Bay of Islands) as a Department of Conservation permitted marine mammal viewing operator for over 30 years. During this time, we have spent thousands of hours on the water observing marine wildlife and the changing conditions within the Bay. Through this long-term experience we have developed a deep respect for the dolphins and marine life of this area and strongly support the protection and sustainability of these precious taonga. We support the proposed changes and removal of both safe zones, for all vessels, as our documented trip records and on-water observations since the introduction of the Marine Mammal Sanctuary in December 2021 indicate that dolphins are rarely seen in these areas. While we acknowledge the scientific research undertaken to inform these proposed changes, we note that the research appears to have been conducted over relatively short timeframes and did not include the peak summer season when vessel numbers and human activity in the Bay are at their highest. A more comprehensive dataset across multiple seasons and years would provide a stronger evidence base for future management decisions. Until longer-term, continuous research is undertaken, we recommend that no further amendments to the Marine Mammal Sanctuary be made. Ensuring that future decisions are supported by robust scientific evidence will help ensure the sanctuary continues to effectively protect dolphins in Te Pēwhairangi. Since Dec 2021, we have also observed ongoing compliance issues with the Marine Mammal Sanctuary

				rules. In particular, the rule requiring vessels to stop with in 300m when dolphins are present, this does not appear to be consistently followed or enforced. From our observations and records on the water, some vessels continue to approach or manoeuvre around dolphins rather than stopping as required. We are also increasingly concerned that non-permitted commercial operators appear to be viewing and interacting with dolphins at higher rates than before the introduction of the Marine Mammal Sanctuary. This undermines the intent of the sanctuary and the protection it is designed to provide. For the sanctuary to be effective in protecting dolphins, we believe there needs to be greater compliance monitoring and enforcement on the water, along with stronger penalties for operators who breach the Marine Mammal Protection Rules and the Marine Mammal Protection act. Increased education about the MMS rules and the fact that the rules and regulations of the Marine Mammal Protection act 1992 still apply is also important, particularly for non-permitted commercial operators, including clearer guidance around rules such as not altering course to approach marine mammals and the three boat rule. We also support the continuation of permitted marine mammal operators in the Bay of Islands. Permitted operators play an important role in educating visitors about dolphins, marine conservation, and the Marine Mammal Protection Regulations, while also providing ongoing observations of dolphin behaviour and presence on the water. Responsible operators contribute to awareness, stewardship, and the long-term protection of these animals through both education and careful observation. As vessels operating daily on the water, permitted operators can also act as an important “eyes on the water” presence, helping to observe dolphin activity and identify potential issues or non-compliance. Based on more than 30 years of daily operations and on-water observations in Te Pēwhairangi / Bay of Islands, we offer the following recommendations for consideration by the Department of Conservation and decision-makers to further support the protection of dolphins in the Bay. Recommendations 1. Increase on-water compliance monitoring and enforcement to ensure all vessels interacting with dolphins follow the requirements of the Marine mammal Protection Regulations 1992, and the marine mammal sanctuary
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				rules particularly the requirement for vessels to stop when dolphins are present. 2. Introduce stronger penalties and enforcement measures for non-permitted commercial operators who breach the Marine Mammal Protection Regulations and the marine mammal sanctuary rules or repeatedly interact with dolphins without the appropriate permits. 3. Improve education and awareness of marine mammal regulations and the marine mammal sanctuary rules, particularly for non-permitted commercial operators and recreational vessels, including clear guidance around rules such as not altering course to approach dolphins. 4. Recognise and support the role of permitted operators as responsible educators and regular observers on the water, helping raise awareness about marine conservation while providing ongoing observations of dolphin behaviour and presence in the Bay. We remain deeply committed to the protection and wellbeing of the dolphins and marine life that call Te Pēwhairangi home. Through thousands of hours on the water, we have developed a strong understanding of the local marine environment and a deep respect for these animals as precious taonga. We support measures that are based on sound science, practical observation, and effective enforcement to ensure dolphins are protected from unnecessary disturbance and safeguarded for future generations.
S-80-1	Vanessa McKay	Northland / Te Pēwhairangi Bay of Islands community member	Yes	I am submitting as an individual who cares deeply about the health of the marine environment and the protection of dolphins in the Bay of Islands. I support the proposed amendments to the Marine Mammal Sanctuary in Te Pēwhairangi / Bay of Islands, including the removal of the current sanctuary zones. Based on observations over recent years, dolphins appear to be rarely encountered in these areas, and it is appropriate to review whether the current zones are the most effective way to protect dolphins in the Bay. At the same time, it is important that the protection of dolphins remains the priority. The dolphins of Te Pēwhairangi are a precious taonga and an important part of the marine ecosystem. Any changes to the sanctuary should continue to support their long-term wellbeing and reduce unnecessary disturbance. I believe it is also important to recognise that the research used to inform the proposed amendments appears to have been conducted over relatively short timeframes and may not fully reflect seasonal variation in dolphin presence,

				particularly during the peak summer months when vessel activity in the Bay is significantly higher. Longer-term monitoring across multiple seasons would provide a more complete understanding of dolphin distribution and behaviour. Need for Further Research While the research undertaken to date is valuable, further long-term and continuous research is needed to better understand dolphin habitat use and behaviour in Te Pēwhairangi / Bay of Islands. Until more comprehensive research is carried out over multiple seasons and years, I recommend that no further amendments to the Marine Mammal Sanctuary be made. A precautionary approach will help ensure that management decisions continue to prioritise the protection of dolphins. Importance of Compliance Ensuring strong compliance with the existing marine mammal regulations is essential. The protections set out in the Marine Mammal Sanctuary rules are designed to reduce disturbance to dolphins, but they are only effective if all vessels operating in the Bay understand and follow the rules. Recommendations To help strengthen protection for dolphins in the Bay of Islands, I encourage the Department of Conservation and decision-makers to consider: 1. Increasing monitoring and enforcement of marine mammal regulations on the water. 2. Strengthening penalties for those who breach the rules designed to protect dolphins. 3. Expanding education and awareness of marine mammal regulations
S-81-1	Mr Bruce McKay	Northland / Te Pēwhairangi Bay of Islands community member	Yes	I support the proposed amendments to the Marine Mammal Sanctuary in Te Pēwhairangi / Bay of Islands, including the removal of the existing sanctuary zones. From what has been observed in recent years, dolphins do not appear to regularly use these areas. At the same time, it is important that management decisions continue to prioritise the protection of dolphins in the Bay. Stronger compliance and enforcement of the Marine Mammal Sanctuary rules will be important to reduce disturbance and ensure all vessels interacting with dolphins follow the rules. Tougher penalties should also be considered for operators who repeatedly breach the regulations, particularly where dolphins are approached or disturbed. I also support the continued presence of permitted operators, who play an important role in educating visitors about marine conservation and responsible behaviour around wildlife. Further long-term research should be undertaken to better understand

				dolphin behaviour and distribution in the Bay of Islands, and no further amendments should be made until more comprehensive research has been completed. Thank you for the opportunity to make a submission.
S-82-1	Miss Celia Elley	Member of the New Zealand Public	No	The Department of Conservation (DOC) are proposing an amendment to Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary by removing the two marine mammal safe zones in the Bay of Islands due to claimed lack of protection and effectiveness. Although I agree with a lot of the statements made and approaches towards the sanctuary measures, I disagree with their reasons to remove both of the safe zones where a 5 knot limit is in place. The Bay of Islands is a popular sailing destination in New Zealand with a large range of marine wildlife and recreational spots, making the coastal area a busy and high-demand place for both wildlife and humans. Some of the most popular marine mammals found in the Bay of Islands area are bottlenose dolphins, common dolphins and the occasional orca, are facing reduced population sizes, making it important to support them in whatever ways we can. In the supporting information document provided alongside the proposal, DOC claims that “Nature is constantly changing, so our management needs to be flexible too” and the NIWA/Far Our report goes on to say that “compliance with the sanctuary rules was generally poor, with power driven vessels rarely adhering to rules” (Brough et al., 2024). Although I agree with the first statement, I disagree with the second. It seems as though there is little effort in enforcing the 5 knot speed limit rule in the sanctuary measurement, so I don't believe it has been effectively evaluated and this may be why there is seen to be little dolphin activity tracked in the area. The fact that most boats do not adhere to the speed limits may be a large part of the reason for less marine life being tracked in the safe zones, which would take away from the accuracy behind the reasons for removing the safe zones. If more effort were made to have boats within the area adhere to the speed limits in the safe zones, an increase in mammal life may then be observed and therefore support the reasoning to keep the safe zones as they were originally intended. Having a consequence such as a speeding fine may then see a result in a change in rule adherence, allowing for the sanctuary measurement of the 5 knot speed limit to be effectively

			assessed in how beneficial it may be for marine mammals in the sanctuary. Implementing consequences may initially be frustrating for local boat operators in the community, as it becomes inconvenient when trying to come in and out of popular beaches in the safe zones (such as Oneroa Bay or Opito Bay). Despite this inconvenience, it is important to look at the results of the implementation from all angles. For other locals in the area, it will become a safer marine society with slower speeds, allowing for safer dockings and disembarkations, as well as a safer environment for those out swimming or participating in water sports. In the long term, adherence to the rules would be beneficial to the marine wildlife and ecosystems. A blog by E-Ko Tours states, “Fast-moving boats can startle dolphins or cause them to avoid the area” (Understanding Dolphin Behaviour in the Marlborough Sounds, n.d.), so having these safe zones may result in marine mammals becoming more comfortable in this environment with slower vessels. I propose that DOC and Ngā Hapū o Pēwhairangi (‘Ngā Hapū’) remove the smaller safe zone speed limit, as it may be harder to manage and enforce adherence to the speed limit, but maintain the larger safe zone between Tapeka Point and Whangaiwahine Point (including Opito Bay and Oneroa Bay). If the larger zone is kept at a 5 knot speed limit, it should be easier to manage and enforce fines on disobeying vessels, as it follows the coast and is nearer to the mainland. DOC can then choose to reassess the need for a speed limit after they “undertake regular bottlenose dolphin surveys to assess key metrics of population health” over a period of time, as they stated in their recommendations from the DOC sanctuary review.
S-83-email	Brad Windust	Emailed submission	Kia ora koutou This is my submission on the Marine Mammal Sanctuary - Bay of Islands My name is Brad Windust, I live in Waitangi and spend a lot of time on the water of Ipiripi. The mauri of moana means a lot to me and my whanau. Distance: Vessels and swimmers Speed: A 5-knot speed limit applies in specific, formerly designated safe zones. maintain a 300 m distance from all marine mammals. Please keep this and extend it to commercial operators also. Stopping: Vessels must stop if a marine mammal comes within 300 m. Please keep this and extend it to commercial operators also. Speed: A 5-knot speed limit applies in specific, formerly designated safe zones. Please keep

			this but extend a 20-knot speed limit over the entire Marine Mammal Sanctuary. I have witnessed a commercial boat traveling at high speed run over a dolphin calf in the bay. It will also protect kororā and other mana moana. Noise: Most importantly there needs to be a noise limit on boats. Underwater, sound travels faster and farther than in air, and water doesn't absorb sound the same way air does. Typically, sound intensity underwater can be about 60 times greater than the same source in air. There is research that noise occurring at medium and higher frequencies, including at 20,000Hz hinder the ability of dolphins to communicate and echolocate, the process of using sound to bounce off objects such as prey and identify where they are. Please do not underestimate noise is having on our dolphins. One of the new commercial operators boats is ridiculously noisy. Enforcement: More stick less carrot. Tēnei te mihi atu ki a koutou.
S-84-email	On behalf of Sir Peter Blake MERC	Emailed submission	Our understanding is long term scientific studies showed key marine mammal species such as bottlenose dolphin (<i>Tursiops truncatus</i>) leaving Te Pēwhairangi (Bay of Islands) due to habitat disturbance caused by human use, such as boat traffic. As a result, Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary was gazetted on 17 November 2021 and came into effect on 15 December 2021. This sanctuary included two safe zones with additional restrictions affording greater protections for marine mammals. These safe zones were chosen based on matauranga Māori. The size of the safe zones are 8.32km² and the size of the sanctuary of 110km² meaning that the safe zones make up 7.6% of the sanctuary. The proposed change is to remove these safe zones within the Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary, allowing for Department of Conservation efforts to be focused on wherever marine mammals are within the sanctuary. This is based on science and experience. Our concern with limitations of the science In reading the supporting papers, while we accept the scientific method is robust, we note that: • Far out/NIWA fieldwork was limited to 20 days between March and June of 2024 • Tri Oceans fieldwork was limited to January and February 2025

			We know bottlenose dolphins are seasonal, and behaviours can vary year on year. Given this, we are concerned given the limited nature of the fieldwork whether definitive conclusions about dolphin use of the safe zones can be drawn. Our concern with the timeframe. While bottlenose dolphins are incredibly smart, we are concerned at the limited time given to them to adapt to protection. As the sanctuary came into effect on 15 December 2021, the NIWA field research was conducted 26 months from this date. Tri Oceans field research was conducted only 6 months later. The effective time these zones were in place would be reduced even further once accounting for the time it would take to change people behaviour. This would only be exacerbated by the peak period for the area being summer holidays meaning holiday goers would have only had part of the summers of 2021/22 and then the summers of 2022/23 and 2023/24 to adapt to the zone requirements. The marketing “Rule of 7” suggests people need to hear a message 7 times before behaviour change occurs¹. Furthermore, the Department of Conservation would likely have shown some grace in compliance with advocacy being in place to give people a chance to change before taking formal compliance action such as infringements and prosecutions. This is reflected in the Far out/NIWA research showing high non-compliant behaviour “The majority (>75%) of power driven vessel of both recreational and commercial classes did not comply with the 5-knot speed restriction in the marine mammal safe zones.”. Similar findings were reported by Tri Oceans “Compliance with the rules within the safe zones was poor and powered recreational vessels were compliant with speed restrictions only 42% of the time”. Furthermore, we note that DOC’s “Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary Review March 2025” (DOC-7831167) contained a number of key recommendations such as “plans for and installs new, larger buoys to mark safe zones”. We are unable to see any evidence of this being actioned, and installation after March 2025 does not give enough time to change. In the same document the Department of Conservation’s own conclusion
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			includes “Due to the short time since establishment of the Sanctuary, it is not possible to evaluate long-term demographic changes of bottlenose dolphins in response to Sanctuary restrictions. Likewise, there is insufficient data available to compare dolphin behaviour before and after the Sanctuary was established, preventing any conclusions about how Sanctuary restrictions have affected dolphin behaviour.” It appears that the Department of Conservation’s own recommendation shows more work and more time is required to show behaviour change. The effectiveness of the sanctuary and safe zones is dependent on compliant behaviour of people. In particular, boat use, which can cause significant acoustic disturbance to cetacea as shown by a University of Otago study of bottlenose dolphin (<i>Tursiops truncatus</i>) Low level of compliance of vessels within the sanctuary and safezones can only undermine the effectiveness of these protections. We are concerned people would not have had the opportunity to effectively alter behaviour since the sanctuary came into effect to the extent that dolphin behaviour would change as a result. This change could include regular use the safe zones. Relevant legislation Two pieces of legislation are relevant to this: • Marine mammal protections act 1978 • Marine mammal protection regulations 1992 These are administered by the Department of Conservation and apply across Aoteroa/New Zealand as normal course of business. Conclusion We do not believe neither the compliance nor the science is progressed enough to inform a management decision about Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary. We would advocate for long term: • field research to measure the effectiveness of any marine mammal protection such as the Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary and the safe zones within • compliance data showing long term high level of compliance to the rules and regulations, including vessel behaviour, within the sanctuary and safe zones.
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				This research needs to take into account seasonal changes of people and dolphins, and considered before any management decisions are made. We understand the rationale to allow the Department of Conservation to effectively protect dolphins throughout the sanctuary. Should this occur, it does present the challenge of resourcing compliance efforts of the Department of Conservation. Any change like this would need to be prefaced by additional funding, direction, training and will of the local office to enforce protections measures under: • Marine mammal protections act 1978 • Marine mammal protection regulations 1992 and additional measures afforded within the Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary. The public should be advised of a clear plan of what future compliance and conservations efforts will look like if the safe zones are removed.
S-85-1	On behalf of Māui and Hector's Dolphin Defenders Nz Inc	Environmental group	No	Māui and Hector's Dolphin Defenders is a non-profit Incorporated Society with the purpose of improving the health and population status of the New Zealand dolphin, and their habitats, and by association, other marine mammals such as bottlenose dolphins. We have an interest in the Te Pēwhairangi Marine Mammal Sanctuary for two main reasons. One is that a Māui/Hector's dolphin has been living in the Bay of Islands over the 2025-6 summer. The second is that the integrity and value of all Marine Mammal Sanctuaries is dubious, and made even less worthy of the title, with the changes proposed in this consultation and reform process. Introduction - Māui and Hector's dolphins are found nowhere else in the world. They used to be the most abundant dolphin in New Zealand's waters, and are now among the rarest in the world. Many of New Zealand's Marine Mammal Sanctuaries (MMSs) were created to offer protection for Māui and Hector's dolphins specifically. Others were developed for specific cetaceans, such as the Te Pēwhairangi Marine Mammal Sanctuary with bottlenose dolphins. In no cases are the MMSs fit for purpose. These proposals make the matters worse for bottlenose dolphins specifically and MMSs generally. That's a reason for strengthening their

				provisions, and integrating the limited rules and controls of the existing MMSs with other regulations such as the Fisheries Act and Navigational Safety rules. The NIWA / Far Out Collective research commissioned by the Department of Conservation (DOC) only completed 20 days of research over one four month period, so its findings, though interesting and important, are limited grounds for removing the existing safe zones. The proposed changes also incorporate only part of the NIWA report's recommendations. The Far Out Collective recommended: " refining the existing sanctuary rules, heightened enforcement or considering alternative management approaches...." Instead, the DOC recommendations are to weaken the MMS and remove the safe zones altogether. Submission points ● By removing the current 'safe zones' in the Te Pēwhairangi MMS, the Department of Conservation throws the baby out with the bathwater. ● There's a case for making the safe zones larger, not removing them. ● Removing the safe zones means the bottlenose dolphins left in the Bay of Islands will be at risk when they are in that area. ● Twenty days research isn't enough of an evidential base on which to remove the safe zones. Just because they weren't there this summer doesn't mean they're not there at other times of the year or other years, or if and when dolphin numbers increase. Dolphin numbers and habitat use is dynamic, and the safe zones at least provide some protection when the dolphins are in that area - if there's proper compliance monitoring and enforcement. That's the case for better and more compliance monitoring and enforcement, not for removing the safe zones. ● The current situation hasn't been helped by a clear lack of prioritisation of compliance monitoring and enforcement, as we understand not even all the budget allocated for these purposes has been spent. Removing the existing safe zones and not either making them bigger or shifting them to areas where the dolphins were more commonly found, undermines the purposes of the
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				MMS and public confidence in the MMS and DOC's commitment to dolphin protection in the area, in MMSs and more widely. Summary We recommend retaining the existing safe zones and improving compliance monitoring and enforcement, so that at least when the few dolphins left in the Bay of Islands are in those areas, they are safe. We also recommend increasing the size of the safe zones, and adding new safe zones to areas where the dolphins were more frequently seen in the 20 days of research. The bottlenose and other dolphins of the Bay of Islands need more protection, not less. Marine Mammal Sanctuaries must be made stronger, not weakened, which is what this proposal suggests. Thank you for the opportunity to submit on behalf of Māui and Hector's Dolphin Defenders.
S-86-1	Mrs Rosalind Noakes	Member of the New Zealand Public	No	Along with every recreational user boat user that I know of in the Bay of Islands, I am amazed at the arrogance and stupidity of these rules. Dolphins have been enjoying interactions with humans as long as humans have been on and in the water. Can nobody making these stupid "protective" laws recognise that the reason why dolphin numbers have reduced so dramatically in the Bay is because humans have for some reason started to ignore them. (Unless of course they are the fortunate few who have the legal right to interact with them). For generations New Zealanders have loved - absolutely cherished in fact - moments when the dolphins have visited, made eye contact , entertained the humans and played in the vessels' bow waves. I believe it should be the right of the public to continue as we have done prior to these laws that give no consideration to the people who enjoy the company of these beautiful creatures. Of course there are less of them in the Bay now. They have been robbed of enjoyment too. However, I do agree that because of a very few inconsiderate power boat drivers it is wise to enforce a 5 knot speed limit in the presence of all dolphins. Of course, most NZ boaties would do this naturally when they have a chance to enjoy the dolphins. Just one other thing I think should be considered. Dolphins are incredibly capable of manoeuvring at high speeds. They are not stupid and know how to look after themselves and protect their young. While I appreciate conservation of wildlife and natural environments, I believe this has been taken too far, and is another unnecessary expense for taxpayers.

S-87-written	Ian Kempthorne	THIS IS A DUPLICATE SUBMISSION refer S-55-email		
S-88-email	On behalf of Environmental Law Initiative	Emailed submission	1. The Environmental Law Initiative (ELI) thanks The Department of Conservation, Te Papa Atawhai (DOC) for the opportunity to submit on the Proposed amendment to Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary (the Sanctuary) rules. Background - 2. The Sanctuary was co-designed by DOC and Ngā Hapū o Pēwhairangi ('Ngā Hapū') and was established in 2021. We acknowledge the role and expertise of Ngā Hapū in the rohe, and the careful work of DOC in creating this important sanctuary. 3. The Minister of Conservation has the power to specify activities that may or may not be engaged in within the sanctuary, and to impose restrictions. 4. DOC is proposing an amendment to one of the current management measures in the Sanctuary. The proposal is to remove the two marine mammal safe zones, in which vessels must observe a 5-knot speed limit. The following rules would be retained: a. People must keep out of the water within 300 metres of all marine mammals; b. Vessels must maintain a 300 metre distance from all marine mammals and stop if the person in charge becomes aware of any marine mammal closer than 300 metres. Vessels must remain stopped until any marine mammal is more than 300 metres away. Protecting mammals within the Sanctuary 5. The Minister of Conservation has broad powers under the Marine Mammals Protection Act 1978 to specify activities that may or may not be engaged in within the Sanctuary, and to impose restrictions. When exercising these powers, the Minister must apply the purpose of the Act, which is 'to make provision for the protection, conservation, and management of marine mammals within New Zealand and within New Zealand fisheries waters.' 6. We understand that bottlenose dolphin numbers are in decline within the Sanctuary.² Calf mortality at one point was 75%³ and, although it has improved since, it is still high.⁴ It is clear that bottlenose dolphins face significant pressure in the Bay of Islands. DOC will also have further information relating to the status of other marine mammals within the Sanctuary, such as orca, seals and common dolphins.	

			We request that you consider this also. 7. Our view is that, given the decline and pressures faced by these mammals, the Minister should focus on what further actions could be taken to protect them, as opposed to removing one measure. ELI's main points 8. We submit that DOC should advise the Minister on: a. Whether the safe zones could be moved, rather than removed. b. Exactly how enforcement will be ramped up. Framing and consultation 9. The consultation materials frame the proposal as 'a proposal to improve the effectiveness of the Marine Sanctuary by removing one of the current management measures.' We question whether this is an accurate framing of the goal. There is no explanation of how the removal of safe zones will improve the effectiveness of the sanctuary. There is an implication that removing the safe zones will enable DOC to focus 'effort on education, advocacy and enforcement of the remaining management measures.' However, there is no mention of what will change, or whether enforcement could improve regardless of removal of the safe zones. Removal of marine mammal safe zones 10. DOC proposes removing the two safe zones currently in place within the Sanctuary. The consultation material justifies this on the basis that bottlenose dolphins are predominantly using other areas. 11. The 2025 report by NIWA, now Earth Sciences, mapped distribution of bottlenose dolphins over a period of time and identified major hotspots in distribution (for example, between Tapeka Point, the Black Rocks and Motuarohia Island) which were consistent over the majority of seasons and over multiple decades.5 ELI submits that DOC should consider moving the safe zones to cover identified high use areas. 12. We acknowledge that research shows that bottlenose dolphins are not spending most of their time in the current safe zones, and that DOC has been advised that use of static protection zones is not the most effective measure. However, we also note that data from the recent research hasn't included year round field work identifying all mammals within safe zones, and that the report by TriOceans noted the potential for increased usage of the safe zones by achieving high levels of compliance7. Please consider whether other mammals are regularly using these areas and advise the Minister if so. Please also consider whether bottlenose dolphins originally used these areas more in the past and were driven out. It may be
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			that further time and research is required in order to find these answers. We submit that the advice to the Minister should also include the option of retaining, and also expanding, the safe zones, but with improved enforcement, larger buoys (as recommended in DOC's review of the Sanctuary) and further. 13. In considering the option of removing the safe zones altogether, ELI submits that the Minister be advised on possible misalignment with the principle of non regression. Focus on enforcement 14. The consultation materials refer to a desired outcome of focusing effort on education, advocacy, and enforcement of remaining measures. The consultation document also provides that compliance with the prohibition on swimming with dolphins has been good, but that most vessels did not adhere to the rules around speed restrictions within safe zones. 15. However, the consultation materials do not convey a clear plan for how improved education and enforcement will happen or the extent to which it will happen. We submit that the advice to the Minister could set out what exactly will change. As recommended in DOC's Sanctuary Review report, this could include carrying out water patrols in shoulder seasons and other actions. 16. We also see that less than half the budget was spent by DOC since the Sanctuary's establishment¹¹ and that DOC has been urged to ramp up its enforcement efforts significantly.¹² We also see DOC's budget for this work appears to have decreased. Please consider requesting an increased budget and a plan to use that budget. 17. As noted in DOC's Sanctuary review, there have been 170 breaches of the rules in the Sanctuary since 2021. DOC has not issued infringement notices or attempted to prosecute on the basis that it should allow time to educate the public. Following five years of an educative approach, we submit that there should be a move towards the use of enforcement powers. Further blanket non use of enforcement powers may be unlawful. Other restrictions 18. The Minister of Conservation has broad powers to specify activities that may or may not be engaged in within the Sanctuary, and to impose restrictions. As part of this review, please also advise the Minister on other options which could be taken to protect dolphins. Under the Marine Mammals Protection Act, the Minister has a duty to protect dolphins, and, in our view, this must encompass taking action to ensure that
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			bottlenose dolphin numbers increase within the Bay of Islands. We acknowledge that it has not been possible to assess long-term demographic changes since the establishment of the Sanctuary. However, given the very low numbers compared with the historical estimates, we consider protective action is necessary. 19. Specifically, please consider whether further fisheries restrictions are needed to either prevent depletion of dolphin prey species, or prevent entanglement of marine mammals. Please note our letter to the Minister of Conservation on 9 March requesting fisheries closures in Sanctuaries where marine mammals have been killed as bycatch. We have only seen data from one fishing year. During that year, the deaths were not within this particular Sanctuary, presumably because of the fishing restrictions in place within some of the Sanctuary. Please review data from previous years to identify whether fisheries bycatch mortality is an issue within the Sanctuary. Summary 20. ELI submits that DOC should consider the possibility of moving safe zones and spell out how it will achieve improved enforcement. We also submit that DOC should consider other measures which could be used to protect both the bottlenose dolphins, and other mammals within the Sanctuary. 21. Thank you for considering our submission. Please contact us if you would like to discuss this further.
S-89-email	Kimberlee Cook	Emailed submission	This proposal for the Marine Mammal Sanctuary is a combination of both because I support the protection goals and all the concern regarding the new proposed rule changes. I personally am more in favour of the sanctuary's existence, due to the recent research showing a huge 91% decline of bottlenose dolphins in the Bay of Islands area. (Allan, 2021). The population has gone from 278 in 1999 to only 26 in 2020, showing that the sanctuary being created in 2021 was very important to help reduce human interactions with mammals and to protect bottlenose dolphins. (Allan, 2021). However, I do very much disagree with removing the 5-knot speed limit in the marine safe zones. While the proposal focuses more on the 300m vessel rule across the sanctuary, I personally believe they should keep the 5-knot speed limit but extended the safety measure throughout the entirety of the marine mammal sanctuary, due to the fact that people tend to care more about their reckless

			activities, than they do about marine life. I feel that true protection requires physical distance and speed reduction to help minimise the disturbance and destruction that human activities cause. (Allan, 2021 and Department of Conservation, 2026a). The new proposal is to remove the two safe zones located within the Marine Mammal Sanctuary Area, which is an attempt to try a different strategy that could better reflect the actual dolphin activity outside of the safe zones. There was a recent summary done that monitored the local bottlenose dolphin population which showed they were hardly in the designated safe zones. (Department of Conservation, 2026b). Removing the safe zones allows them to focus on compliance, education and enforcement resources on the entirety of the Sanctuary, so they can provide the protection where it actually matters the most, and to follow them with wherever they swim or end up feeding/nursing their babies. So, they aren't necessarily expanding they are just removing some small, focused areas to expand to the whole Sanctuary and have better use of their money spent. (Department of Conservation, 2026b) While the removal of the safe zones would help to simplify the map, I feel that a 5-knot speed limit sanctuary-wide would be more inclusive and easier to manage the range of users in the Bay. (Allan, 2021) There are high levels recorded of non-compliance by several powered vessels with the speed restrictions in the two safe zones. (Department of Conservation, 2025a). If the entire sanctuary had a 5-knot limit there would be less confusion on the speed limits and then the department would be able to treat everyone the exact same, with clear expectations. (Department of Conservation, 2025a). I feel that this inclusive approach would ensure entire responsibility for everyone that would lead to a safer and quieter habitat, considering the decline in population and making that a priority over human activity which I feel is more important. We need to protect our dolphins and other marine life to help regrow the population back, before we lose one of our apex predators, due to the calf mortality rate being so high at 75% which is the highest seen in New Zealand and internationally. (Allan, 2021 and Department of Conservation, 2021)
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			Another suggestion is to permanently ban all boats from within the sanctuary could offer the highest level of mammal protection possible, but it must be handled with care, to help ensure the policy remains inclusive of the iwi, small business owners and commuters who all rely on the Bay for their livelihoods. Data reveals that even with the existing 300m rule in place, that dolphins have been spending most of their days interacting with or trying to avoid boats rather than resting or nursing as they are supposed too. (Department of Conservation, 2021). There needs to be a decision made on whether the short-term loss of speed and tourism revenue is more important over the long-term gain of preventing a permanent extinction of bottlenose dolphins. When the current proposal suggests removing the safe zones, this insight of banning boats would provide biological peace that all calves need for survival. This can come across extreme but even if they had a plan to slow down traffic in some way, or have a 5-knot limit, it would help to increase the population which would provide a win-win situation for dolphins and the community. Specific Recommendations: A Sanctuary-wide 5-knot speed limit: Would be replacing the removed safe zones with a complete 5-knot speed limit restriction for the entire sanctuary to ensure a safe environment for all marine mammals. Enforcement funding reallocation: Move the allocated money into hiring more rangers to patrol and focus on enforcing the 300m rule across the entire sanctuary. Seasonal “boat-free” zones: Rather than having a complete permanent ban on all boats, could possibly trial a complete vessel exclusion for two months in certain bays that are known for nursing mothers and calves. Apply for a “Quiet Bay” certification program: This would help operators to switch to electric or ultra-quiet engines/low noise propellers. Which would be a positive for dolphins as they use sound to find fish or their calves.
S-90-email	On behalf of Tourism Industry Aotearoa	Emailed submission	Feedback on proposed amendments to the Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary Thank you for the opportunity to provide feedback on the proposed amendments to the Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary. We are supportive of the proposed changes and the intent to better target dolphin protection efforts based on observed behaviour and available evidence. Feedback from a number of our members, including long-

			standing permitted operators, indicates that dolphins are infrequently encountered within the current sanctuary zones. On this basis, we support the proposed removal of these safe zones. But there is a theme from our members for the need for improved compliance, monitoring, and enforcement. There are frequent observations of non-compliance with existing rules, particularly among private and recreational vessels. Education must play a central role and increased efforts are needed to raise awareness among recreational and non-permitted operators about how to behave around dolphins.
S-91-email	On behalf of Bay of Islands Maritime Park Incorporated	Emailed submission	The Bay of Islands Maritime Park Incorporated was formed in 2008, initially to bring together at least 35 organisations interested in the Bay of Islands' marine environment. It has evolved into a standalone organisation focused on marine protection and management, and catchment management across the wider Bay of Islands and the coast north and south. It has established a series of ecological restoration projects focused on wetlands, riparian habitats and catchments. Members collectively spend considerable time out in the waters of the marine mammal sanctuary. We have observed a lack of adherence to the 5-knot rule in the two marine mammal safe zones, as well as to the 5-knot rule for vessels within 200m of shore (to be enforced by the Northland Regional Council Harbourmaster). There are also problems with power vessels not conforming to the 5-knot rule for vessels within 200m of a dive flag and 50m of another vessel or a person in the water. Proposal to remove the 5-knot safe zones for marine mammals - As the current evidence does not support retaining these two safe zones, we also note that we have not seen any evidence supporting the in-water 300m exclusion distance for seals. We have not seen evidence supporting the requirement that swimmers, snorkellers and divers are to exit the water within 300m of a seal. Notwithstanding the risk of insufficient safe exit points in some instances, a seal may remain in a general area for many hours. Some members have dived, snorkelled and kayaked with seals in many locations outside of the BOI, usually accidentally, and the seals did not seem disturbed. I participated in an organised sealion snorkel trip on the southern Atlantic coast in Argentina, where several hundred sealions freely entered and exited

			the sea and showed no evidence of being disturbed by the small groups of snorkellers and their guides. We were not allowed to go within 2m of a sealion, although the sealions were happy to come within 2m of us from time to time. We were also not allowed to get too close to the beach (not shallower than 1-2m). Mostly the sealions just ignored the presence of the snorkellers. In the water, it is usually not possible to see a seal until it is quite close. Snorkellers and swimmers are not necessarily accompanied by boats. The Society considers that the ill will generated by the 300m exclusion zone around seals is not helpful for efforts to protect marine life. We recommend that, in addition to removing the safe zones (which we neither enthusiastically support nor oppose), the general marine mammal rules for the Marine Mammal Sanctuary should not apply to seals. Alternative 5 knot safe zone? If the Department were interested in a safe zone frequently visited by dolphins, we and others have observed family groups of dolphins using Deep Water Cove and, more generally, Maunganui Bay. It seems that these sheltered areas with more fish may be good sites for teaching fishing techniques to juvenile dolphins. At present, some power boats and all jet skis travel at high speeds along the northern sector of Maunganui Bay, around White Reef and into the entrance of Deep-Water Cove. We can provide further information if sought. Conclusion 1. The General (especially in-water) rules for marine mammals in the Marine Mammal Sanctuary should not apply to seals. 2. An alternative 5 knot safe zone could be Deep Water Cove- northern sector of Maunganui Bay.
S-92-email	On behalf of SPCA	Emailed submission	Executive Summary • SPCA supports the establishment of marine protected areas as part of a holistic approach to preserve genetic diversity, promote biodiversity, and protect the environment and animals from human impacts. • All aquatic animals should have a good life and have places where they can thrive, such as sanctuaries and refuges. • Whilst we understand that multiple reports indicate bottlenose dolphins spend little time in the current two safe zones, it is not clear how removal of the protected areas benefits dolphins other than shifting resources to enforce other rules. • SPCA urges DOC to consider alternative safe zones for bottlenose dolphins based on their known

			patterns of use of habitats in the Te Pēwhairangi Bay of Islands Marine Mammal Sanctuary (BOIMMS). • SPCA advocates for continued public education and engagement that encourages human behavioural change that improves the welfare and population outcomes for bottlenose dolphins and all other animals that can benefit from the BOIMMS. • SPCA urges support for ongoing monitoring and genetic assessment of bottlenose populations in and near the BOIMMS. We support ongoing research to better understand the anthropogenic stressors and ecological factors that could be driving population decline of dolphins in the BOIMMS and inform marine spatial planning. Introduction The following submission is made on behalf of The Royal New Zealand Society for the Prevention of Cruelty to Animals (trading as SPCA). SPCA is the preeminent animal welfare and advocacy organisation in New Zealand. The Society has been in existence for over 150 years with a supporter base representing more than 100,000 New Zealanders across the nation. The organisation includes 28 Animal Welfare Centres across New Zealand and approximately 60 inspectors appointed under the Animal Welfare Act 1999. SPCA welcomes the opportunity to submit on the consultation for the Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary Review. Submission SPCA supports the establishment of marine protected areas as part of a holistic approach to preserve genetic diversity, promote biodiversity, and protect the environment and animals from human impacts. All aquatic animals should have a good life and have places where they can thrive, such as sanctuaries and refuges. Their welfare is intimately linked with their ability to find food, rear offspring, build nests, find roosts or habitats suitable for laying eggs, and engage in social interactions and normal behaviours. We acknowledge the value of reviewing the Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary (BOIMMS) to assess the current status of the sanctuary on bottlenose dolphins. We support efforts to maximise rules in the sanctuary that offer the best protection of the dolphins. Whilst we understand that multiple reports indicate bottlenose dolphins spend little time in the current two safe zones, it is not clear how removal of the protected areas benefits dolphins other than shifting resources to enforce other rules. There are
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			compliance issues within the safe zones as noted in the supporting information for this consultation, but there is no suggestion in the current consultation of following recommendations to enhance enforcement in these areas or enhance the visibility of the protected areas (e.g., larger buoys) (Brough et al., 2025; Department of Conservation, 2025). At least one review of the BOIMMS indicated that the dolphin's pattern of use in the safe zones may change and that usage could be increased with better enforcement (Tangaroa Research Institute of Oceanographic Studies, 2025). SPCA urges DOC to consider alternative safe zones for bottlenose dolphins based on their known patterns of use of BOIMMS habitats established in two independent reports (see Brough et al., 2025; Tangaroa Research Institute of Oceanographic Studies, 2025). As noted in the supporting information, overlapping safe zones with areas that the dolphins more frequently use is more relevant for protecting the dolphins in the BOIMMS (Brough et al., 2025). SPCA advocates for continued public education and engagement that encourages human behavioural change that improves the welfare and population outcomes for bottlenose dolphins and all other animals that can benefit from the BOIMMS. The consultation indicates DOC will focus on enforcement of the three rules where no one can be in the water within 300 m of a dolphin, no boats can approach a dolphin within 300m, and if the 300m distance from dolphins is breached, then boat must stop and remain stopped until marine mammals are 300m away. However, the consultation indicates that all observed vessels complied with the rule prohibiting swimming. We question why put more resourcing towards this rule if compliance is not a problem. SPCA urges support for ongoing monitoring and genetic assessment of bottlenose populations in and near the BOIMMS. We support research to better understand the anthropogenic stressors and ecological factors that could be driving population decline of dolphins in the BOIMMS and inform marine spatial planning (see Brough et al., 2025). Aquatic animals face immediate threats from the cumulative impacts of commercial fishing, aquaculture, mining, chemical pollution, coastal nutrient and sediment input, invasive species, and harmful algal blooms (Aguirre, 2017; Gordon et al., 2010; Paquet & Darimont, 2010; Rae et al., 2023; Shields,
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				2019). Cumulative pressures from anthropogenic activities increase the vulnerability of aquatic animals to further threats of habitat loss, depleting prey stocks, water pollution, and the overarching longer-term threats of climate change including global warming, rising air and water temperatures, heat waves, water acidification, and extreme weather events (Aguirre, 2017; Almiron & Faria, 2019; Fraser et al., 2012; Joseph et al., 2023). Conclusion: SPCA appreciates the opportunity to contribute to the Te Pēwhairangi (Bay of Islands) Marine Mammal Sanctuary Review. Our organisation is happy to discuss this matter if further information is required.

Total considered: 90