s 9 (2)(a)

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:48 pm
To: Sea Change
Subject: Revitalising the gulf submission
Attachments: Submission on Revitalising the Gulf Marine protection proposals.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

KIa ora
Please find attached my revitalising the gulf submission.
Kind regards
s 9 (2)(a)

--
s 9 (2)(a)
s 9 (2)(a)

Submission on Revitalising the Gulf Marine protection proposals

Date: 28th October, 2022

Name: s 9 (2)(a) PGDipSci

Email s 9 (2)(a)

To: Department fo Conservation - seachange@doc.govt.nz

To whom it may concern,

I support further marine protected areas in the Hauraki Gulf, and wider New Zealand. We need these to;

- protect and grow fish stocks from very depleted levels, and to;
- restore and maintain healthy, functioning marine ecosystems across the whole gulf.

I would like to see urgent establishment of the proposed Gulf Marine Protection areas alongside additional communication, engagement, monitoring and enforcement resourcing with clearer definition regarding agency responsibilities and resourcing commitments for marine protected areas and biosecurity management.

I am a recreational fisher and have previously, or currently, fish in many of the proposed HPA/SPA. I am very familiar with the Mahurangi and Kawau Bay areas alongside Ti Point and the Noises. I hold A BSc and PGDipSci covering Biology and Geography and work in environmental management.

- ☐ I support the proposed high protection area (HPA) and seafloor protection area (SPA) framework
- ☐ I support the proposed HPA's and SPA's
- ☐ I support the proposed extension of existing marine reserves at Cape Rodney-Okakari Point (Leigh) and Whanganui-a-Hei (Cathedral Cove) Marine Reserve

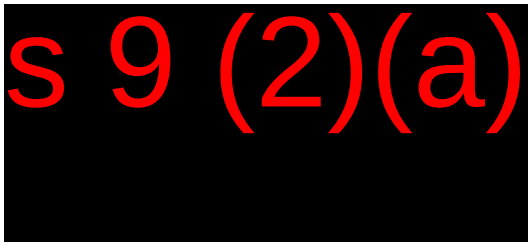
- ☐ I request the extension of Kawau Bay HPA to the end of the Mahurangi East peninsula/Sadler Point and including Te Haupa/Saddle Island and Motuora Islands.
    - Inclusion of this coastline and the islands increases the habitat diversity and important rocky/near shore areas. It would result in what seems an ecologically sensible embayment of protected area.

- The Te Haupa channel has strong current flows past the rocky reef and sees many juvenile kingfish over summer months. Bronze whalers are regularly seen and caught across this proposed HPA. Snapper are caught in large volumes by those who regularly fish the area. Trevally are often caught on the outer coasts of the islands.
- Extension to cover the islands provides a clearer boundary to the proposed HPA and appears to capture the habitat/spatial extent that many fish species would likely move around. The increased area would achieve better protection for fish from heavy recreational fishing pressure over summer months from those visiting Kawau and Mahurangi and those launching from Sandspit, Mahurangi sites, Martins Bay and further afield.
- The coastline and islands in this area are administered by public bodies (Department of Conservation and Auckland Council). No additional land based access points would be included. The majority of those fishing in this area are in boats capable of travelling beyond or through the expanded HPA to other locations.
- The benefit that a healthy marine ecosystem with strong fish stocks including many large mature individuals would provide to the surrounding area and wider gulf would be huge.
- The clear waters of this area, significant public ownership of coastline and many protected aspects offer recreational opportunities that could spread visitor pressure and impacts from other marine reserves on the East Coast. An important role of marine protected areas is engagement and education.

Please contact me regarding speaking to the submission.

Kind regards,

s 9 (2)(a)



Date: 28th October, 2022

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:50 pm
To: Sea Change
Subject: submission
Attachments: Swinburn submission on Revitalising the Hauraki Gulf.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora

Please see the attached submission

Ngā mihi nui

s 9 (2)(a)

s 9 (2)(a) s 9 (2)(a)

s 9 (2)(a)

INFORMAS
Benchmarking food environments

Submission in response to 'Revitalising the Gulf' marine protection zones proposed by the Department of Conservation

From s 9 (2)(a) of s 9 (2)(a)

s 9 (2)(a)

28/10/2022

About us:

We are active in the Pakiri community's efforts to preserve and restore the natural land and marine environments which have been extensively denigrated through unconstrained human activities, especially extractive commercial activities, over many decades. We have coordinated community-level responses and activities in relation to restoring the Pakiri Regional Park by advocating for the removal of grazing stock and planting it back into native bush. We have joined many other community groups in opposing the destructive sand mining in the Pakiri-Mangawhai area. We enjoy the fruits of the sea, including fish and shellfish, within the limits of sustainable takes.

Overall comments

1. We applaud the long overdue plans to revitalise the Hauraki Gulf
2. We support the recommendations in the report, but urge that that they are made stronger than proposed in the ways proposed below
3. Increased tightening of Government budgets places the implementation of the report's recommendations in jeopardy, so we urge that these actions are given high priority within the available budgets

Specific comments

4. **Increase the size of the marine reserves and high protection areas.** While the proposed increase in size from 6.6% to 17.6% is a step in the right direction, it still falls far short of the recommended 30% area under protection. Hauturu has been an above-water nature reserve for 128 years, yet below the water is nothing but kina barrens. Marine reserves and High Protection Areas should be significantly extended to 30% by area. Extension of existing marine reserves, like Goat Is, should be through revisions to the Acts which established them so their extensions have the same status as the

original reserves and therefore avoiding the creation of two types of jurisdiction within the same area.

5. **All destructive seabed activities should be ceased.** The plan needs to include sand mining as a seabed activity which is prohibited in the Gulf. It should also include a halt to any commercial or recreational scallop dredging forthwith.
6. **Include provisions to protect marine life on the rocks.** The shoreline rocks around the Hauraki Gulf are regularly clean harvested for shellfish by members of the public (see below). Protection is currently haphazard and dependent on rahui being placed by local mana whenua or through citizen petitions to MPI. Protection needs to be more regulated and systemic.

Plentiful catseyes inside the Goat Is Reserve	Fewer catseyes outside the Goat Is reserve boundaries	Virtually no catseyes at the south end of Pakiri Beach
		

Sea Change

From: s 9 (2)(a)
Sent: Friday, 28 October 2022 3:58 pm
To: Sea Change
Subject: Whanganui-A-Hei (Catheral Cove) marine reserve extension - Submission

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hi there,

My name is s 9 (2)(a) and I'm a practicing marine ecologist with a master's in marine science from the University of Auckland.

I have been fortunate enough to grow up enjoying the spoils of having a family batch at s 9 (2)(a) for the last 25 years. Over that time, I have come to know the reefs around Mahurangi Island, Pah Hill, and the broken rocks (Front Reef) intimately.

Despite being an avid fisherman and spearfisherman, I support an expansion of the marine reserve that better captures the ecological values of the area.

Below I have made an amendment to the proposed extension of the marine reserve in red. My reasoning is as follows:

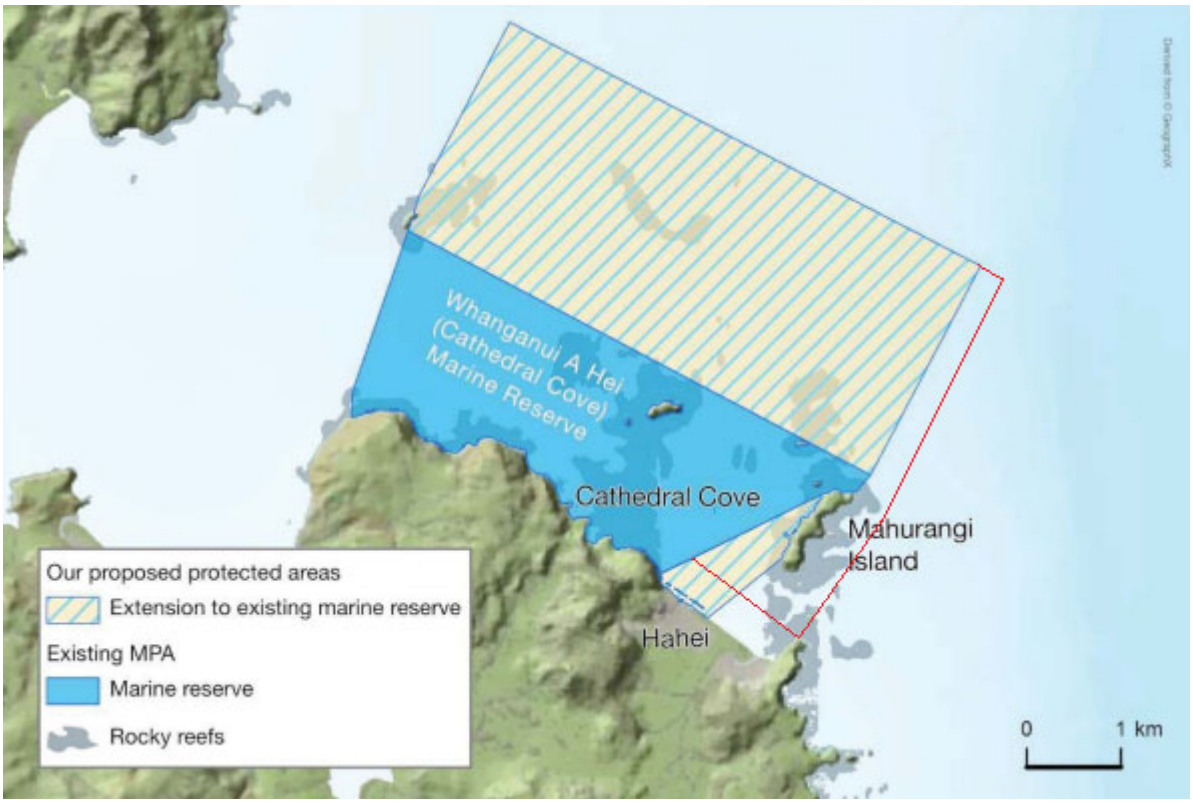
- As mentioned, the reef system on the eastern side of Mahurangi Is. supports a deep-water reef system that is otherwise underrepresented in the Whanganui-A-Hei reserve. The proposed plan below would capture much of this habitat.
- There are substantially large and growing urchin barrens to the north, east and south of front reef and parallel to Pah Hill headland that with reduced fishing pressure may be recolonised by Ecklonia forest. The proposed plan below would capture much of this habitat.
- Juvenile snapper are regularly observed on Front Reef and the shallow habitat between it and Pah Hill. From observation, I believe this is a snapper nursery. The proposed plan below would capture much of this important habitat.
- The exclusion of the beach from the marine reserve would allow for recreational fisherman to still surf cast from the beach, where the predominant species caught is kahawai, a highly mobile and transient fish with little site fidelity.
- The amendment would still allow recreational fisherman to fish off the end of Pah Hill, of which the northwestern corner is already the least frequently used portion.
- It would allow for the continued launching and retrieval of boats using tractors without having to face any technicalities around disturbance and damage to the seafloor.

If the aim is to conserve and promote the ecological values local to Hahei, while extending the boundaries around the existing marine reserve to reduce edge effects from fishing and diving, then the proposed marine reserve needs to include those reef systems to the east and south of Mahurangi Is. They are diverse and productive habitats that epitomise the types of areas needing protection to achieve the goal of reversing the environmental decline of the Hauraki Gulf.

I hope you take these into consideration.

Kind Regards,

s 9 (2)(a)


Whanganui A Hei
(Cathedral Cove)
Marine Reserve
Cathedral Cove
Mahurangi
Island
Hahei
Our proposed protected areas
Extension to existing marine reserve
Existing MPA
Marine reserve
Rocky reefs
0
1 km

s 9 (2)(a)

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:59 pm
To: Sea Change
Subject: Fwd: Last chance to have a say on the Hauraki Gulf protection proposal

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

I wish to make a submission in favour of complete sea floor protection for the entire Hauraki Gulf. Piecemeal protections are insufficient and cannot protect against bottom trawling, scallop dredging and other destructive practices.

Sincerely
s 9 (2)(a)
s 9 (2)(a)

Sent from my iPhone

Begin forwarded message:

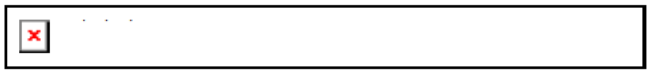
From: LegaSea <support@legasea.co.nz>
Date: 28 October 2022 at 2:02:35 PM NZDT
To: s 9 (2)(a) s 9 (2)(a)
Subject: Last chance to have a say on the Hauraki Gulf protection proposal

Kia ora s 9 (2)(a)

Today is the last chance to have your say on the Department of Conservation's proposal for marine protected areas in the Hauraki Gulf Marine Park. Deadline is 5pm.

The New Zealand Sport Fishing Council and LegaSea are calling for park wide seafloor protection, rather than a scattering of High Protection Areas (HPAs), Seafloor Protection Areas (SPAs) and extensions to existing Marine Reserves. We're making this call because the DOC plan will still allow destructive fishing methods to continue, such as bottom trawling and scallop dredging in the Marine Park.

MAKE A SUBMISSION NOW



Hauraki Gulf Marine Park MPA plan. Click to enlarge.

This has been kept separate from a soon to be released Hauraki Gulf Fisheries plan being developed by Fisheries New Zealand. We want an integrated management plan for the Hauraki Gulf as only this can properly deal with the issues facing the Gulf. The Department of Conservation's marine protection plan cannot increase marine biodiversity without first addressing the fishing techniques that are causing environmental damage and the amount of fish being taken in the Hauraki Gulf Marine Park.

Please have your say. It only takes a minute. Tell DOC to go further. Let's redefine seafloor protection areas to ban trawling and dredging in all of the Hauraki Gulf Marine Park.

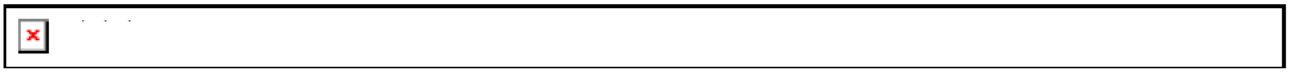
MAKE A SUBMISSION NOW

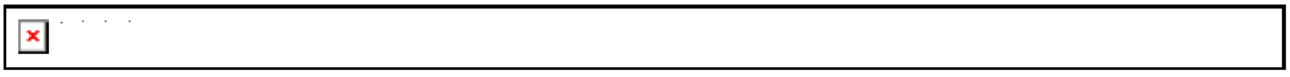
Please note: *If you miss the 5pm deadline, please make your submission anyway. There is no way DOC can ignore submissions that come after the deadline.*

--

Ngā mihi nui,
The LegaSea crew

LegaSea appreciates the ongoing support of our Platinum and Gold partners -





If you no longer wish to receive these emails unsubscribe

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:00 pm
To: Sea Change
Subject: Stet support the protection proposals for the Hauraki Gulf
Attachments: -RTG submission STET-sml.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reply sent, Recorded

Kia Ora

Please find submission attached, sorry it is so long.

Let me know if you have any questions.

Can you please confirm receipt?

Ngā mihi

s 9 (2)(a)

s 9 (2)(a)
mostnewzealand.com
reviveourgulf.org.nz
nztracker.org

STET Limited
s 9 (2)(a) Director
s 9 (2)(a)
[redacted]

Stet support the Department of Conservations (DOCs) Marine protection proposals for the Hauraki Gulf / Tīkapa Moana / Te Moananui-ā-Toi (the Gulf).

Stet is a social enterprise that supports restoration and conservation projects in New Zealand much of the paid, discounted and volunteer work is focused on improving the health of the Gulf. Clients for this work include the Department of Conservation, Auckland Council, the Hauraki Gulf Forum, and many community groups. We worked on the last three State of the Gulf reports.

Shaun Lee is one of the company directors, he is diver and citizen scientist who works on active and passive restoration initiatives in the Gulf. He is also a trustee of the Mussel Reef Restoration Trust involved in the Revive Our Gulf project. Shaun was not involved in the 2013-2017 Sea Change mahi and welcomes this opportunity to give feedback on the Government's response. He is a member of the Hauraki Gulf – Benthic Spatial Planning Advisory Group (HG-BSPAG).

Seafloor Protection Areas (SPAs)

We support the proposed SPAS. We also support the Hauraki Gulf Forum's policy to remove all industrial bottom trawling and scallop dredging harvest techniques from the entire Hauraki Gulf Marine Park. We also support petitions by the Hauraki Gulf Alliance (currently about 10,000 signatures) for the same change because bottom impact fishing:

- Flattens the seafloor reducing complexity that is valuable to benthic life
- Kills plants & animals that build complex habitats
- Injures plants & animals making them vulnerable to predation and disease (Fisheries New Zealand (2022).

Bottom impact fishing also generates massive sediment plumes to (to scare fish into the net) that:

- Prevent the ocean from sinking carbon (Sala et. al. 2021)
- Choke sessile filter feeding animals
- Smother photosynthesising plants (Ferdinand 2016, Pilskaln 1998)

84% of respondents to a poll (Horizon Research 2021) want to ban all bottom impact fishing the Gulf. Please extend the five SPAs to cover the entire seafloor of the marine park. It's important that any legislation used to create the SPAs enables extensions to the five proposed areas.

Recommendations:

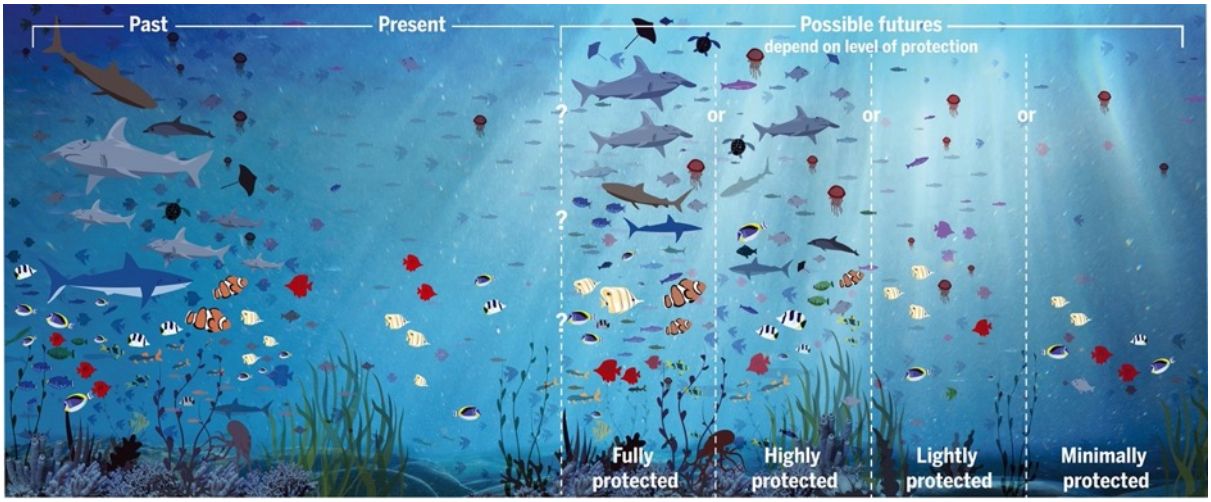
A. Extend the SPAs over the entire Haruaki Gulf Marine Park.

B. Ensure the SPA legislation allows for extensions and new SPAs.

High Protection Areas (HPAs)

We support all the proposed HPAs. As someone involved in active restoration work I was very pleased to see that *"active habitat restoration initiatives, such as the removal or addition of marine life (translocation) to improve habitats of interest"* has been included in the HPA proposals.

Although the biodiversity benefits of these HPAs will be experimental in that they have not been tried in Aotearoa / New Zealand before, we support their goals / aspirations.



Grorud-Colvert, K., Sullivan-Stack, J., Roberts, C., Constant, V., Horta e Costa, B., Pike, E. P., ... & Lubchenco, J. (2021). The MPA Guide: A framework to achieve global goals for the ocean. Science, 373(6560), eabf0861.

Addressing fishing lobby rhetoric

We are concerned the fishing lobby will continue to reject the plan based on poor logic, self-interest and disdain for marine protection. Government need to better educate these groups on the value of marine protection. We are expecting submissions to be similar to what was presented to the Hauraki Gulf Forum in August 2021 (Hauraki Gulf Forum 2021). Shaun Lee address many of these concerns in an opinion piece published in the Gulf Journal (Lee S. 2021). We have talked to many fishers about Revitalising the Gulf (RTG) since then. Key issues summarised here:

- The fishing lobby regularly overstate the views they represent, The New Zealand Sports Fishing Council, Legasea The New Zealand Angling and Casting Association, The New Zealand Underwater Association etc regularly submit against marine protection but have not asked their members about their views on marine protection. In 2018 only 14.2% (700,000 of 4,900,000) of New Zealanders went fishing (PMCSA 2021). The fishing lobby also understate their impact on the environment. In the Gulf, recreational catches of tāmure / snapper, kahawai and haku / kingfish exceed commercial take (PMCSA 2021). Commercial fishers overstate the financial impact marine protection has on the economy providing no alternative argument to the financial benefits quantified in Qu et al 2021.

- We agree with the fishing lobby that the plan could have been stronger, the government should not have 'cherry picked' aspects of the plan and rejected others without public consultation. The fisheries management plan and protection area proposals should have been consulted on at the same time. However these are not a rationale for rejecting the

package. One could use the same logic to say that sediment management proposals (currently being addressed under the National Policy Statement for Freshwater Management 2020 – Te Mana o Te Wai) should have been presented for feedback with the protection area proposals. The reality is this work is spread over multiple agencies and is staggered to fit in with their work programmes. The package is a clear step in the right direction. The protection measures are urgent (Conomos 2022) there is no argument for delay, we must act with haste.

- Like the fishing lobby I also wish there was more detail in the plan, however this is not a logical reason to reject it. Its more sensible to ask questions before rejecting the plan, some environmentalists have similar logic for different reasons. My advice to them is similar to that of the fishing lobby. State your position based on speculation like: *"I support this plan if the HPAs hit international marine protection standards for high protection." Or "I reject this plan if it doesn't address effort displacement".* Rejecting the plan without condition shows a lack of consideration / engagement and should be weighted accordingly.

- The fishing lobby will likely argue that the suggested areas are not big enough to protect fish which is ridiculous given the higher abundance of mobile keystone species within no-take marine reserves compared to fished areas. It's hypocritical to make such statements and also oppose extending MPAs. Any critique on the function of the MPA network should be saved until the Department of Conservation has been resourced to address the gaps. We will need new MPAs to complete the network.

- MPAs are the simplest solution to balance fishers "rights to fish" with other peoples "rights to experience unfished ecosystems".

- Although the HPAs were not designed with the best science available today, they roughly cover the right kind of habitats, predominantly rocky reefs. Assertions that marine reserves do not protect animals are obviously untrue, as experienced by anyone who has visited one. Snapper may move outside the reserves and their populations are impacted by the surrounding fishery but they respond strongly to protection (Allard H. 2020). We agree the network is not complete and needs more design work but that has been foreseen in the work programme. We share concerns on monitoring, enforcement and education, these are easily addressed with budget.

- The recreational fishing lobby will argue that commercial interests extract too many fish and vice versa. Both groups need to reduce their take in order for us to create HPAs and do ecosystem based management (EBFM). Rescue Fish (Legasea 2020) is nuanced enough to ensure EBFM but we agree it's a step in the right direction.

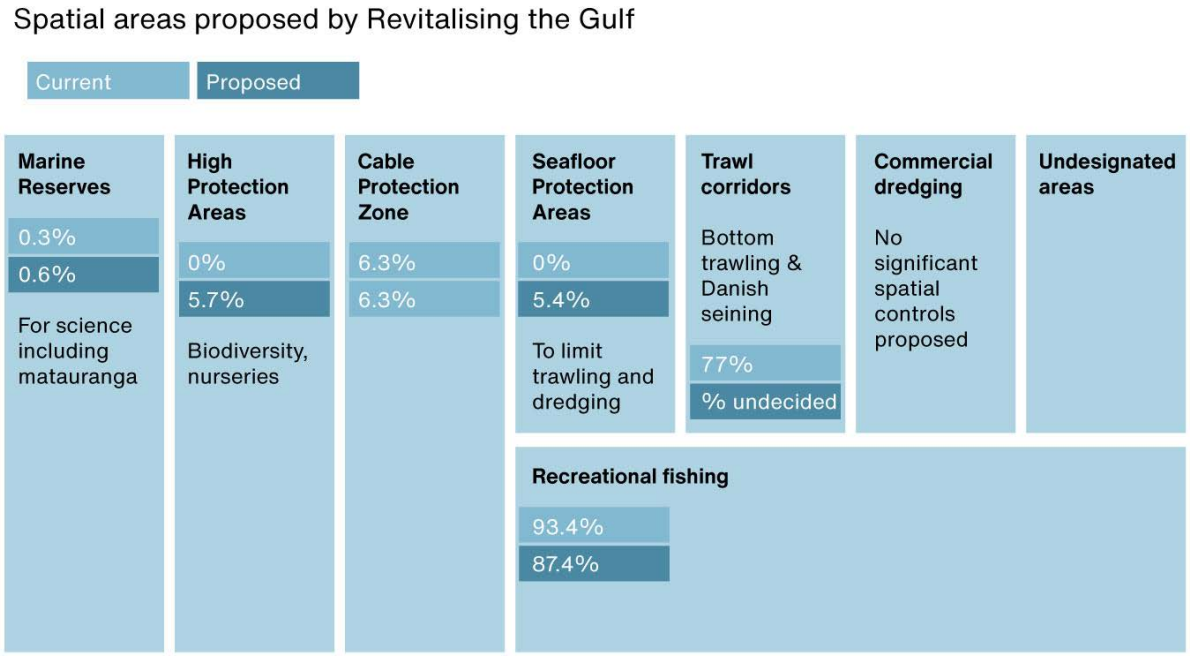
- At the 2022 Hauraki Gulf Forum Conference representatives for recreational, charter and commercial fishers took the stage to argue against marine protection. They had two core arguments which did not stack up.

  1. Tāmure / snapper numbers are increasing, the QMS works. We agree that numbers of some fish are increasing, we disagree that the QMS is working as evidenced by Rāhui and fisheries closures. MPAs have fisheries benefits see Appendix 4 (The fisheries benefits of Marine Protected Areas) but that is not their primary function. MPAs are insurance against future impacts and are our best effort at creating intact / natural ecosystems.

2. Marine protection won't stop sediment impacts. We agree that sediment is a problem and we need to do more. We are excited for changes being introduced through the National Policy Statement for Freshwater (Cross-government water taskforce 2020). The government understands that there are multiple impacts on ocean health and is working on a suite of measures to address them. Shaun Lee dived the Motu Manawa-Pollen Island Marine Reserve in August 2022 and was impressed with the density of tio / oysters and tuangi / cockles filtering the water. Closing sediment impacted areas to fishing can aid in their natural recovery.

Tuangi / cockles with sea-anemones and whelk trails in the Motu Manawa-Pollen Island Marine Reserve. Photo by Shaun Lee.

- The fishing lobby should not be concerned about displaced fishing effort: see Appendix 2 (Concerns about displacement are ill-informed). Please also note the fisheries benefits of marine protection when considering submissions from the fishing lobby: see Appendix 4 (The fisheries benefits of Marine Protected Areas). Note that 87.4% of the HGMP will remain open for recreational fishing. Any suggestion from recreational fishing lobby groups that they need more than this is abhorrently selfish.



Note that the 77% bottom impact fishing area calculation is an estimate.

- Recreational fishing lobby groups will likely reject the HPAs due to their experimental nature and hypocritically suggest their own experiments like their new Ahu Moana Policy. The policy seems to have been developed without input from marine scientists and has significant problems if proposed as an alternative for HPAs that meet IUCN guidelines as MPAs (Day J. 2019).

  1. Declines in lobster populations at small no-take marines reserves that only extend c1km off-shore do not protect the keystone species from the effects of fishing the boundary (LaScala-Gruenewald 2021). The 1km limit of the experimental policy has already been scientifically proven to fail.

  2. A lack of understanding of marine ecosystems (see previous point) shows that communities are not resourced to conserve marine ecosystems alone. Citizen science has a huge contribution to make, there are many advancements in this area including 10 minute kina counts, Marine Metre Squared, iNaturalist.nz and more. A very successful citizen conservation programme for one species (the Dotterel Management Course) requires two days training.

  There is a place for Ahu Moana, its intention to build relationships between local fishing clubs, communities and mana whenua is particularly applaudable, however it is clearly not a conservation tool. Rāhui are a better way to finely manage populations for fisheries purposes. The work recreational fishing groups have put in to with mana whenua on rāhui to date is equally applaudable. The governments recent investment in this area (Waikato Herald 2022) will help strengthen this tool. Rāhui are not a conservation management tool due to the short-term nature of the 186a closures which is inconsistent with the time it takes to passively restore marine abundance. This is evidenced by continual renewal of most 186a applications. We hope this evolves.

- In their bulk submission Legasea have rejected the SPAs which are effectively recreational fishing parks. This is disappointing as although similar restrictions have failed to produce biodiversity outcomes in the Poor Knights (Denny et. al. 2003) and the Mimiwhangata Marine Park (Denny et. al. 2004) I can see some value in the SPAs especially in the Mokohinau Islands where the potting restrictions will dramatically increase the lobster population.
- The submission form which Legasea advertised on Facebook pits Type 2 seabed protection against Type 1 marine protection. They did this knowing that was not what was being consulted on (the Hauraki Gulf Fisheries Management Plan is due to come out for consultation in a month). I think would be fair enough to count bulk submissions from the form as opinions on the upcoming fisheries management plan, not submissions on the marine protection proposals.

Real concerns for the HPAs

It's critical that the HPAs continue to be framed as conservation tools. We have some concerns about achieving biodiversity goals: see Appendix 6 (Speculative concerns on customary take). However there doesn't seem to have been any significant progress on defining the customary practices since they were proposed in 2017. Without this definition our concerns are speculative. We note that in the latest consultation document the HPAs are no longer referred to as Type 1 Marine Protection Areas (MPAs). If commercial customary take is allowed in the HPAs, the government should clearly articulate that to the public during the consultation process, this has not happened to-date. The new HPA legislation should not prevent the implementation of stricter no-take rules via Motiti protection areas or existing / future Marine Reserves Act legislation in the HPA areas. No-take areas are the gold standard for marine protection.

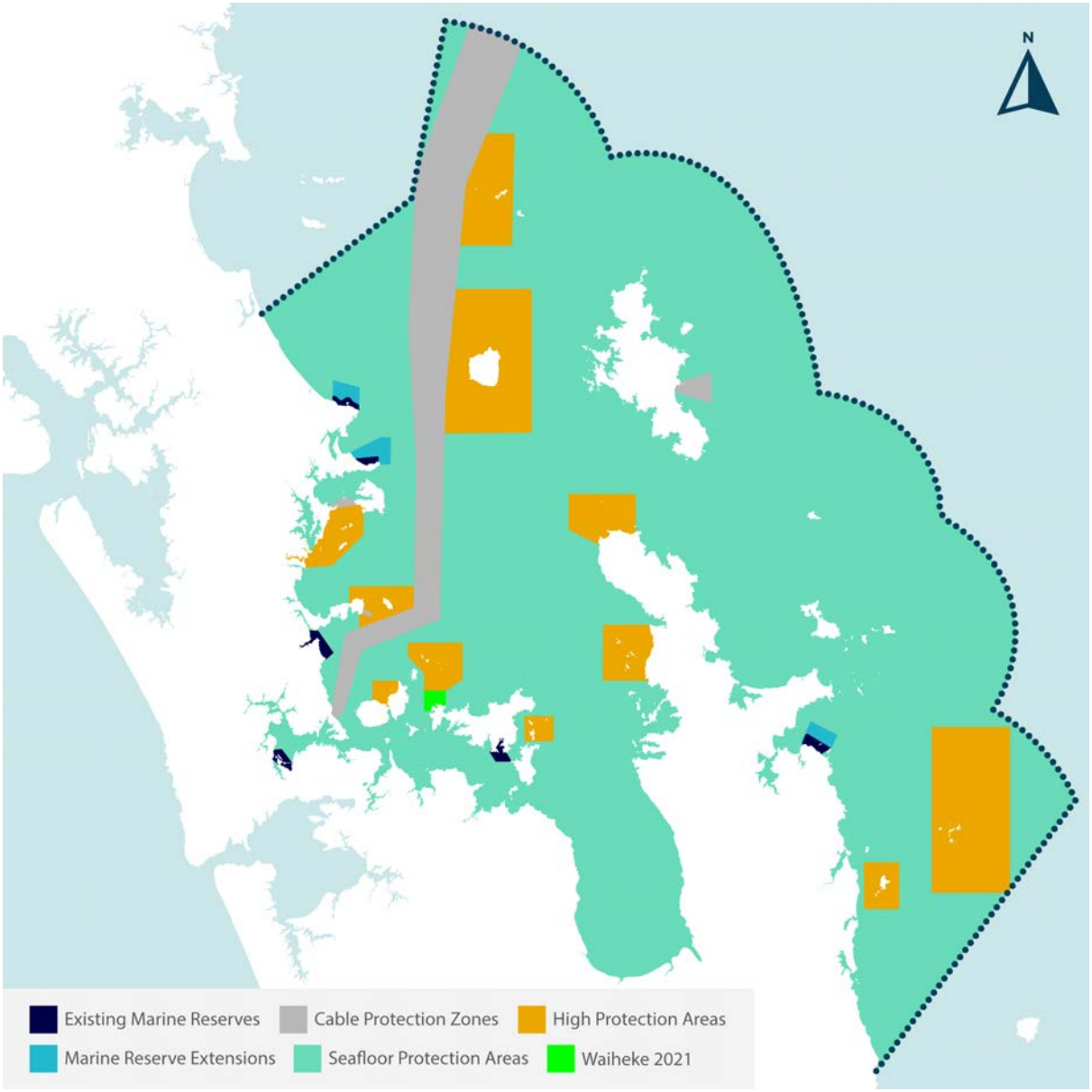
Recommendations to improve the HPA network

We have some concerns about the design of the HPAs. Mostly that they are nowhere near big enough to fill full the 30% protection target sought by the Hauraki Gulf Forum and the United Nations Convention on Biological Diversity (30x30). The Gulf MPA network needs to be much more ambitious (and work hand in hand with the Fisheries Management Plan) to restore abundance at the bottom of the food chain and stop declines in species that are going extinct at the top of the food chain.

11 years ago a Colman Brunton poll found that New Zealanders thought that 30% of their ocean was protected from fishing. Only 3% of our EEZ is protected and little has changed since then. The poll showed 96% of New Zealanders thought that 30% of New Zealand's marine environment should be protected (Colmar Brunton 2011).

77% of respondents to a more local and recent poll (Horizon Research 2021) want 30% of the Gulf in marine protected areas. The public understanding of MPAs at that time was that they would be no-take. 72% of the recreational fishers polled also supported the 30% target.

We have suggested some extensions to the HPAs. We explain the proposed extensions and their rationale in the sections below.



Our proposed extensions to the government's proposal

Please extend the Mokohīnau Islands HPA

The recreational fishing lobby have rejected the commercial restrictions in the huge Mokohīnau SPA which would provide considerable protection for lobster. If you change the proposed SPA then the proposed HPA should extend further north and south down past Simpson Rock. Although the kina barrens recorded over the last decade are growing this is one of the least impacted areas of the Gulf. The high naturalness values mean it's likely to recover faster than other areas. Its distance from the mainland also protects it from land based impacts. Once protected from fishing it will likely weather many anthropogenic impacts (including climate change) better than other parts of the Gulf. Together with its high levels of terrestrial biodiversity it's an excellent candidate for marine conservation but I'm concerned it's too small to restore large species like hāpuku, and provide safe places for natural behaviours like workups. See Appendix 3 (Terrestrial benefits of marine protection).

Please extend the Te Hauturu-O-Toi / Little Barrier Island HPA

Te Hauturu-o-Toi / Little Barrier Island was declared a wildlife sanctuary in 1897 by the New Zealand government. Over the last four decades predators have been removed from the island and terrestrial wildlife is recovering fast. The same can not be said about the marine environment where human predators have knocked marine wildlife numbers down to the lowest numbers in recorded history. Extensive kina barrens can be seen in aerial imagery due to declines in urchin predators. See Appendix 3 (Terrestrial benefits of marine protection). Extending the area will benefit endemic reptiles and seabirds including: Suter's skink, Hauraki skink, Takahikare-raro / New Zealand storm petrel, Tākoketai / Black petrel and others.

Under the water many local extinctions are likely to have already occurred and many of them are likely to need bigger home ranges than what has been proposed in RTG e.g. hāpuku. Tīpa / scallop habitat was excluded from the *'Agency analysis and advice on selection of MPAs towards development of the Hauraki Gulf Marine Park network.'* The tīpa bed off the southern end of the motu is an important biogenic habitat and one of the few remaining beds with numbers Fisheries New Zealand deem commercially harvestable. *"It would be logical to close some scallop beds and create passive restoration (broodstock areas) to increase the fishery yield*" – Pers Comms Dr Mark Morrison December 2021.

In *Hauturu – The history, flora and fauna of Te Hauturu-o-Toi Little Barrier Island* esteemed marine biologist and Sea Change stakeholder Dr Roger Grace authors a chapter on declines in the marine environment around the motu. The proposed HPA was an important hope for the future, and I'm sure he would have loved to see it increase in size. As one of our oldest and most critical wildlife sanctuaries the motu deserves complete maunga-to-moana no-harm protection around the entire island.

Please extend the Kawau Bay HPA

Despite having high ecological values no estuaries are included in the protection package. At only 2-4% these habits (*Estuarine Intertidal Soft Sediment, Estuarine Intertidal Rocky Reef, Estuarine Shallow Mud, Estuarine Shallow Sand, Estuarine Shallow Rocky Reef*) are not adequality represented. Please extend this HPA further south. My understanding is that this is aligns with:

- A planting programme being undertaken by local iwi and community to protect the moana from sediment impacts.
- The restoration ethos of bordering local regional parks.
- Terrestrial and seabird restoration projects on Motuora Island.
- A 2014 proposal by esteemed marine biologist Roger Grace at the start of the Sea Change – Tai Timu Tai Pari process.
- Nearby mussel reef restoration mahi.

It would also provide amenity value missing from the proposed network.

Please extend the Tiritiri Matangi HPA

The proposed tiny HPA is welcome, but it is not aligned with the community-led conservation values that have made the island what it is today. When volunteers began to restore the motu in the 1980's they didn't just try and restore half the island. While the forest on the island has grown over the last few decades the underwater forest has declined due to overfishing. In 2004 David Bellamy thought the Island was worthy of World Heritage Status. If he were alive today and peered under the water

he might have a different opinion. Without marine protection the motu's terrestrial conservation values are compromised See Appendix 3 (Terrestrial benefits of marine protection). With more marine protection we hope visits to Tiritiri Matangi could include observations of species that Māori once ate on the island (sea lions, bottle-nosed dolphins, sharks, rays, and fish eating birds like king shag (Rimmer A. 2004) which are now locally extinct). Spotted shags breed on the motu in 1910 (Rawlence 2019), more recent memory (1992) 60 spotted shags roosted on the island. Its likely that declines in prey availability impacted their decline. Recent research by the Northern New Zealand Seabird Trust has found that the kuaka / common diving petrel colony on Tiritiri Matangi is highly vulnerable to any decreases in fish numbers (Gaskin 2021). A significant increase in the size of the HPA would:

- Support volunteer efforts to actively restore seabird colonies on the motu
- Increase ecotourism and education opportunities
- Provide more food and habitat for At Risk – Declining shore skinks and other species
- Dramatically increase abundance in the HPA which will likely leak on its northern boundaries because there is no natural break in habitat type.
- Better fit with the no-take conservation ethos that has flourished on the island
- Reduce ecotourism pressure on scientific no-take marine reserves like the one at Leigh

Please extend the Rangitoto and Motutapu HPA further west

The proposed HPA does not allow enough protection for the seasonal movements of kōura / crayfish which often travel 1-2 km beyond the reef edge. This buffer is well explained in the Noises proposal (The Noises 2022). This would greatly increase the reef biodiversity which is particularly important for enhancing the natural wildlife experience for the Motutapu Outdoor Education Camp and the recovery of translocated Tuturuatu / Shore plover, see Appendix 3 (Terrestrial benefits of marine protection).

Please extend the HPA around the Noises further south

We are particularly pleased to see the Noises proposal included. The boundaries are sensible and well designed. However its proximity to the proposed Hākaimangō-Matiatia (Northwest Waiheke) Marine reserve provides two significant opportunities. 1 - An excellent resource for study (both under the scientific purpose of the Marine Reserves Act and the guidance of Auckland Museum who are heavily invested in the Noises restoration project) and 2 - A nursery function, right in the middle of the inner Gulf. Both of these opportunities would be greatly enhanced by closing the gap between the MPAs.

Shaun Lee and other divers have witnessed great declines in biodiversity and changes in habitat structure due to overfishing in the Noises over the last decade. Please act urgently to preserve remaining marine wildlife here before it's too late.

Kina barrens at David Rocks (the Noises). Photo by Shaun Lee.

Please extend the Rotoroa Island HPA

The name of this HPA is currently incorrect as the proposal was shifted north to encompass the area around and between Pakatoa and Tarahiki Island as reflected in the maps supplied and RTG. The rationale for this was that the Sea Change 2017 proposal was not of viable size to meaningfully afford protection to associated species and ecological processes. Rather than correct the name I suggest you extend the area south to re-encompass Rotoroa Island. This would:

- Address the original concerns on size of the proposal
- Protect a greater diversity of habitats
- Support and encourage historic marine restoration efforts by Revive Our Gulf
- Extend Rotoroa Islands restoration ethos to the ocean for a maunga-to-moana outcome. See Appendix 3 (Terrestrial benefits of marine protection). This ethos is not found on Pakatoa Island.

Note Shaun Lee has done a lot of diving in the area and agrees that there is far more diversity of biogenic habitat around Pakatoa Island.

Tubeworms mounds around Pakatoa Island. Photo by s 9 (2)(a)

Actively restored kūtai / green-lipped mussel bed. Photo by s 9 (2)(a)

Please extend the Motukawao Islands HPA further south

I am concerned the proposed small HPA will not meaningfully afford protection to associated species and ecological processes due to fishing pressure on its northern, westerns and southern boundaries. The best known example of a scarlet tubeworm colony (*Galeolaria hystrix*) in the HGMP was discovered in south of Moturua / Rabbit Island in early 2021. Please extend the HPA to encompass this valuable biogenic habitat which is not represented in the proposed network of MPAs (the Pakatoa Island mounds are a different species assemblage). This extension is strongly supported by analysis of the HPAs: see Appendix 5 (Tablada et al 2022).

Scarlet tubeworm mounds. Photo by s 9 (2)(a)

Please extend the Cape Colville HPA

We are concerned the proposed small HPA will not meaningfully afford protection to associated species and ecological processes due to fishing pressure on its unusual boundaries. The boundaries of the SPA make much more sense and are easier to read. The unique incline and currents here support a unique diversity of habitats. Much more of the area should be protected. This extension is strongly supported by analysis of the HPAs: see Appendix 5 (Tablada et al 2022).

Please close the gap between the two Aldermen Islands / Te Ruamāhua HPAs

The gap between the two HPAs makes little sense. Closing the gap creates the largest and most meaningful HPA in the Gulf. This extension is strongly supported by analysis of the HPAs: see Appendix 5 (Tablada et al 2022). This would:

- Enhance the mana of the local iwi who are passionate about marine conservation (Ngāti Hei 2020).
- Protect the a huge range of marine habitats as the proposed areas are some of the deepest parts of the HGMP.
- Keep bottom impact fishing methods away from sensitive habitats (this HPA is not connected to an SPA and is vulnerable to bulk and bottom fishing methods).

- Align with a community led marine protection initiative for the area. See https://www.facebook.com/aldermanislandsgroup/
- Align with the high conservation value of the island group See Appendix 3 (Terrestrial benefits of marine protection.
- Protect unique geological features which support unique marine biodiversity.
- Deliver an ecotourism experience similar to that of the Poor Knights Marine Reserve which is known as one of the best dive sites in the world.

Please extend the Slipper Island / Whakahau HPA

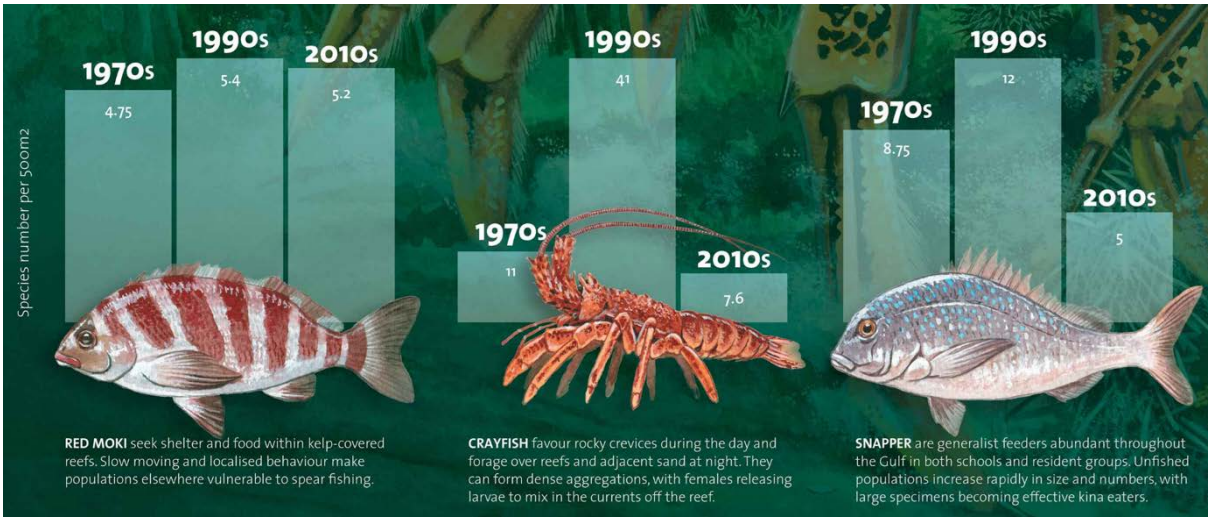
We are concerned the proposed small HPA will not meaningfully afford protection to associated species and ecological processes due to fishing pressure on its boundaries. Please extend the area inline with the design principles used for the Noises proposal. This extension is strongly supported by analysis of the HPAs: see Appendix 5 (Tablada et al 2022).

Tāmure / snapper at the Whanganui-a-Hei (Cathedral Cove) Marine Reserve. Photo by s 9 (2)(a)

Stet supports the extensions to the Whanganui-a-Hei (Cathedral Cove) and Cape Rodney – Okakari Point marine reserves using the Marine Reserve Act 1971

We understand DOC received mixed feedback from mana whenua on which protection tool to use. Our preference is to extend the Marine Reserves using the Marine Reserves Act as proposed in Sea Change – Tai Timu Tai Pari 2017. This was not an easy decision to make, see logic here: see '1. Extensions decision' in the appendix.

Extending the boundaries will help create an example of an unimpacted marine ecosystem. However biodiversity in the reserve will always reflect that outside the reserve due to population source / sink dynamics. It's important the proposed Hauraki Gulf Fisheries Management Plan reduces fishing pressure in unprotected areas.



Changes in numbers of three species at the Cape Rodney – Okakari Point Marine Reserve over time. https://gulfjournal.org.nz/poster/goat-island/

Small marine reserves do not provide a safeguard against overfishing (LaScala-Gruenewald 2021).

The extensions will enable better reef biodiversity benchmarking for HPA biodiversity goals. The extension also offers a opportunity to better understand the recovery of soft-sediment ecosystems in the Gulf.

Please also extend the Tāwharanui Marine Reserve

The same logic used to extend the Whanganui-a-Hei (Cathedral Cove) and Cape Rodney – Okakari Point marine reserves applies to the Tāwharanui Marine Reserve where fishing on the boundary is having a huge impact on biodiversity in the reserve. The regional park hosts regionally significant community led shorebird and seabird restoration efforts. See Appendix 3 (Terrestrial benefits of marine protection). The reserve is an important replicate (control) for the Cape Rodney – Okakari Point Marine Reserve. The MPA has fantastic amenity values and restoration potential. The existing protections is also note adequate because it leaks on the eastern boundary. It is logical to extend the reserve around the peninsular to Jones Bay where there is a natural change in habitat and an adjacent no-take marine area created by Auckland Council. This is supported by Tablada et. al.

Kōura / Crayfish / Spiny rock lobster at the Tāwharanui Marine Reserve. Photo by s 9 (2)(a)

Please talk to the community on Aotea / Great Barrier island about HPAs

A science informed community meeting would help get the conversation going on the island. I helped make the island a Dark Sky Sanctuary which has been a huge success. I believe the community will be ready for change after the *Calupera* biosecurity restrictions are eased.

Please approve the Proposed Hākaimangō-Matiatia (Northwest Waiheke) Marine Reserve

We know this proposal is outside the scope of the current consultation, but it is very relevant when considering the network of MPAs in the Gulf. The reserve application was submitted to DOC in January 2022, under the Marine Reserves Act. Public consultation showed overwhelming (93%) public support, including (73%) support from those submitters identifying as Māori. Shaun Lee has published the reasons why the reserve should be approved in his supporting submission (Lee S 2022).

Suggestions for future mahi

We desperately need a new Marine Reserves Act. It's embarrassing that the government of Aotearoa / New Zealand has not actioned this work (DOC 2001) published 21 years ago. There are many more reasons to create MPAs that are not provided for in the act.

Please increase resourcing on this mahi, especially iwi consultation. It must be terribly underfunded as the results from the last 14 months of work are at best, minimal. MPAs are incredible popular (Horizon Research 2021) and successive State of the Gulf reports clearly explain the need for them (Hauraki Gulf Forum 2022) . The entire work programme is too slow and small in scope.

"Urgent action is needed to repair damage to the Gulf and to stop it degrading further. We do not think the draft strategy conveys sufficient urgency or ambition" – Report from the Sea Change – Tai Timu Tai Pari Ministerial Advisory Committee, September 2020.

Please ensure the gap analysis that RTG plans to begin in 2024 *"Assess gaps in the protected area network for the Gulf, to inform ongoing evaluation"* has a smooth legislative pathway. Please also ensure it uses a the systematic approach to conservation planning that produces better conservation outcomes (Tablada et. al. 2022). It should also use the biogenic habitat modelling work developed to inform the design of the trawling corridors and new data sets developed for mobile species.

Please better consider public access to future HPAs. Only three of the twelve proposed HPAs (1/4) are connected to the mainland. MPAs are incredibly popular with the public. Despite the marine reserve's historically poor condition (the abundance of Tāmure / Snapper and Kōura / Crayfish has never been lower – even before it was a marine reserve (Hauraki Gulf Forum 2016)) the carparks at the Cape Rodney-Okakari Point (Leigh) Marine Reserve still overflow in summer. The Kawau Bay HPA will only reduce a small amount of this pressure. The Motukawao Island HPA and Cape Colville HPA were not designed with access for Aucklanders in mind.

Appendix

1. MPA vs. HPA for extensions to existing marine reserves

Advantages of using the High Protection Area (HPA) legislation or the existing Marine Reserves Act to extend the Cape Rodney-Okakari Point (Leigh) Marine Reserve and the Whanganui-a-Hei (Cathedral Cove) Marine Reserve.

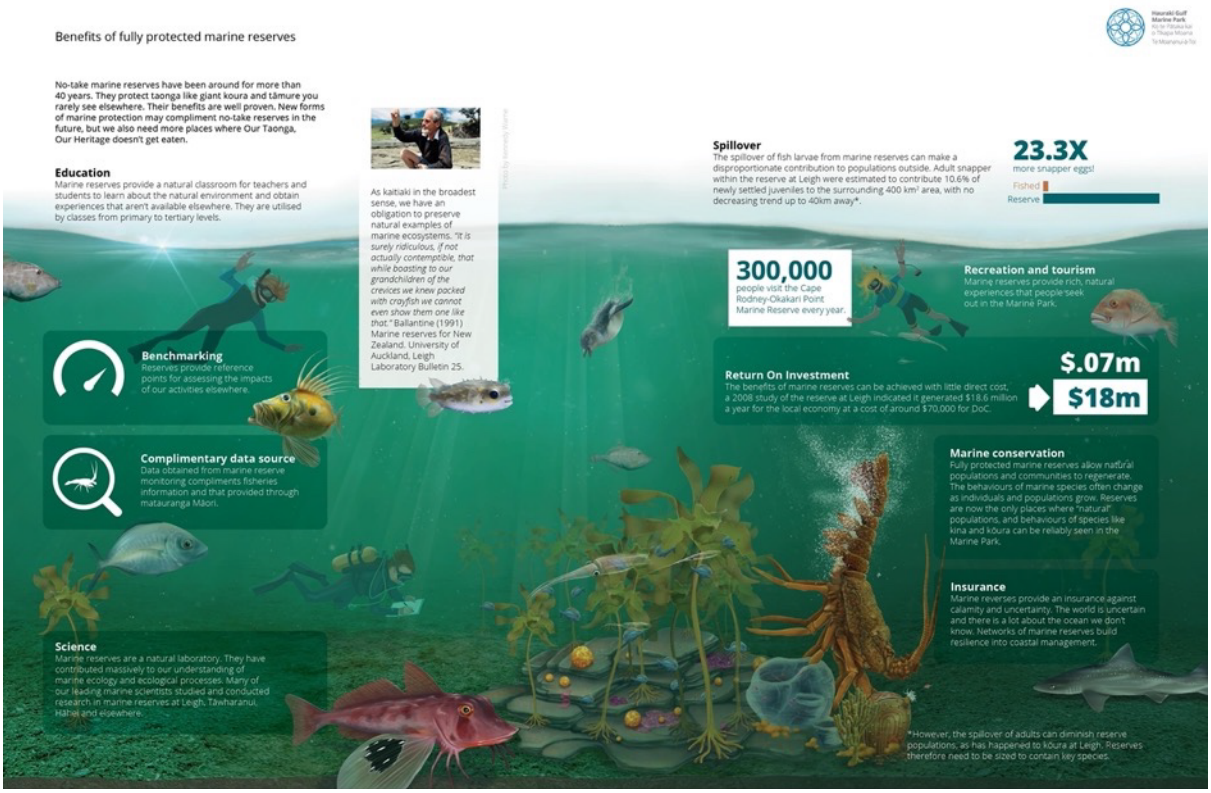
Advantages of existing Act	Advantages of new legislation
Highest possible abundance and biodiversity guaranteed. The HPAs are experimental.	Allows for cultural practices for Māori in extended areas, increasing the mana of the local iwi.
Easier for the public to understand.	Less paperwork for policy makers.
Enables the biodiversity values of marine reserves to be more accurately compared with those of the new larger HPAs. This better enables the scientific purposes of the marine reserves (benchmarking) and will help mana whenua decide on their biodiversity objectives.	Allows for active restoration. Kina removal and mussel reef restoration. I asked around and no one in the Revive Our Gulf team (or anyone they have talked to) has expressed an interest in doing mussel reef restoration in these areas. The areas are not known to have any kina barrens due to their depth.
	Increases the no-take status / importance of HPAs.

People for and against marine reserves argue that the Marine Reserves Act is no longer fit for purpose (Ministry for the Environment 2016). An update to the Marine Reserves Act (1971) is long overdue. Using the existing act may or may not aid this development.

The Gulf needs big permanent no-take areas for benchmarking purposes. The decision to allow cultural practices in HPAs puts faith in iwi as the best possible kaitiaki. You have to have faith that iwi will be 100% selfless. Thought experiments:

1. *Can you imagine a future where an iwi group decides its ok to harvest an extension? This would undermine the scientific value of the areas as benchmarks. If you can imagine it, then it would be better to use the existing Act.*
2. *Can you imagine that by using the HPA legislation for the extensions, no cultural take ever happens in any of the HPAs? If so you're better off taking a chance with iwi, because the extensions are very small (0.3% of the HGMP) and the wider HPA benefits are huge (5.6% of the HGMP).*

We could imagine an iwi harvesting an extension. We could not imagine no cultural take ever happening in the HPAs. We just don't think any group of humans can be that selfless.



Graphic from the State of Our Gulf 2020 (Hauraki Gulf Forum 2020).

2. Concerns about displacement are ill-informed

Here are some counter arguments to concerns you will hear from fishers who are worried about displacement.

1. The abundance of marine life in our oceans is not homogeneous. Different habitats exist in different places supporting different numbers of species. Variation in fishing pressure driven by catch effort reduces the diversity of abundance. Fishers who argue against displacement want abundance evenly distributed in the ocean, this is unnatural.
2. All fisheries controls displace fishing effort including those sought by groups who argue that short-term displacement caused by marine protection areas negatively impacts unprotected

areas. For example banning bottom impact fishing in the Hauraki Gulf will increase use of the method outside the area. The displacement argument is usually hypocritical.

3. Over time no-take marine reserves have proven to offset short-term losses with increased productivity from an abundance of large animals. These large animals make a disproportionate contribution to populations. For example it takes thirty six 30cm Tāmure / Snapper to make the same amount of eggs as one 70cm fish (Willis 2003).
4. The Hauraki Gulf Fisheries Management Plan should address concerns about overfishing in unprotected areas.

3. Terrestrial benefits of marine protection

There is no hard line between the ecology of the ocean and land. The narrow strip between the two worlds is a small but incredibly diverse, scientists continue to find new connections between these environments.

Extensive kina barrens caused by overfishing and coastal darkening is reducing kelp in the Gulf. Thirteen percent of our assessed macroalgae are threatened with or at risk of becoming threatened with extinction (Nelson 2019). The lack of kelp washing up on the beaches combined with increasing take of beach-cast kelp by the public and commercial businesses is reducing kelp available for terrestrial food chains. Beach-cast kelp supports a diverse ecology of organisms through its nutrient cycling and decomposition including bacteria, yeasts, and fungi in the microflora, nematodes, invertebrate larvae and mites in the meiofauna, and numerous species of macrofaunal invertebrates of marine and terrestrial origin (Lindsey White 2005). These are important food for shorebird species, 82% of indigenous shorebirds are classified as threatened with extinction or at risk of becoming threatened with extinction (Ministry for the Environment and Stats NZ 2022).

Tuturuatu / Shore plover. Photo by s 9 (2)(a)

Terrestrial reptiles that are threatened with extinction like *Cyclodina oliveri* (Hauraki skink) which are endemic to the region also depend on beach-cast kelp. Protected areas are more likely to have a constant supply of beach-cast kelp.

Many seabirds that are Threatened or At-Risk of extinction breed on predator free islands in the Gulf. These birds depend on the ocean as a food source. Large fish chase smaller fish and invertebrates to the surface where they become available to seabirds. Fishing reduces the number of large fish, making the prey items and discards unavailable to seabirds. Fishing in workups disrupts natural behaviours and causes bycatch and injury to seabirds that are threatened with extinction. This reduces nutrient supply to terrestrial ecosystems. 40% of the diet of At Risk Tuatara that live on island sanctuaries is derived from seabirds (Lamar 2022). To my knowledge Aotearoa / New Zealand has never implemented an MPA big enough to measurably benefit seabirds. The proposed HPAs will better provide for seabirds with shorter foraging ranges (E.g. shags, terns, penguins and gulls). If the HPAs are extended we are likely to see food abundance increase and fisheries threat decrease. This should increase threatened seabird populations with larger foraging ranges, especially during the breeding months (Campos et. al. 2018). This is an important part of the experimental nature of the HPAs. Please ensure sure this research is funded.

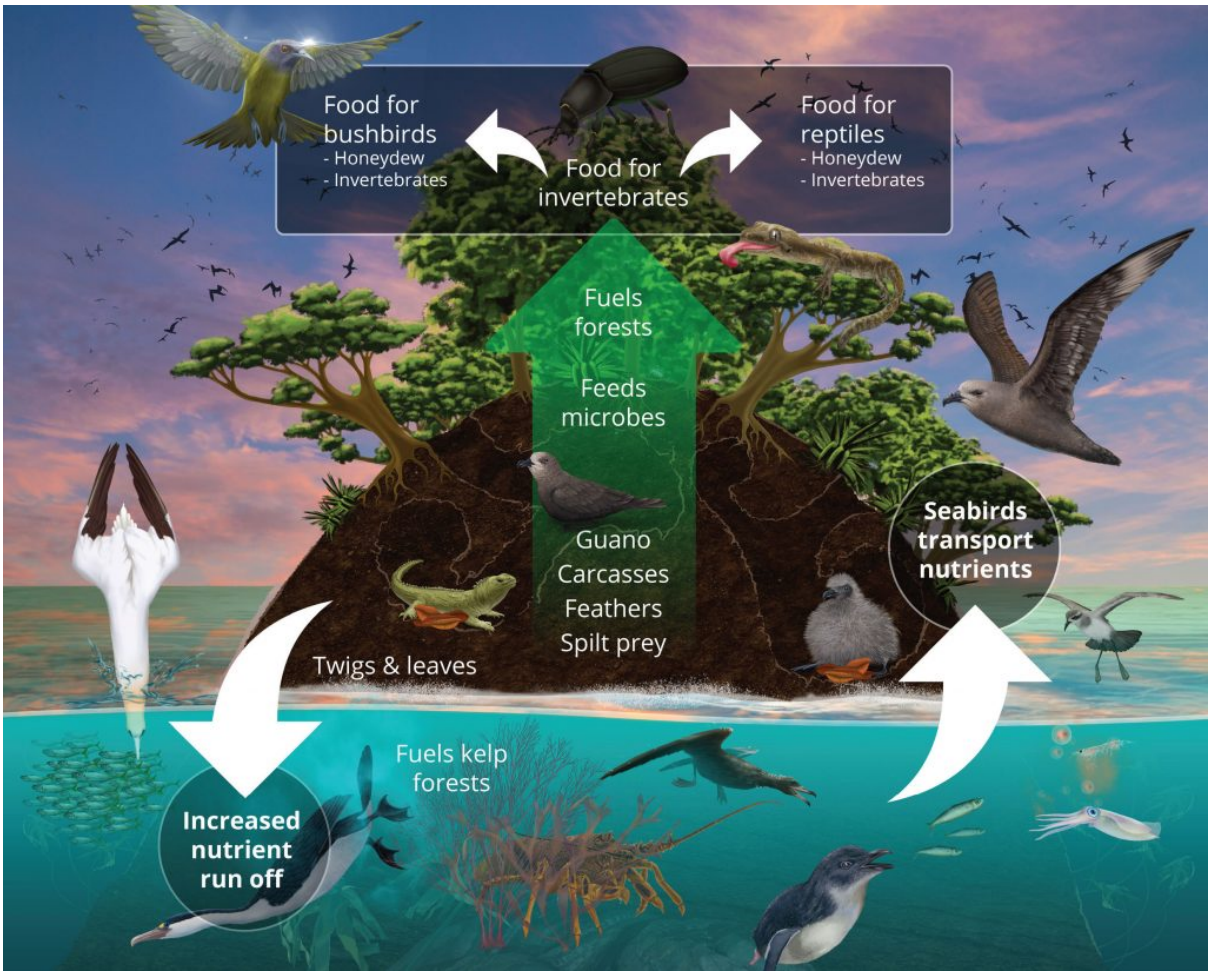


Diagram from the State of Our Seabirds (Gaskin 2021).

Protecting areas from fishing helps conserve many terrestrial species, ecosystems and behaviours.

4. The fisheries benefits of Marine Protected Areas

1. It takes thirty six 30cm Tāmure / Snapper to make the same amount of eggs as one 70cm fish (Willis et. al., 2003). The proposed HPAs will dramatically increase egg production in the HGMP by increasing the number of large animals.
2. Marine reserves make a disproportionate (2,330% Tāmure / Snapper in the reserve at Leigh) larvae spillover. Adult Tāmure / Snapper within the reserve at Leigh were estimated to contribute 10.6% of newly settled juveniles to the surrounding 400km2 area, with no decreasing trend up to 40km away (Le Port et. al. 2017).
3. With my proposed edits the proposed HPAs are big enough for people to fish the borders with a clear conscience. Fishing in these areas will be popular with many big fish leaving the area (See Lester et. al. 2009). Although MPAs were not initially conceived to help catch more fish outside their boundaries, well-enforced marine reserves can increase adjacent fishery catches, aiding in sustainability and increasing the long-term profitability of local fisheries.
4. Juvenile Tāmure / Snapper leaving the Cape Rodney to Okakari Point (Goat Island/Leigh) Marine Reserve boosted the commercial fishery by $NZ 1.49 million per annum (Qu et. al. 2021). The researchers found economic benefits to the recreational fishery are even more substantial.

5. Tablada et al 2022.

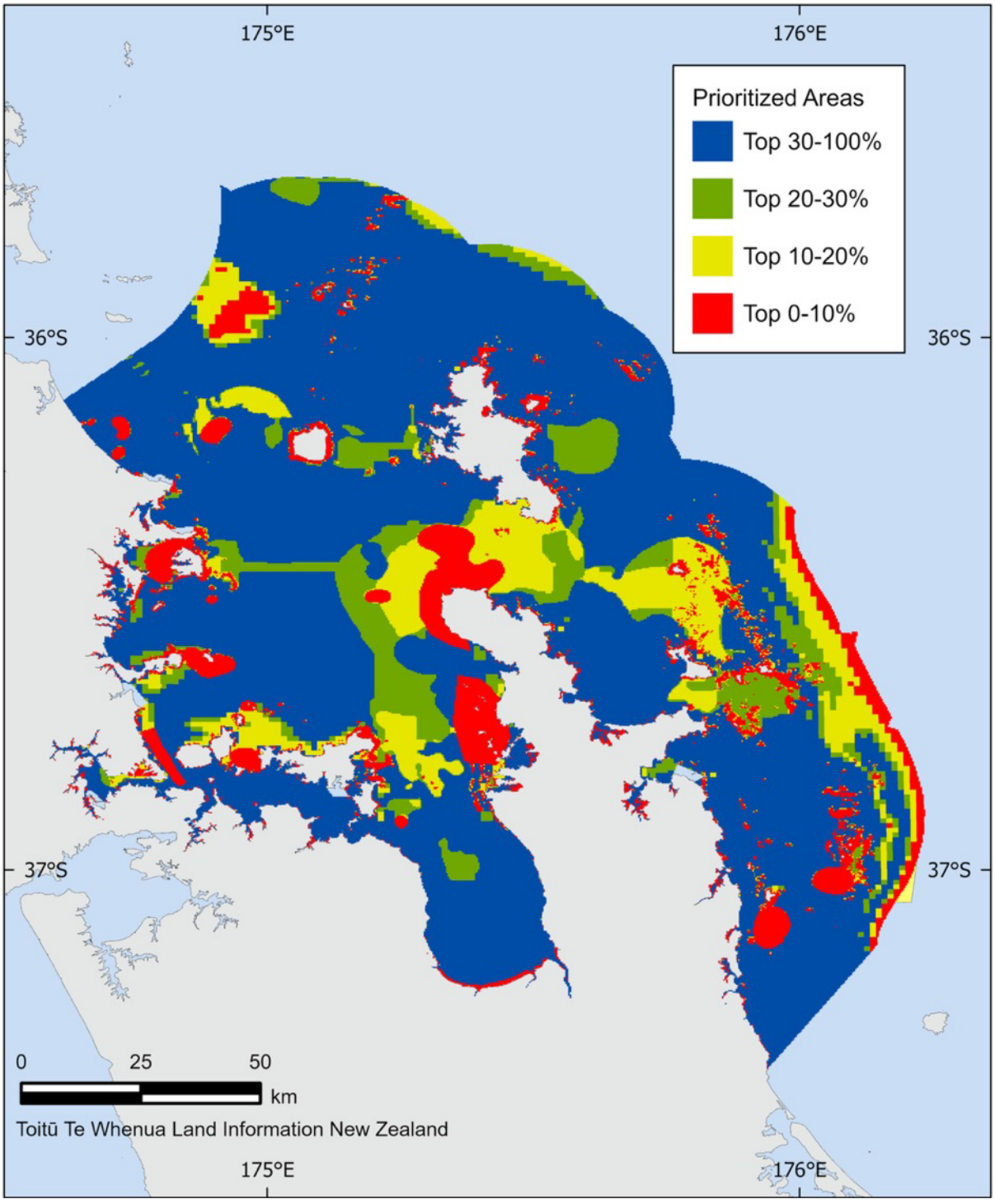


Figure 2. From Tablada, J., Geange, S., & Lundquist, C. J. (2022). Evaluation of biodiversity benefits of proposed marine protected areas from the Sea Change—Tai Timu Tai Pari Hauraki Gulf Marine Spatial Plan. *Conservation Science and Practice*, e12803. https://doi.org/10.1111/csp2.12803

6. Speculative concerns on customary take

Marine Reserves created under the Marine Reserves Act 1971 are 'no take'. This means local Māori might get locked out of their traditional hunting and gathering areas. A solution to this is to allow customary take in proposed High Protected Areas (HPAs). Sea Change 2017 suggests this customary

take is done on a case-by-case basis with a special permit. In highly populated areas like the Hauraki Gulf / Tīkapa Moana / Te Moananui-ā-Toi providing for customary practices within protected areas the Government should consider the following factors that may lead to negative outcomes.

1. Most people agree the pre-European population estimate of 100,000 (Chapple 2017) Māori is the most likely. In 2021 this has grown to 875,300 (Stats NZ 2021) people in New Zealand that identify as Māori. Traditional harvesting management might not be able to cope with a more than 800% increase in fishing pressure. Although Māori have more options now, the ecosystems are not what they were and face other pressures (like sediment run off and pollution). Modern Māori also have much better tools for killing (like nylon nets). This means the HPA experiment may well fail, especially compared to 'no take' marine reserves or Motiti protections areas created under the RMA. Previous attempts at partial take MPAs have failed at the Poor Knights (Denny et. al. 2003) and the Mimiwhangata Marine Park (Denny et. al. 2004). Failure will damage Māori rights, beliefs, and perceptions as kaitiakitanga or good guardians.

2. If the model is successful the area will be home to large animals that live for decades. Anyone who visits the area regularly will build relationships with the animals. You can see this in Maunganui Bay (Deep Water Cove) where Ngāti Kuta and Patukeha have had a rolling no-take Rāhui / section 186 closure since 2010. Here regular visitors have names for many individual animals. Humans really like to do this and there are hundreds of famous individual birds in New Zealand. The most famous fish is probably Monkey Face from the Cape Rodney-Okakari Point Marine Reserve. So what happens when a diver entering the water sees someone from the local iwi hauling out a one of those animals she has formed a relationship with? The cultural variance in rules creates conflict. A great example is the Gulf Harbour Marina where fishing is not allowed. Here fish grow large and are sometimes even fed. When two local Māori killed a fish it upset locals who posted the video on social media. The men identified themselves as tangata whenua, asserting their rights to take the fish, the video attracted violent and racist comments (Marriner 2021).

We understand and respect that Māori have the right as partners (under the Treaty of Waitangi) to maintain access to their local hunting and gathering areas. We think it's important they get to assert those rights early on in Marine Spatial Planning processes as is hopefully occurring with the proposed MPA's, HPA's and SPA's. However the customary take policy within HPA's is going to need to be carefully thought out, managed and monitored if this concept is going to minimise the risks outlined above. One solution could be that the mana whenua within the region are compensated for their loss by having their catch limits in fished areas increased or some other way that iwi might suggest.

Additionally we would like to know if there is interest in customary feeding? Feeding fish is not allowed in Marine Reserves because it alters their natural behaviour. Some dislike the activity as it makes scavengers aggressive towards them. However the public really like doing it. It would be interesting to know if this is something mana moana are interested in. It makes it possible for the HPAs to have higher than 100% biomass targets.

References

Allard, H. (2020). The direct and indirect effects of marine reserve protection on reef fish assemblages The University of Auckland https://researchspace.auckland.ac.nz/handle/2292/54495

Day, J., Dudley, N., Hockings, M., Holmes, G., Laffoley, D., Stolton, S., Wells, S. and Wenzel, L. (eds.) (2019). Guidelines for applying the IUCN protected area management categories to marine protected areas. Second edition. Gland. Switzerland: IUCN. https://portals.iucn.org/library/sites/library/files/documents/PAG-019-2nd%20ed.-En.pdf

Campos, Leila & Oppel, Steffen & Carneiro, Ana Paula & Dias, Maria & Green, Jonathan & Masello, Juan & Richard, Phillips & Owen, Ellie & Quillfeldt, Petra & Beard, Annalea & Bertrand, Sophie & Blackburn, Jez & Boersma, P. & Borges, Alder & Broderick, Annette & Catry, Paulo & Bolton, Mark & Cleasby, Ian & Clingham, Elizabeth & González-Solís, Jacob. (2018). Spatial scales of marine conservation management for breeding seabirds. Marine Policy. 98. 37-46. 10.1016/j.marpol.2018.08.024.

Colmar Brunton (2011). Kiwis want over a third of New Zealand oceans protected WWF-New Zealand https://www.wwfca.org/?200414/Kiwis-want-over-a-third-of-New-Zealand-oceans-protected

Conomos K., Trnski T., Haggitt T., Furey L., Rayner M., Spyskma A., Neureuter S. (2022). Documenting another chapter. https://www.thenoises.nz/2022/08/31/documenting-another-chapter/

Chapple, S. (2017). New Zealand numbers from nearly nowhere: 80,000 to 100,000 Maori circa 1769. New Zealand Journal of History, 51(2), 104-121.

Cross-government water taskforce (2020). National Policy Statement for Freshwater Management https://environment.govt.nz/acts-and-regulations/national-policy-statements/national-policy-statement-freshwater-management/

Denny, C. M., Willis, T. J., & Babcock, R. C. (2003). *Effects of Poor Knights Islands marine reserve on demersal fish populations*. Wellington, New Zealand: Department of Conservation. https://www.doc.govt.nz/globalassets/documents/science-and-technical/DSIS142.pdf

Denny, C. M., & Babcock, R. C. (2004). *Do partial marine reserves protect reef fish assemblages?*. Biological conservation, 116(1), 119-129. https://www.sciencedirect.com/science/article/abs/pii/S0006320703001836

DOC / Department of Conservation (2001). Review of the Marine Reserves Act 1971 https://www.doc.govt.nz/about-us/science-publications/conservation-publications/marine-and-coastal/marine-protected-areas/review-of-the-marine-reserves-act-1971/

Fisheries New Zealand (2022). Aquatic Environment and Biodiversity Annual Review 2021. Compiled by the Aquatic Environment Team, Fisheries Science and Information, Fisheries New Zealand, Wellington New Zealand. 779 p.

Ferdinand K.J. Oberle, Curt D. Storlazzi, Till J.J. Hanebuth. What a drag: Quantifying the global impact of chronic bottom trawling on continental shelf sediment. *Journal of Marine Systems*, Volume 159, 2016, Pages 109-119, ISSN 0924-7963, https://doi.org/10.1016/j.jmarsys.2015.12.007

Gaskin, C.P. (ed) 2021. The State of Our Seabirds 2021. Seabird ecology, research and conservation for the wider Hauraki Gulf / Tīkapa Moana / Te Moananui-ā-Toi region. *Northern New Zealand Seabirds Charitable Trust*, Auckland, New Zealand. 154p

Hauraki Gulf Forum (2016). Icons of the Gulf series: Goat Island. https://gulfjournal.org.nz/poster/goat-island/

Hauraki Gulf Forum (2020). *State of our Gulf 2020*. Hauraki Gulf / Tīkapa Moana / Te Moananui-ā-Toi. State of the Environment Report 2020 https://gulfjournal.org.nz/wp-content/uploads/2020/02/State-of-our-Gulf-2020.pdf

Hauraki Gulf Forum (2021). August agenda. https://infocouncil.aucklandcouncil.govt.nz/Open/2021/08/HGF_20210823_AGN_10499_AT.PDF

Hauraki Gulf Forum (2022). State of the Gulf Reports. https://gulfjournal.org.nz/state-of-the-gulf/

Horizon Research (2021). Hauraki Gulf survey. Horizon Research https://gulfjournal.org.nz/2021/11/results-of-hauraki-gulf-poll/

Lamar S., Altobelli T., Nelson N., Ormsby D.; Investigating the link between morphological characteristics and diet in an island population of omnivorous reptiles (Sphenodon punctatus). Biol Open 15 October 2022; 11 (10): bio059393. doi: https://doi.org/10.1242/bio.059393

LaScala-Gruenewald, DE, Grace, RV, Haggitt, TR, et al. Small marine reserves do not provide a safeguard against overfishing. Conservation Science and Practice. 2021 ;e362. https://doi.org/10.1111/csp2.362

Lee S. (January 2022). Why I'm supporting the Waiheke Marine Reserve proposal https://blog.shaunlee.co.nz/why-im-supporting-the-waiheke-marine-reserve-proposal/

Lee, S. (August 2021). Opinion – NZ Sports Fishing Council should not reject govt action plan https://gulfjournal.org.nz/2021/08/opinion-nz-sports-fishing-council-should-not-reject-govt-action-plan/

Legasea (2020). Rescue Fish. https://rescuefish.co.nz

Le Port, A. Montgomery, J. C, Smith, A. N. H, Croucher, A. E, McLeod, I. M. Lavery, S. D. (2017) Temperate marine protected area provides recruitment subsidies to local fisheries. Proceedings of the Royal Society B: Biological Sciences. https://doi.org/10.1098/rspb.2017.1300

Lester, S. E., Halpern, B. S., Grorud-Colvert, K., Lubchenco, J., Ruttenberg, B. I., Gaines, S. D., ... & Warner, R. R. (2009). Biological effects within no-take marine reserves: a global synthesis. Marine Ecology Progress Series, 384, 33-46. https://www.int-res.com/abstracts/meps/v384/p33-46

Lindsey White W. (2005). *Beach-cast seaweed: a review*. Ministry of Fisheries. ISSN 1175-1584 https://ref.coastalrestorationtrust.org.nz/site/assets/files/10551/beach-cast_seaweed_a_review.pdf

Marriner C. (April 2021). Video shows row over fishing at Gulf Harbour Marina. NZ Herald. https://www.nzherald.co.nz/nz/video-shows-row-over-fishing-at-gulf-harbour-marina/7SLDLALQGXI57ZOVKF3AK3H5HI/

Ministry for the Environment (2016). A New Marine Protected Areas Act: Consultation Document. Wellington: Ministry for the Environment https://environment.govt.nz/assets/Publications/Files/mpa-consultation-doc.pdf

Ministry for the Environment and Stats NZ (2022). Our marine environment. https://environment.govt.nz/publications/our-marine-environment-2022/

Nelson W., Neill K., D'Archino R. and Rolfe J. (2019). *Conservation status of New Zealand macroalgae*. New Zealand Department of Conservation. New Zealand Threat Classification Series. ISBN 978–1–98–851497–0

Ngāti Hei (June 2020). https://www.ngatihei.iwi.nz/joe-davis-made-a-member-of-the-new-zealand-order-of-merit/

Pilskaln, C. H., Churchill, J. H., & Mayer, L. M. (1998). Resuspension of Sediment by Bottom Trawling in the Gulf of Maine and Potential Geochemical Consequences. Conservation Biology, 12(6), 1223–1229. http://www.jstor.org/stable/2989840

PMCSA / Prime Minister's Chief Science Advisor (2021). The future of commercial fishing in Aotearoa New Zealand ISBN 9780473562038 https://www.pmcsa.ac.nz/topics/fish/context/

Qu Z., Thrush S., Parsons D., Lewis N. (2021). Economic valuation of the snapper recruitment effect from a well-established temperate no-take marine reserve on adjacent fisheries, Marine Policy, Volume 134, 104792, ISSN 0308-597X, https://doi.org/10.1016/j.marpol.2021.104792

Rawlence, Nicolas & Rayner, Matt & Lovegrove, Tim & Stoddart, Debbie & Vermeulen, Melanie & Easton, Luke & Tennyson, Alan & Scofield, R. & Kennedy, Martyn & Spencer, Hamish & Waters, Jon. (2019). Archival DNA reveals cryptic biodiversity within the Spotted Shag (*Phalacrocorax punctatus*) from New Zealand. 121. 1-16. 10.1093/condor/duz029.

Rimmer A. (2004). Tiritiri Matangi – A model of Conservation page 21

Sala, E., Mayorga, J., Bradley, D. *et al.* Protecting the global ocean for biodiversity, food and climate. *Nature* 592, 397–402 (2021). https://doi.org/10.1038/s41586-021-03371-z

Sea Change – Tai Timu Tai Pari (2017). Seachange Stakeholder Working Group. http://www.gulfjournal.org.nz/wp-content/uploads/2022/01/5086-SCTTTP-Marine-Spatial-Plan-WR.pdf

Stats NZ (2021). Māori population estimates: At 30 June 2021 ISSN 2382-2295 https://www.stats.govt.nz/information-releases/maori-population-estimates-at-30-june-2021

Tablada, J., Geange, S., & Lundquist, C. J. (2022). Evaluation of biodiversity benefits of proposed marine protected areas from the Sea Change—Tai Timu Tai Pari Hauraki Gulf Marine Spatial Plan. Conservation Science and Practice, 4(10), e12803. https://doi.org/10.1111/csp2.12803

The Noises (2022). https://www.thenoises.nz/marine-restoration/

Waikato Herald (October 2022). University of Waikato researchers win MBIE funding for significant projects https://www.nzherald.co.nz/waikato-news/news/university-of-waikato-researchers-win-mbie-funding-for-significant-projects/4ZVYNAMN5LI7ACRDLIFW4V5GAY/

Willis, T.J., Millar, R.B. and Babcock, R.C. (2003), Protection of exploited fish in temperate regions: high density and biomass of snapper *Pagrus auratus* (Sparidae) in northern New Zealand marine

reserves. Journal of Applied Ecology, 40: 214-227. https://doi.org/10.1046/j.1365-2664.2003.00775.x

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:04 pm
To: Sea Change
Subject: SUBMISSION TO REVITALISING THE GULF MARINE PROTECTION PROPOSALS
Attachments: Yachting New Zealand Submission - Hauraki Gulf Marine Protection Proposal October 2022.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

To whom it may concern

Please find attached the submission to the revitalising the Gulf marine protection proposals from Yachting New Zealand on behalf of its members.

Thank you for the opportunity to submit on this proposal.

Ngā mihi | Kind regards

s 9 (2)(a)

Proudly Supporting Yachting and Boating in New Zealand

s 9 (2)(a) | s 9 (2)(a) | **Yachting New Zealand**
s 9 (2)(a)

yachtingnz.org.nz | Facebook | NZL Sailing Team

For the latest news and offerings download the Yachting New Zealand app.

YACHTING NEW ZEALAND
s 9 (2)(a)
www.yachtingnz.org.nz

Sail for Life

To: **Minister of Oceans and Fisheries, Hon. David Parker**
Minister of Conservation, Hon. Poto Williams

c/- Te Papa Atawhai Department of Conservation by email:
seachange@doc.govt.nz

27th October 2022

Dear Minister Parker and Minister Williams,

SUBMISSION TO REVITALISING THE GULF MARINE PROTECTION PROPOSALS

1. This submission is on behalf of the members of Yachting New Zealand (YNZ). YNZ is the national sports organisation (NSO) for sailing and boating in New Zealand and represents over 25,000 members in 108 sailing and boating clubs from Taipa in the north to Bluff in the south. We are also affiliated with 52 class associations and 40 maritime associations.

   40 of our member clubs are in the Auckland region and are Hauraki Gulf users. Members are involved in both power and sail-driven activities.

General Comments

2. We support the marine protection proposal package of 12 High Protection Areas, 5 Seafloor Protection areas and the extension of protection adjacent to two current marine reserves (Cathedral Cove and Cape Rodney).

3. We encourage the Government to act with urgency to set in place all proposed 19 protection zones in the Hauraki Gulf Marine Park.

4. We also submit that the Hauraki Gulf Marine Protection Bill be enabling and provide a mechanism to introduce additional High Protection Areas over time. This point our members are particularly interested in when we sought their feedback for this submission.

Thank you for the opportunity to submit on this matter.

s 9 (2)(a)
s 9 (2)(a)
Chief Executive

s 9 (2)(a)
s 9 (2)(a)
National Sport Development Director

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:04 pm
To: Sea Change
Subject: Hauraki Gulf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora,

I wholeheartedly support the introduction of new marine and seafloor protection areas to restore the mauri (life-force) of Tikapa Moana, the Hauraki Gulf Marine Park, and urge the government to proceed to the next stage.

We have experienced the obvious benefits of marine protection at reserves such as the Poor Knights. These include but are not limited to, protection of biodiversity, abundant life and increased productivity, fisheries spillover through egg and larval movement, increased resilience against ocean stressors such as climate change and sedimentation, and the provision of a measurable benchmark of ocean health. From a social perspective, protected areas provide opportunities for science and education, to connect New Zealander's with te Moana and for the protection of cultural values. They also provide significant economic value through recreational and tourism opportunities, increased visitor numbers, and considerable economic growth in townships adjacent to the marine protected areas.

The implementation of this proposal will increase the Highly Protected Areas from 0.3% to 6% of the Gulf. Although this is still a far cry from achieving the 30% protection that will ensure the longevity of resources, it is a step in the right direction. The current health of Tikapa Moana is unacceptable, with kōura (crayfish) now considered functionally extinct, a 93% reduction in scallop populations in the last 10 years, prolific kina barrens, and 20% of our seabirds threatened with extinction including fairy terns and black petrels.

It is disappointing to see that the scientific community was not adequately consulted in the placement of proposed Marine Protected Areas and that such a large proportion was designated due to commercial convenience rather than biodiversity value. The majority is also not adjacent to the coastal mainland, meaning the reserves are less accessible to New Zealanders.

In saying that, the implementation of this proposal puts us on a positive trajectory to achieving future change. If we are able to restore a thriving marine environment adjacent to the largest population in New Zealand, we can act as a global leader in this space, showing it is possible to achieve positive outcomes for multiple stakeholders.

Ngā mihi nui.

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:07 pm
To: Sea Change
Subject: Hauraki Gulf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora,
I wholeheartedly support the introduction of new marine and seafloor protection areas to restore the mauri (life-force) of Tikapa Moana, the Hauraki Gulf Marine Park, and urge the government to proceed to the next stage.

We have experienced the obvious benefits of marine protection at reserves such as the Poor Knights. These include but are not limited to, protection of biodiversity, abundant life and increased productivity, fisheries spillover through egg and larval movement, increased resilience against ocean stressors such as climate change and sedimentation, and the provision of a measurable benchmark of ocean health. From a social perspective, protected areas provide opportunities for science and education, to connect New Zealander's with te Moana and for the protection of cultural values. They also provide significant economic value through recreational and tourism opportunities, increased visitor numbers, and considerable economic growth in townships adjacent to the marine protected areas.

The implementation of this proposal will increase the Highly Protected Areas from 0.3% to 6% of the Gulf. Although this is still a far cry from achieving the 30% protection that will ensure the longevity of resources, it is a step in the right direction. The current health of Tikapa Moana is unacceptable, with kōura (crayfish) now considered functionally extinct, a 93% reduction in scallop populations in the last 10 years, prolific kina barrens, and 20% of our seabirds threatened with extinction including fairy terns and black petrels.

It is disappointing to see that the scientific community was not adequately consulted in the placement of proposed Marine Protected Areas and that such a large proportion was designated due to commercial convenience rather than biodiversity value. The majority is also not adjacent to the coastal mainland, meaning the reserves are less accessible to New Zealanders.

In saying that, the implementation of this proposal puts us on a positive trajectory to achieving future change. If we are able to restore a thriving marine environment adjacent to the largest population in New Zealand, we can act as a global leader in this space, showing it is possible to achieve positive outcomes for multiple stakeholders.

Ngā mihi nui, s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:11 pm
To: Sea Change
Subject: Marine protection area Hauraki Gulf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Sent from my iPhone
Kia ora,

I wholeheartedly support the introduction of new marine and seafloor protection areas to restore the mauri (life-force) of Tikapa Moana, the Hauraki Gulf Marine Park, and urge the government to proceed to the next stage.

We have experienced the obvious benefits of marine protection at reserves such as the Poor Knights. These include but are not limited to, protection of biodiversity, abundant life and increased productivity, fisheries spillover through egg and larval movement, increased resilience against ocean stressors such as climate change and sedimentation, and the provision of a measurable benchmark of ocean health. From a social perspective, protected areas provide opportunities for science and education, to connect New Zealander's with te Moana and for the protection of cultural values. They also provide significant economic value through recreational and tourism opportunities, increased visitor numbers, and considerable economic growth in townships adjacent to the marine protected areas.

The implementation of this proposal will increase the Highly Protected Areas from 0.3% to 6% of the Gulf. Although this is still a far cry from achieving the 30% protection that will ensure the longevity of resources, it is a step in the right direction. The current health of Tikapa Moana is unacceptable, with kōura (crayfish) now considered functionally extinct, a 93% reduction in scallop populations in the last 10 years, prolific kina barrens, and 20% of our seabirds threatened with extinction including fairy terns and black petrels.

It is disappointing to see that the scientific community was not adequately consulted in the placement of proposed Marine Protected Areas and that such a large proportion was designated due to commercial convenience rather than biodiversity value. The majority is also not adjacent to the coastal mainland, meaning the reserves are less accessible to New Zealanders.

In saying that, the implementation of this proposal puts us on a positive trajectory to achieving future change. If we are able to restore a thriving marine environment adjacent to the largest population in New Zealand, we can act as a global leader in this space, showing it is possible to achieve positive outcomes for multiple stakeholders.

Ngā mihi nui,

s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:11 pm
To: s 9 (2)(a) Sea Change
Subject: RE: Invitation to engage on marine protection proposals in the Hauraki Gulf
Attachments: MpaDocProposals20221028.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora DOC,

Attached is our submission.

Kindest regards
s 9 (2)(a)
Exec Officer, CoroMFA
Phone s 9 (2)(a)
Email s 9 (2)(a)
CoroMFA

28 October 2022

DOC & Sea-Change Team
seachange@doc.govt.nz &s 9 (2)(a) [redacted]

Tēnā koe DOC,

Sea-Change MPA proposals and Hauraki Aquaculture

The Coromandel Marine Farmers Association represents almost all of the Hauraki Gulf's marine farmers, apart from at Mahurangi and Great Barrier (Aotea). We write to you on the Sea-Change proposals for Marine Protected Areas in the Hauraki Gulf.

Firstly we point out that some of the Sea-Change info re Aquaculture understates the value our Hauraki marine farming creates. Our Industry creates and provides;

- over 750 FTE jobs, and
- more than $100M annually in sales value, of
- health-giving kaimoana for local and export markets,
- plus recreational amenity benefits, with
- further growth and benefits in the coming decade/s including from new species and products, all fully sustainably, indeed with
- benefits for environmental improvement. There is growing local and international research proving shellfish farming provides a range of environmental services, vital to the health of the planet as wild shellfish beds disappear and waterways continue to degrade. A review by NIWA (2019) demonstrates that shellfish farming in New Zealand provides positive ecosystem benefits including filtering waterways, supporting biodiversity by providing habitat, food and roosting structures, and by providing a form of substitution for historic mussel beds and biogenic reefs destroyed last century by dredging, trawling, and sedimentation. (From J. Stenton-Dozey, N. Broekhuizen (2019); Provisioning of ecological and ecosystem services by mussel farming in the Marlborough Sounds: A literature review in context of the state of the environment pre- and post-mussel farming. NIWA Client Report No: 2019020H. 141 pages).

Our primary submission is that <u>we do not oppose indeed we accept the identified 19 marine protection area proposals for the Hauraki Gulf</u>. We note that and commend the MPA proposals were developed in the Sea-Change process, and we can only hope that the Sea-Change Aquaculture areas will likewise meet with agreement/acceptance in the context of what was planned to be an integrated approach. **Our acceptance however of these MPA proposals is subject to;**

- That any additions or increases to these MPAs proposed are further subject to full consultation with us.
- That such protection areas do not preclude the use of aquaculture mooring and anchor systems, such as screw anchors.
- That seabed; enhancement, reseeding and Mussel Restoration be recognised as a valuable important activity such as within seafloor protection areas and even high protection areas.

- That the Te Matuku Marine Reserve continue to allow for the ongoing operation of the Oyster farms within the MPA.
- That we are kept informed and allowed the opportunity to be further involved as these MPA Proposals progress towards being implemented.

Thank you for your consultation. We would be pleased to elaborate further on any aspect of our submission.

Yours sincerely

s 9 (2)(a)

Exec Officer,
Coromandel Marine Farmers Assoc.
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:15 pm
To: Sea Change
Subject: Feedback (submission) to the Proposed protection zones designed to revitalise the Hauraki Gulf and it's marine life. - Individual submitter.
Attachments: feedback submission_Hauraki proposed feedback Zones_s 9 (2)(a) 2020.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Please find attached my feedback on "*The Proposed protection zones designed to revitalise the Hauraki Gulf and it's marine life*".

Submissions close 5pm, 28 October 2022.

Please keep my address and email address private (not for public). I am happy if you wish to contact myself directly.

s 9 (2)(a) (Individual Submitter)

s 9 (2)(a)

Feedback Submission to the Proposed Protection Zones designated to Revitalise the Hauraki Gulf and its Marine Reserve.

Name: s 9 (2)(a) (as an individual submitter)
Address: s 9 (2)(a)

General comment:
My father Vaughan Harsant (who gave the land of the current Cathedral Cove Recreational reserve) instilled in myself a belief in the value of reserves. As such I see the importance in further developing the Hauraki Gulf Marine reserves. Situated in Hahei, I wish to provide feedback, regarding this area.

"2 protected areas: These will be adjacent to Cathedral Cove | Whanganui-a-Hei and Cape Rodney-Okakari Point marine reserves. These will be established as either two new High Protection Areas, or as extensions to the two existing marine reserves. "

In general I support the enlargement of the Cathedral Cove Marine Reserve with regard to extending the current marine reserve further out to sea. I do not agree for it to become a 'high protection area'.

I ask the Committee overseeing the feedback to take time to further consider the benefits verse the more restrictive aspects faced by individuals who currently enjoy a range of recreational activities on and off Hahei Beach. Hahei has been a popular family beach for over 70 years and is the point from which a number of tourist activities that support the reserve are launched.

I ask the Committee to consider keeping the current marker point at the North end of the beach and instead extend the reserve out (from that point) to just encompass Mahurangi Island or at least extend to the forward section of the Island.

I also ask if the Committee have researched the viability of creating additional reserves further along the coastline abutting to land/cliffs where few people have access. For instance area(s) South of Hot water Beach to North of Sailors Grave.

Table 19. Assessment of Whanganui A Hei (Cathedral Cove) Marine Reserve extension against Sea Change Plan objectives.

- *"Set aside places where mana whenua and communities want to experience abundance and diversity of marine and coastal life"* – By retaining the existing Hahei beach boundary point of the Cathedral Cove Marine Reserve you retain easy opportunities for family based exploration of the beach and coastal environment. (Extending the reserve along Hahei Beach will impact on their beach activities.)

- *"Provide opportunities for the enjoyment of restored marine environments through education, and sustainable recreation and tourism."* - eg. Cathedral Cove Marine Reserve lies off the Cathedral Cove Recreational Reserve. Both are very popular with locals and international Tourists for providing the opportunity to experience a wide range of recreational and educational activities because of their easy access from Hahei beach. One would better meet this objective by keeping the current Hahei beach marine edge point and

extending out from there to the front of Mahurangi Island. This would allow for existing use of the beach but enlarge the marine reserve to better encompass Mahurangi marine life.

- *"Identify and protect each habitat type to ensure ecosystem integrity and resilience"* - A win-win situation could be to develop reserves along coastal/cliff areas which is used by fewer people. Eg. along the coastal cliff line between say Hot Water beach South to North of Sailors Grave beach.

Table 20. Assessment of affected users for the proposed Whanganui A Hei Marine Reserve extension. I support the prohibition of mining and petroleum exploration within the marine reserve.

Thank you for the opportunity to provide feedback.

s 9 (2)(a)

Sea Change

From: s 9 (2)(a)
Sent: Friday, 28 October 2022 4:15 pm
To: Sea Change
Subject: Submission objecting expansion Hahei Marine Reserve
Attachments: Once again we find Hahei and is the main focus.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Attached is our submission objecting to proposed expansion of Hahei Marine Reserve – due by 28 October.

s 9 (2)(a)
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) <s 9 (2)(a)
Sent: Friday, 28 October 2022 4:17 pm
To: Sea Change
Cc: s 9 (2)(a)
Subject: Sir Peter Blake MERC submission
Attachments: MERC Submission to DOC on Proposed Marine Protection.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Tena koe,

Please find attached a submission from Sir Peter Blake MERC in relation to the Hauraki Gulf marine protection proposals.

Nga mihi,
s 9 (2)(a)

s 9 (2)(a) **– General Manager/Mana Whakahaere**
Sir Peter Blake Marine Education and Recreation Centre – Providing life changing marine education and outdoor experiences for young New Zealanders since 1990
https://merc.org.nz/
s 9 (2)(a)
s 9 (2)(a)

Check out these links to connect with us via email & on socials: MERC's mailing list / Seaweek mailing list

SUBMISSION TO REVITALISING THE HAURAKI GULF MARINE PROTECTION PROPOSALS

Minister of Oceans and Fisheries, Hon. David Parker
Minister of Conservation, Hon. Poto Williams
c/- Te Papa Atawhai Department of Conservation

28 October 2022

Tēnā kōrua Minister Parker rāua ko Minister Williams,

This submission is on behalf of the team at Sir Peter Blake Marine Education and Recreation Centre (MERC), which is situated at the edge of the Long Bay-Okura Marine Reserve. The Haruaki Gulf, Tīkapa Moana / Te Moananui-ā-Toi is our classroom, a source of inspiration and the place we recreate. Our centre is situated at the edge of the Long Bay Okura Marine Reserve, part of the 0.28% of the Hauraki Gulf Marine Park which is fully protected.

At MERC we pair education and recreation, teaching all clients to engage with the moana safely, and give them the opportunity to be inspired, fall in love with the Haruaki Gulf and leave with a better understanding of the threats it faces. At MERC we understand and get to see the benefits of marine protection on a daily basis. It's safe to say that marine protection is a subject quite close to our hearts, as the founders of MERC were instrumental in the establishment of the marine reserve in Long Bay and the value of a healthy marine ecosystem is ingrained in what we do.

We would like to make a submission in support of the proposed marine protection package in its entirety including 12 High Protection Areas, 5 Seafloor Protection areas and the extension of protection adjacent to two current marine reserves (Cathedral Cove and Cape Rodney).

General comments on the marine protection proposals

We support the proposed provision within HPAs for monitoring and research driven by both Mātauranga Māori and western science knowledge systems. We acknowledge and support the Government's work to recognise customary practices of Mana Whenua within the context of marine protection in the Hauraki Gulf but would eventually like a clearer definition of *biodiversity objectives* and how these will be determined.

High Protection Areas

We are glad to see that HPAs include part of the outer gulf island ecosystems on which the main impact is overfishing – but we see these as only a first step to revitalising the Gulf. We expect that the benefits of protection will enhance the abundance of marine species beyond the protected area through the spillover effect and larval transport.

Seafloor Protection Areas

On the matter of seafloor protection, we feel that the protected areas should be more widespread and better aligned with other protection zones.

Marine Reserve Extensions

On the topic of extensions, we strongly support the areas adjacent to Cape Rodney to Okakari Point being extended. We would like to see them extended under the existing legislation under which they were created, the Marine Reserves Act 1971, to make the boundaries straightforward and rules simple and clear for people to follow.

Regular review and adaptive management

We noticed that the Government's proposal is currently silent on the matter of reviews. *Revitalising the Gulf*[1] refers to the development of a monitoring and reporting framework for the Hauraki Gulf, which will be underpinned by an adaptive management cycle to ensure management actions can be adjusted based on the regular evaluation. We urge care in the drafting of the Hauraki Gulf Marine Protection Bill so that the biodiversity objectives can be truly adaptive.

Monitoring and reporting

Revitalising the Gulf refers to the development of a monitoring and reporting framework and the development of a Gulf research plan. Both are central to the principle of adaptive management. We take this opportunity to urge the Government to fund and prepare the monitoring and reporting framework and research plan for the Hauraki Gulf into the future.

Urgent action required

The observable degradation across many ecosystems in the gulf continues to be alarming and distressing. The Sea Change Plan was put together to form an action plan to reverse the degradation, but the area which is proposed to be fully protected is not likely large enough, or inclusive of enough high biodiversity areas to reverse the ongoing decline.[2]

New Zealand, once a leader in marine protection, has not prioritised marine protection, and this is highlighted by the fact that only two small marine reserves (Te Matuku – Waiheke and Tāwharanui) were established in the Gulf over the past 20 years. Excluding the cable protection zones, which don't constitute marine protection under IUCN definitions, the proposals will result in approximately 6% of the Hauraki Gulf Marine Park being in a form of full no-take marine protection. Whilst an enormous step forward for the Hauraki Gulf, this is still a very small fraction of the Marine Park.

We urge that you move with pace – introduce legislation to the House as soon as possible to enact these marine protection areas this parliamentary term and avoid further devastation to marine

[1] Revitalising the Gulf: Government Action on the Sea Change Plan, released June 2021, page 94.
[2] LaScala-Gruenewald (2021) Small marine reserves do not provide a safeguard against overfishing.

s 9 (2)(a)
[redacted]
d www.merc.org.nz

ecosystems. Please also consider making clear what the pathway for other marine protected areas (i.e., new HPAs) will be, so there is an understanding of how future HPAs will be assessed. Framework around how we make steps to introduce new HPAs going forward should be included in the Hauraki Gulf Marine Protection legislation.

Close behind in terms of prioritization should be reform to fisheries management through the delivery of the Hauraki Gulf Fisheries Plan. To achieve maximum benefits in revitalising the Gulf, we implore you to move with pace to deliver the Hauraki Gulf Fisheries Plan in close alignment with the marine protection proposals.

Conclusion

Management of the Hauraki Gulf Marine Park must be active, adaptative and enduring to not only meet the current environmental degradation, but to create a resilient Gulf. The ecosystems need a chance to recover if we expect them to function with unavoidable added stresses created by the direct and indirect effects of climate change.

Sincerely and on behalf of Sir Peter Blake MERC and the thousands of kids we serve,

s 9 (2)(a)

s 9 (2)(a)
General Manager

s 9 (2)(a)

s 9 (2)(a)
Education & Outreach Manager

Sea Change

From: Forest and Bird s 9 (2)(a)
Sent: Friday, 28 October 2022 4:18 pm
To: Sea Change
Cc: s 9 (2)(a)
Subject: Submission on the Revitalising the Gulf, Marine Protection Proposals package

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Submitted on Fri 28 Oct 2022

Submission on the Revitalising the Gulf, Marine Protection Proposals package

Kia ora,

I support the Revitalising the Gulf, Marine Protection Proposals package to establish 19 new marine protection areas to restore Hauraki Gulf Marine Park / Tīkapa Moana / Te Moananui ā Toi.

Marine protection is the only proven way to restore an ecosystem to full health. An intact ecosystem is also more resilient to external pressures such as sedimentation, pollution and the impacts of climate change.

We have seen the direct benefit of marine protection at Goat Island and the Poor Knights. The proposal to protect a range of small areas in the Gulf will bring the same benefits to the wider marine environment, feeding and replenishing unprotected waters.

The Government must act with urgency to set in place all proposed 19 protection zones in the Hauraki Gulf Marine Park. The Hauraki Gulf is in a biodiversity crisis and ecological collapse. It is time to act for the benefit of future generations and the mauri of our precious moana.

Revitalising the Gulf Marine protection proposals.

s 9 (2)(a) Goat Island Dive and Snorkel
I'm submitting this on behalf of myself, my company and all my fish friends!
These views represent the entire organization.
s 9 (2)(a)
s 9 (2)(a)

The planet, our Ocean and our gulf is being threatened by a national and global crisis. The fact that we're sitting with a proposal that would help, benefit, and restore some of our gulf, and we're still debating whether this should happen is catastrophic. This proposal has taken so long to put together, it has taken so much hard work, and I know there has been some serious sweat and tears put into this. It's not easy to make changes that effects so many. It is a logistical and legal nightmare but that doesn't mean it shouldn't happen, maybe even the opposite. It is time to show that fighting for a good cause is worth it! We need to prove that we support the scientific evidence, that we learn from passed mistakes, that we are fighting for a better future, that we can't just give up, and if we all work together CHANGE CAN HAPPEN. It is so important that this proposal goes through.
We're at a tipping point where we can sit and watch what we love and care for disintegrate, or we can stop making excuses and do something about it.
It is no doubt that we need more protected areas and the fact that the proposal is only increasing protected areas to 18% is disappointing, but at least it's a start. A global goal of 30% by 2030 is looking pretty slim if there are countless people and organisations working extremely hard on getting this proposal through and it's just over half of the

target. Hopefully this will be an eye opener for a lot and can pave the way for New MPA's in the future, hopefully making it easier and quicker to implement change.
Regarding the HPA's areas, although a great concept this could cause a lot of issues. It is not okay that there may be customer rights, or any sort of rights to fishing/harvesting/damaging of any kind. It is already a fighting battle to stop people fishing in current protected areas, and with more gray zones, we're just opening for "miss interpretations" and for what would be an extremely difficult thing to police. The proposal is already only protecting a smaller scale than what it should, it is still allowed to fish/collect/harm the majority of the gulf, why should we need to fish/gather in protected areas?
There are so many great changes in this proposal, and it's good to see more protected areas especially extensions and seafloor protections, but the truth is that we need more and bigger areas. I live next to the Goat Island Marine Reserve, so it's where my heart is, but the same arguments as seen below can be made for each of these amazing places. I hope this proposal goes through so we can finally implement some much-needed changes, and that we have now created a discussion and a forum to make it easier to create more. I Sincerely hope that the new protected areas can educate and shine some light on how insanely important these areas are!

The Cape Rodney-Okakari Point Marine Reserve:
This is the most magical place in NZ! I have been over all over the world, and you just can't beat it. This Marine Reserve needs to be extended, and it needs to be extended as a Marine reserve, not an HPA (HPA better than Nothing, but not great) It is too many people fishing on the boundary, there are too many cray pots, and there are too many excuses "Oo I didn't know where the boundary went" "I didn't know everything was protected". Having it as a HPS would just open an impossible thing to police, how can you tell a someone that they are 789 meters off the beach, so everything is protected… but if you go another 12 meters out, you're in the clear? How can you possible police that? The proposal lacks definitions and clarification of customary rights, which I'm sure will be clarified at length in a different document. I think it is horrible that someone can fish/harm/collect in any protected area. It just makes a laughingstock of what we work so hard to protect.
This Marine reserve have cleared the way for so many new marine reserves and educated generations of people about our Marine life, different marine habitats, benefits of protected areas, and so much knowledge that is just invaluable. It is NZ's and one of the world's first marine reserve and to think that it is only one of the smallest is outrageous. I've been interviewed by filmmakers from the other side of the world raving and bragging about Goat Island marine reserve and saying that it has had such a significant impact on Marine Reserves around the world! This little reserve in NZ! Absolutely amazing! And yet we're not acknowledging its importance by making it the size it needs to be. At the moment it is so small that the fishing we see happening on its boarders has a significant impact of the numbers of fish/critters and the kelp forest.
Everyone know the science behind why it needs to be bigger, it is a joke that we're still discussing it's importance and impact.
It has a financial effect on Leigh, Matakana, Warkworth, Mangawhai, Wellsford and all the other small towns around here. It has over 350,000 visitors every year and is free for everyone! It creates so many jobs for the whole area and not at least it creates fun and educational learning.
It is absolutely amazing that people can go there and swim with the fish and see how amazing our ocean can be just by jumping off the beach. It offers a view that is normally only seen at an aquarium. It teaches the next generations what our ocean is supposed to look like. It teaches them respecting nature, it teaches them what effect humas have on ecosystems, it gives them perspective, it firsthand shows them why we need to respect and protect our oceans. It gives them the confidence they need to interact with our ocean and it's marine life, to do it in a safe way for them and the marine habitat and residents.
If the boarders of the new extension of the reserve is up for discussion, then it should be mentioned that the reef on the east side of the Island should be included! It Is an extremely important habitat for Crayfish. I can't think of a reason (except greedy ignorant people wanting to fish there) that this should be included.
Nothing beats the look on a kid or adults face first time they snorkel at Goat Island when they see the massive 80-year-old Snapper cruising pass! Or their big happy faces when they get to dive into a Kelp Forest seeing 10 different species on one breath hold. And the saddest thing you'll see is if you take the same group of the beach 1 km away from the reserve and all you see is Kina Barrens…. Our gulf is dying… we've pulled the trigger… and it's about time we do something about it. Make this plan happen! Even better, make it bigger, make it beet and please make it easier to make more protected areas in the future! Our ocean is relying on us to correct our wrongs and ensure it will still be a healthy place in 30 years.

The Hauturu-o-Toi – Little Barrier Island

It is incredible that this is not already a marine reserve! It is already a Nature reserve protection so many birds who depend on a healthy ocean to be able to survive. You must protect the ocean if you will have success protecting land. It should have more of its coastline protected, and without a doubt it should be larger.

Mokohinau Islands
This offer some of the best diving in NZ. It rich eco system is incredible and the currents provide nutrition and life we don't see close to shore. I went diving there 4 years ago, what I saw blew my mind, the colors of the water, and the kelp forest was second to non and it was rich with life, adults and juvenile and so many species, I went back recently and was just met by kina Barren. I am angry that this keeps happening, I'm angry that were not protecting bigger and more areas, and that we are taking away the home for these amazing creatures.
Overfishing is such a massive global and national problem that we need to change, but at least if we're protecting some areas, we're giving the fish a small chance to live, repopulate and recover.

I sincerely hopes this proposal goes through, and I cannot think of a legit reason why it shouldn't.
Be a better human, show us that change is possible, approve this proposal and make our future better.

Ngā mihi,

s 9 (2)(a)
Goat Isalnd Diev and sNorkel
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:18 pm
To: Sea Change
Cc: s 9 (2)(a)
Subject: Hauraki Gulf Proposal submission
Attachments: 22.10.28 DOC submission Live Ocean FINAL.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

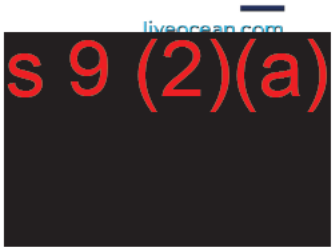
Kia ora,

Please find attached the submission by Live Ocean Foundation in support of the marine protection proposal.

Thank you,
s 9 (2)(a)

LIVE OCEAN FOUNDATION

liveocean.com



28 October 2022

To whom it may concern,

Live Ocean Foundation (Live Ocean) appreciates the opportunity to provide input on the marine protection proposals for the Hauraki Gulf released by the Department of Conservation. Live Ocean is a marine conservation charity. Since inception Live Ocean has partnered with the University of Auckland and other organisations working on science and innovation, in order to advance the understanding and appreciation of the Gulf.

Live Ocean recognises the significance of Tīkapa Moana, Te Moananui-ā-Toi as one of the great marine ecosystems of the world, a taonga with significant cultural, recreational and economic value. It is important to a large part of Aotearoa New Zealand's population, a pivotal connection point to the state of our marine environment.

Live Ocean's network is motivated by the vision of a healthy ocean for a healthy future. We recognise the key role that the ocean has played a climate regulator and in buffering the effects of climate change. The recently published *Our Marine Environment Report 2022* (MFE) shows New Zealand's ocean is acidifying, with warming and extreme events like marine heatwaves becoming more common. Biodiversity is essential for resilience in the face of these mounting challenges.

Since the declaration of the Hauraki Gulf Marine Park in 2000, the Gulf has further declined due to multiple stressors, including the levels of recreational and commercial fishing, rapid increases in coastal development, sedimentation nutrient inflow, and with decreases in denitrification and increases in sea temperature seeing stronger algal blooms. Ecosystems need to be resilient to respond to these challenges. Currently, we are not helping the Gulf, since 2000 the area of the Marine Park protected has only increased by 0.05%, with the establishment of Te Matuku Marine Reserve, which was applied for before 2000.

The Hauraki Gulf is recognised as a globally important seabird biodiversity hotspot, yet many of the species are threatened by the rapidly deteriorating marine environment. In 2000 4% of our seabirds were threatened, in 2021 it was reported that 22% are now threatened. These figures serve as a stark reminder that it is not only species that live in the ocean that are reliant upon it for their wellbeing, and their survival.

Live Ocean notes that the proposals are an updated iteration of those set out in the government's response to the extensive engagement and consultation process with mana whenua and key stakeholders from 2013 resulting in *Seachange – Tai Timu, Tai Pari* as reflected in *Revitalising the Gulf: Government action on the Sea Change Plan.* Given the community engagement and terrestrial-marine ecological linkages, Live Ocean specifically highlights its endorsement of the inclusion of the Ōtata – the Noises HPA in the proposals.

Live Ocean notes peer reviewed research that shows benefits of the Leigh Marine Reserve that arise from the export of adult fish (spillover) and net export of eggs and juveniles (recruitment). Adult snapper are 5.7–8.7 times larger inside the Leigh Marine Protected Area (MPA) than

outside, and they reproduce a lot more (10.6% of newly settled juvenile snappers sampled up to 55 km outside of the Leigh Marine Reserve were the offspring of adult snappers from the MPA).

Live Ocean also notes that the Cable Protection Zones (CPZs) covering 6.3% of the Gulf as they stand clearly do not meet the International Union for Conservation of Nature (IUCN) criteria for marine protected areas. CPZs are only likely to be effective in supporting biodiversity if they contain areas of suitable habitat and no take throughout the water column enforced. These areas are not currently to be managed for biodiversity and it Is misleading to include them in a total of marine protection.

Live Ocean refers to the independent poll commissioned by the Hauraki Gulf Forum which identified very strong support for putting 30% of the Gulf into marine protected areas (77% support, 5% oppose). As an organisation dedicated to marine protection and restoration, our network has a heightened interest in these issues.

We welcome these marine protection proposals as a move towards the Hauraki Gulf Forum's goal of at least 30 percent marine protection to restore the mauri of Tīkapa Moana Te Moananui-ā-Toi. Effective ecosystem-based management with a more ambitious MPA network working alongside the Fisheries Management Plan is necessary to allow a flourishing Gulf for future generations.

s 9 (2)(a)

s 9 (2)(a)

Chief Executive

Live Ocean Foundation

Sea Change

From: s 9 (2)(a)s 9 (2)(a)
Sent: Friday, 28 October 2022 4:18 pm
To: Sea Change
Subject: Submission to the Hauraki Gulf Marine Protection Proposal

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

I wish to provide feedback on the Government's Revitalising the Gulf Marine Protection Proposals as a private citizen.

My submission is that the plan does not go far enough to protect the environment in the Hauraki Gulf Marine Park. I do not agree that there should be ANY bottom trawling or sand mining in **any** part of the Marine Park whatsoever.

I ask that the proposals be reconsidered, and extended to either ban or strictly limit bottom trawling and sand mining within the Hauraki Gulf Marine Park.

Regards

s 9 (2)(a)
s 9 (2)(a)
s 9 (2)(a)

Sea Change

From: Goat Island Dive and Snorkel s 9 (2)(a)
Sent: Friday, 28 October 2022 4:23 pm
To: Sea Change
Subject: Revitalising the Gulf Marine protection proposals
Attachments: Revitalising the Gulf Marine protection proposals_TRF.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reply sent, Recorded

Hi Team,

Please see attached!

Thank you for your time, and for your work towards this proposal.

I hope we'll get some positive results from this proposal.

Have a fin-tastic day!

Kind Regards
s 9 (2)(a)
Business Manager

Like us on FACEBOOK
http://www.goatislanddive.co.nz

s 9 (2)(a)

s 9 (2)(a)

Revitalising the Gulf Marine protection proposals.

s 9 (2)(a) Goat Island Dive and Snorkel

I'm submitting this on behalf of myself, my company and all my fish friends!

These views represent the entire organization.

s 9 (2)(a)

s 9 (2)(a)

The planet, our Ocean and our gulf is being threatened by a national and global crisis. The fact that we're sitting with a proposal that would help, benefit, and restore some of our gulf, and we're still debating whether this should happen is catastrophic. This proposal has taken so long to put together, it has taken so much hard work, and I know there has been some serious sweat and tears put into this. It's not easy to make changes that effects so many. It is a logistical and legal nightmare but that doesn't mean it shouldn't happen, maybe even the opposite. It is time to show that fighting for a good cause is worth it! We need to prove that we support the scientific evidence, that we learn from passed mistakes, that we are fighting for a better future, that we can't just give up, and if we all work together CHANGE CAN HAPPEN. It is so important that this proposal goes through.

We're at a tipping point where we can sit and watch what we love and care for disintegrate, or we can stop making excuses and do something about it.

It is no doubt that we need more protected areas and the fact that the proposal is only increasing protected areas to 18% is disappointing, but at least it's a start. A global goal of 30% by 2030 is looking pretty slim if there are countless people and organisations working extremely hard on getting this proposal through and it's just over half of the target. Hopefully this will be an eye opener for a lot and can pave the way for New MPA's in the future, hopefully making it easier and quicker to implement change.

Regarding the HPA's areas, although a great concept this could cause a lot of issues. It is not okay that there may be customer rights, or any sort of rights to fishing/harvesting/damaging of any kind. It is already a fighting battle to stop people fishing in current protected areas, and with more gray zones, we're just opening for "miss interpretations" and for what would be an extremely difficult thing to police. The proposal is already only protecting a smaller scale than what it should, it is still allowed to fish/collect/harm the majority of the gulf, why should we need to fish/gather in protected areas?

There are so many great changes in this proposal, and it's good to see more protected areas especially extensions and seafloor protections, but the truth is that we need more and bigger areas. I live next to the Goat Island Marine Reserve, so it's where my heart is, but the same arguments as seen below can be made for each of these amazing places. I hope this proposal goes through so we can finally implement some much-needed changes, and that we have now created a discussion and a forum to make it easier to create more. I Sincerely hope that the new protected areas can educate and shine some light on how insanely important these areas are!

The Cape Rodney-Okakari Point Marine Reserve:

This is the most magical place in NZ! I have been over all over the world, and you just can't beat it. This Marine Reserve needs to be extended, and it needs to be extended as a Marine reserve, not an HPA (HPA better than Nothing, but not great) It is too many people fishing on the boundary, there are too many cray pots, and there are too many excuses "Oo I didn't know where the boundary went" "I didn't know ***everythin***g was protected". Having it as a HPS would just open an impossible thing to police, how can you tell a someone that they are 789 meters off the beach, so everything is protected… but if you go another 12 meters out, you're in the clear? How can you possible police that? The proposal lacks definitions and clarification of customary rights, which I'm sure will be clarified at length in a different document. I think it is horrible that someone can fish/harm/collect in any protected area. It just makes a laughingstock of what we work so hard to protect.

This Marine reserve have cleared the way for so many new marine reserves and educated generations of people about our Marine life, different marine habitats, benefits of protected areas, and so much knowledge that is just invaluable. It is NZ's and one of the world's first marine reserve and to think that it is only one of the smallest is outrageous. I've been interviewed by filmmakers from the other side of the world raving and bragging about Goat Island marine reserve and saying that it has had such a significant impact on Marine Reserves around the world! This little reserve in NZ! Absolutely amazing! And yet we're not acknowledging its importance by making it the size it needs to be. At the moment it is so small that the fishing we see happening on its boarders has a significant impact of the numbers of fish/critters and the kelp forest.

Everyone know the science behind why it needs to be bigger, it is a joke that we're still discussing it's importance and impact.

It has a financial effect on Leigh, Matakana, Warkworth, Mangawhai, Wellsford and all the other small towns around here. It has over 350,000 visitors every year and is free for everyone! It creates so many jobs for the whole area and not at least it creates fun and educational learning.

It is absolutely amazing that people can go there and swim with the fish and see how amazing our ocean can be just by jumping off the beach. It offers a view that is normally only seen at an aquarium. It teaches the next generations what our ocean is supposed to look like. It teaches them respecting nature, it teaches them what effect humas have on ecosystems, it gives them perspective, it firsthand shows them why we need to respect and protect our oceans. It gives them the confidence they need to interact with our ocean and it's marine life, to do it in a safe way for them and the marine habitat and residents.

If the boarders of the new extension of the reserve is up for discussion, then it should be mentioned that the reef on the east side of the Island should be included! It Is an extremely important habitat for Crayfish. I can't think of a reason (except greedy ignorant people wanting to fish there) that this should be included.

Nothing beats the look on a kid or adults face first time they snorkel at Goat Island when they see the massive 80-year-old Snapper cruising pass! Or their big happy faces when they get to dive into a Kelp Forest seeing 10 different species on one breath hold. And the saddest thing you'll see is if you take the same group of the beach 1 km away from the reserve and all you see is Kina Barrens…. Our gulf is dying… we've pulled the trigger… and it's about time we do something about it. Make this plan happen! Even better, make it bigger, make it beet and please make it easier to make more protected areas in the future! Our ocean is relying on us to correct our wrongs and ensure it will still be a healthy place in 30 years.

The Hauturu-o-Toi – Little Barrier Island

It is incredible that this is not already a marine reserve! It is already a Nature reserve protection so many birds who depend on a healthy ocean to be able to survive. You must protect the ocean if you will have success protecting land. It should have more of its coastline protected, and without a doubt it should be larger.

Mokohinau Islands

This offer some of the best diving in NZ. It rich eco system is incredible and the currents provide nutrition and life we don't see close to shore. I went diving there 4 years ago, what I saw blew my mind, the colors of the water, and the kelp forest was second to non and it was rich with life, adults and juvenile and so many species, I went back recently and was just met by kina Barren. I am angry that this keeps happening, I'm angry that were not protecting bigger and more areas, and that we are taking away the home for these amazing creatures.

Overfishing is such a massive global and national problem that we need to change, but at least if we're protecting some areas, we're giving the fish a small chance to live, repopulate and recover.

I sincerely hopes this proposal goes through, and I cannot think of a legit reason why it shouldn't.

Be a better human, show us that change is possible, approve this proposal and make our future better.

Sea Change

From: s 9 (2)(a)
Sent: Friday, 28 October 2022 4:23 pm
To: Sea Change
Subject: s 9 (2)(a) - Submission
Attachments: s 9 (2)(a) submission on Marine Reserve boundary changes..pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Thankyou for the opportunity to make the attached submission.

Nga mihi
s 9 (2)(a)

Ngā Mihi,

s 9 (2)(a)
s 9 (2)(a)
s 9 (2)(a)
s 9 (2)(a)

s 9 (2)(a)
s 9 (2)(a)

Submission to Department of Conservation

Expansion of Te Whanganui a Hei (Cathedral Cove) Marine Reserve

28 October 2022

Seachange, Department of Conservation

Private Bag

Wellington

Kia ora,

We wish to make the following submission in relation to the Revitalising the Gulf – Marine Protection Proposals.

Our submission relates solely to the proposed expansion of Te Whanganui a Hei (Cathedral Cove) Marine Reserve as this will directly affect us and our community.

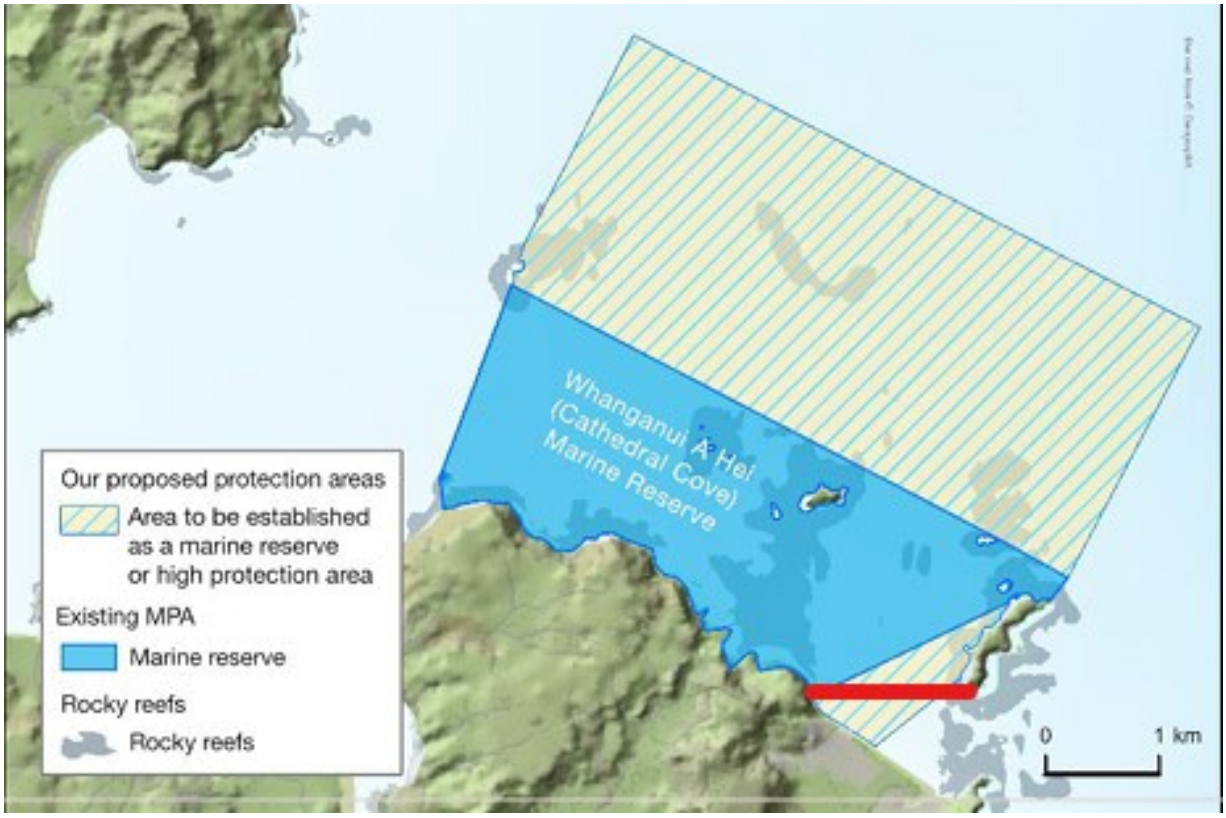
We have lived in s 9 (2)(a) for over 20 years and have enjoyed the benefits of Cathedral Cove, the Te Whanganui a Hei marine reserve and Hahei Beach. We have a strong connection to it and support the expansion, subject to the following:

- ***Hahei Beach Encroachment*** - we do not wish to see our beach divided and would like the current location, at the northern end of Hahei Beach retained
- ***Location of Hahei Beach to Mahurangi Island Boundary*** – We support further inclusion of Mahurangi Island into the Marine Reserve but propose the boundary post at the foot of the cliffs at the north end of Hahei Beach remain where it is and the boundary along the coast of Mahurangi Island be moved.
- ***Extension into Mercury Bay*** – we strongly support the proposed extension of the reserve into Mercury Bay
- ***Improved DoC Management of Cathedral Cove*** – with the expansion of Te Whanganui a Hei (Cathedral Cove) Marine Reserve, we can expect more visitors both on land and sea. Cathedral Cove is one of New Zealand's most popular tourist destinations and it is vital that DoC upgrades its management capabilities for Cathedral Cove. There must be more investment in enforcement, maintenance and other matters relating to long term management of such a wonderful asset.

Thankyou for the opportunity to make a submission,

Nga mihi

s 9 (2)(a)
s 9 (2)(a)



Our proposed boundary change, cutting from the existing marine reserve marker under the cliffs to the bottom end of Mahurangi Island.

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:24 pm
To: Sea Change
Subject: Hauraki Gulf submission.

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Dear Sirs

Please eliminate all commercial dredging in the greater Hauraki gulf.
Eliminate area 10a (east of Mahurangi East peninsular) as only for Maori. I live on the Mahurangi harbour and the real issue is that the habour needs to be dredged so as to allow greater water movement. The sediment build up has occurred over the last 100 years from land runoff where trees have been cut down. Greater water movement would encourage fish movement.

Eliminate the area north of Little Barrier as only for Maori and also eliminate the area around the Mokoheinau islands as only for Maori.

Fishing should not be based on race. It should be based on sustainability and enjoyment by all those partaking in fishing.

I would be willing to appear before the board.

Your faithfully

s 9 (2)(a)
s 9 (2)(a)

s 9 (2)(a)

Sent from Mail for Windows

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:26 pm
To: Sea Change
Subject: letter in support of HG MPA proposals

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora,
I am writing to you regarding the Hauraki Gulf Marine Protection Area proposal and hope that immediate action can be taken to help our gulf recover and protect our valuable resources for future generations.

Although there is no one fix-all solution, we urgently need to take action to increase our protected areas which includes extending our existing marine reserves and establishing more HPAs.

I strongly support the extension of the two marine reserves under the Marine Reserves Act 1971 (ie not as a High Protection Area around the existing marine reserves). These marine reserves at Leigh and Hahei are currently too small to effectively protect large predators like crayfish and snapper from fishing pressure at the edges and it would also help preserve linkages between the soft substrates and the rocky reef.

I strongly support the establishment of the 12 proposed High Protection Areas (HPAs) and see this as a crucial first step towards revitalising the Gulf and developing a comprehensive network of highly protected areas. This proposal will increase the total area of the Gulf protected to about 12%. Overall, this is still a relatively small increase in total area to be protected from fishing, but the proposal includes some large, well-designed and significant High Protection Areas (like marine reserves) at some of the offshore islands such as at the Mokohinau Is, Hauturu-o-Toi and the Noises.

I support the proposed Seafloor Protection Areas (SPAs), but suggest that these areas be considered and incorporated as part of the Hauraki Gulf Fisheries Plan in order to protect a much larger proportion of the Gulf from bottom-impact fishing.

I hope that these proposals can be accepted to establish a greater network of protection to allow our valuable ecosystems to recover from continued and increasing stress and protect our marine life from fishing pressures.

Ngā mihi,
s 9 (2)(a)

s 9 (2)(a)
s 9 (2)(a)
s 9 (2)(a)
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:28 pm
To: Sea Change
Subject: Submission in relation to the Hauraki Gulf marine protection proposals
Attachments: s 9 (2)(a) submission to revitalising the Hauraki Gulf marine protection proposals.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Tena koe,

Please find my submission for the Hauraki Gulf marine protection proposals.

Nga mihi,
s 9 (2)(a)

SUBMISSION TO REVITALISING THE HAURAKI GULF MARINE PROTECTION PROPOSALS

Minister of Oceans and Fisheries, Hon. David Parker
Minister of Conservation, Hon. Poto Williams
c/- Te Papa Atawhai Department of Conservation

28 October 2022

Tēnā kōrua Minister Parker rāua ko Minister Williams,

I write this submission in support of the proposed marine protection package in its entirety including 12 High Protection Areas, 5 Seafloor Protection areas and the extension of protection adjacent to two current marine reserves (Cathedral Cove and Cape Rodney). While there are short comings, it is a step in the right direction which I embrace.

Overall comments on the marine protection proposals

I support the proposed provision within HPAs for monitoring and research driven by both Mātauranga Māori and western science knowledge systems. I acknowledge and support the Government's co-governance model and work to recognise customary practices of Mana Whenua within the context of marine protection in the Hauraki Gulf but would eventually like a clearer definition of *biodiversity objectives* and how these will be determined.

High Protection Areas

I am glad to see that HPAs include part of the outer gulf island ecosystems on which the main impact is overfishing – but I see these as only a first step to revitalising the Gulf. I expect that the benefits of protection will enhance the abundance of marine species beyond the protected area through the spillover effect and larval transport.

Seafloor Protection Areas

On the matter of seafloor protection, I feel that the protected areas should be more widespread and better aligned with other protection zones.

Marine Reserve Extensions

On the topic of extensions, I strongly support the areas adjacent to Cape Rodney to Okakari Point being extended. However I would insist these be made under existing legislation under which the original reserves were created, the Marine Reserves Act 1971, to make the requirements and enforcement straightforward and clear for people to follow.

Regular review and adaptive management

I note the Government's proposal is currently silent on the matter of reviews. *Revitalising the Gulf*[1] refers to the development of a monitoring and reporting framework for the Hauraki Gulf, which will be underpinned by an adaptive management cycle to ensure management actions can be adjusted based on the regular evaluation. We urge care in the drafting of the Hauraki Gulf Marine Protection Bill so that the biodiversity objectives can be truly adaptive.

Monitoring and reporting

Revitalising the Gulf refers to the development of a monitoring and reporting framework and the development of a Gulf research plan. Both are central to the principle of adaptive management. I take this opportunity to urge the Government to fund and prepare the monitoring and reporting framework and research plan for the Hauraki Gulf into the future.

Urgent action required

The observable degradation across many ecosystems in the gulf continues to be alarming and distressing. The Sea Change Plan was put together to form an action plan to reverse the degradation, but the area which is proposed to be fully protected is not likely large enough, or inclusive of enough high biodiversity areas to reverse the ongoing decline.[2]

New Zealand, once an example to nations as a leader in marine protection, has not prioritised marine protection, and this is highlighted by the fact that only two small marine reserves (Te Matuku and Tāwharanui) were established in the Gulf over the past 20 years. Excluding the cable protection zones, which don't constitute marine protection under IUCN definitions, the proposals will result in approximately 6% of the Hauraki Gulf Marine Park being in a form of full no-take marine protection. Whilst an enormous step forward for the Hauraki Gulf, this is still a very small fraction of the Marine Park and behind best practice.

I urge you to move with pace – introduce legislation to the House as soon as possible to enact these marine protection areas this parliamentary term and avoid further devastation to marine ecosystems. Please also consider making clear what the pathway for other marine protected areas (i.e., new HPAs) will be, so there is an understanding of how future HPAs will be assessed. Framework around how we make steps to introduce new HPAs going forward should be included in the Hauraki Gulf Marine Protection legislation.

Close behind in terms of prioritization should be reform to fisheries management through the delivery of the Hauraki Gulf Fisheries Plan. To achieve maximum benefits in revitalising the Gulf, we implore you to move with pace to deliver the Hauraki Gulf Fisheries Plan in close alignment with the marine protection proposals.

Water connects all life. It connects land to ocean. When considering actions for the benefit of the Park, I urge you to extend your focus to the waterways that feed into the ocean. The nitrate run off from land to ocean also has a detrimental effect on the ocean. These proposals do not address this

[1] Revitalising the Gulf: Government Action on the Sea Change Plan, released June 2021, page 94.
[2] LaScala-Gruenewald (2021) Small marine reserves do not provide a safeguard against overfishing.

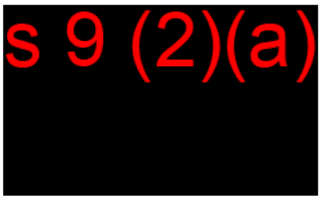
threat to the marine ecosystem and is just as important as Marine protection if we are to effect meaningful change.

Conclusion

The Hauraki Gulf Marine Park is vital to the health of all flora and fauna, including people. It will also be crucial in managing the impacts of climate change. Management of the Park must be active, adaptative and enduring to not only meet the current environmental degradation, but to create a resilient Gulf. The ecosystems need a chance to recover if we expect them to function with unavoidable added stresses created by the direct and indirect effects of climate change.

I support the proposals as a first step towards effective initiatives to improve Ocean health.

Yours sincerely,



s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:30 pm
To: Sea Change
Subject: Hauraki Gulf submission

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

name: s 9 (2)(a)
organisation:
Te Ahu wai o Tangaroa sustainable ecological aquaculture.

submission:
Hauraki Gulf restoration project is paramount.
Aquaculture is the ONLY future regarding seafood for the billions.
Environmental destruction in the pursuit for profit is not civilized yet acceptable.
One planet one home, we don't have the technology to move masses to another planet... which NASA found an exo planet about 40 billion light-years away. Do the math.

contact details.
Email: s 9 (2)(a)
Mobile: s 9 (2)(a)

Sea Change

From: s 9 (2)(a)s 9 (2)(a)
Sent: Friday, 28 October 2022 4:31 pm
To: Sea Change
Cc: dan@falconermarine.co.nz
Subject: Revitalise our Gulf submission
Attachments: Submission for Revitalise our Gulf.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora,

Please see the attached submission in support of DoC's Revitalise our Gulf proposal.

Ngā mihi nui,
s 9 (2)(a)

Submission in support of Revitalising the Gulf proposal

s 9 (2)(a)
s 9 (2)(a)
s 9 (2)(a)

s 9 (2)(a)
s 9 (2)(a)
s 9 (2)(a)

Postal Address:

s 9 (2)(a)

Kia ora,

I am making this submission on behalf of myself and my partner Daniel. We are both keen sailors and work in the marine industry. Daniel is a marine engineer and I am a high performance sailor and sailing coach. We cruise widely around the Hauraki Gulf and beyond, and live aboard our 12m yacht. I am also studying a Bachelor of Science majoring in Marine science and Earth science at the University of Auckland.

We support the Revitalising the Gulf, Marine Protection Proposals package to establish new marine and seafloor protection areas in the Hauraki Gulf Marine Park /Tīkapa Moana / Te Moananui-ā-Toi (the Gulf).

The health of our ocean is crucial to our survival, as it plays a critical role in regulating and combating climate change, as well as providing resources and livelihood for millions of people. Research shows health of the Hauraki Gulf is declining rapidly, and rapid action is needed to prevent this tragedy from continuing.

This proposal is a good start, particularly the protection of unique places such as the Mokohinau Islands and Te Hauturu-o-toi, and the recognition of the customary rights of mana whenua. However, much more protection is needed, and faster. We are concerned that this proposal barely touches commercial fisheries which are one of the major contributors to declining ocean health and climate change, through damaging fishing practises such as trawling and dredging.

In addition, major work needs to be undertaken to reduce the damaging sedimentation and runoff created by urban and rural activities on the coastline of the Gulf. Only a few months ago I watched construction on the Takapuna waterfront turn the ocean surrounding Takapuna Beach almost completely white. Toxic chemicals, microplastics and nutrient runoff have devastating impacts on the nearshore environment damaging shellfish beds and fish nurseries.

- I also support the submission from the Revive our Gulf organisation
- I also support the calls of LegaSea to create 100% seabed protection in the Hauraki Gulf and ban damaging practises such as bottom trawling, mining, dumping, scallop dredging, and Danish seining

Urgent action is needed to repair damage to the Gulf and to stop it degrading further. We encourage Ministers to proceed as quickly as possible to implement these much needed changes and more. It has our absolute support.

Ngā mihi nui,
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:32 pm
To: Sea Change
Subject: Re cathedral cove marine reserve

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

I support the expansion seawards of the reserve. I DO NOT support the expansion along Hahei beach which will be impossible to administer and make 'criminals' of dog walkers and children collecting shells. There is no benefit to the reserve in extending this along the beach. Far better in my view to include the coastline towards Cook's beach.

Thanks for considering.

s 9 (2)(a)
s 9 (2)(a)

Sent from my iPhone

Sea Change

From: s 9 (2)(a)
Sent: Friday, 28 October 2022 4:33 pm
To: Sea Change
Subject: revitalise the Hauraki Gulf by having your say on marine protection submission

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

s 9 (2)(a)

s 9 (2)(a)

I agree with

12 high protection area proposed (HPA)

5 seafloor protection area (SPA)

2 additional marine protection areas adjacent to existing marine reserves

I do not agree with the following proposals, where the customary practices of mana whenua, including customary non-commercial fishing, will be provided for within HPA, SPA , and marines reserves (and additional marine protection areas. A High Protection Area, seafloor protection area, and additional marine protection areas adjacent to existing marine reserves is just that and the same rules are to apply to all parties, i.e. there is to be no fishing, either commercial, recreational, or customary within there areas.

Regards

s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:37 pm
To: Sea Change
Subject: Proposed no fishing area

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Please do not make this a no fishing area
We rely on fishing these area for our families
s 9 (2)(a)
s 9 (2)(a)

Help revitalise the Hauraki Gulf by having your say on marine protection

Have your say on the proposed protection zones designed to revitalise the Hauraki Gulf and its marine life. Submissions close 5 pm, 28 October 2022.

Kind Regards

Sea Change

From: s 9 (2)(a) [redacted]
Sent: Friday, 28 October 2022 4:37 pm
To: Sea Change
Subject: Revitalising the Gulf MAKE IT HAPPEN. Public opinion

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Opinions on the 'Revitalising the Gulf Marine protection proposals.

Through growing up spending summers at Goat Island, Tawharanui and Cathedral Cove I've grown a love for the ocean. Then through my studies at Toi Ohomai Institute of Technology where I studied Environmental Management (Marine Strand) I've grown an understanding of the importance and dire need for marine protection.

There are an abundance of studies that highlight the importance of Marine protected areas and the protection and restoration of our marine ecosystems. I emphasise the consideration of expanding and creating more Marine Reserves. The goal is to revitalise and restore the Gulf but allowing take with HPAs open ups a potential grey area for people to take advantage of. The fisheries officers of New Zealand are already having issues with catching poachers. Making more rules such as the customary fishing rights within HPAs will create another stress on the fisheries officers. Is there going to be something put in place to determine if the people who are fishing within the HPA are apart of the Mana Whenua? How are you going to stop people who are not affiliated with the Mana whenua from going fishing and saying that they are?

There needs to be more clarification on what is going to happen if the HPA goes ahead instead of the marine reserve. What is sustainable in your terms? What will the biodiversity objectives be? How will everything (rules) be controlled? There need to be specific rules e.g catch and size limits put in place for the Mana whenua. These rules need to be policed. The fisheries officers are already struggling.

On page 5 of the document it states "Mana whenua will continue to manage fishing activities and decide on the conditions that apply to the taking of fish for customary purposes." This statement contradicts the previous comments and leads to creating a grey area where rules may be changed to the Mana whenuas wants at each time. Although this may lead to needed change in accordance with sustainability while the ecosystem changes it also allows for the creation/change or removal of rules which could end up negatively impacting the reserve. On page 3 of the document it states that "Customary practices will be managed to achieve the biodiversity objectives agreed with mana whenua for each site." What if the biodiversity objectives are not supportive enough of the environment? If HPAs are to be put in place instead of fully protected marine reserves will there be discussions with marine biologists that are familiar and know hat is needed for the specific environment to show recovery? Will marine biologist be included in the implementation of the biodiversity goals? Will marine biologist for example at the Leigh laboratory be included on the decision on the conditions of the customary fishing?

An issue that may arise due to handing out customary fishing permits is that if they were to be sold to people. This would decrease the cultural importance of the rights being given. Who has the authority and what controls will be put in place to regulate who and how many are issued. What controls will be put in place to prevent monetising the permits?

As stated in the proposal, the fish abundance within the Cape Rodney-Okakari Point Marine Reserve (Goat Island Marine reserve) has been significantly effected by fishing at the reserve's boundary. This leads to the thought that allowing customary fishing rights along side fishing at the boundary would have even more significant negative impacts on fish abundance. The immense decrease in marine life within the Hauraki Gulf over the past few years

calls for complete protection if we wish to succeed with any form of restoration. Allowing any sort of take within the expansion will decrease the time of recovery.

As stated on page 7 “it is estimated adult snapper at Leigh marine reserve contributed 10.6% of newly settled juveniles to the surrounding 400km2 area.” This shows that the Marine reserve is working. Why change the structure of a working system when there is so much scientific evidence supporting it? We know that by expanding the reserve and keeping the same regulations that we will see the environment restore. By allowing people to take even if its only customary fishing by the mana whenua it creates an uncertainty. We are too late with informing protection of our marine environment and don’t have time for uncertainty. The goal is to protect the marine ecosystem and the fish within it. The most effective way is to expand and create No Take Marine Reserves. This will also make it easier for fisheries officers to police.

Tourism is a massive part of New Zealand’s economy. Since growing up spending summers snorkelling at marine reserves I have seen the impact they have on where tourists want to spend their time and money. People come to New Zealand because we advertise ourselves as an environmentally sustainable and beautiful country. The boom of tourist at Goat Island marine reserve since its establishment in 1975 shows how important they are for our economy. Expanding the Goat Island marine reserve and keeping it fully protected will provide more tourism opportunities in the future while protecting the tourism sector established now.

As well as tourism there will be heavy positive impacts on our fishing industry if we were to implement and expand NO TAKE Marine reserves. The spillover that has been seen from our current marine reserves has already had positive impacts on the industry and will magnify when reserves are implemented and expanded. There are an overflow of studies that show the positive impact marine reserves have on the fishing industry.

The many students who pass through the Leigh laboratory have been able to answer questions that help restoration elsewhere and have majorly helped in the understanding of our Marine Environment. Having uncontrolled reserves such as HPAs will invalidate their important research as taking from the reserve will create an unbalanced and unnatural ecosystem.

Although we are a bit late when it comes to protecting our marine environment expanding Goat Island marine reserve is a good start. Goat Island marine reserve being the first fully protected Marine reserve in the world has paved the way for marine reserves all over the world. This is another reason why we should implement and expand while fully protecting the choosen areas. We have paved the way for many other reserves and our actions will likely be followed.

Overall I fully support the proposal in terms of the extension and addition of the marine reserve but also propose that the reserves DO NOT ALLOW FISHING OF ANY KIND! This is to ensure the dire need for recovery of our marine ecosystems. With extending the reserves I propose that fisheries officers be multiplied in order to control the reserves. Giving Mana whenua the opportunities and providing them with fisheries courses in order for them to elect Kiatiakitanga for the area. The Mana Whenua care about the sustainability of our reseources but the most effective way to recover them are to expand while fully protecting. Get those reserves implemented!!!!!!!!!

Kind regards,
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:38 pm
To: Sea Change
Subject: Make it Happen! Revitalizing the Gulf Marine Protection Proposals

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia Ora,

I wholeheartedly support the introduction and extensions of marine and seafloor protected areas in the Hauraki Gulf Marine Park. I urge the government to proceed to the next stage.

After reading through the Marine Protection Proposal for Revitalising the Gulf, there are a few things that I´d like to address/ comment on.

First of all, on page 12 it´s mentioned that the Mana whenua were "broadly supportive of new marine protection measures provided customary practises could be exercised". I understand that the Mana whenua have cultural rights to these areas whether or not they become protected, but what´s the point in giving an area 50% protection (by allowing customary practises, you´re basically saying that it´s half protected), and not 100% protection? If you´re going to make it a protected area, you may as well fully protect it, so that the habitat can recover and fish stocks can replenish properly- not to mention the spill-over effect this 100% protection will have (as opposed to 50% protection)- you have the science to prove that this works.
On this note, what is the definition of "Customary Practises"? How are these practises going to be regulated and will you do regular checks to make sure that these practises aren´t having the same effects on the HPA than recreational fishing was having on the same area before it became protected? What if these areas become even more exploited through frequent customary practises? Will you make these areas fully protected then?
How are you going to police this? How are you going to prove that the fishing and the practises that are being undertaken in these HPA´s are "customary", and that the people partaking in them are Mana whenua? If you´re going to be issuing permits so that the Mana whenua can fish in these areas, who will be issuing the permits, how will they be policed, and how are you going to determine if the people fishing in these HPA´s are allowed to be fishing, or if they´re poaching?
Will there be more restrictions placed on fishing in these areas (minimum fish size, smaller bag limits) because these areas are HPA´s? Or would the same rules and current regulations for recreational fishermen apply, except it´s only the Mana whenua that are allowed to be fishing in these areas?

Second, these proposed changes will mean that 18% of the Gulf would be protected. If we want to get to 30% protection by 2030, these areas should be fully protected- not made into HPA´s or SPA´s. I say this because when it comes time to implement the next 12% of protected areas, don´t you think it will be easier if they were fully protected? The science would be able to back up why fully protected areas work- not only do they boost biodiversity and the habitat can recover, but the fish stocks will increase and eventually spill over into areas that aren´t protected- which will benefit recreational and commercial fishermen alike. There is more science to prove marine reserves work, which will mean that the public would be more supportive when it comes to implementing the next 12% of MPA´s.

Third, it would make sense for the proposed extension of the Goat Island MPA to be a marine reserve, rather than an HPA. As the oldest fully-protected marine reserve in the world, it would make more sense for the extension to be fully protected as well. Goat Island serves not only as an amazing tourist destination but also as an educational tool, with people coming from all over the world to learn about and experience this marine reserve. Goat Island homes snapper that have been found to be up to 86 years old- which is amazing for tourists to see and swim with fish this

size. It makes them want to protect marine life, it shows that marine reserves work, and it also helps our economy as tourists come from everywhere to experience the fish life for themselves. Not only does it have the snapper but Goat Island is a breeding ground to crayfish which are now considered functionally extinct. They move out of the marine reserve (which at the moment only extends 800m offshore, so it´s not hard for them to do) to lay their eggs and feed, and are then promptly taken by fishermen. The proposed extension to this reserve is great and very much needed as this will protect the crayfish further, however I urge you to consider the benefits of making it a fully protected marine reserve, rather than just a highly protected area.

In saying all of this, I am very supportive of the proposed extensions, and would very much prefer an area to be highly protected as opposed to an area that is not protected, however I would just like to raise these questions in the hope that the proposed HPA´s can be made into Marine Reserves, as these will be more beneficial in the long run. The implementation of this proposal puts us on a positive trajectory to achieving future change, and where New Zealand can act as a global leader in this space, showing that it is possible to achieve positive outcomes for multiple stakeholders.

Nga mihi nui,

s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:39 pm
To: Sea Change
Subject: Submission: Help Revitalise the Gulf

:

seachange@doc.govt.nz

Your Name: s 9 (2)(a)

Your Email s 9 (2)(a)

Address: s 9 (2)(a)

Subject: Submission Revitalising the Gulf

Message
I wish to formally support the application for the 'Revitalising the Gulf' proposal for 19 new marine protection zones.

Only about 6% of the Gulf is currently protected from fishing and most of this is in offshore cable protection zones and nd significant High Protection Areas (like marine reserves) at some of the offshore islands such as at the Mokohinau Is, Hauturu-o-Toi and the Noises. It also includes extensions to two existing marine reserves at Leigh and Hahei which will enhance the effective protection of large predators like crayfish and snapper. The proposed High Protection Areas will prohibit commercial and recreational fishing and seafloor protection areas will prohibit bottom impact fishing (trawling and dredging) but still allow other forms of fishing including recreational fishing.

At the current established no-take marine reserves in Northeast New Zealand we observe an abundance of marine life in comparison to non-protected areas. In no-take areas, the large predators, like snapper and crayfish, return and kelp forests are more abundant. Marine reserves provide a safe environment for the predator species to recover. This change to a more natural state supports the food chains to become balanced again, and reverse the effects of the trophic cascade currently affecting our shallow rocky reefs. At the Leigh and Tawharanui marine reserves there are noticeably higher numbers of snapper and rock lobster and lower numbers of kina, as opposed to adjacent waters which are not marine protected areas. Importantly a more natural age structure is also achieved for these two keystone predator species. The ecosystem is more balanced and there is a healthy environment for all the many species that use the kelp forests which become abundant and regain their important role as nurseries for a variety of marine species.

Through my work as a marine educator and founder of Experiencing Marine Reserves, students are able to observe the benefits of experiencing healthy functioning marine ecosystems and abundant kelp forests. This is an amazing experience for a young person and sadly not often experienced outside of our existing marine reserves or no-take rahui due to the effects of fishing.

Over the years snorkelling in marine reserve's has provided the most inspiration "I saw a massive snapper!". We see marine reserves as rich educational tools and often refer to them as 'wet libraries'.
I look forward to the government stepping up and implementing more protection of the Hauraki Gulf for future generations

This submission is as a individual - s 9 (2)(a)

Personal background

My passion for the marine environment began when my geography teacher, s 9 (2)(a) took our class snorkelling at Motukaroro Island in Whangarei Harbour. I saw sea horses, colourful anemones and other marine life. I was extremely impressed and it gave me a feeling of true belief in the marine reserve proposal that had begun at the Kamo High School in 1990 by other students. I wanted to make a difference, and realised that I could!

The late Dr Bill Ballantine and Wade Doak, both long-time proponents of marine protection talked to the Kamo High School students and I became hooked on the Whangarei Harbour marine reserve proposal.

I interviewed Wade Doak and wrote an article on the proposed marine reserve that was published in the Forest and Bird magazine. Our class was involved in marine surveys and we had meetings with community organisations such as the Ngatiwai Trust Board.

After a busy bursary year, I was unsure about what to do next so took some time out to travel overseas. On my return I began a two-year diploma on environment management at Northland Polytechnic.

I also met s 9 (2)(a) whom worked for Department of Conservation at the time and we discussed about the lack of marine education for Northland schools. I visited Goat Island Marine Reserve with Whananaki School and was buddied up with two children. The look on the children's faces when they saw a huge snapper inspired me to capture that experience in an education programme. I had the idea of taking schools to see their local unprotected marine area, then follow up with a visit to Goat Island to do a comparison. As part of my programme I wanted to do a follow up at the school and get the children to do a community project telling or showing their experiences and thoughts.

s 9 (2)(a) was very supportive and I founded the Experiencing Marine Reserves (EMR) programme in early 2002. I was also a founding member of the Mountains to Sea Conservation Trust as an umbrella entity for EMR.

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:44 pm
To: Sea Change
Subject: Submission on Marine Protection Proposals for the Hauraki Gulf
Attachments: 221028_Submission on the Revitalising the Gulf.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Please find attached our submission on the Revitalising the Gulf, Marine Protection Proposals package.
This submission is being made on behalf of the committee of the Leigh Penguin Project.
Future communication can be made through the address s 9 (2)(a)

Kind regards,
s 9 (2)(a)

Submission on the Revitalising the Gulf, Marine Protection Proposals package

28 October 2022

Leigh Penguin Project,
c/o Forest and Bird, Warkworth Branch,
s 9 (2)(a)

s 9 (2)(a)

Kia ora,

Submission made on behalf of the **Leigh Penguin Project**, a Forest and Bird supported project, Warkworth Branch.

The Leigh Penguin Project is a community initiative. Our objectives are to restore the coastal habitat for seabirds, with a focus on the kororā little penguin. The impetus for establishing this community group, was based on an observed decline in the kororā population along our local coast over the course of just two or three decades. Our group of about 40 volunteers are actively engaged with penguin monitoring, and with pest control to reduce threats from predators. We cover the coastal strip from Ti Point to Goat Island (in the Cape Rodney-Okakari Point Marine Reserve), on the shores of the outer Hauraki Gulf. Our actions help to protect the birds while they are on land. However, we are increasingly aware that the success of the kororā, and of all our seabirds, relies on access to good quality food from the Hauraki Gulf.

We strongly support the extension of the marine reserves at Cape Rodney-Okakari Point (also known as Goat Island Marine Reserve) and at Cathedral Cove / Whanganui-a-Hei under the Marine Reserves Act (1971). An extension to the size of these reserves will provide additional protection for wide-ranging species and their habitats and help to enhance biodiversity and resiliency. Extending these existing marine reserves under the Marine Reserves Act 1971 would ensure success and be less complicated than setting up a new protected area. The expansion of the reserves should occur without delay.

We also strongly support the establishment of all twelve new High Protection Areas (HPAs), and the five proposed Seafloor Protection Areas (SPAs). We believe that the protection of marine communities and ecosystems will help maintain biodiversity, ecosystem productivity, trophic efficiency and connectivity. This will help to ensure an abundant supply of good quality food for the kororā and other marine life.

As a community group we are working hard to enhance the viability and sustainability of a native species in decline. While we are committed to doing all we can to protect the kororā and other seabirds on the shore, we are limited to actions on land. Protecting and enhancing the biodiversity and sustainability of marine communities and ecosystems will help provide food vital to the survival of these birds. We urge the Government to act promptly to put these measures in place, to protect the Hauraki Gulf.

Ngā mihi,

s 9 (2)(a)

(On behalf of the Leigh Penguin Project Committee)

Sea Change

From: s 9 (2)(a)s 9 (2)(a)
Sent: Friday, 28 October 2022 4:47 pm
To: Sea Change
Subject: Marine Protected area submission
Attachments: MPA.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

See attached submission

Regards,

s 9 (2)(a)
s 9 (2)(a)

28 October 2022

Submitter: s 9 (2)(a) s 9 (2)(a)

Boat owner and recreational diver

Contact s 9 (2)(a)

SUBMISSION ON MARINE PROTECTION PROPOSALS

- I strongly support increased no fish reserves. While accepting that there can be iwi customary practices this has to be strictly controlled.
- I accept we have to protect the commercial fishery within limits that are sustainable.
- I strongly oppose scallop dredging in the gulf which should be banned at least in all the designated areas of the marine protection proposal (19 areas). Ideally recreational and commercial scallop dredging should be banned in the entire gulf.
- The HPA's do provide a level of protection however marine reserves remove grey areas around what can be taken under HPA guidelines.
- Compliance is a serious concern. There is no point in establishing reserves if there isn't sufficient monitoring of compliance. Increase compliance monitoring/penalties.
- I strongly support at least 18% of the gulf becoming protected in some form.
- I strongly support the extensions to Cape Rodney-Okakari Point and Whanganui-a-hei as marine reserves not HPA's. Main reason is to avoid compliance grey areas and to simplify compliance in a high visitor areas.
- I strongly support the HPA at the Noises and understand it is supported by the owners of the islands. I believe this should be a marine reserve not an HPA for reasons stated above.
- I strongly support the establishment of the Proposed Hākaimangō-Matiatia (Northwest Waiheke) Marine Reserve. I note this is not shown in your document.

Regards

s 9 (2)(a)

Ph s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:48 pm
To: Sea Change
Subject: Hauraki Gulf Marine Park Marine Park

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora,

I wholeheartedly support the introduction of new marine and seafloor protection areas to restore the mauri (life-force) of Tikapa Moana, the Hauraki Gulf Marine Park, and urge the government to proceed to the next stage.

We have experienced the obvious benefits of marine protection at reserves such as the Poor Knights. These include but are not limited to, protection of biodiversity, abundant life and increased productivity, fisheries spillover through egg and larval movement, increased resilience against ocean stressors such as climate change and sedimentation, and the provision of a measurable benchmark of ocean health. From a social perspective, protected areas provide opportunities for science and education, to connect New Zealander's with te Moana and for the protection of cultural values. They also provide significant economic value through recreational and tourism opportunities, increased visitor numbers, and considerable economic growth in townships adjacent to the marine protected areas.

The implementation of this proposal will increase the Highly Protected Areas from 0.3% to 6% of the Gulf. Although this is still a far cry from achieving the 30% protection that will ensure the longevity of resources, it is a step in the right direction. The current health of Tikapa Moana is unacceptable, with kōura (crayfish) now considered functionally extinct, a 93% reduction in scallop populations in the last 10 years, prolific kina barrens, and 20% of our seabirds threatened with extinction including fairy terns and black petrels.

It is disappointing to see that the scientific community was not adequately consulted in the placement of proposed Marine Protected Areas and that such a large proportion was designated due to commercial convenience rather than biodiversity value. The majority is also not adjacent to the coastal mainland, meaning the reserves are less accessible to New Zealanders.

In saying that, the implementation of this proposal puts us on a positive trajectory to achieving future change. If we are able to restore a thriving marine environment adjacent to the largest population in New Zealand, we can act as a global leader in this space, showing it is possible to achieve positive outcomes for multiple stakeholders.

Ngā mihi nui,
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:48 pm
To: Sea Change
Subject: additional submission to Hauraki GulfMarine Park deadline October 28, 22

Categories: Recorded

ADDITIONAL SUBMISSION FROM
s 9 (2)(a)
s 9 (2)(a)

PLEASE UTILISE WHEN FORMULATING THE HAURAKI GULF MARINE PROTECTION BILL
Protection means protection in all senses.
ELIMINATE TRAWLING THROUGHOUT THE AREA ESPECIALLY IN THE COLVILL CHANNEL and provide retraining and subsidies to those employed in the sector.

DO NOT SUPPORT CAGE FIN FISH FARMING IN THE HAURAKI GULF. I do realise that DOC has some concerns but DOC is not putting up a concerted effort to halt this central government business push to pollute our seas and deplete food sovereignty and food supplies for poorer countries, (from which the tiny fish used at least 3 to 1) to feed the fast growing kingfish

You will need to get a copy of the 1000 or so pages of APP142620--CONSENT APPLICATION TO ESTABLISH AND OPERATE A MARINE FARM IN THE COROMANDEL MARINE FARMING ZONE FOR FARMING FIN FISH AND OTHER MARINE SPECIES

Additional INDUSTRIAL CAGE KINGFISH HEARING NOTES to accompany submission opposing the application by Pare Hauraki to use the Hauraki Gulf to create an industrial caged kingfish business

A lot of research has been presented as part of the Pare Hauraki application. As a 100% novice in the field my concerns are based on investigations and environmental research more normally attributable to and limited to that of an investigative journalist.

As a result I seriously oppose the business plan to anchor cages in the Firth of Thames to raise kingfish and potentially hapuku—up to eleven, weighing two to four kg, within one cubic metre of water space.

I ask: are these caged kingfish likely to survive? If I were a gambler I would not be putting my money on survival. And no I wouldn't recommend the business as a winning investment

Where to begin?

Off the top of my head I seem to recall an Appendix with graphs showing Oxygen readings. I used to do DO readings myself for Kinleith many years ago, watching floating dead fish as a result of mercury (chlorine by-product) flowing into feeder streams of the Waikato. All these byproducts, what do we do with them. Aluminium industry found the dental industry for its fluoride byproduct, the Pulp and Paper industry found a use for bleached wood pulp—bread and if it is an industry standard it doesn't even have to be on the label.

So from the data, do you think two weeks with O2 at 34.1% or 17 days with 30.9% at 10 m is healthy? What about six to nine weeks with 32.3% at 33m? Now I am not too sure at what exact depth the fish will be incarcerated but its pretty clear they will need to be at least 10m off the floor so I'm asking Pare Hauraki scientists and WRC scientists to explain what impact these low oxygen levels will have on high respirating kingfish.

Total carbon, nitrogen and sulphide concentrations ARE "moderate to moderately high" with 'Increasing enrichment" of total reactive phosphorus and redox. "in the vicinity of the CMFZ" Substitute 'pollution' for 'enrichment' to question why this does not raise alarm bells.
Adding to this existing profile is a good idea? Obviously not.

The physical farm appears to stretch over two kilometers by half a kilometre. (If the Policy and Strategy committee rubber stamp the request to extend this area to THREE kilometres by ONE kilometre an even greater sea grab! Is this a kind of payback for land grabs? Stolen seas from the public domain! Endphase capitalism transfer. Guess you can't blame a fox for being a fox.)
And you don't seem to think Brydes Whales and dolphins will mind?
Yachties do mind, all those who use the surface to travel, sightsee, or fish will mind.

Can fur seals rip holes in nets? Seems like a lot of Brydes whales congregate in the Firth from your maps "Lunge feeding was frequently observed."(SLR report) How impermeable to whale or fur seal attack are these cages?
What will such attacks do to stress the caged kingfish?

And absolutely no to your publicly notified rule change so you can take up even more public space. WRC agreed to 300 not 301 or 350. ALL your gear and all you boats need to be within the designated area…it's a bit like stolen land only its stolen sea.

Love the cultural love of the centuries old love of the sea. What, by the way, is the outcome of the customary marine title challenges? Ngāi Tai ki Tāmaki Trust, Ngāpuhi Nui Tonu, Ngāti Tamaoho, Ngāti Whanaunga and Te Kupenga o Ngāti Hako. Have they made submissions? If not, could this be interpreted as having no opposition to the business proposal we are discussing, rather a pecuniary interest in royalties? Apologies if I am way off the mark, it's just that there is no information. And do explain what are the "Crown obligations under the Māori Commercial Aquaculture Claims Settlement Act 2004." This is a serious question and I look forward to the reply because if anyone knows it will be DOC.

There's a quote from the original Working Panel who totally support the plan (why did we ever imagine otherwise?) and who declare the embayment is in "deep water". It may well be, but only metaphorically. How can anyone state 30 m is "deep water" and those guys were paid for months to listen to people like us begging them not to rubber stamp the government's plan to conjure a $3 billion industry by 2035. Export earnings of $110 million are predicted supposedly because in 2020, Auckland shoppers were buying kingfish at $22 a kilo and Aussies were paying $18 in Sydney with much much more per kilo predicted in Japan (sushi market) and in other developing Asian markets including China and India. 230 jobs are predicted (full-time equivalents). Should check the job turnover figures at Clean Seas.

The application states Pare Hauraki Kaimoana provides well over $1 million on "grants for kaumatua, marae, education, arts and sports—as well as contributing to the operating costs of the Hauraki Māori Trust Board/Pare Hauraki Fishing Trust." It would be beneficial to have the actual income from all existing leases and also what the monetary impact was, caused by the loss of scallop income, due to the brave Ngati Hei, Opito ratepayers and Legasea rahui. You may believe none of this has any relevance to your Gulf 'Protection' bill which will require ordinary citizens once again to go through the farce of submissions, but since I have prepared this for the Resource Consent lodged with Waikato Regional Council I thought I may as well lob all of this to you, with, no doubt, the exact same result. Another rubber stamp.

Once this application is granted the business owners must agree to stringent conditions including allowing independent scientists freedom to research. There must be no ability to deny research access onto and under the installations in our public space.

"The risk of infectious agents can be mitigated using good management practices and an appropriate biosecurity plan." Yes, let's work to make the BMP stringent—a decision that can only help the dreadful life of the kingfish and enhance the business in the eyes of critics.

"no robust conclusions' (P102 *Overall Assessment of ecological effects* James& Giles) means we actually don't know how much we are going to stuff up the benthic layer. Substitute the word "pollution" for "enrichment" and you get the picture. Another reason to not approve this application.

What must business operator pay for?

SPI equipment
Independent scientists and veterinarians who monitor DO etc

Absolutely NO to the suggestion that the bond could be arranged using an "industry pooled fund and/or security scheme…"

The applicant shall be required to pay ALL costs, not just "reasonable"costs.

Benthic Impact

What is the "ecological carrying capacity of the seabed"? **see baseline survey Giles/James App 1A**
Giles states free water depth has largest effect to "promote dispersal of faeces and uneaten food" This translates to 10 or so metres of "free water depth" beneath the cages, so yes one can imagine dispersal of pollution in the Gulf.

Let's imagine more than 3100 tonnes of faeces, hundreds of tonnes of waste from 12,000 tonnes of feed, total N release nearly 800 tonnes, 161 tonnes of particulate N, particulate Carbon is 1614 tonne per year, not told the total Carbon release.

In Appendix N on P 28 video assessments are suggested but in 2007 Giles said "Video surveys and sediment trap deployments are not recommended following problems experienced during earlier work caused by unfavourable environmental conditions".

How best to measure biogeochemical parameters so as to reveal "earlier signs of impact and allow remedial measures…to prevent severe impacts."
We are told all these prior studies, including trace metals and stable isotopes will help identify limits of "acceptable sediment modification"

What does Giles now recommend? And while her recommendation for utilization of SPI sounds 'robust' how does that compare with Sim-Smith/Kelly using video and "a 61. Van Veen grab"? Their pictures are stunning so it seems it will be easy to notice the impact of pollution depending on dispersal. Will the Mediterranean fan-worm, an unwanted organism currently abundant *in situ,* on receipt of faeces and waste food, plus toxic chemicals, multiply or be destroyed? Sim-Smith and Kelly appear to gloss over the high Total Reactive Phosphorus and Total Free Sulphides, and the infaunal communities

"dominated by tanaid shrimps" presumably provide food for different sea mammals?

Where are the independent scientists listed who will measure and interpret the accumulation of copper and zine, the likely impoverishment of the benthic infauna communities, and the effects of biofouling?

Who is to carry out the "broader expert assessment required to evaluate the environmental management goal" P 26 N

Shane Kelly (*Potential Environmental Effects Associated with the Proposed Shift from Mussel to Finfish Farming in the Firth of Thames*) states there "is a high probability that the deposition of waste food, faeces and chemical contaminants will lead to degradation of the seabed directly beneath fish farms, and for a relatively small distance beyond, (up to several hundred meters)." Further he uses the words "heavily impacted." He states disease treatments and feed additives can have significant deleterious effects on seabed microbial communities, "likely to exacerbate the growth of some invasives already in the FoT, such as the Asian kelp…and potentially increase their spread." What has changed since this study?

Disease/pest impact

Where are the sophisticated epidemiological models taking into account variables such as disease agent life cycle, hydrography, currents, winds, fish population sizes (both caged and wild), water temperature, salinity, river flows, Coriolis forces and other factors? Surely WRC will require these prior to approval?

One of your researchers concluded in an earlier study that finfish farming is a "potential exacerbator for biosecurity risk" (Barrie Forrest *Marine Pest Assessment*.) How does WRC marry that risk with regulations limiting such risks on land?

Who is the designated Facility Vet?

Brightwater from Tasmania state the PHK proposal has the potential to add to "the existing pathogen risk profile of the Waikato Region." And we land farmers have to at least attempt to eradicate both weed and animal pests! And with Predator Free floating with $200 million for publicity and poisons it will be intriguing to see pathogen and disease responses on land. Monarchs are already suffering thanks to glyphosate.

The BMP fails to consider three significant viral agents and 6 bacterial diseases as part of the *Consideratаion of specific disease risks identified in the risk assessments* (see p 18-19)

It's not until P 40 we read of two such viruses (missing in action is IPNV Acquatic Birnavirus) and on P 38 we read the list of toxic chemicals and treatments.

In spite of the many, many references per report, there is a failure to reference Ben Diggles 2019 *Biosecurity Considerations for Offshore Finfish Aquaculture in New Zealand* prepared for Aquaculture. He lists one virus, two metazoa, one Digenea, one Crustacea and one Myxozoa that register a High estimation for disease in kingfish with eleven disease risks measured at Moderate for disease in kingfish

His key references are Arimoto et al. (1993), Sharp et al. (2001, 2003), Sheppard (2004), Diggles and Hutson (2005), Hutson and Whittington (2006), Hutson et al. (2007, 2011), Stephens and Savage (2010), Stride et al. (2013), Sicuro and Luzzana (2016), Stephens (2016) and Garcia-Mendoza et al. (2019), a number of which are not referenced at all in your application.

He also discusses strategies for control of sea lice in Europe now relying less on drugs or pesticides and more stocking densities, cage "skirts" and "snorkel cages" that "reduce access of planktonic parasite infective stages to fish, hydrogen peroxide baths or hot water baths for removing sealice…" Apparently barrier cages may prevent infection by monogean skin and gill flukes.

I found no mention of this management in your application

Issues to be defined in the conditions prior to approval—

1/ Buffer zones and proximity to adjacent cage

Monogeans travel at least 8 km downstream. Sea lice can journey 18-45 km The actual layout of three cage sets seems not to "minimize downstream effects."

B.K. Diggles in *Biosecurity Considerations for Offshore Finfish Acquaculture in NZ* states "Provision of appropriate buffer zones between farming areas is a critical biosecurity management consideration, given that new endemic diseases could emerge in finfish acquaculture in NZ at some time in the future, as well as the ever present but unquantifiable risk of biosecurity leaks that could allow exotic disease incursions to occur." Diggles*2011,2016,2018*

2/ stocking density

Further:

I oppose the private plan change requested to extend beyond CMZ

“actual and reasonable” levies are mentioned but what if disaster is “unreasonable”? Levies need to accommodate such events

Conditions: 10 years not 35

Where is the Code of Practice?

Why is WRC pushing an additional 10% of pollution into the FoT

What amount is the bond?

Where is the Fish Health Plan?

What is good food management?

Who examines brain tissue for scutcociliates?

Where is the condition requiring fish testing for trace elements or stable isotopes or pesticides?

Darren Parsons investigated stress on kingi hatchlings, how do you minimize distress?

Do you think 7-10 x2-4kg kingfish in one cubic metre of cage space will not be stressful?

The DO can become low with increased rates of respiration by densely farmed fish

Zeldis suggests adequate nutrition and immunization can cause less disease transference

Tell me what you think a 1kg kingfish’s adequate nutrition looks like.

Zeldis states the FoT has a “naturally undersaturated oxic status.”
Cause for concern where the vigorous kingi have a higher respiration rate than salmon?

Who is watching out for the Brydes whales and dolphins that feed on local zooplankton?

Who determines adverse significant impacts?

Unless the SPI work has been done by Giles to inform us right now as to the benthic environment below and near the cages showing similar parameters as under mussel cultivation : “depth of layers identified from colour parameters,

scanner penetration depth, annelid worms, Echinocardiums sp. individuals, epifauna, black/dark patches, shell hash in/on the sediment, mussel faecal pellets and burrows."

Where are the desired transects ranging from "maximum organic input to reference areas in which anthropogenic organic input is considered negligible" to assist in the creation of a useful benthic habitat quality index.

Who defines performance indicators or determines associated trigger levels?

What is acceptable biofouling maintenance? From external research it appears that biofouling eats into profits, using from 5% to 40% of production costs.

Aggregations of wild fish near the cage fish make them more susceptible to predators

Who determines when an adverse effect is significant?

Invasiveness of marine pests is nototriously variable in space and time.

I haven't touched on the challenges of climate change, storms, dissolved oxygen levels. Although John Oldman's DHI 2020 'in-depth' study, narrowly making the cutoff time prior to application on 9 November 2020 is clear there are issues at the two feeding times (up to 13% increase in time where dissolved oxygen saturation drops below 70% in surface readings in autumn)

He states "This modeling shows that there will need to be clear protocols and procedures linking oxygen model monitoring (to identify the onset of potential low oxygen events) and feed management during such events include (*sic*) trigger levels for moving from twice-daily feeding to daily to no feed days. These may include guidance on avoiding feeding around high and low water..."

Where did the SeaChange input disappear? But in their 2017 report they state the Hauraki Gulf is a "culturally significant area" and when it comes to aquaculture pātaka kai, mahinga mātaitai, and mana whenua food gathering areas are to be avoided.

This document also declares

Plus SeaChange feels it is the "local communities" who get to decide locations for this dirty industry.

They are also clear on consent transfers. "Restrictions should be placed on the circumstances in which consents can be transferred to others and should require that development is completed within five years of the consent being granted." We say three years is sufficient for develoment, pursuant to the RMA

Consent should be NON-TRANSFERRABLE

Regarding actual consents, within the Draft Consent business operators can come up with their own plan 20 working days prior to any structure going into the public space of the sea (this public space should also incur a hefty parking fee as it destroys public access for years)

Totally inadequate as any rational bureaucrat will ascertain.

And just a reminder from the early research by John Zeldis: "Therefore, dispersion of farms within the proposed aquaculture zone is unlikely to inhibit the spread of nuisance organisms (or pathogens) among farms because of transport by tidal currents. However, tidal currents in the proposed farming zone run very predominantly in a northwest-southeasterly direction. Consequently, separation of farms along a west-east axis could potentially inhibit the spread of nuisance organisms, at least in the short term (days). Over longer periods (days or weeks, depending on weather conditions), diffusion and wind-driven currents would disperse the larvae even further from their point of origin along the axis of tidal movement and very probably disperse them more generally within the zone."

Zeldis also records "Fish farm management of fouling is achieved by various methods including treating farm structures with antifoulants to reduce the rate of development, combined with periodic cleaning. If antifoulants are included, the timing and methods used for cleaning antifouled structures should ensure that any biosecurity or contamination risks associated with the cleaning are prevented or minimised. This relates specifically to the accidental release of non-indigenous organisms or biocidal antifouling paint material, which is likely to occur when abrasive cleaning methods are used and waste material is not fully captured and contained. The use of antifoulants, particularly those containing trace metals (most commonly copper), may be controlled through resource consents in accordance with the ANZECC Code of practice for antifouling and in-water hull cleaning and maintenance (ANZECC 1997), which currently prohibit the cleaning of antifouled structures in situ. The code is currently under review and the results will potentially have implications for the management of fouling on aquaculture structures, including specification of acceptable biofouling maintenance practices and standards (Oliver Floerl, NIWA, pers. comm.)."

We have to presume the code has changed to allow cleaning at sea.

Regarding marine mammals Zeldis writes "There is potential for interactions of the farms with marine mammals which will need consideration at consenting stages. This is an important issue for stakeholders who have expressed concerns about adverse effects, particularly on Bryde's whales and dolphins, during discussions with Environment Waikato (H. Giles EW, pers. comm. Dec. 2010). Information (Bryde's whale sightings along with other scientific information) has been collated by EW (H. Giles) and made available to MFish. Information has also been collated by University of Auckland (Dr. Rochelle Constantine) and by Willis and Zeldis (2010) who described Bryde's whale feeding behaviour in Hauraki Gulf with respect to zooplankton distributions.

On the topic of significant adverse environmental effects Zeldis writes, "LAC is not a tool for determining resource usage levels that are ecologically sustainable or that maintain a certain carrying capacity, but provides an adaptive management framework to prevent significant adverse environmental effects during resource use (Oliver 1995). At Area A it has been implemented using a 'trigger level' strategy, in response to EW's mandate within its Regional Coastal Plan that its marine farming zone should be developed in stages to ensure that farming activities do not cause significant adverse effects (Turner and Felsing 2005). In ecological terms, it can be hard to determine what constitutes 'adverse' and 'significant', and the LAC approach acknowledges the difficulty in defining levels of acceptable ecological change. Nonetheless, it still demands that **acceptable degrees of change be agreed upon among stakeholders prior to development**. The approach provides a collaborative, transparent framework to allow this process: identifying

environmental indicators of change, setting levels of acceptable change in the indicators (trigger levels), and identifying management responses when the trigger levels are exceeded."(emphasis added)

Zeldis "Decisions on the magnitude and spatial extent of acceptable pelagic effects will undoubtedly also be linked with the benthos, where we expect the largest effects of fish farming to become manifest. **Large-scale fish farming such as is envisaged in Waikato has potential for adversely affecting the benthic marine environment, as shown by the deposition modelling** of Section 4.3, hence it is important to identify appropriate benthic LAC indicators for it. It is possible **that enhanced deposition of organic matter**, both directly in the farm footprint and downstream through the production and recycling of phytoplankton within the pelagic system will compromise the benthic environment." (emphasis added)

Appendix N Indicative draft consent conditions
2 j) limited to 300ha (do not grant permit to extend beyond CMFZ
4 permit shall expire 10 years from date of commencement
11 At least three months (not 20 working days) to provide WRC with engineering design
12 PHK will provide a survey plan

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:48 pm
To: Sea Change
Cc: s 9 (2)(a)
Subject: Ngāti Hei - Submission on Marine Protections
Attachments: Ngāti Hei - Submission on Marine Protections - FINAL.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Kia ora,

Please find attached our submission on behalf of Ngāti Hei.

Ngā mihi nui
s 9 (2)(a)

Chairperson
Ngāti Hei Charitable Trust

s 9 (2)(a)

HEI
KI WHAREKAHO

To:
Minister of Oceans and Fisheries, Hon. David Parker
Minister of Conservation, Hon. Poto Williams
c/- Te Papa Atawhai Department of Conservation by email: seachange@doc.govt.nz

28th October 2022

Tēnā kōrua, Minister Parker and Minister Williams,

Ka tangihia, ka tipa a Takareto
Ka tangihia, ka topa a Mumuhau
Ka puta te tohutohu tioro mai ngā manumea a Ngātoro Repanga ona nuinga
Mārō atu a Moehau
Mārō tonu ki Te Ahuahu
Titiro ki Tāhanga
Ko Tāhanga titiro ki Maunga Tāwhirimatea
Kei raro te taumarumaru a Tāwhirimatea
A te kumore tapu a Wharetaewa
Hei te tangata
Te Whanga O Hei te moana
Te O-A-Hei te nuinga
Tuturu whakamaua kia tina-tina!
Hui ē Tāiki ē.

Tīhe mauri ora!

About this submission

1. This submission is from the Ngāti Hei Trust Board the mandated authority representing all uri of Ngāti Hei ki Wharekaho and the Hei o Wharekaho Trust.

2. This submission on the marine protection proposals for the Hauraki Gulf Marine Park / Tīkapa Moana / Te Moananui-ā-Toi in response to the Department of Conservation's request for feedback.

3. The Ngāti Hei rohe extends up the eastern side of Te Tara-o-te-Ika-a-Māui / Coromandel Peninsula and ecompasses some of the most popular tourism destinations in the Coromandel (refer Appendix A). We have witnessed the effects of pressures from our use over-harvesting, pollution and sedimentation. Indicative of

this, a collapse in our tīpa/scallop population led Ngāti Hei to place a rāhui on this species across our entire rohe in 2021.

4. We support continued use of customary management tools such as rāhui, but observe that their increasing use recently in the Hauraki Gulf Marine Park is symbolic of a failure of Government agencies to manage and protect the Gulf's marine ecosystem through current legislative and regulatory tools.

5. **We therefore support the Government creating special legislation** (i.e. the Hauraki Gulf Marine Protection Bill) for the Hauraki Gulf Marine Park.

We support the marine protections proposed, but would like to see more ambition

6. We support the proposed marine protection package as a starting point – including the 12 High Protection Areas, 5 Seafloor Protection areas and the extension of protection adjacent to the two current marine reserves Whanganui-ā-Hei and Te Hāwere-a-Maki / Goat Island[1].

7. Whilst an enormous step forward for the Hauraki Gulf, this is still a very small fraction of the Marine Park and requires further ambition to reach a 30% target. **Ngāti Hei supports the Hauraki Gulf Forum's stated goal of putting protection in place for 30% of the Hauraki Gulf Marine Park.**

8. There is broad scientific consensus that protecting or conserving at least 30% of land and oceans is the minimum needed to curb biodiversity loss and to reach global climate goals. The Hauraki Gulf Forum's 30% marine protection goal accords to the proposed United Nations Convention on Biological Diversity target of 30% marine protection by 2030.

9. **We would like to see bottom contact fishing methods removed from the entirety of the Hauraki Gulf Marine Park** - a further goal of the HGF which Ngāti Hei supports wholeheartedly.

10. We support the proposed provision within HPAs for monitoring and research driven by both mātauranga and 'western' science knowledge systems. This must be effectively resourced so that effectiveness of the protections in place can be measured against the biodiversity goals set.

11. We strongly support the proposed provision within HPAs for "active habitat restoration initiatives such as the removal or addition of marine life (translocation) to improve habitats of interest." Protection and active restoration combined will accelerate regeneration and enhance the abundance of marine species within and beyond these areas.

[1] The protections proposed would mean marine protected areas within the Hauraki Gulf Marine Park (HGMP) would increase from 0.3% to 6.2% (reserves + HPAs); or 11.6% (reserves + HPAs + SPAs) - excluding the Cable Protection Zone (CPZ).

Specific feedback on proposed HPAs within our rohe

12. We support the extension of the Whanganui-ā-Hei reserve as per the boundaries indicated (area 12). We would like to see this extension implemented as an HPA under a new Act of Parliament. This would support the goals of protection and regeneration while allowing for customary practices.

13. We are supportive of the HPAs proposed for Whakahau / Slipper Island (area 2) and Te Ruamāhua / The Aldermans (areas 9a & 9b) as per the boundaries indicated in the proposal.

The protections package does nothing to protect remaining tipa/scallop broodstock areas

14. Ngāti Hei implemented a rāhui and S186A for tipa/scallop in our rohe. We remain concerned about the state of this taonga species. Fisheries New Zealand's own data showed how this fishery has collapsed[2] and yet the decision was made to keep two areas open for harvest (South and West of Te Hauturu-o-Toi and to the west of Aotea / Great Barrier).

15. We would like to see these remaining areas closed. We need to give tipa every chance to recover and protect these valuable broodstock areas. Ngāti Hei supports the Ngāti Manuhiri rāhui and s186 closure request in this respect. We would also be supportive of any request from the iwi for additional HPA extensions to protections around Hauturu.

The proposed process for managing customary practices in HPAs

16. We acknowledge and support the Government's work to recognise customary practices of mana whenua within a context of marine protection in the Hauraki Gulf.

17. We support the proposal that mana whenua have the option to design their own Customary Practice Management Plans (CPMPs). CPMPs recognise our role as kaitiaki and allow us to exercise rangatiratanga over our customary practices.

18. **We request that the Government puts significant resources into public education around customary practices** as, presently, little information is available to support public understanding.

Reviews and adaptive management

[2] Review of Sustainability Measures for New Zealand scallops (SCA1 & SCA CS) for 2022/2023.

19. *Revitalising the Gulf*[3] refers to the development of a monitoring and reporting framework for the Hauraki Gulf, which will be underpinned by an adaptive management cycle to ensure management actions can be adjusted based on regular evaluation. Adaptive management is also recommended by the Sustainable Seas National Science Challenge[4] as a principle for the advancement of ecosystem-based management.

20. We urge care in the drafting of the Hauraki Gulf Marine Protection Bill so that the biodiversity objectives can be truly adaptive. In creating special legislation **we request the Government be future focussed** and**:**
    - Provide a mechanism to introduce additional marine protected areas over time.
    - Include a marine protection target of 30% marine protection for the Hauraki Gulf, to provide clear points of reference for ongoing engagement with iwi and stakeholders and to align to the goals already set by the Hauraki Gulf Forum.
    - Be based on Ecosystem Based Management (EBM) principles, including:
        - Emphasing the protection of ecosystem structure.
        - Explicitly acknowledging the interconnectedness among systems, such as between land and sea.
        - Recognising the strong interdependencies between ecological, social, economic and cultural perspectives.

21. There is no mention on the matter of how protected areas under a new Hauraki Gulf Marine Protections Act would be maintained or reviewed under the act. **We submit that provision be made for regular reviews of HPA areas at least every 10 years**. This would allow for effective monitoring and tracking of effects.

22. In addition to Adaptive Management, to prevent any back-sliding on protections, **we would like to see an overarching protection goal, such as "30% protected by 2030"** (as requested by the HGF and aligned to the UN Convention on Biodiversity).

23. We submit that reviews should assess achievement against the agreed set of biodiversity objectives and tohu/indicators of change, including a mauri framing, and Customary Practice Management Plans, and enable regulations to be adjusted in accordance with achievement or otherwise of those objectives and Plans.

24. We submit that regular reviews also consider:

    - The benefits and impacts arising from the implementation of the protected area, and any subsequent changes to the management of the protected area.
    - The effects of cumulative and multiple stressors, such as land-based activities and climate change on biodiversity, ecosystem and species objectives.

---

[3] Revitalising the Gulf: Government Action on the Sea Change Plan, released June 2021, page 94.
[4] Sustainable Seas, discussion paper: Advancing ecosystem-based management in Aotearoa New Zealand through current governance arrangements, March (2018).

- New or updated research, mātauranga Māori and science information.
- The results of trial active regeneration or translocation initiatives.
- Management adjustments to adapt to new evidence.

25. We submit that all stakeholders (including recreational and commercial fishers, divers, researchers and community groups) are afforded the opportunity to contribute to regular reviews.

26. We encourage use of instruments under the Fisheries Act to improve the visibility of recreational catch as this is a major blindspot and an opportunity for collecting meaningful and useful data on species abundance, size and health.

Making the Act enabling so new areas can be added

27. We submit that the Hauraki Gulf Marine Protection Bill be enabling and provide a mechanism to introduce new additional HPAs over time.

28. We submit that a pathway for other areas of the HGMP to be assessed and included is provided in the Hauraki Gulf Marine Protection legislation. Without such a pathway, the legislation will inadvertently block the formation of other marine protected areas and/or mana whenua led initiatives in the Hauraki Gulf into the future.

29. As above, **we would like to see an overarching protection goal, such as "30% protected by 2030"**.

Local community & stakeholder involvement in monitoring, research & active habitat restoration

30. *Revitalising the Gulf* refers to the development of a monitoring and reporting framework, and the development of a Gulf research plan. Both are central to a principle of adaptive management. We urge the Government to fund and prepare the monitoring and reporting framework and research plan.

31. We support the idea of local biodiversity objectives being managed locally between mana whenua and the hāpori/community. This would involve monitoring, research and active habitat restoration. We would appreciate opportunities to work closely with the Department of Conservation on this.

32. Ngāti Hei are a small iwi with a rohe that expands across some of the most popular coastal holiday destinations in the Coromandel Peninsula. We like the idea of an Ahu Moana model but would need skilled support and funding to establish and operate such a programme into the future.

Resourcing for surveillance and enforcement

33. Enforcement of marine protection will be key to their effectiveness. Without enforcement, at the boat ramp and out on the water, we risk failing.

34. While 'social pressure' is one tool it is not enough. We would observe that currently the capacity is lacking to undertake enforcement properly across the proposed areas.

35. We take this opportunity to urge the Government to explore approaches to funding surveillance and enforcement appropriate to the scale of the marine protection areas proposed.

36. Ngāti Hei would be interested in an active role in surveillance and enforcement and request that DOC/Fisheries NZ look at a localised, mana whenua led model for this very important task.

The need to act with urgency

37. We applaud the Government on this progress and ask that you move with pace. Introduce legislation to the House as soon as possible to enact these marine protection areas **in this parliamentary term**.

38. The Hauraki Gulf Forum has documented the declining state of the HGMP over the past 20 years. The evidence is backed-up by the experiences of those of us who live in and around the Gulf. We must be the generation (of good ancestors) that seized this opportunity, and made the bold moves necessary to reverse this decline - for the sake of our tamariki and mokopuna.

39. The extent of regeneration within the HPAs is also dependent on how well other proposals in Revitalising the Gulf are implemented and managed over time, in particular, reform to fisheries management through the delivery of the Hauraki Gulf Fisheries Plan.

40. To achieve maximum benefits revitalising the Gulf, we implore you to move with pace to deliver the Hauraki Gulf Fisheries Plan in close alignment with the marine protection proposals.

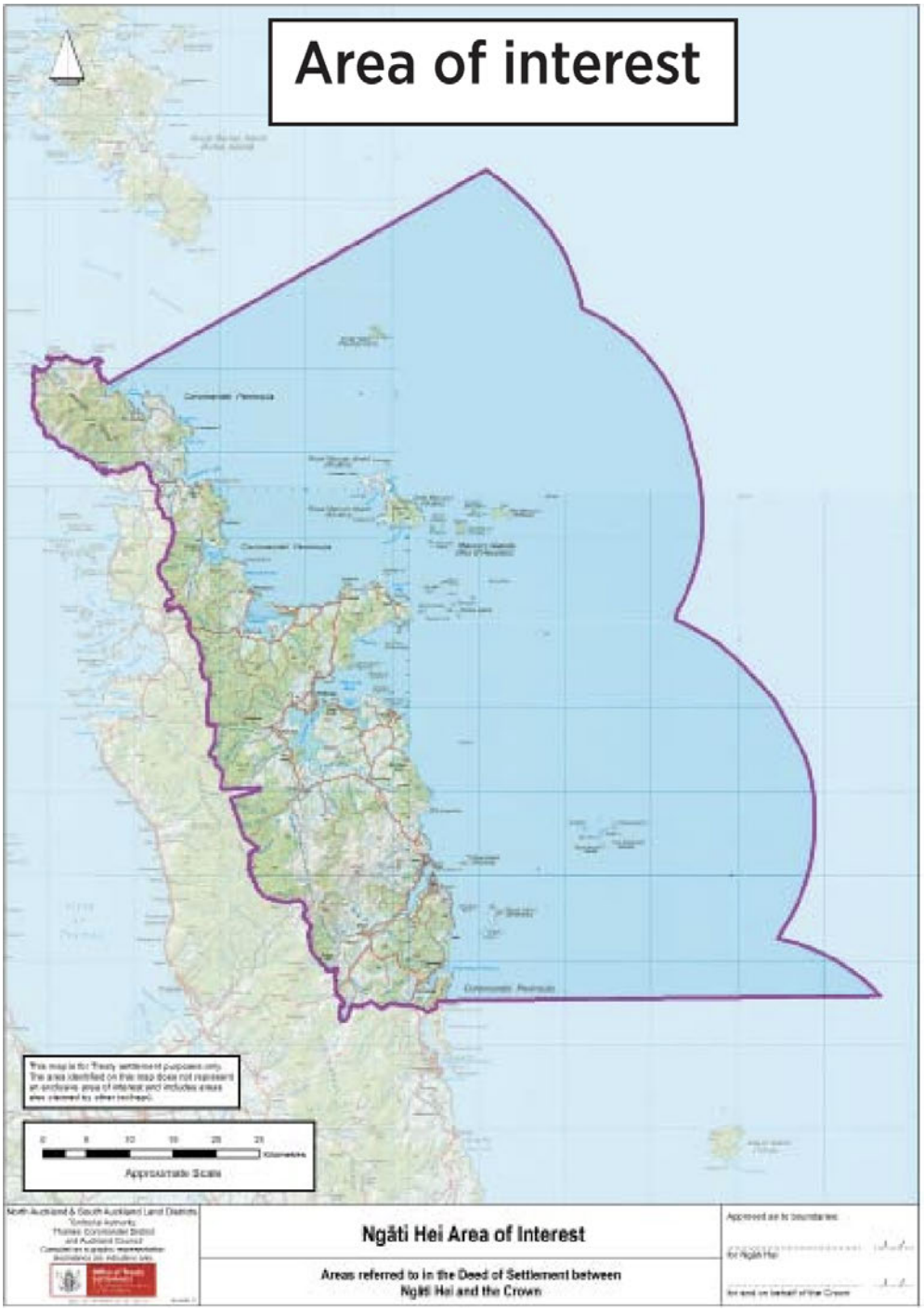
Management of the Hauraki Gulf Marine Park must be active, adaptive and enduring. We must work to improve the state of the Gulf, revitalise its mauri, and make it resilient to the pressures of increased urbanisation and population growth and climate change. Ngāti Hei supports the Marine Protections package proposed as a modest but meaningful starting point.

Nā māua noa, nā,

s 9 (2)(a)s 9 (2)(a)
Kaumātua, Ngāti Hei

s 9 (2)(a)
Chair, Ngāti Hei Trust

Appendix A: The Ngāti Hei rohe



Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:49 pm
To: Sea Change
Subject: Submission on marine protection proposals
Attachments: s 9 (2)(a) Submission Signed.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

I would like to submit my feedback (attached) on the *Revitalising the Gulf's* Marine Protection Proposals.

Thank you for this opportunity,

Best fishes,

s 9 (2)(a)
https://ispeakforthesea.com

Submission on *Revitalising the Gulf*'s
Marine Protection Proposals

Minister of Oceans and Fisheries, Hon. David Parker
Minister of Conservation, Hon. Poto Williams
c/- Te Papa Atawhai Department of Conservation

28 October 2022

Dear Minister Parker and Minister Williams,

I would like to make a submission in support of the proposed marine protection package; the 12 High Protection Areas, 5 Seafloor Protection areas and the extension of protection adjacent to the two current marine reserves (Cape Rodney-Okakari Point and Whanganui-a-Hei).

This submission is on my own behalf, as a marine scientist, educator and communicator of all things ocean. The Haruaki Gulf, Tīkapa Moana / Te Moananui-ā-Toi has been a very large part of my life since I moved to Auckland in 2015. My first experiences in the waters of the Hauraki Gulf were at Cape Rodney – Okakari Point (Goat Island) marine reserve. That set the bar quite high for me, I thought more places would be like that with marine life all around! Then I realised how special Goat Island was and became very interested in how I could support the establishment of marine protection.

Several years later, my master's research encompassed investigating the ecological effects of Long Bay-Okura Marine Reserve[1], part of the 0.28% of the Hauraki Gulf Marine Park which is currently fully protected. I am confident in saying that I understand and strongly value the various direct and indirect benefits of marine protection. I would also like to say thank you for finally providing an opportunity for the public to have a say in this matter.

General comments on the marine protection proposals

I support the proposed provision within HPAs for monitoring and research driven by both Mātauranga Māori and western science knowledge systems. I acknowledge and support the Government's work to recognise customary practices of Mana Whenua within the context of marine protection in the Hauraki Gulf but would like to see a clearer definition of *biodiversity objectives* and how these will be determined in the future.

High Protection Areas
It's good to see that HPAs include part of the outer gulf island ecosystems on which the main impact is overfishing – but this is only a first step to revitalising the Gulf. HPAs will need to be more widespread in the future but I am supportive of this as a good start!

I am very excited to see that the Ōtata / the Noises HPA is included in this proposal as I have seen extensive barrens myself and have been involved in the research around the viability of the removal of urchins to enable kelp regrowth. This area, amongst all others, needs protection for the impact of this incredible work to reach its full potential.

[1] https://researchspace.auckland.ac.nz/handle/2292/58820

The Noises, Mokohinau, Little Barrier and Tiritiri Matangi are islands where conservation values are strong on the land but so weak past the shore. Each of those islands are places where exceptional native vegetation and the most diverse seabird communities in the Gulf thrive. They are also home to a range of rare native vertebrates and invertebrates. These marine protected areas around the islands would ideally be larger and surround the coastlines of all the islands to support important land-sea linkages at *all* these places. However, I am supportive of them the way they are drawn and hope they will be expanded in the future.

Seafloor Protection Areas
On the matter of seafloor protection, we feel that the protected areas should be more widespread and dredging and trawling should be banned altogether in the Gulf.

Marine Reserve Extensions
On the subject of extensions, I strongly support the areas adjacent to Cape Rodney-Okakari Point and Whanganui-a-Hei being extended. I would like to see them extended under the existing legislation under which they were created, the Marine Reserves Act, to make the boundaries straightforward and rules simple and clear for people to follow.

Regular review and adaptive management

Revitalising the Gulf[2] refers to the development of a monitoring and reporting framework for the Hauraki Gulf, which will be underpinned by an adaptive management cycle to ensure management actions can be adjusted based on the regular evaluation. Please create the Hauraki Gulf Marine Protection Bill in a way that allows for the biodiversity objectives to be adaptive.

Monitoring and reporting

Revitalising the Gulf refers to the development of a monitoring and reporting framework and the development of a Gulf research plan. Both are central to the principle of adaptive management. Please fund and prepare the monitoring and reporting framework and research plan for the Hauraki Gulf into the future.

Urgent action required

The observable degradation across many ecosystems in the gulf continues to be alarming and distressing. I have seen large areas of urchin barrens for myself and I've seen the decline in kelp due to overgrazing by urchins. The Sea Change Plan was put together to form an action plan to reverse the degradation, but the area which is proposed to be fully protected is not likely large enough, or inclusive of enough high biodiversity areas to reverse the ongoing decline.[3] The impact of edge effects on small protected areas reduces the efficacy of these areas so I feel that the proposed HPAs should be larger but support the establishment of these as a start.

New Zealand, once a leader in marine protection, has not prioritised marine protection in recent years, and this is highlighted by the fact that only two small marine reserves (Te Matuku – Waiheke

[2] Revitalising the Gulf: Government Action on the Sea Change Plan, released June 2021, page 94.
[3] LaScala-Gruenewald (2021) Small marine reserves do not provide a safeguard against overfishing.

and Tāwharanui) were established in the Gulf over the past 20 years. Excluding the cable protection zones, which don't constitute marine protection under IUCN definitions, the proposals will result in approximately 6% of the Hauraki Gulf Marine Park being in a form of full no-take marine protection. Whilst an enormous step forward for the Hauraki Gulf, this is still a very small fraction of the Marine Park.

Please introduce legislation to the House as soon as possible to enact these marine protection areas this parliamentary term and avoid further devastation to marine ecosystems. Please also consider making clear what the pathway for other marine protected areas (i.e., new HPAs) will be, so there is an understanding of how future HPAs will be assessed. The framework around how we take steps to introduce new HPAs going forward should be included in the Hauraki Gulf Marine Protection legislation.

Close behind in terms of prioritization should be reform to fisheries management through the delivery of the Hauraki Gulf Fisheries Plan. To achieve maximum benefits in revitalising the Gulf, please act quickly to deliver the Hauraki Gulf Fisheries Plan in close alignment with the marine protection proposals.

Conclusion

While I'd love to see an increase in the percentage of the Gulf which receives full protection, I am happy to support these proposals. I hope that someday soon the Hauraki Gulf Marine Park has active, adaptative and enduring legislation which helps us reverse the current environmental degradation, and create a more resilient Gulf. These ecosystems and the marine life within them desperately need protection to have a chance to recover. I feel that it's unreasonable for us to expect them to function and keep on supporting the appetites of many fishermen, on top of the unavoidable added stresses created by direct and indirect effects of anthropogenic climate change, invasive species, and urbanisation.

Please act with urgency,

s 9 (2)(a)

s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:52 pm
To: Sea Change
Cc: s 9 (2)(a)
Subject: SUBMISSION on HGMP

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

SUBMISSION TO THE HAURAKI GULF MARINE PARK MARINE PROTECTION PROPOSAL

SUBMITTER: s 9 (2)(a)

ADDRESS: s 9 (2)(a)

EMAIL: s 9 (2)(a)

I SUBMIT THAT:

As part of the Hauraki Gulf Marine Park Protection plan, commercial caged finfish aquaculture, including but not limited to marine farming of Yellowtail Kingfish and Hapuka, should be banned effective immediately from the inner Hauraki Gulf including the Firth of Thames and the area defined as the Coromandel Marine Farming Zone (CMFZ) between Waiheke Island and the Coromandel Peninsula.

THE REASONS FOR MY SUBMISSION ARE:

The CMFZ is currently being proposed as the site of the region's first ever caged finish farm, with resource consent application pending at Waikato Regional Council for industrial scale aquaculture over a 300 ha area.

Caged finish farming is widely recognised by environmentalists and conservationists as having severe deleterious effects on the marine environment and a range of plant and animal marine species. Caged finish farming is well known to result in complete dead zones immediately under the farming structures, as well as in the wider surrounding area, resulting from direct deposition of faeces and unconsumed fish feed, chemical contamination from antifouling and cleaning agents, and prophylactic and therapeutic pharmaceuticals. These severe adverse environmental effects, some of which are irreversible, are observed throughout the world where marine caged finish farming is allowed.

In addition to degradation of the seabed floor, caged finfish farming presents risk of spread of bacterial, viral, and parasitic disease (which are common) from the caged to native fish populations. Furthermore, escapes of caged fish (which are unavoidable) present risk of genetic transfer from caged to native stocks.

Further to the above, the massive floating and anchored cage structures and cables are known to present risk to threatened marine mammals from strike and/or entanglement. The cage structures are also known to present entanglement risk to a range of seabirds.

The aforementioned threats and adverse effects have been identified in official staff reports to the former Environment Committee of Environment Waikato (now WRC) regional council. Some potential adverse effects would be long-standing, with estimated recovery over years or decades. Other potential adverse effects are irreversible.

The Department of Conservation is encouraged to obtain all technical staff reports of EW and WRC on the subject of the effects of finish farming from 2010 to the present and make those reports part of the public record in respect of this Protection Proposal.

The marine environment of the Hauraki Gulf is already severely degraded. The last and most obvious activity that should be allowed is industrial caged finish aquaculture, well known to result in further degradation. A range of native marine species are already threatened, depleted, or declining. The last and most obvious activity that should be allowed is industrial caged finish aquaculture, again well known to result in accelerated decline and increased risk.

While this topic is entirely ignored in the HGMP Protection Proposal, it is imperative that it be included and that this particular aquaculture activity, which is experimental and untested in these waters, be explicitly banned.

Respectfully Submitted,
s 9 (2)(a)
28 October 2022

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:53 pm
To: Sea Change
Subject: Marine Protection Proposal - Submission

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hi,

1. I am against the proposal due to the lack of consultation. I have only learnt of the proposal today 28 October 2022. I have visited various locations in the Coromandel at least 20 times this year. As an example of lack of consultation, the Port Jackson DOC Campsite which will be greatly effect by the proposed change has zero information on the website https://www.doc.govt.nz/parks-and-recreation/places-to-go/coromandel/places/northern-coromandel/things-to-do/port-jackson-campsite/ . I have also visited Port Jackson twice this year and do not recall any information regarding the proposal at the campsite.

2. I am against the proposal due to the discrimination against lower socioeconomic recreational fishers. I can see no reference in the document which differentiates between the type of recreational fisher. The rock or surf caster fisher is often from the lower socioeconomic section of society and cannot afford a boat/drone/kontiki etc and works very hard for their kai.

3. I am against the proposal as it does not support or encourage sustainable fishing. On many days, the rock/surf caster fisher unlikely to catch any fish; and it is very seldom that a limit of will be caught. Rock or surf caster fishing should be encouraged as a sustainable fishing method.

s 9 (2)(a)
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:53 pm
To: Sea Change
Subject: Re: additional submission to Hauraki GulfMarine Park deadline October 28, 22

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

THIS SECOND EMAIL INCLUDES A FURTHER SUBMISSION BELOW
THANK YOU
s 9 (2)(a)
On 28/10/2022, at 4:48 PM, s 9 (2)(a) s 9 (2)(a) wrote:

ADDITIONAL SUBMISSION FROM
s 9 (2)(a)
s 9 (2)(a)

PLEASE UTILISE WHEN FORMULATING THE HAURAKI GULF MARINE PROTECTION BILL
Protection means protection in all senses.
ELIMINATE TRAWLING THROUGHOUT THE AREA ESPECIALLY IN THE COLVILL CHANNEL and provide retraining and subsidies to those employed in the sector.

DO NOT SUPPORT CAGE FIN FISH FARMING IN THE HAURAKI GULF. I do realise that DOC has some concerns but DOC is not putting up a concerted effort to halt this central government business push to pollute our seas and deplete food sovereignty and food supplies for poorer countries, (from which the tiny fish used at least 3 to 1) to feed the fast growing kingfish

You will need to get a copy of the 1000 or so pages of APP142620--CONSENT APPLICATION TO ESTABLISH AND OPERATE A MARINE FARM IN THE COROMANDEL MARINE FARMING ZONE FOR FARMING FIN FISH AND OTHER MARINE SPECIES

Additional INDUSTRIAL CAGE KINGFISH HEARING NOTES to accompany submission opposing the application by Pare Hauraki to use the Hauraki Gulf to create an industrial caged kingfish business

A lot of research has been presented as part of the Pare Hauraki application. As a 100% novice in the field my concerns are based

on investigations and environmental research more normally attributable to and limited to that of an investigative journalist.

As a result I seriously oppose the business plan to anchor cages in the Firth of Thames to raise kingfish and potentially hapuku—up to eleven, weighing two to four kg, within one cubic metre of water space.

I ask: are these caged kingfish likely to survive? If I were a gambler I would not be putting my money on survival. And no I wouldn't recommend the business as a winning investment

Where to begin?

Off the top of my head I seem to recall an Appendix with graphs showing Oxygen readings. I used to do DO readings myself for Kinleith many years ago, watching floating dead fish as a result of mercury (chlorine by-product) flowing into feeder streams of the Waikato. All these byproducts, what do we do with them. Aluminium industry found the dental industry for its fluoride byproduct, the Pulp and Paper industry found a use for bleached wood pulp—bread and if it is an industry standard it doesn't even have to be on the label.

So from the data, do you think two weeks with O2 at 34.1% or 17 days with 30.9% at 10 m is healthy? What about six to nine weeks with 32.3% at 33m? Now I am not too sure at what exact depth the fish will be incarcerated but its pretty clear they will need to be at least 10m off the floor so I'm asking Pare Hauraki scientists and WRC scientists to explain what impact these low oxygen levels will have on high respirating kingfish.

Total carbon, nitrogen and sulphide concentrations ARE "moderate to moderately high" with 'Increasing enrichment" of total reactive phosphorus and redox. "in the vicinity of the CMFZ" Substitute 'pollution' for 'enrichment' to question why this does not raise alarm bells.
Adding to this existing profile is a good idea? Obviously not.

The physical farm appears to stretch over two kilometers by half a kilometre. (If the Policy and Strategy committee rubber stamp the request to extend this area to THREE kilometres by ONE kilometre an even greater sea grab! Is this a kind of payback for land grabs? Stolen seas from the public domain! Endphase capitalism transfer. Guess you can't blame a fox for being a fox.)

And you don't seem to think Brydes Whales and dolphins will mind?
Yachties do mind, all those who use the surface to travel, sightsee, or fish will mind.

Can fur seals rip holes in nets? Seems like a lot of Brydes whales congregate in the Firth from your maps "Lunge feeding was frequently observed."(SLR report) How impermeable to whale or fur seal attack are these cages?
What will such attacks do to stress the caged kingfish?

And absolutely no to your publicly notified rule change so you can take up even more public space. WRC agreed to 300 not 301 or 350. ALL your gear and all you boats need to be within the designated area…it's a bit like stolen land only its stolen sea.

Love the cultural love of the centuries old love of the sea. What, by the way, is the outcome of the customary marine title challenges? Ngāi Tai ki Tāmaki Trust, Ngāpuhi Nui Tonu, Ngāti Tamaoho, Ngāti Whanaunga and Te Kupenga o Ngāti Hako. Have they made submissions? If not, could this be interpreted as having no opposition to the business proposal we are discussing, rather a pecuniary interest in royalties? Apologies if I am way off the mark, it's just that there is no information. And do explain what are the "Crown obligations under the Māori Commercial Aquaculture Claims Settlement Act 2004." This is a serious question and I look forward to the reply because if anyone knows it will be DOC.

There's a quote from the original Working Panel who totally support the plan (why did we ever imagine otherwise?) and who declare the embayment is in "deep water". It may well be, but only metaphorically. How can anyone state 30 m is "deep water" and those guys were paid for months to listen to people like us begging them not to rubber stamp the government's plan to conjure a $3 billion industry by 2035. Export earnings of $110 million are predicted supposedly because in 2020, Auckland shoppers were buying kingfish at $22 a kilo and Aussies were paying $18 in Sydney with much much more per kilo predicted in Japan (sushi market) and in other developing Asian markets including China and India. 230 jobs are predicted (full-time equivalents). Should check the job turnover figures at Clean Seas.

The application states Pare Hauraki Kaimoana provides well over $1 million on "grants for kaumatua, marae, education, arts and sports—as well as contributing to the operating costs of the Hauraki Māori Trust Board/Pare Hauraki Fishing Trust." It would

be beneficial to have the actual income from all existing leases and also what the monetary impact was, caused by the loss of scallop income, due to the brave Ngati Hei, Opito ratepayers and Legasea rahui. You may believe none of this has any relevance to your Gulf 'Protection' bill which will require ordinary citizens once again to go through the farce of submissions, but since I have prepared this for the Resource Consent lodged with Waikato Regional Council I thought I may as well lob all of this to you, with, no doubt, the exact same result. Another rubber stamp.

Once this application is granted the business owners must agree to stringent conditions including allowing independent scientists freedom to research. There must be no ability to deny research access onto and under the installations in our public space.

“The risk of infectious agents can be mitigated using good management practices and an appropriate biosecurity plan.” Yes, let’s work to make the BMP stringent—a decision that can only help the dreadful life of the kingfish and enhance the business in the eyes of critics.

“no robust conclusions’ (P102 *Overall Assessment of ecological effects* James& Giles) means we actually don’t know how much we are going to stuff up the benthic layer. Substitute the word “pollution” for “enrichment” and you get the picture. Another reason to not approve this application.

What must business operator pay for?

SPI equipment
Independent scientists and veterinarians who monitor DO etc

Absolutely NO to the suggestion that the bond could be arranged using an “industry pooled fund and/or security scheme…”

The applicant shall be required to pay ALL costs, not just “reasonable”costs.

Benthic Impact

What is the “ecological carrying capacity of the seabed”? **see baseline survey Giles/James App 1A**
Giles states free water depth has largest effect to “promote dispersal of faeces and uneaten food” This translates to 10 or so metres of “free water depth” beneath the cages, so yes one can imagine dispersal of pollution in the Gulf.

Let's imagine more than 3100 tonnes of faeces, hundreds of tonnes of waste from 12,000 tonnes of feed, total N release nearly 800 tonnes, 161 tonnes of particulate N, particulate Carbon is 1614 tonne per year, not told the total Carbon release.

In Appendix N on P 28 video assessments are suggested but in 2007 Giles said "Video surveys and sediment trap deployments are not recommended following problems experienced during earlier work caused by unfavourable environmental conditions".

How best to measure biogeochemical parameters so as to reveal "earlier signs of impact and allow remedial measures…to prevent severe impacts."
We are told all these prior studies, including trace metals and stable isotopes will help identify limits of "acceptable sediment modification"

What does Giles now recommend? And while her recommendation for utilization of SPI sounds 'robust' how does that compare with Sim-Smith/Kelly using video and "a 61. Van Veen grab"? Their pictures are stunning so it seems it will be easy to notice the impact of pollution depending on dispersal. Will the Mediterranean fan-worm, an unwanted organism currently abundant *in situ,* on receipt of faeces and waste food, plus toxic chemicals, multiply or be destroyed? Sim-Smith and Kelly appear to gloss over the high Total Reactive Phosphorus and Total Free Sulphides, and the infaunal communities "dominated by tanaid shrimps" presumably provide food for different sea mammals?

Where are the independent scientists listed who will measure and interpret the accumulation of copper and zine, the likely impoverishment of the benthic infauna communities, and the effects of biofouling?

Who is to carry out the "broader expert assessment required to evaluate the environmental management goal" P 26 N

Shane Kelly (*Potential Environmental Effects Associated with the Proposed Shift from Mussel to Finfish Farming in the Firth of Thames*) states there "is a high probability that the deposition of waste food, faeces and chemical contaminants will lead to degradation of the seabed directly beneath fish farms, and for a relatively small distance beyond, (up to several hundred meters)." Further he uses the words "heavily impacted." He states disease treatments and feed additives can have significant deleterious effects on seabed microbial communities, "likely to exacerbate the

growth of some invasives already in the FoT, such as the Asian kelp…and potentially increase their spread." What has changed since this study?

Disease/pest impact

Where are the sophisticated epidemiological models taking into account variables such as disease agent life cycle, hydrography, currents, winds, fish population sizes (both caged and wild), water temperature, salinity, river flows, Coriolis forces and other factors? Surely WRC will require these prior to approval?

One of your researchers concluded in an earlier study that finfish farming is a "potential exacerbator for biosecurity risk" (Barrie Forrest *Marine Pest Assessment*.) How does WRC marry that risk with regulations limiting such risks on land?

Who is the designated Facility Vet?

Brightwater from Tasmania state the PHK proposal has the potential to add to "the existing pathogen risk profile of the Waikato Region." And we land farmers have to at least attempt to eradicate both weed and animal pests! And with Predator Free floating with $200 million for publicity and poisons it will be intriguing to see pathogen and disease responses on land. Monarchs are already suffering thanks to glyphosate.

The BMP fails to consider three significant viral agents and 6 bacterial diseases as part of the *Considerataion of specific disease risks identified in the risk assessments* (see p 18-19)

It's not until P 40 we read of two such viruses (missing in action is IPNV Acquatic Birnavirus) and on P 38 we read the list of toxic chemicals and treatments.

In spite of the many, many references per report, there is a failure to reference Ben Diggles 2019 *Biosecurity Considerations for Offshore Finfish Aquaculture in New Zealand* prepared for Aquaculture. He lists one virus, two metazoa, one Digenea, one Crustacea and one Myxozoa that register a High estimation for disease in kingfish with eleven disease risks measured at Moderate for disease in kingfish

His key references are Arimoto et al. (1993), Sharp et al. (2001, 2003), Sheppard (2004), Diggles and Hutson (2005), Hutson and Whittington (2006), Hutson et al. (2007, 2011), Stephens and

Savage (2010), Stride et al. (2013), Sicuro and Luzzana (2016), Stephens (2016) and Garcia-Mendoza et al. (2019), a number of which are not referenced at all in your application.

He also discusses strategies for control of sea lice in Europe now relying less on drugs or pesticides and more stocking densities, cage "skirts" and "snorkel cages" that "reduce access of planktonic parasite infective stages to fish, hydrogen peroxide baths or hot water baths for removing sealice…" Apparently barrier cages may prevent infection by monogean skin and gill flukes.

I found no mention of this management in your application

Issues to be defined in the conditions prior to approval—

1/ Buffer zones and proximity to adjacent cage

Monogeans travel at least 8 km downstream. Sea lice can journey 18-45 km
The actual layout of three cage sets seems not to "minimize downstream effects."

B.K. Diggles in *Biosecurity Considerations for Offshore Finfish Acquaculture in NZ* states "Provision of appropriate buffer zones between farming areas is a critical biosecurity management consideration, given that new endemic diseases could emerge in finfish acquaculture in NZ at some time in the future, as well as the ever present but unquantifiable risk of biosecurity leaks that could allow exotic disease incursions to occur." Diggles*2011,2016,2018*

2/ stocking density

Further:

I oppose the private plan change requested to extend beyond CMZ

"actual and reasonable" levies are mentioned but what if disaster is "unreasonable"? Levies need to accommodate such events

Conditions: 10 years not 35

Where is the Code of Practice?

Why is WRC pushing an additional 10% of pollution into the FoT

What amount is the bond?

Where is the Fish Health Plan?

What is good food management?

Who examines brain tissue for scutcociliates?

Where is the condition requiring fish testing for trace elements or stable isotopes or pesticides?

Darren Parsons investigated stress on kingi hatchlings, how do you minimize distress?

Do you think 7-10 x2-4kg kingfish in one cubic metre of cage space will not be stressful?

The DO can become low with increased rates of respiration by densely farmed fish

Zeldis suggests adequate nutrition and immunization can cause less disease transference

Tell me what you think a 1kg kingfish's adequate nutrition looks like.

Zeldis states the FoT has a "naturally undersaturated oxic status." Cause for concern where the vigorous kingi have a higher respiration rate than salmon?

Who is watching out for the Brydes whales and dolphins that feed on local zooplankton?

Who determines adverse significant impacts?

Unless the SPI work has been done by Giles to inform us right now as to the benthic environment below and near the cages showing similar parameters as under mussel cultivation : "depth of layers identified from colour parameters, scanner penetration depth, annelid worms, Echinocardiums sp. individuals, epifauna, black/dark patches, shell hash in/on the sediment, mussel faecal pellets and burrows."

Where are the desired transects ranging from "maximum organic input to reference areas in which anthropogenic organic input is considered negligible" to assist in the creation of a useful benthic habitat quality index.

Who defines performance indicators or determines associated trigger levels?

What is acceptable biofouling maintenance? From external research it appears that biofouling eats into profits, using from 5% to 40% of production costs.

Aggregations of wild fish near the cage fish make them more susceptible to predators

Who determines when an adverse effect is significant?

Invasiveness of marine pests is nototriously variable in space and time.

I haven't touched on the challenges of climate change, storms, dissolved oxygen levels. Although John Oldman's DHI 2020 'in-depth' study, narrowly making the cutoff time prior to application on 9 November 2020 is clear there are issues at the two feeding times (up to 13% increase in time where dissolved oxygen saturation drops below 70% in surface readings in autumn)

He states "This modeling shows that there will need to be clear protocols and procedures linking oxygen model monitoring (to identify the onset of potential low oxygen events) and feed management during such events include (*sic*) trigger levels for moving from twice-daily feeding to daily to no feed days. These may include guidance on avoiding feeding around high and low water..."

Where did the SeaChange input disappear? But in their 2017 report they state the Hauraki Gulf is a "culturally significant area" and when it comes to aquaculture pātaka kai, mahinga mātaitai, and mana whenua food gathering areas are to be avoided.

This document also declares

Plus SeaChange feels it is the "local communities" who get to decide locations for this dirty industry.

They are also clear on consent transfers. "Restrictions should be placed on the circumstances in which consents can be transferred to others and should require that development is completed within five years of the consent being granted." We say three years is sufficient for develoment, pursuant to the RMA

Consent should be NON-TRANSFERRABLE

Regarding actual consents, within the Draft Consent business operators can come up with their own plan 20 working days prior to any structure going into the public space of the sea (this public space should also incur a hefty parking fee as it destroys public access for years)

Totally inadequate as any rational bureaucrat will ascertain.

And just a reminder from the early research by John Zeldis: "Therefore, dispersion of farms within the proposed aquaculture zone is unlikely to inhibit the spread of nuisance organisms
(or pathogens) among farms because of transport by tidal currents. However, tidal currents in the proposed farming zone run very predominantly in a northwest-southeasterly direction. Consequently, separation of farms along a west-east axis could
potentially inhibit the spread of nuisance organisms, at least in the short term (days). Over longer periods (days or weeks, depending on weather conditions), diffusion and wind-driven currents would disperse the larvae even further from their point of origin along the axis of tidal movement and very probably disperse them more generally within the zone."

Zeldis also records "Fish farm management of fouling is achieved by various methods including treating farm structures with antifoulants to reduce the rate of development, combined with
periodic cleaning. If antifoulants are included, the timing and methods used for cleaning antifouled structures should ensure that any biosecurity or contamination risks associated with the cleaning are prevented or minimised. This relates specifically to the accidental release of non-indigenous organisms or biocidal antifouling paint material, which is likely to occur when abrasive cleaning methods are used and waste material is not fully captured and contained. The use of antifoulants, particularly those containing trace metals (most commonly copper), may be controlled through resource consents in accordance with the ANZECC Code of practice for antifouling and in-water hull cleaning and maintenance (ANZECC 1997), which currently prohibit the cleaning of antifouled structures in situ. The code is currently under review and the
results will potentially have implications for the management of fouling on aquaculture structures, including specification of acceptable biofouling maintenance practices and standards (Oliver Floerl, NIWA, pers. comm.)."

We have to presume the code has changed to allow cleaning at sea.

Regarding marine mammals Zeldis writes "There is potential for interactions of the farms with marine mammals which will need consideration at consenting stages. This is an important issue for stakeholders who have expressed concerns about adverse effects, particularly on Bryde's whales and dolphins, during discussions with Environment Waikato (H. Giles EW, pers. comm. Dec. 2010). Information (Bryde's whale sightings along with other scientific information) has been collated by EW (H. Giles) and made available to MFish. Information has also been collated by University of Auckland (Dr. Rochelle Constantine) and by Willis and Zeldis (2010) who described Bryde's whale feeding behaviour in Hauraki Gulf with respect to zooplankton distributions.

On the topic of significant adverse environmental effects Zeldis writes, "LAC is not a tool for determining resource usage levels that are ecologically sustainable or that maintain a certain carrying capacity, but provides an adaptive management framework to prevent significant adverse environmental effects during resource use

(Oliver 1995). At Area A it has been implemented using a 'trigger level' strategy, in response to EW's mandate within its Regional Coastal Plan that its marine farming zone should be developed in stages to ensure that farming activities do not cause significant adverse effects (Turner and Felsing 2005). In ecological terms, it can be hard to determine what constitutes 'adverse' and 'significant', and the LAC approach acknowledges the difficulty in defining levels of acceptable ecological change. Nonetheless, it still demands that **acceptable degrees of change be agreed upon among stakeholders prior to development**. The approach provides a collaborative, transparent framework to allow this process: identifying environmental indicators of change, setting levels of acceptable change in the indicators (trigger levels), and identifying management responses when the trigger levels are exceeded."(emphasis added)

Zeldis "Decisions on the magnitude and spatial extent of acceptable pelagic effects will
undoubtedly also be linked with the benthos, where we expect the largest effects of fish farming to become manifest. **Large-scale fish farming such as is envisaged in Waikato has potential for adversely affecting the benthic marine environment, as
shown by the deposition modelling** of Section 4.3, hence it is important to identify appropriate benthic LAC indicators for it. It is possible **that enhanced deposition of organic matter**, both directly in the farm footprint and downstream through the production and recycling of phytoplankton within the pelagic system will compromise
the benthic environment." (emphasis added)

Appendix N Indicative draft consent conditions
2 j) limited to 300ha (do not grant permit to extend beyond CMFZ
4 permit shall expire 10 years from date of commencement
11 At least three months (not 20 working days) to provide WRC with engineering design
12 PHK will provide a survey plan

Additional submission made as a prelude many years ago, for this current application for a cage fish farm

CAGE FIN FISH SUBMISSION 3

Tena koe

What follows is my second submission to the proposal to introduce the dirty industry of cage fish farming to the Firth of Thames.

"Increasing intensification of land and aquatic use patterns and primary production will put more pressure on ecosystems and may lead to greater pest management risks....New types of pests will emerge, such as more invertebrates, reptiles and new diseases. Marine pests will take a greater focus." Think Piece on the future of pest management in NZ Main Report, Hellstrom, Moore, Black, 3 October 2008, P 17

"The NZ public is increasingly urbanised and opposed to the use of chemicals in the environment." (ibid P6)

This document quotes a CEO of one regional council as reminding the group that the "sea bed is owned by the

Crown, therefore the Crown should be responsible for pest management of the water above it." (ibid P 62)

The Tui Mine owners, New Zealand's Cable Price Downer together with Canadian and US based companies were able to declare bankruptcy and go on to further business deals leaving the rate payer and the tax payer to clean up a toxic nightmare.

Unless this legislation demands contracts where investors pledge to pay for all clean up we are heading down another disastrous road. (Rule Y) Unless new consents are required for the use of new toxins to deal with disease outbreaks the public will remain unaware of the poisons entering our waters and food. RMA section 36 allows levys that are "actual and reasonable", what if the disaster is unreasonable? Who pays? Where is the stated Code of Practice for cage fin fish farming? Rule 2 must require a bond that requires rehabilitation of site and this is not required under current legislation but "eight years was given as an example that allows benthic recovery." Working Group notes June 10, 2008. Eight years! And this figure is based on what?

By the way-- all of the Firth is a Significant Natural Area.

In the same notes "industry mooted an idea of proportional and tradable rights". So here we have it, sell off industrial dirty cage fish farming to overseas profiteers and watch the destruction of our environment. Already the minimum clearance of a paltry 10 metres is being opposed and "will be reconsidered by EW". Working Group Notes 18 May 2009. The Zeldis report Exploring the carrying capacity of the Firth of Thames for finfish farming:a nutrient mass balance approach I have not located. Do you have the relevant statistics causing concern at the meeting? Where are the depositIonal impact statements?

As the Working group noted on 7th July 2008, "much more work needed on effects of the proposed chemicals on other similar estuarine ecosystems." Where is the work? In the same paper under the title Sustainability of fishmeal feed supply (Over-fishing) we read that the "biggest issue is customer perception—need training."

I don't think anyone fully understands what hundreds of acres of sea filled with structures that interfere not just with fish life, but bird life and human/boaties navigation will actually look like. The "conservative limit of 4000 tonnes over 20 hectares" of kingfish is discussed, the nitrogen discharge is around "240-300 tonnes and is equivalent to 7.6%-9.4% of the riverine input into the Firth.

"The preliminary decision is to approve the full size of the Area (520 farmable hectares within the 1072 hectare footprint).
Our current Coastal Plan prohibits experimental finfish aquaculture. Why not support that plan?

With all the money from taxpayers going to fund this huge "trial" (14 March 2008 Working Group notes) why not invite those of us who live on the Coromandel to the discussion of how we would like to see our youth employed and businesses developed such as a possum industry, a tertiary institution with a bush craft focus and organic farming developed right here.

Encouraging an industry that will pour even more nitrogen into the Firth is criminal. Of course this cage fish farming should not go ahead in clean green Aotearoa however this miniscule façade of consultation is just that. We all realise that the struggle is over. Industrial cage fish farming is on the plate whether we want it or not, whether the environment can absorb its consequences or not. No one in their right mind would choose farmed fish and that is another problem for future investors. The palate is not high end diners. This is an example of the race to the bottom. NZ producing yet another commodity. There is nothing sustainable about this plan with its conversion rate of 4-6 tonnes of wild fish to 1 tonne of farmed fish. We note that the working group is concerned about how this will be perceived and this is dealt with by choosing to use the term "fed aquaculture" rather than the reality of industrial cage fish farming. The Local Government Act requires EW to provide for the wellbeing of the community. This is definitely not providing for the wellbeing of our community. Feed stock sustainability remains on the table and is an unresolved issue of increasing public concern.

All the studies that have been undertaken at ratepayer expense (I have yet to see the various funded, peer-reviewed "cultural assessment reports" at least two were underway at 15 August 2008 with three other runanga in the wings) raise warning bells, in particular Shane Kelly's study of ecological effects. Disease treatments and feed additives that can have significant deleterious effects on seabed microbial communities Footprint Estimates for Potential Finfish Farms in the Wilson Bay Area of the Firth of Thames

by J Oldman. Have you read the details of this piece of research? Have you read the Cultural Assessment reports?
Have you read any DHI modelling of waves and currents on industrial cage fin fish farming? (15 August 2008 Working Group reference). Please share today.

As you will note much rate payer monies have been spent on meetings with interest groups and on research both by in-house scientists at EW and by consultants from government departments and private business.

High levels of DDT and arsenic exist in the sediment Firth of Thames From the Mountains to the Sea, Supplement to the proposed Waikato Regional Policy Statement 2010 P 70, we are not told of the levels of cadmium, mercury, zinc, and other toxins. What is also not published here for general consumption are any statistics for heavy metals and toxins in fish caught in the Firth. The general health of this water way appears to be severely compromised by our land occupation, past and present. If the current planning is accepted this population and land use will increase the ill health of the Firth. The Waihou is currently the third most polluted waterway in the country. We should consider referring to the Firth as the Filth of Thames or even the Sewer of Thames given the low-lying waste water treatment plant in Coromandel that overflowed into the harbour during the 2002 'weather bomb'.

So we all agree that the Firth is a shallow embayment, approximately 36 degrees 44' S latitude, between 175 degrees 11' and 175 degrees 31' longitude, it is between eleven and fourteen nautical miles wide and reaches a maximum depth of 35 metres near its northern limits. "About 95% of the Firth is less than 30 metres deep." Muddy Feet, Firth of Thames Ramsar Site Update P 2. This document goes on to state "Wind and tidal currents cause a net retention of a great volume of sediments brought into the southern half of the Firth by rivers and streams." This infill is coming mostly from the Waihou and Piako rivers.
What impact this is currently having on our diet we don't know. There is no information provided to assure citizens of the health and safety of current intake of kaimoana.
The project should not proceed until all scientific data is publicly available. A referendum of the people of this country should be taken to ascertain whether industrial cage fish farming is a future we want for our mokopuna rather than this fast track highly conflicted plan.
Kia ora na

s 9 (2)(a)
s 9 (2)(a)

I WISH TO SPEAK TO MY SUBMISSION

The abstracts below have been included to show where further research is required and where issues remain unresolved.

Bayesian Network Analysis Exploring the Benthic Carrying Capacity for Finfish Farming Within the Firth of Thames

-

Report: TR 2007/50
Author: Hilke Giles, Niwa
Abstract
Environment Waikato is currently scoping a plan change to allow for the diversification of aquaculture within existing aquaculture management areas in the region that will potentially allow for the cultivation of species other than mussels, including finfish. Currently no information about environmental effects of finfish aquaculture is available for this region. This report presents an exploration of the benthic carrying capacity of the Firth of Thames for finfish farming to provide some background information for the aquaculture diversification plan change. An estimate of the

scale of expected benthic effects associated with fish farming in the Firth of Thames Wilson Bay Marine Farming Zone was obtained by carrying out a Bayesian network analysis supported by literature studies. In addition, estimates of the likely spatial extent of benthic effects were provided based on previous published studies as a first step to predicting the footprint of finfish cages. The Bayesian network used in this study is a modified and re-parameterised version of an existing Bayesian network that was developed to quantitatively assess the relationships between benthic fish farm impact parameters and site and farm characteristics based on data published in peer-reviewed international journals from finfish farms located in temperate zones. The scale of benthic effects expected from establishing finfish farms in the Wilson Bay Marine Farming Zone was examined using selected case studies that represent realistic farming scenarios for this area. Case studies were created by examining different combinations of fish stocking density and water depth, which are expected to influence the scale of benthic impact. The focus of this report was to highlight the differences in benthic impacts predicted from the case studies and the trends generated from varying the input parameters, rather than making predictions of absolute variable values. The Bayesian network analysis suggested that of the examined input parameters the free water depth below fish cages has the largest effect on the severity of benthic impacts and it is recommended that the minimum free water depth below cages should be 10 m. It is general practice in finfish aquaculture to use cages between 10 and 15 m depth and allow for a similar depth of water below cages to promote the dispersal of faeces and uneaten food, consequently the most suitable areas for the installation of fish cages are those with water depths of 20 m or more. Changes in stocking density only resulted in small changes in the probability distributions of most variables. Selected literature studies were reviewed to examine the usefulness of monitoring parameters for the assessment of benthic impacts in the Firth of Thames that were not included in the Bayesian network. Video surveys and sediment trap deployments are not recommended following problems experienced during earlier work caused by unfavourable environmental conditions. The examination of opportunistic macrofauna species was generally accepted as a good indicator of benthic impact; however, it was suggested that measurements of biogeochemical parameters may reveal earlier signs of impact and allow remedial measures to be taken if necessary to prevent severe impacts. It is recommended that pre-impact studies should be carried out in locations chosen for fish farming to gain an understanding of these processes prior to the additional organic enrichment. This would allow changes in biogeochemical processes to be identified and limits of acceptable sediment modification to be chosen based on sound data. Additional parameters considered potentially useful for the detection of severity and spatial extent of benthic impacts once fish farms are operating are trace metals and stable isotopes. Estimates of the spatial extent of expected benthic impacts were derived from a review of peer-reviewed literature and monitoring data from New Zealand fish farms and it was concluded that 100 m was a cautious estimate. Since the largest change of most examined parameters took place within about 50 m of the farm and the gap between farm blocks in Area A is 75 m a 50 m buffer zone between the outermost cages inside a farm block and the perimeter of the block was considered an adequate estimate of the buffer zone for initial applications before measurements are available to make realistic assessments of spatial effects. Especially if cages larger than those examined in this study (>15 m diameter) are to be installed in the Firth of Thames, it is strongly recommended that benthic impacts should be measured at high spatial and temporal resolution until sufficient information on their severity and spatial extent has been gathered to make sound recommendations on minimum buffer zones for farm blocks. To enable a reliable detection of farm footprints, it is also recommended that the natural variability of parameters used for future monitoring is measured prior to any farming activity. This will enable the identification of changes caused by the farms and minimise the problem of separating natural from farm induced changes observed in the farm area. Bayesian Network Analysis Exploring the Benthic Carrying Capacity for Finfish Farming Within the Firth of Thames <http://www.ew.govt.nz/PageFiles/5553/tr0750.pdf>
(557 kb, 79 seconds to download, 56k modem)

Potential Environmental Effects Associated with the Proposed Shift from Mussel to Finfish Farming in the Firth of Thames

Author: Shane Kelly (Coast and Catchment Ltd.)

Abstract

Local and international literature was reviewed to identify the potential environmental effects of fish farming in the Firth of Thames (FoT), and the results of FoT-specific studies were summarized. The key conclusions of this review were:

- Marine farms provide habitat for invasive species and the movement of farm stock and equipment provides a pathway for their transfer within and between regions. Nutrients released from fish farms are likely to

exacerbate the growth of some invasives already in the Firth of Thames, such as the Asian kelp Undaria pinifitada, and potentially increase their spread. The potential consequences of invasive species could be very significant, and their scale of impact could extend well beyond the farm area.

- Interbreeding between farmed and wild stock has the potential to alter the genetic make-up of wild fish stocks, if: farmed fish are selectively bred; are grown to maturity; and/or have high escape rates. The potential for genetic effects is also influenced by the size of the wild population and natural immigration rates. Genetic impacts can be minimized by preventing fish escapes, using sterile fish or harvesting before maturity, avoiding selective breeding and maintaining large, natural populations of wild fish.
- Fish farming uses significant quantities of fishmeal, which is produced from fish obtained by wild capture. Rapid growth in the fish farm industry has increased the demand for fishmeal and led to global concern about the sustainability of fish stocks used in its production. Currently, all fishmeal used in New Zealand is sourced from overseas.
- There is a high probability that the deposition of waste food, faeces and chemical contaminants will led to degradation of the seabed directly beneath fish farms, and for a relatively small distance beyond (up to several hundred meters). Benthic ecosystems are likely to be heavily impacted within the immediate deposition zone, but the level of impact will reduce toward the margin of the depositional footprint.
- The Firth of Thames currently receives relatively high nutrient loads from its river systems. Nutrients released from fish food and metabolic wastes would add to the overall nitrogen budget of the Firth. The influence of this could range from insignificant to significant relative to Firth-wide nitrogen-ecosystem processes, depending on scale of fish production and to a lesser extent fish-food conversion rates. Local effects are likely to be greater than Firth-wide effects.
- Mussel culture has the potential to offset some nutrient effects. At full production, Areas A and B in Wilson Bay, plus other mussel farms in the Firth could theoretically offset nitrogen released from 2900 tonnes of fish production. In practice, the level of direct offsetting is likely to be less than this, because all of these mussels would have to be located in the area(s) directly influenced by farm nutrients.
- Infections of parasites and disease agents may be amplified within sea cages, but actual disease is only likely to occur in the cultured fishes. This is because the mobility of the wild fishes tends to prevent hyperinfections from occurring, eliminating a necessary prerequisite for disease. However, infection rates may increase slightly in wild fishes that have an association with the area surrounding sea cages. A high concentration of fish farms can act as a reservoir of parasites, such as sea lice and infect wild populations.
- The value of the southern Firth of Thames to waders is recognised through the designation of Ramsar status to intertidal areas. 135 bird species have been identified in the Ramsar site and around 35,000 waders use the southern Firth each year. The only potential link between fish farms in Wilson Bay and waders in the Ramsar site appears to be via an indirect response to changes in food abundance or habitat modification, caused by nutrient enrichment. However, it is unlikely that such indirect effects will have a significant impact on the Ramsar site.
- Fish farms can positively affect seabirds through the provision of new roosting sites and by attracting fish. Conversely, they can negatively affect seabirds through entanglement, disturbance and loss of habitat. However, the footprint of fish farms on seabird habitat would be very small, so any effects are likely to be minor.
- Fish farms can affect marine mammals through entanglement, habitat exclusion, and disturbance by vessel strikes and underwater noise. However, available information suggests that the adoption of good farm management practices should minimize the risk of these impacts actually occurring.
- Wild fish can be attracted to fish farms and this may have a beneficial effect on wild fish stocks if the area is protected from intensive fishing, or improve the recreational fishing resource if the area is left unprotected.
- Fish farms can also alter waves and current flows, attract wild fish and promote the settlement and growth of non-resident native species. The (additional) impacts of these issues are considered to be relatively minor.

Potential Environmental Effects Associated with the Proposed Shift from Mussel to Finfish Farming in the Firth of Thames <http://www.ew.govt.nz/PageFiles/12521/TR2008-38.pdf>
(209 kb, 29 seconds to download, 56k modem)

Table of contents

Date Printed: 20 September 2007

Natural Character and Visual Impact Assessment of Potential Finfish Farming Development

Report: TR 2008/24
Author: Bernard Brown Associates Ltd

Abstract
Environment Waikato is considering a plan change to the Regional Coastal Plan that will enable fish farming and other new types of aquaculture in the existing Aquaculture Management Areas (AMA) located offshore from Wilson Bay, and the Coromandel Peninsula. Bernard Brown Associates has been engaged to undertake a Natural Character and Visual Impact Assessment of the proposed fish farming aquaculture activities. As a baseline assessment, the study is required to compare full development of mussel farming aquaculture in the existing AMAs with potential fish farming activities. The study focuses on the greatest concentration of marine farms on the Peninsula's west coast from Wilson Bay to Amodeo Bay. Existing mussel farming activities in the Waikawau/Wilson Bay coastal environment are located in Area A of the Wilson Bay Marine Farming Zone sited 1.5 kilometre off shore. The mussel farm activities generate visual effects caused by buoys, barges and navigational lighting. The buoys (the actual farms) are generally innocuous and their presence in the CMA is signified by the barges working the farms. Existing mussel farm activities in the Coromandel/Motukawao coastal environment are randomly located throughout the CMA often in close proximity to the mainland and islands shoreline. The Coromandel sub unit is in a delicate balance with respect to any additional mussel farming activities being developed in this area. There are two key variables that affect the ability of the marine environment to visually absorb mussel farming activities. These include: a) the scale of the receiving coastal environment and the degree of visual interest in the view. b) elevation and distance viewed. The vast scale of the Waikawau/Wilson Bay coastal environment provides high visual absorption capability, sufficient to accommodate full development of mussel farming expanding into Area B of the Wilson Bay Zone without causing adverse effects on natural character values. In the Coromandel coastal sub unit additional mussel farms would have a significant visual impact and should not be allowed unless those effects can be remedied or mitigated. A precautionary approach is recommended for this area. Based on a model fish farm using circular sea cages, fish farming will have increased visual effects compared to mussel farming activities. This is primarily due to their characteristic vertical structural elements. Viewing distance (for example 5km offshore) is considered a key visual mitigation measure. When considering the location of fish farming in the Wilson Bay Zone, Area B is the preferred location for large scale (50 hectares or more) fish farming activities from a visual impact perspective Fish farming activities would assimilate best when seen in conjunction with existing mussel farming activities. Established mussel farming activities would form the foreground, provide context and mitigate the effect of additional fish farm structures. To maintain and protect the natural character values of the coastal environment fish farming activities should avoid high visual

audience areas where close views are gained.

Date Printed: 20 September 2007

Method Development: Assessing the Benthic Impacts of Aquaculture

•

Report: TR 2010/03
Author: Hilke Giles, NIWA

Abstract
In 2006 NIWA began testing the utility of sediment profile imagery (SPI) for resource monitoring of the seafloor near mussel farms in Wilson Bay, Firth of Thames. Sediment Profile Imagery is an underwater technique for photographing the interface between the seabed and the overlying water. The technique is used to measure or estimate biological, chemical, and physical processes occurring on and in the first few centimetres of the sediment. Projects commissioned by Environment Waikato and the Wilson Bay Group A Consortium as well as NIWA funded research have demonstrated the usefulness of SPI. As a consequence, the benthic monitoring component of the Wilson Bay Group A monitoring programme has been modified by substituting the previous video surveys with SPI surveys. To aid the interpretation of SPI data sets, NIWA proposed to collect additional sediment profile images in the Firth of Thames in reference regions that are not affected by aquaculture and in regions that are affected by different intensities of mussel farming activities. Environment Waikato commissioned NIWA to conduct such a SPI baseline survey within a method development project funded through the Ministry for the Environment's Aquaculture Planning Fund (APF) and Environment Waikato. This report describes the outcomes of the method development project. Specifically, it presents results of two SPI surveys, demonstrates the potential of SPI to underpin the assessment of benthic impacts and provides suggestions on how to develop a SPI-based benthic habitat quality index for the Firth of Thames, which could inform the development of benthic limits of acceptable change (LACs).
In 2007 and 2009 we collected a total of 174 sediment profile images. We identified a range of attributes in the images, including layers defined from colour parameters that are known to relate to the microbial decomposition of organic matter, and attributes that can be directly identified from the images, such as fauna, mussel faecal pellets or burrows. The variability of attributes among sites suggests that they provide useful information for the assessment of seafloor functioning and thus the benthic effects of aquaculture. We identified a selection of attributes that we consider useful candidates for a Firth of Thames benthic habitat quality index similar to indices used in the assessment of anthropogenic input overseas. These attributes include the depth of layers identified from colour parameters, scanner penetration depth, annelid worms, Echinocardium sp. individuals, epifauna, black/dark patches, shell hash in/on the sediment, mussel faecal pellets and burrows. A review of advantages and disadvantages of SPI and video surveys, the previously employed method for the assessment of benthic effects of mussel farming in the Wilson Bay Marine Farming Zone, clearly favoured SPI. The key advantages of SPI are the better quality and meaningfulness of data and higher efficiency in data analysis. Some technical problems experienced during this study were related to the difficulty of scanner penetration under the mussel farms. NIWA has purchased a new SPI device and we are confident that the new device will resolve this problem. The main conclusions of this method assessment projects were:

1. Sediment profile imagery is a useful tool for the assessment of benthic aquaculture impacts in the Firth of Thames. It is superior to the previously employed video surveys, primarily due to the better quality and meaningfulness of data and higher efficiency in data analysis.
2. We believe that the proposed combination of attributes identified from sediment profile images has the potential to form the basis of a SPI-based benthic habitat quality index, which can become a cost-effective and scientifically sound tool for the assessment of benthic habitat quality in the Firth of Thames.
3. Such a benthic habitat quality index would be independent of the source of impact and could inform the development of benthic limits of acceptable change (LACs).

4. Future work is required to develop a SPI-based benthic habitat quality index for the Firth of Thames and we suggest the following development process:
5. a. The various sources and locations of anthropogenic organic input into the Firth of Thames are identified (e.g., mussel farms, rivers).
6. b. The areas affected by these inputs are identified.
7. c. In each of these areas transects are generated ranging from maximum organic input to reference areas in which anthropogenic organic input is considered negligible.
8. d. Surveys similar to the one conducted in this study are conducted along these transects.
9. e. Images are analysed as described in this study and all attributes recommended in this study as being useful for a benthic habitat quality index collated.
10. f. Various potential benthic habitat quality indices are calculated from these attributes and examined for their merit in classifying benthic habitats in the Firth of Thames.
11. g. The final selection of a benthic habitat quality index is made by Environment Waikato.

Date Printed: 20 September 2007

/

Magnitudes of natural and mussel farm-derived fluxes of carbon and nitrogen in the Firth of Thames

•

Report: TR05/30
Author: John Zeldis (NIWA)
Abstract
The eastern Firth of Thames supports the largest single block of mussel farms in New Zealand, within the Wilson Bay Marine Farming Zone. In addition to this, another Aquaculture Management Area (AMA), is under consideration by Auckland Regional Council in the western Firth. The scale of these developments has made it necessary that EW and ARC assess and predict environmental performance of Firth aquaculture at Firth-wide, as well as local AMA scales. This study evaluates fundamental ecosystem processes at the scale of the Firth: incorporation of carbon and nitrogen into organic material through system import and primary production, and losses of nitrogen and carbon through system denitrification, respiration and export. These values are compared with carbon and nitrogen assimilation and respiration by mussel farms, at the various AMA development intensities. The intention of the work is to provide perspectives on the relative magnitudes of ecosystem and farm processes, under the various intensities of AMA development. Information on Firth system primary production, respiration and denitrification were compared with information on mussel biomass, C and N composition, and weight-specific respiration, to draw conclusions about the importance of mussel aquaculture within the Firth ecosystem. At the present level of AMA development, mussel biomass harvest removes 0.2% of Firth C primary production y-1. At projected biomasses of maximum AMA development (= WBMFZ fully developed + Western Firth AMA) the harvest would remove 1.6% of primary production y-1. For these respective scenarios, mussel C respiration would account for 0.3 and 1.8% of present Firth system respiration. Similar to denitrification, the mussel harvest represents a net sink for nitrogen, removing nitrogen from the internal cycle supporting Firth primary production. At maximum AMA development, about 1.4% of Firth N primary production (i.e., DIN fixed) would be removed by the mussel harvest. This is about 2.8% of the size of the denitrification sink. Magnitudes of natural and mussel farm-derived fluxes of carbon and nitrogen in the Firth of Thames <http://www.ew.govt.nz/PageFiles/3524/tr05-30.pdf>
(1838 kb, 262 seconds to download, 56k modem)

Date Printed: 20 September 2007

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:56 pm
To: Sea Change
Subject: Revitalising the Gulf Marine Protection Proposals Submission

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Dear Sir/Madam

I wish to provide feedback on the Government's Revitalising the Gulf Marine Protection Proposals as a private citizen who enjoys recreational fishing in the Hauraki Gulf and has property on the Thames Coast.

My submission is that the plan does not go far enough to protect the environment in the Hauraki Gulf Marine Park. I strongly object to the environmentally damaging practices of bottom trawling and sand mining in **any** part of the Marine Park whatsoever. These would have been ignored in the 80's, but I don't accept that they should be allowed today with our improved environmental awareness and understanding of the damage they cause.

I ask that the proposals be reconsidered, and extended to either ban or strictly limit bottom trawling and sand mining within the Hauraki Gulf Marine Park.

Yours faithfully

s 9 (2)(a)

s 9 (2)(a)

And:

s 9 (2)(a)

s 9 (2)(a)

[redacted]

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:56 pm
To: Sea Change
Subject: Re: Submission - Revitalising the Gulf
Attachments: Submission Revitalising the Gulf - s 9 (2)(a) (1).pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Apols, pls see updated submission!

Thank you for understanding

On Fri, 28 Oct 2022 at 16:48, s 9 (2)(a) s 9 (2)(a) wrote:

> Pls find herein my submission on Revitalising the Gulf.
> Thank you very much for enabling this process.
> Applauding very much the great steps forward that we are taking here.
>
> Mauri Ora kia tātou
>
> s 9 (2)(a)

SUBMISSION ON:

Marine Protection Proposals for Revitalising the Gulf

28 October 2022

I support the:

- actions to pursue effective marine protection with protocols that manage and control human and machine interventions that risk to harm or contravene the mauri, mana, and tapu of all marine species within the realm of Tangaroa and Hinemoana

- commitment to embody Te Tiriti o Waitangi by recognising tino rangatiratanga and mana motuhaketanga of tangata whenua; acknowledging their specific relationship to taonga; and making provision for customary practices with respect to these matters

- proposal to provide for monitoring and research driven by both matauranga Māori and western science knowledge systems

- proposal to provide for "active habitat restoration initiatives such as the removal or addition of marine life (translocation) to improve habitats of interest" as long as full understanding of the mauri of place is understood. I applaud that already starting from a point of eco-system based management model is a great step in an excellent direction.

I would recommend in addition that the proposals:

- enable Tangata Whenua and Matauranga Māori to have primacy in relation to decisions impacting regenerative eco-system work (too many examples of Government and well-meaning conservationists introducing new species to control manage ecosystems without understanding full complexity of mauri or in-situ ecological actualities)

- acknowledge rāhui, taiāpure, mataitai as examples of indigenous policy mechanisms within which the proposed HPA and SPA will operate

- space be allowed to enable local communities to participate in any research enquiry such as using a 'citizen science' approach

- actively encourage for wānanga, or further collaborative review opportunities in research and monitoring work

I note with some concern:

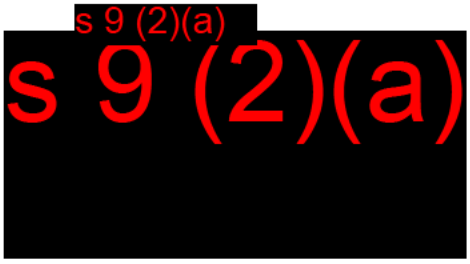
- the lack of resourcing for hapū, ahi kaa, mataawaka, and community to implement marine protection tools

- the lack of central and local authorities to enforce breaches of current marine protection actions and call perpetrators to appropriate account

- the risk of displacement of fishing efforts particularly that of the Noises HPA to Waiheke Island

- That the level of protection only covers up to 18% and I wonder what it would take to get to 30 or even 50 percent.

Mauri Ora kia tātou



Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:59 pm
To: Sea Change
Subject: Revitalising the gulf submission

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

s 9 (2)(a)

Personal submission

s 9 (2)(a)

I OPPOSE the proposal as presented to revitalise the Gulf.

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:59 pm
To: Sea Change
Subject: Make it happen
Attachments: doc proposal letter.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hello Team

I have attached a letter in support of the proposal.
I hope this happens as I have been pushing to get action for many years and look forward to the results.
--
Have a fin-tastic day,

s 9 (2)(a)

Revitalising our gulf Proposal.

s 9 (2)(a) Goat Island Dive & Snorkel.

s 9 (2)(a)

[redacted]

As a dive instructor and business owner operator in New Zealand's first marine reserve and someone who has grown up in Leigh and have witnessed first-hand the destruction and total disregard to the ocean around our coast. The new proposal has its merits and is a start to replenishing ore gulf. I am very concerned with regards to the extension to the Goat Island Marine Reserve that this will only be an HPA and not an MPA. Why are we not giving the flag ship of marine reserves and the fish who call it home and inspire generations to love our oceans the full protection they deserve. This will not only increase fish stocks within the reserve but will continue to feed the surrounding sea with young fish, as proven time and time again through studies at the leigh marine lab.

Page 6 of the document (protection tool for extensions to existing marine reserves).

The new extension to the goat island marine and Cathedral Cove reserves should be extended as marine reserves under the marine reserves act 1971. This will eliminate any confusion and frustration from recreational and commercial fishermen.

The boundary to the east of the reserve needs to be considered for change. There is a rocky reef that is outside of the reserve that if protected would hold many crayfish and add to the breeding stock within the existing reserve. If the eastern boundary where to be altered 45 degrees to the east this would allow this reef to be protected.

Goat Island Marine Reserve. Cape Rodney-Okakari Point

This is a magical place that has given generations hope and the love for our ocean. Personally I have conducted thousands of school educational trips here and introduced groups to the friendliest fish in New Zealand. These fish need the upmost protection to allow this area to continue its work and provide the education it has for many years.

Little Barrier/ Hauturu

is in desperate need of protection with dwindling crayfish numbers and almost no kelp cover it is a wonder there is anything there at all. I have many amazing dive sites there and I almost cry every time I dive there now, it is like a desolate wasteland by comparison to what it was. This amazing underwater habitat has the ability to house a multitude of life and feed the inner hauraki with fish with the spill over effect.

Customary fishing rights is going to be almost impossible to police and enforce. I can also see that this has the potential to fuel racial debates and encourage apartheid views. Having these areas instead marine protected areas will stop this from happening as this will mean that no one is allowed to fish there.

I do have trepidation in regard to having so many areas that are not marine protected areas and are only high protection areas. I can see this adding more confusion and being the cause of many issues

down the line. Areas such as little barrier island need to have full protection no customary fishing rights just full stop no take zones.

This proposal is a start to achieving abondance and a full and thriving gulf. It shouldn't be a question if this should not be passed. Having the extensions as marine reserves as apposed to High protection areas is the only way forward for these locations.

I sincerely hope this is achieved and many more to come.

Nga Mihi.

s 9 (2)(a)

Sea Change

From: s 9 (2)(a) <s 9 (2)(a)
Sent: Friday, 28 October 2022 4:59 pm
To: Sea Change

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

s 9 (2)(a)
s 9 (2)(a)
Diver, marine technician, ocean enthusiast

I fully support the proposal to protect the Hauraki Gulf. The more MPA's the better, and it's completely ludicrous we allow any bottom trawling or fishing activity that we so clearly know causes damage to ecosystems.

Regards
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) [redacted]
Sent: Friday, 28 October 2022 5:00 pm
To: Sea Change
Subject: Hauraki Gulf Submission

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

I wish to support the proposals except for the continuance of some bottom trawling.

All bottom trawling must be stopped within the Gulf

I have a long experience of the Gulf environment including a MSc in Marine ecology, over 55 years history of diving within the Gulf and work on bottom trawlers in the early 1970s.

s 9 (2)(a) MSc (Auck)
s 9 (2)(a) [redacted]

Sent from my Galaxy

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 5:09 pm
To: Sea Change
Subject: Revitalising the Gulf,Marine protection proposals
Attachments: s 9 (2)(a) _Consultation_submission.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

To the Minister of Conservation

Please find attached my response to the Revitalising the Gulf Marine protection proposals.

Regards - s 9 (2)(a)

Revitalising the Gulf
Marine protection proposals

A personal response to the consultation to the Minister of Conservation seachange@doc.govt.nz.
From:

s 9 (2)(a)
s 9 (2)(a)
28 October 2022

Summary

1) The proposed "High Protection Areas" are **hopelessly inadequate** to address the stated goal to "protect and enhance marine communities, ecosystems, and habitats". Nothing short of 30% protection can be accepted: this the the goal of the Hauraki Gulf Forum and United Nations Convention on Biological Diversity (30x30). The Government proposes to give only 6.2% of the Hauraki Gulf Marine Park a level of protection from fishing, and the 18% figure quoted by the Government is disingenuous. The public overwhelmingly support 30% protection and the Government's proposal is a nothing more than a sop to the commercial and recreational fishing lobbies.

2) **"Seafloor Protection Areas" should extend to 100%** of the Hauraki Gulf Marine Park. There is no excuse in these times to allow heavy machinery to be dragged across the sea floor to destroy the ecosystems just in order to catch fish for money. "Seafloor Protection Areas" offer no protection from other fishing and the Government should stop disingenuously claiming these and the "Cable Protection Area" in the figures for "an effective network of marine protection."

3) **Honest marine protection means "no take".** The Government purports to create new "marine protection areas" but then proposes to permit certain undefined people to remove undefined quantities of undefined species from these areas. Proper marine protection is afforded by the current Marine Reserves Act. These reserves are proven to be effective at restoring mauri of the moana. In contrast, partial protection in so-called HPAs and SPAs are experimental at best. The majority of Maori supported the no-take Hakaimango-Matiatia Marine Reserve proposal and the Government should have the courage to support this majority view.

4) The proposals make **no reference to Waiheke Island**. The Government is sitting on the Hakaimango-Matiatia Marine Reserve proposal and could have endorsed it in the consultation but did not. That proposal received overwhelming 93% support during its consultation, including 73% Maori support and 95% Waiheke support. The Sea Change process promised to listen to the people of Waiheke, who have spoken and must be respected.

5) The Government should **dismiss Legasea's attempts to wreck marine protection**. The campaign by the New Zealand Sports Fishing Council (Legasea) on this consultation is

typical: they pretend to be good conservationists (asking for 100% sea-floor protection) while asking others to reject the proposals because they do not go far enough. They do not represent most fishers and their objections must be treated accordingly.

Marine Reserves and High Protection Areas

New Zealanders should be able to trust their government to be honest when presenting information for consultation. The Government should not communicate through green-washing.

The Government should be honest enough to acknowledge that:

1) The proposal does not include the addition of any new Marine Reserve. Whatever HPAs end up being, they are not Marine Reserves of the type that people understand, and that have been established under the Marine Reserves Act.
2) Even the HPA and SPA areas are not imminent, but subject to a new Hauraki Gulf Marine Protection Bill. No date is set for this, and there is no guarantee that future governments will enact this.
3) The claim of 18% protection is sophistry: the Cable Protected Zone and Sea-floor Protected Areas have no protection except from bottom fishing. The actual figures for Marine Reserves and High Protection Areas is less than 6% of the Hauraki Gulf Marine Park,
4) The Government claims that "the protected areas would also bring us a step closer to achieving global goals and targets under the United Nations Convention on Biological Diversity" (i.e. 30% marine reserve protection). This is also a policy goal of the Hauraki Gulf Forum. The claim is dishonest as it implies the Government is on track to achieving 30% protection whereas they have no such road map.

The Government should have the courage to announce a plan for 30% protection. This is what the majority of New Zealanders is asking for: 77% of respondents to a Horizon Research poll in 2021 want 30% of the Gulf in marine protected areas. And 72% of the recreational fishers polled also supported the 30% target.

The new reserves will not come into effect until the passage of a new "Hauraki Gulf Marine Protection Bill." It is not reasonable to consult of these new marine protection areas without publishing a draft Bill. The consultation describes High Protection Areas differently to the existing Marine Reserves Act reserves. Apart from the customary-take provisions, what other differences will there be? How can the public make informed decisions without seeing the legislation?

I accept that adding further High Protection Areas will add a degree of additional protection to the Hauraki Gulf environment. To that extent I welcome the addition that the Government is offering. It is better than nothing.

However, the reserves should be bigger. The present proposals loos like a compromise between environmental enhancement and fishing interests. The Government should place environmental restoration as the highest priority. This would mean entire islands surrounded by HPAs or Marine Reserves – not just parts, as with the Little Barrier and Tiritiri Matangi proposals. This is what makes ecological sense: fish will not know that when they swim around the corner they can be caught.

I support and endorse the proposals by Shaun Lee for larger marine protected areas. His submission provides a clear rationale for extended areas, and the Government should adopt these proposals.

New marine protection areas adjacent to existing Marine Reserves should be Marine Reserves and not High Protection Areas. This includes the Whanganui-a-Hei (Cathedral Cove) and Cape Rodney-Okakari Point marine reserves. These could be established immediately using existing legislation.

Having two different types of protection on opposition sides of an invisible line in the sea will rightly be seen by the public as crazy, and will be difficult to enforce and police. Many people – Maori and non-Maori - will not take kindly to seeing some Maori gathering food in HPAs immediately adjacent to the Marine Reserves.

Seafloor Protection Areas

I accept that adding new Seafloor Protection Areas will add a degree of additional protection to the Hauraki Gulf environment. To that extent I welcome the protection that the Government is offering. It is better than nothing.

However Seafloor Protection Areas should be extended to 100% of the Hauraki Gulf Marine Park. It is outrageous in these times to allow heavy machinery to be dragged across the sea floor to destroy the ecosystems just in order to catch fish for money.

This activity destroys vital plant and animal communities across the Gulf and while this is permitted in such a large percentage of the Gulf it will set a limit beyond which ecological restoration cannot pass.

The Government should stop claiming that the SPAs and the "Cable Protection Area" add to "an effective network of marine protection." All fishing through the water column can still take place.

The Government should have the courage to provide 100% protection. This is what the majority of New Zealanders is asking for: 84% of respondents to a Horizon Research poll 2021 want to ban all bottom impact fishing the Gulf.

No-take Marine Reserves vs Customary Take High Protection Areas

In the mind of the public, marine protection areas means "no-take". The Government purports to create new "marine protection areas" but then proposes to permit certain undefined people to remove undefined quantities of undefined species from these areas, through a process that is undocumented.

The Government proposes that each HPA will have its own “biodiversity objectives” and that these may permit some Maori groups to take fish from “their” HPAs. This makes no sense from an ecological perspective, since the only honest “biodiversity objective” if one is attempting to restore the health of the Gulf is to maximise biodiversity by leaving fish in the sea. This applies equally to every HPA.

(The one exception to this would be to permit taking of kina from areas of kina barrens, and only until snapper and crayfish populations recover enough to restore the natural balance which is currently lost).

From a political perspective “customary-take” within HPAs would becomes a political and legal nightmare.

Customary-take within HPAs promises conflict between different groups of New Zealanders: not just Maori-Pakeha mistrust, but also conflict between different groups of Maori as they fight for the right to obtain the customary marine title (CMT). There is the chance of legal conflict between Maori groups and the Crown. There is the chance of conflict between groups with protected customary rights (PCR) and different groups with customary marine title (CMT).

(The Government should publish the names of the different groups who have claimed CMT and PCR within each HPA. I suspect that every HPA will have many claimants. That process would

identify the scale of the conflict yet to come).

The Government should recognise that there is more than one Maori view on marine protection. During the consultation on the Hakaimango-Matiatia (North-West Waiheke) Marine Reserve, the majority of respondents identifying as Maori supported the Marine Reserve status. The consultation process invited people to identify as Maori, and of those who did 70% supported the establishment of the no-take Marine Reserve.

The details of this proposal, and the breakdown of responses from Maori, can be found in this Response to Objections document. This document includes a forward by Danella Roebeck, Co-Chair, Ngāti Paoa Trust Board in which she endorses the Marine Reserve.

Rather than planning for customary-take within HPAs, the Government and mana whenua might consider beginning a process that acknowledges rights and status, that agrees that nevertheless the health of the Gulf is best enhanced by no-take Marine Reserves, and to give an actual degree of say in the management of the new reserves, and of the Gulf, perhaps through new provisions within a revised Hauraki Gulf Marine Park Act.

By using the Marine Reserves Act 1971 the HPAs could be implemented as Marine Reserves immediately. Marine Reserves are proven to improve the health of the Gulf, whereas HPAs are an unknown quantity, experimental at best, and who knows how many years down the road.

Hakaimango-Matiatia Marine Reserve

The Hakaimango-Matiatia (North-West Waiheke) Marine Reserve proposal should be approved by the Government and included within the Revitalising the Gulf plan.

This is a proposal submitted under the terms of the Marine Reserves Act. The proposal, and the response to objectors document, are available on the Friends of the Hauraki Gulf website.

It is a community-driven process and overwhelmingly supported by the public: 93% of those who submitted a response to the consultation were in favour of this new Marine Reserve. Yet after many months I understand that DoC have not yet placed this proposal on the desk of the Minister of Conservation for a decision.

The Government is failing in its responsibilities here. The Sea Change document commits to:

> *By 2018, identify any gaps in the MPA network with specific attention to Waiheke Island and Aotea – Great Barrier Island. Establish further MPAs if required.*

And:

> *The Stakeholder Working Group was approached by community representatives from Waiheke and Aotea (Great Barrier) seeking that marine protected areas be included in the Plan for both islands. Because the SWG also heard conflicting views and concerns at not being consulted regarding proposals it was considered more appropriate for the location of MPAs for the two islands to be decided by those communities as part of the implementation of Sea Change.*

Well, the people of Waiheke have decided: 95% of submitters who identified as Waiheke Island residents or landowners supported the Marine Reserve.

The Government has a duty now to do its part to honour the Sea Change process. The Government should approve the Marine Reserve proposal (as a no-take Marine reserve, and not as an HPA,

which is not what the people have demanded).

Wrecking attempts by New Zealand Sports Fishing Council (Legasea)

The Government must recognise the work by the New Zealand Sports Fishing Council (Legasea) to wreck efforts at establishing Marine Protected Areas.

Legasea is a pressure group working on behalf of some recreational fishers. Their strategy is clear. It is to ensure that no new marine protection areas should get in the way of the "right" of their members to fish wherever they want to.

Their tactics are also clear. They pose as friends of the environment and take what superficially seems to be the environmental high-ground: they demand that commercial fishing activities such as bottom-trawling are stopped. At the same time however they object to other marine conservation projects such as Marine Reserves. They reject meaningful protections by saying they do not go far enough.

This approach can be seen in their website for the current consultation: Make a submission on the Hauraki Gulf Marine Park marine protection proposal

Here they begin by saying:

> *the DoC proposals don't go far enough... We need you to support a 100% Seafloor Protection Area for the entire Hauraki Gulf Marine Park.*

From there they move on to criticise other aspects of the proposal:

> *The public consultation process by DOC has flown by with minimal consultation time, a lack of detail, and research to substantiate biodiversity outcomes of proposed sites, ignoring economic or social implications while no alternatives are available in place of the predetermined outcome.*

And then call on their supporters to:

> *REJECT the government proposals in favour of 100% seabed protection and more meaningful public consultation.*

and:

> *do not support the Government-proposed Marine Protection proposal for the Hauraki Gulf Marine Park because it doesn't go far enough.*

Legasea took the same approach in their response to the Hakaimango-Matitia Marine Reserve proposal: they said they could not support it because it did not go far enough, and also that existing provisions (rahui on shellfish around Waiheke) were sufficient. The pattern of their opposition can be seen in the Response to Objections document – search this document for "Legasea".

By taking this approach, they are at odds with most recreational fishers. They are also acting against the best interests of recreational fishers since it is well established that fish travel out from Marine Reserves to populate other areas of the Gulf.

Analysis to the responses received to the Haikaimango-Matiatia Marine Reserve consultation shows:

> *Of the approximately 325 submissions that indicated an interest in Recreational Fishing or Non fishing Recreation through diving or snorkelling there were 265 submissions in support 6 in partial support, 55 were in objection and 5 in partial objection.*

The Horizon Research poll 2021 shows that 72% of the recreational fishers polled supported the 30% target for marine protection zones. It is clear that Legasea are at odds with most fishers, and the Government must reject their claims to the contrary.

Legasea willfully ignores evidence that Marine Reserves are good for fishing elsewhere in the Gulf. This research by Zoe Qu of Auckland University Economic valuation of the snapper recruitment effect from a well-established temperate no-take marine reserve on adjacent fisheries shows:

> *shows that 10.6% of newly settled juvenile snappers sampled up to 55 km outside of the [Leigh Marine Reserve] were the offspring of adult snappers from [Leigh]. This suggests a significant boost to the commercial fishery of $NZ 1.49 million catch landing value per annum and $NZ 3.21 million added from recreational fishing activity associated spending per annum.*

So the tiny area of the Leigh Marine Reserve contributes a more than 10% of snapper in the Gulf. Think how much better it will be with more Marine Reserves.

Conclusion

I give the Government 2 out of 10. Well done for proposing some addition protections, and I will pocket those while they are on offer.

But the Government must acknowledge that their proposals fall way short of what New Zealanders expect. The people will continue to clamour for a proper level of protection. The Government should do what they have been elected to do – to lead, and to serve the people.

Customary Take, if implemented, will be a nightmare and will lead to animosity at many levels. It will benefit only lawyers. Government should recognise that many/most Maori are not calling for customary take within Marine Reserves. Time and effort should be better spent giving Maori a proper role in "revitalising the gulf".

Finally, the Government must not allow the recreational fishing lobby to determine the health of the Hauraki Gulf.

s 9 (2)(a)
s 9 (2)(a)
28 October 2022

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 5:16 pm
To: Sea Change
Cc: s 9 (2)(a) s 9 (2)(a))
Subject: Charter Boat Association - Hauraki Gulf Marine Protection Proposals
Attachments: Charter Boat Assoc Submission-Hauraki Gulf Marine Protection Proposals.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hi team,

Please find attached a submission not in support on behalf of the Charter Boat Association.

Could you please send a receipt of confirmation?

Please send updates to s 9 (2)(a)
s 9 (2)(a)

Thank you,
s 9 (2)(a) on behalf of the Charter Boat Association

Charter Boat Association
s 9 (2)(a)
s 9 (2)(a)

Department of Conservation
Seachange@doc.govt.nz

28 October 2022

Submission not in support of the Hauraki Gulf Marine Protection Proposals

Submitters

1. The NZ Charter Boat Association represents and provides a voice New Zealand's Charter Boat Operators, advocating for a bountiful marine environment, the promotion of New Zealand as a high-value, low-impact international and local tourist fishing destination.

Submission

2. As charter operators, we acknowledge there are environmental issues within the Marine Park. **Therefore, we offer the following recommendations:**
    a. We recommend that DOC and FNZ invest in a more comprehensive analysis of the economics of charter vessels and tourism operators in the Marine Park and consider this data in the Revitalising the Gulf process.
    b. We endorse the use of localized management tools, such as an Ahu Moana approach. This would mean fishing impacts can be mitigated through a variety of other tools including reductions in daily bag limits, rāhui, or the removal of destructive fishing techniques. These are solutions that we are already supportive of.

3. Saltwater fishing is one of the most popular outdoor activities in New Zealand. To support this there are secondary industries comprising of retailers, manufacturers, wholesalers, and support services, working to help ensure fishers enjoy their day on the water. The financial contribution of the marine recreational fishing industry to New Zealand's economy is significant. See the appendix and supporting data from the New Zealand Marine Research Foundation.

4. Upcoming economic opportunities will be hindered. In the Hauraki Gulf Marine Park, there is a growing number of specialist saltwater flyfishing operations. New Zealand is just picking up on this international market sector and will likely see considerable growth if we have accessible and robust fisheries.

5. Charter Boats provide a service to the many Kiwis that cannot afford to buy a boat and get on the water and catch their own food.

6. Charter Boats are progressive in fish sustainability. Operators in the Charter Boat Association only catch enough fish to align with 'fish for a feed' principle and we are evolving with the times and focusing on showing Kiwis how fishing helps with self esteem, a sense of purpose and culture, mental health and overall wellbeing.

7. The Hauraki Gulf Marine Park is inseparable from regional tourism in areas such as Mangawhai, Leigh, Whitianga, Tairua, Pauanui, Whangamata, Waiheke and Coromandel township. Domestic and international tourists often visit the areas to go fishing. They rent accommodation, eat in restaurants and shop in our local retail outlets.The economic impact of a recreational fisher is substantially more than simply renting a charter boat or guide.

8. We are concerned about the apparent lack of economic research around the displacement of tourism both in the Hauraki Gulf Marine Park and on land bordering the Marine Park. Our concern is the adverse effect it will have on the region's ability to generate income and create employment opportunities. Specifically:
    a. The impact on tourism providers and in particular charter vessel operators in the Marine Park.
    b. It will create further economic turmoil for local coastal communities heavily reliant on tourism. Particularly as many are still struggling from economic losses created by the COVID restrictions between 2020-2022.

9. Because of COVID international tourism has waned. Now, Tourism NZ is investing significantly to attract international visitors back to New Zealand. For many, charter operators are the only opportunity for international tourists to get out and fish. The proposals compromise our industry by closing off well-known areas for charter-based fishing, thus compromising our businesses.

10. Finally, as a sector, the economic benefit of every fish we harvest is substantially more than the commercial fishing industry. Particularly with international tourists who spend thousands and the entire event is experiential. They can't take the fish with them so normally fish are caught and released with harvest being kept to a minimum of what can be eaten in the coming days.

Additional Information

A research survey from 2014-15 highlighting the economic contribution recreational fishing has in New Zealand has some data bringing greater awareness around the role of Charter operators in the New Zealand economy. See the following points and **Table 1** in the appendix.

11. More than 375,000 New Zealand residents fished marine waters in the Upper North Island region (Figure 1), spending more than 1.71 million days fishing.

12. Around 76% of fishers were boat-based, adding up to 1.18 million days fishing.

13. Roughly 43% of the international visiting fishers (47,000) fished in the Upper North Island (Table 1). Approximately 16,000 travelled for the primary purpose of saltwater fishing and 6,400 of those fishers hired a charter boat service.

14. The annual trip-related economic contributions in the north half of the North Island (North Cape down to Taranaki region and Gisborne region) can be found in the below table (table 2). The direct contribution of New Zealand resident marine fisher spending on trip-related goods and services in the Upper North Island was $124 million per annum in 2014-15. See **Table 2** in the appendix.

15. The total economic contributions stimulated by resident and international fishers trip-related spending are noteworthy (Table 2). Collectively, the total annual contribution to the New Zealand economy by marine recreational fishing activities in the Upper North Island includes $343 million in output, $148 million in value added (GDP) benefits plus 2,000 jobs and household income of $73 million.

16. Charter Vessel catch reporting data is readily available and accessible. See here.

17. Most 88% of charter vessel catch in the Hauraki Gulf Marine Park is snapper, a species that is abundant in this area.

Appendix

Table 1. Participation in marine fishing among international tourists visiting the Upper North Island

	All visiting fishers	Fishing as a primary purpose of visit	Fishing as a secondary purpose of visit
Total international marine fishers	**60,842**	**15,707**	**45,135**
International visitors using a charter boat service	24,832	6,411	18,421
International visitors not using a charter boat service	36,010	9,296	26,714

Table 2. Total economic contributions of trip-related, per annum spending on marine fishing in the Upper North Island by residents and international visitors

Trip-related spending*	Direct contributions	Indirect & induced contributions	Total contributions
New Zealand residents			
Direct spending	$175,054,155		
Output	$123,610,598	$135,493,756	$259,104,354
Value Added (GDP)	$47,554,166	$63,048,976	$110,603,142
Employment	909	600	1,509
Income	$28,015,870	$26,039,395	$54,055,265
New Zealand visitors			
Direct spending	$50,098,338		
Output	$39,744,883	$43,887,708	$83,632,591
Value Added (GDP)	$17,408,382	$20,311,765	$37,720,147
Employment	385	196	581
Income	$10,624,316	$8,327,441	$18,951,756
Trip-related spending by all fishers			
Direct spending	$225,152,493		
Output	$163,355,481	$179,381,464	$342,736,945
Value Added (GDP)	$64,962,548	$83,360,741	$148,323,289
Employment	1,294	796	2,090
Income	$38,640,186	$34,366,836	$73,007,021

*Direct spending values reflect consumer-based prices. Prior to applying the economic multipliers, these values were adjusted to exclude import leakages and the goods & service tax. All output, value-added, employment, and income values reflect the contributions based on the adjusted direct spending.

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 5:30 pm
To: Sea Change
Subject: Marine and sea floor protection areas

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora,

I wholeheartedly support the introduction of new marine and seafloor protection areas to restore the mauri (life-force) of Tikapa Moana, the Hauraki Gulf Marine Park, and urge the government to proceed to the next stage.

We have experienced the obvious benefits of marine protection at reserves such as the Poor Knights. These include but are not limited to, protection of biodiversity, abundant life and increased productivity, fisheries spillover through egg and larval movement, increased resilience against ocean stressors such as climate change and sedimentation, and the provision of a measurable benchmark of ocean health. From a social perspective, protected areas provide opportunities for science and education, to connect New Zealander's with te Moana and for the protection of cultural values. They also provide significant economic value through recreational and tourism opportunities, increased visitor numbers, and considerable economic growth in townships adjacent to the marine protected areas.

The implementation of this proposal will increase the Highly Protected Areas from 0.3% to 6% of the Gulf. Although this is still a far cry from achieving the 30% protection that will ensure the longevity of resources, it is a step in the right direction. The current health of Tikapa Moana is unacceptable, with kōura (crayfish) now considered functionally extinct, a 93% reduction in scallop populations in the last 10 years, prolific kina barrens, and 20% of our seabirds threatened with extinction including fairy terns and black petrels.

It is disappointing to see that the scientific community was not adequately consulted in the placement of proposed Marine Protected Areas and that such a large proportion was designated due to commercial convenience rather than biodiversity value. The majority is also not adjacent to the coastal mainland, meaning the reserves are less accessible to New Zealanders.

In saying that, the implementation of this proposal puts us on a positive trajectory to achieving future change. If we are able to restore a thriving marine environment adjacent to the largest population in New Zealand, we can act as a global leader in this space, showing it is possible to achieve positive outcomes for multiple stakeholders.

Ngā mihi nui,

s 9 (2)(a)
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 5:47 pm
To: Sea Change
Subject: FW: Submission re Hauraki Gulf management
Attachments: Submission on behalf of the Shakespear Open Sanctuary society Inc completed by s 9 (2)(a) .docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 4:51 PM
To: 'seachange@doc.govt.nz.'
Subject: Submission re Hauraki Gulf management

Please accept this submission
s 9 (2)(a)

s 9 (2)(a)

Submission on behalf of the Shakespear Open Sanctuary Society Incorporated completed by Alison Wesley

After consultation with members of our committee we applaud your plans for more protection within the gulf. We would suggest that the inclusion of the shores of Shakespear Regional Park including Okoromai and Te Haruhi Bays be added.

We are aware of the deterioration of the gulf such as the reef dwelling crayfish being functionally extinct with kina taking over these areas and destroying the kelp beds.

We have also observed the benefits of the protected areas at the Leigh Marine reserve and North of Tawharanui Regional Park.

We would promote and advocate for a high level of marine protection, particularly in the marine areas adjoining mainland sanctuaries on regional parks at Tāwharanui and Shakespear

We are concerned that your current proposals are not going far enough to provide substantial improvement of the Hauraki gulf.

I have support of the committee members at this time.

s 9 (2)(a)

Deputy Chairperson

Shakespear Open Sanctuary Society

Email: s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 5:55 pm
To: Sea Change
Subject: Submission on Hauraki Gulf
Attachments: Submission on Hauraki Gulf Protection.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Attached

Submission on Hauraki Gulf Protection

This is a personal submission from :
s 9 (2)(a)
s 9 (2)(a)
s 9 (2)(a)

I do not wish this submission to be made public as s 9 (2)(a) and this is a personal submission and is not made on behalf of that organisation.

- I do not feel the proposal adequately restricts commercial fishing which should be further reduced in the Hauraki Gulf.
- I do not feel adequate resourcing has been provided for enforcement.
- I support the additional HPA's as adequate if commercial fishing is reduced and enforcement is adequately provided for.
- I support the Seafloor protection Areas.
- I support better education around claiming of customary fishing rights and prosecution of those unlawfully claiming these.
- I support the currently proposed extensions of the Marine reserves.
- I support the use of science rather than ethnicity as being the basis for regulation.

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 6:00 pm
To: Sea Change
Subject: stop bottom trawling in the Hauraki Gulf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hi

I want to submit this submission to say we should STOP bottom trawling and mining in the Hauraki Gulf region. This includes increasing the Secure protected areas adjacent to Cathedral Cove/Whanganui-a-Hei and Cape Rodney-Okakari Point Marine reserves, as well as New protected zones of the sea floor.

19. New protected zones increasing area under protection to 18% with ambition to increase the marine protection proposals
* 12 High Protection Areas (HPAs)
* 5 Seafloor Protection Areas.

Regards

s 9 (2)(a)
Mobile: s 9 (2)(a)

Sea Change

From: SECTA s 9 (2)(a)
Sent: Friday, 28 October 2022 6:14 pm
To: Sea Change
Subject: Proposed protection zones Hauraki golf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

I have read the proposal for the expansion of HPA zones in the Hauraki gulf. I feel that this could be a great idea and chance to regenerate area which have seen heavy fishing and loss of sealife.
The issue is, it's racist. What is proposed allows for one group of people to take from a supposedly HPA based on their ethnicity. Allowing any take from a HPA defeats the purpose of the HPA. If the area is to be closed off for regenerative reasons then it should be closed to everyone.
If not, it shouldn't be closed at all.

s 9 (2)(a)
s 9 (2)(a)
--
Regards,
s 9 (2)(a)

SECTA
s 9 (2)(a)
Nelson, New Zealand
Phone: s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 6:19 pm
To: Sea Change
Subject: Submission

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora,

I wholeheartedly support the introduction of new marine and seafloor protection areas to restore the mauri (life-force) of Tikapa Moana, the Hauraki Gulf Marine Park, and urge the government to proceed to the next stage.

We have experienced the obvious benefits of marine protection at reserves such as the Poor Knights. These include but are not limited to, protection of biodiversity, abundant life and increased productivity, fisheries spillover through egg and larval movement, increased resilience against ocean stressors such as climate change and sedimentation, and the provision of a measurable benchmark of ocean health. From a social perspective, protected areas provide opportunities for science and education, to connect New Zealander's with te Moana and for the protection of cultural values. They also provide significant economic value through recreational and tourism opportunities, increased visitor numbers, and considerable economic growth in townships adjacent to the marine protected areas.

The implementation of this proposal will increase the Highly Protected Areas from 0.3% to 6% of the Gulf. Although this is still a far cry from achieving the 30% protection that will ensure the longevity of resources, it is a step in the right direction. The current health of Tikapa Moana is unacceptable, with kōura (crayfish) now considered functionally extinct, a 93% reduction in scallop populations in the last 10 years, prolific kina barrens, and 20% of our seabirds threatened with extinction including fairy terns and black petrels.

It is disappointing to see that the scientific community was not adequately consulted in the placement of proposed Marine Protected Areas and that such a large proportion was designated due to commercial convenience rather than biodiversity value. The majority is also not adjacent to the coastal mainland, meaning the reserves are less accessible to New Zealanders.

In saying that, the implementation of this proposal puts us on a positive trajectory to achieving future change. If we are able to restore a thriving marine environment adjacent to the largest population in New Zealand, we can act as a global leader in this space, showing it is possible to achieve positive outcomes for multiple stakeholders.

Ngā mihi nui,

s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 7:09 pm
To: Sea Change
Subject: Hahei Marine Reserve Extension

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

I have a residential property at s 9 (2)(a) Coromandel and would like to make a submission in relation to the proposed Te Whanganui a Hei (Cathedral Cove) Marine Reserve Extension.

I strongly support this proposed extension. In fact, I suggest the eastern boundary run along the eastern side of all Mahurangi Island, then along the eastern side of Te Karaka Island to the pa (Te Pare Point) at the eastern end of Hahei Beach. I also support the proposal to included the western side of Mahurangi Island in the extended reserve. From my observations over many years there is almost no fishing done along this side of the island either on land or by boat except for Crayfish pots. Diving, snorkelling and kayaking is popular in this location. Also, extending the reserve to include all Hahei beach would not preclude normal beach activity. This activity coexists comfortably at other existing marine reserves in NZ, such as the Leigh Marine Reserve. So, the same could occur at Hahei.

Overall, I see the proposal as beneficial to the future of Hahei in it becoming an attractive sea and ecological centre to tourist and thereby benefitting the town and wider Coromandel economy. This proposal is broadly consistent with the Hahei and Coromandel community values of stewardship of caring for and enhancing the natural environment.

s 9 (2)(a)
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 8:54 pm
To: Sea Change
Subject: Submission
Attachments: NMST - DOC - Revitalising the Gulf - 28 Nov 2022.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Tēnā koe,

Please see the attached submission from the Ngāti Manuhiri Settlement Trust.

Nga mihi nui,

s 9 (2)(a)
Ngāti Manuhiri Settlement Trust
P: s 9 (2)(a)
E s 9 (2)(a)

NGĀTI MANUHIRI
SETTLEMENT TRUST

To: Minister of Oceans and Fisheries, Hon David Parker
Minister of Conservation, Hon Poto Williams
c/- Te Papa Atawhai Department of Conservation
Submitted via email: seachange@doc.govt.nz

28 October 2022

***Revitalising the Gulf* Marine Protection Proposals**

The Proposal

Te Papa Atawhai The Department of Conservation (the Department) is seeking feedback on proposals to establish 19 new protected zones in the Hauraki Gulf through the introduction of the proposed Hauraki Gulf Marine Protection Bill. The proposals were originally developed as part of the 'Revitalising the Gulf: Government action on the Sea Change Plan' which was adopted in June 2021.

Ngāti Manuhiri Settlement Trust were involved in the development of the Sea Change Plan. The general concepts in that plan are supported by Ngāti Manuhiri Settlement Trust.

The Department proposes the establishment of new protected zones in the Hauraki Gulf, using two new marine protection tools established through new legislation (a new Hauraki Gulf Marine Protection Bill). The intent of this increase in marine protection is to support the recovery of parts of the Gulf which have high biodiversity values. The proposed marine protection package includes:

- 12 High Protection Areas (HPAs) to protect and enhance marine habitats and ecosystems while providing for the customary practices of mana whenua;
- 5 Seafloor Protection Areas (SPAs) to protect sensitive sea floor habitats while continuing to allow for compatible activities; and
- 2 protected areas adjacent to Whanganui-a-Hei (Cathedral Cove) and Cape Rodney – Okakari Point marine reserves. These areas will be established as HPAs or marine reserve extensions.

It is acknowledged that the proposal does not include the Hauraki Gulf Fisheries Plan or the development of biodiversity objectives for each HPA.
Te Moananui a Toi (Hauraki Gulf) is an important part of the Ngāti Manuhiri rohe. Ngāti Manuhiri as kaitiaki of Te Moananui a Toi have a right to exercise their mana whenua within their rohe. This includes working with the Crown in the development of legislation that will impact on the taiao, and also the ability of Ngāti Manuhiri to be active kaitiaki of their taiao.
This document outlines the Ngāti Manuhiri taiao/environmental expectations in the marine space.

The Ngāti Manuhiri Settlement Trust

The Ngāti Manuhiri Settlement Trust (the Trust) is a Post Settlement Governance Entity (PSGE) who are the mandated and approved entity to represent Ngāti Manuhiri and its environs.

Ngāti Manuhiri are the descendants of the famous warrior chieftain Maki and his wife Rotu who, in the early seventeenth century, migrated with their family and a large group of followers from Kawhia to what is now the Tamaki (Auckland) region.

They initially named and occupied Tamaki, and later settled in the southern Kaipara, Waitakere, Whenua roa o Kahu (North Shore) and Mahurangi districts (From te Arai Okura)

When Maki and his people arrived in Tamaki, they were returning to an ancestral home that had been explored, named, and settled by their tupuna (ancestors).

In time the children of Maki and his followers dispersed throughout southern Kaipara, Te Whenua roa o Kahu (the North Shore), Hikurangi (West Auckland), Whangaparaoa, Mahurangi, Matakanakana, Pakiri, Aotea (Great Barrier Island), and Te Hauturu o Toi Little Barrier Island. Together they are known today as the “Te Kawerau confederation”. Maki and Rotu finally settled at Te Korotangi, a pa near the mouth of Waihe (Mahurangi River).

Ngāti Manuhiri were instrumental in helping to establish Aotearoa New Zealand’s first ever Marine Reserve at Te Hāwera-ā-Maki (Goat Island) in 1975. Current projects include waterways plantings to reduce sedimentation and a Sustainable Seas National Science Challenge project, Kohunga Kūtai, that aims to find natural products that can replace plastics used in aquaculture.

Rohe

Ngāti Manuhiri Settlement Trust’s rohe or tribal boundaries encompass Bream Tail / Mangawhai to the north and extend south to the Okura River mouth south of Whangaparaoa.

Our easterly boundary takes in the islands of Hauturu-ō-Toi, Kawau Tūmārō-ō-Tōi, Tiritiri Matangi, Panetiki, the Mokohinau islands, Hāwere a Maki, Motu Tohorā, Motuihe, Moturekareka, Motuketekete, Motutara, Te Haupa and associations in the Waitemata and the lower Hauraki Gulf.

The western boundary starting in the North at Patumakariri, Kaipara, Moturemu, Arapārera, Makarau through to Oteha / Takapuna.

General Feedback:

- The Trust is very pleased to see progress being made on critical proposals for protection of the Hauraki Gulf marine habitats.
- We wish to highlight the urgent need for strong marine conservation action in Hauraki Gulf, due to the major past and ongoing degradation suffered in this, the most densely populated region of New Zealand (as clearly outlined in the Sea Change Plan).
- Overall, the primary principles the Trust wishes to see implemented are the greatest levels of habitat protection possible that can be agreed to by all the stakeholders.

Feedback on Specific Proposals:

1) The Trust support and want a full HPA over Hauturu-ō-Toi Little Barrier Island to include customary management in accordance with the tikanga of Ngāti Manuhiri
2) The Trust support and want a Mataitai zone linking Tāwharanui and Te Hawere-a-Maki and to extend the current boundary by a further 5km.
3) The Trust do not support and want banned sea dredging, trawl fishing and serie fishing. These practices are destructive and destroy our rohe moana.
4) We support and want 30% of the Gulf under the protection of HPA's and MPA's.

Final General Comments:

- The Trust looks forward to, if required, providing additional feedback on the Hauraki Gulf Marine Protection Bill during the Select Committee process.

- We also look forward to providing feedback to MPI on the Hauraki Gulf Fisheries Plan later this year.

Finally, Ngāti Manuhiri Settlement Trust supports that The Gulf be afforded legal personhood status.

Thank you for the opportunity to provide feedback on these proposals.

s 9 (2)(a)
Acting CE, Ngāti Manuhiri Settlement Trust

Sea Change

From: s 9 (2)(a) s 9 (2)(a) >
Sent: Friday, 28 October 2022 9:09 pm
To: Sea Change
Subject: Hauraki Gulf Maritime Park

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hi,

For the purposes of this submission, I will use the term fish to refer to all fish, crayfish and shellfish.

To rebuild our fishery as a whole, the number of fish killed each year must be less than the number of new fish successfully reaching maturation each year. This is an indisputable fact.

This is very simple mathematics:

[Total number of fish next year] = [present number of fish] - [mortality (fish killed)] + [recruitment (new fish reaching maturation)]

It does not matter where these fish are killed - this simple formula will always hold true.

Suppose you have 20 fish. 10 in tank A. 10 in tank B.
If you kill 2 fish in tank A, and kill 2 fish in tank B, how many fish do you have left in total? (16)
If you kill 0 fish in tank A, and kill 4 fish in tank B, how many fish do you have left in total? (16)

To assist the process of rebuilding our fishery, we have ONLY two categories of options:
1) Increase recruitment. i.e assist new fish in reaching maturation each year
2) Decrease mortality i.e. kill less fish each year

Any strategy that does not do one or both of these things will certainly fail. Not only will it fail, but it will have many undesirable effects as well.

Category 1: Assist Recruitment. i.e. Assist new fish in reaching maturation each year.
To do this, we must destroy less habitat and stop using destructive fishing practices.
Dredging - both recreational and commercial, damages the sea floor and must be stopped.
Bottom trawling damages the sea floor and must be stopped. (Note that anchoring is NOTHING like dredging or bottom trawling.)
Reduce water pollution

Category 2: Reduce Mortality i.e. Kill less fish each year.
The only thing that matters here is the number of fish killed. The precise location of where they are killed is irrelevant to the overall number of fish remaining. Again, this is simple mathematics. If you kill less fish in one particular area (a reserve), fish numbers in that area might increase to some extent - but fish numbers in other areas will decrease by the exact same number, **UNLESS THE TOTAL NUMBER OF FISH KILLED IS REDUCED.**

Suppose you have a fish tank with 20 fish in it, then one day you kill 5 fish and add 4 new fish. You will have 19 live fish in the tank. This is an indisputable fact. It does not matter if you kill the 5 fish on the left hand side of the tank or the right hand side of the tank - you will still have 19 live fish in the tank.

Marine reserves are nice for divers, in that they provide a small area with more tame fish, but unless the total number of fish killed changes, the net effect on total fish populations is zero. As a diver, I support only the small number of marine reserves that we already have. Marine reserves are not the answer to rebuilding fish stocks.

So, the big question is: Do marine reserves actually reduce the total number of fish killed?

MARINE RESERVES HAVE ALMOST NO EFFECT WHATSOEVER ON THE NUMBER OF FISH KILLED BY COMMERCIAL FISHERMEN. Marine reserves are almost always adjacent to land, in semi-sheltered waters mostly only frequented by recreational fishermen. Even if commercial fishermen did previously fish there, commercial fishermen with quota will always kill the same number of fish somewhere else to fulfil their quota.

MARINE RESERVES HAVE LITTLE EFFECT ON THE NUMBER OF FISH KILLED BY RECREATIONAL FISHERMEN
Many recreational fishermen think marine reserves are good for a number of reasons.
1) We all want to do our bit to help.
2) They are tricked into believing the net effect will be positive for them.
3) They don't appreciate the inequality of marine reserves (see further below)
4) They believe they can still catch a similar number of fish somewhere else - **AGAIN, THE TOTAL NUMBER OF FISH KILLED IS NOT SIGNIFICANTLY REDUCED.**

Aside from being ineffective, marine reserves have many negative effects:

Shifting the problem
Unless quotas are reduced, **MARINE RESERVES ALWAYS INCREASE THE FISHING PRESSURE ON SURROUNDING AREAS**. In some instances these effects can be massive and catastrophic.

Best recreational fishing spots gone
Often the very best fishing spots are proposed for reserves. e.g. current proposal for Mokohinau Islands
Proposed locations for marine reserves are virtually always adjacent to land.
This means that land based spots are no longer fishable
This means that semi-sheltered waters for small boats are no longer fishable. For some areas, in a given weather condition, there will be no sheltered waters for small recreational boats to fish. e.g. current proposal for the entire northern side of Little Barrier - the only area of Little Barrier that is fully sheltered from prevailing SW winds.

Inequality of Marine Reserves
Marine reserves will always affect some people a lot more than others.
They will always be on someone's favourite spot
They will always be someone's local spot
They are typically proposed for areas of special interest to recreational fishermen.
They will almost always have little impact on commercial fishermen, while predominantly affecting recreational fishermen, who typically have smaller boats and enjoy the semi-sheltered waters that are proposed for marine reserves.

Wake up call
Recreational fishermen need to recognise that marine reserves are a direct assault on the freedom of recreational fishermen to enjoy the most pleasant and most productive parts of the marine environment - while being almost completely ineffective at increasing total fish stocks.

Reducing Limits
This has been done many times already. I believe the recreational community has already taken one for the greater good enough times already. e.g. 16 per day reduced to 9 per day, then reduced to 7 per day. Minimum size increased from 27cm to 30cm (Whilst many recreational fishermen the minimum size change, it is questionable whether the effect of this is positive or negative - because for every legal sized fish kept, more fish are being returned to the ocean manhandled, gut hooked, suffering barotrauma and eaten by waiting seabirds)

Reduce Quotas
Recreational fishermen have already made many sacrifices, while commercial quotas have remained unchanged or

increased for species of interest to recreational fishermen. It must be remembered that it was the commercial sector that decimated our marine resources prior to the introduction of the QMS. It must be remembered that it was commercial fishermen who wiped out the scallop motherbed. It is high time that quotas were either reduced or bought out and disposed of. This needs to be done by MPI.

Recreational Only Fishing Areas
Some areas of special interest to recreational fishermen such as the Mokohinau Islands should be set aside for recreational only fishing only. Because of their remoteness, recreational fishing pressure on these islands is very limited.

Reduce Wasteful Practices
Mortality can be reduced by reducing or eliminating wasteful practicesDumping and high grading of fish must be stopped.
All fish commercially caught must be landed.
Intentional catch and release fishing is wasteful. If an angler chooses to release an exceptionally large fish with a good chance of survival that's good, but deliberately catching more fish than you need to eat is wasteful.
Recreational fishermen should be encouraged to stop fishing when they have enough fish.

Summary
For reasons stated above, **I AM VEHEMENTLY OPPOSED TO NEW MARINE RESERVES or HPAs**.
For our fish stocks to recover, we must pursue avenues that either directly decrease mortality or increase recruitment, rather than simply impacting the freedoms of recreational fishermen.

I fully support the banning of dredging - both recreational and commercial
I fully support the banning of bottom contact trawl netting
I fully support the reduction or buy out of commercial quota
I fully support measures to reduce water pollution
I fully support banning of high grading and fish dumping
I fully support banning commercial fishing in areas that are of special interest to recreational fishermen

Regards,
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 9:17 pm
To: Sea Change
Subject: Hauraki Gulf Maritime Park

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hi,

For the purposes of this submission, I will use the term fish to refer to all fish, crayfish and shellfish.

To rebuild our fishery as a whole, the number of fish killed each year must be less than the number of new fish successfully reaching maturation each year. This is an indisputable fact.

This is very simple mathematics:

[Total number of fish next year] = [present number of fish] - [mortality (fish killed)] + [recruitment (new fish reaching maturation)]

It does not matter where these fish are killed - this simple formula will always hold true.

Suppose you have 20 fish. 10 in tank A. 10 in tank B.
If you kill 2 fish in tank A, and kill 2 fish in tank B, how many fish do you have left in total? (16)
If you kill 0 fish in tank A, and kill 4 fish in tank B, how many fish do you have left in total? (16)

To assist the process of rebuilding our fishery, we have ONLY two categories of options:
1) Increase recruitment. i.e assist new fish in reaching maturation each year
2) Decrease mortality i.e. kill less fish each year

Any strategy that does not do one or both of these things will certainly fail. Not only will it fail, but it will have many undesirable effects as well.

Category 1: Assist Recruitment. i.e. Assist new fish in reaching maturation each year.
To do this, we must destroy less habitat and stop using destructive fishing practices.
Dredging - both recreational and commercial, damages the sea floor and must be stopped.
Bottom trawling damages the sea floor and must be stopped. (Note that anchoring is nothing like dredging or bottom trawling.)
Reduce water pollution

Category 2: Reduce Mortality i.e. Kill less fish each year.
The only thing that matters here is the number of fish killed. The precise location of where they are killed is irrelevant to the overall number of fish remaining. Again, this is simple mathematics. If you kill less fish in one particular area (a reserve), fish numbers in that area might increase to some extent - but fish numbers in other areas will decrease by the exact same number, **unless the total number of fish killed is reduced.**

Suppose you have a fish tank with 20 fish in it, then one day you kill 5 fish and add 4 new fish. You will have 19 live fish in the tank. This is an indisputable fact. It does not matter if you kill the 5 fish on the left hand side of the tank or the right hand side of the tank - you will still have 19 live fish in the tank.

Marine reserves are nice for divers, in that they provide a small area with more tame fish, but unless the total number of fish killed changes, the net effect on total fish populations is zero. As a diver, I support only the small number of marine reserves that we already have. Marine reserves are not the answer to rebuilding fish stocks.

So, the big question is: Do marine reserves actually reduce the total number of fish killed?

Marine reserves have almost no effect whatsoever on the number of fish killed by commercial fishermen. Marine reserves are almost always adjacent to land, in semi-sheltered waters mostly only frequented by recreational fishermen. Even if commercial fishermen did previously fish there, commercial fishermen with quota will always kill the same number of fish somewhere else to fulfil their quota.

Marine reserves have little effect on the number of fish killed by recreational fishermen
Many recreational fishermen think marine reserves are good for a number of reasons.
1) We all want to do our bit to help.
2) They are tricked into believing the net effect will be positive for them.
3) They don't appreciate the inequality of marine reserves (see further below)
4) They believe they can still catch a similar number of fish somewhere else - **again, the total number of fish killed is not significantly reduced.**

Aside from being ineffective, marine reserves have many negative effects:

Shifting the problem
Unless quotas are reduced, **marine reserves always increase the fishing pressure on surrounding areas**. In some instances these effects can be massive and catastrophic.

Best recreational fishing spots gone
Often the very best fishing spots are proposed for reserves. e.g. current proposal for Mokohinau Islands
Proposed locations for marine reserves are virtually always adjacent to land.
This means that land based spots are no longer fishable
This means that semi-sheltered waters for small boats are no longer fishable. For some areas, in a given weather condition, there will be no sheltered waters for small recreational boats to fish. e.g. current proposal for the entire northern side of Little Barrier - the only area of Little Barrier that is fully sheltered from prevailing SW winds.

Inequality of Marine Reserves
Marine reserves will always affect some people a lot more than others.
They will always be on someone's favourite spot
They will always be someone's local spot
They are typically proposed for areas of special interest to recreational fishermen.
They will almost always have little impact on commercial fishermen, while predominantly affecting recreational fishermen, who typically have smaller boats and enjoy the semi-sheltered waters that are proposed for marine reserves.

Wake up call
Recreational fishermen need to recognise that marine reserves are a direct assault on the freedom of recreational fishermen to enjoy the most pleasant and most productive parts of the marine environment - while being almost completely ineffective at increasing total fish stocks.

Reducing Limits
This has been done many times already. I believe the recreational community has already taken one for the greater good enough times already. e.g. 16 per day reduced to 9 per day, then reduced to 7 per day. Minimum size increased from 27cm to 30cm (Whilst many recreational fishermen the minimum size change, it is questionable whether the effect of this is positive or negative - because for every legal sized fish kept, more fish are being returned to the ocean manhandled, gut hooked, suffering barotrauma and eaten by waiting seabirds)

Reduce Quotas
Recreational fishermen have already made many sacrifices, while commercial quotas have remained unchanged or

increased for species of interest to recreational fishermen. It must be remembered that it was the commercial sector that decimated our marine resources prior to the introduction of the QMS. It must be remembered that it was commercial fishermen who wiped out the scallop motherbed. It is high time that quotas were either reduced or bought out and disposed of. This needs to be done by MPI.

Recreational Only Fishing Areas
Some areas of special interest to recreational fishermen such as the Mokohinau Islands should be set aside for recreational only fishing only. Because of their remoteness, recreational fishing pressure on these islands is already very limited, so recreational fishing does not need to be banned in such locations.

Reduce Wasteful Practices
Mortality can be reduced by reducing or eliminating wasteful practicesDumping and high grading of fish must be stopped.
All fish commercially caught must be landed.
Intentional catch and release fishing is wasteful. If an angler chooses to release an exceptionally large fish with a good chance of survival that's good, but deliberately catching more fish than you need to eat is wasteful. Recreational fishermen should be encouraged to stop fishing when they have enough fish.

Summary
For reasons stated above, **I am strongly opposed to any new marine reserves or HPAs.**
For our fish stocks to recover, we must pursue avenues that either directly decrease mortality or increase recruitment, rather than simply impacting the freedoms of recreational fishermen.

I fully support the banning of dredging - both recreational and commercial
I fully support the banning of bottom contact trawl netting
I fully support the reduction or buy out of commercial quota
I fully support measures to reduce water pollution
I fully support banning of high grading and fish dumping
I fully support banning all commercial fishing in areas that are of special interest to recreational fishermen such as the Mokohinau Islands.

Regards,
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 10:09 pm
To: Sea Change
Subject: Haruki Gulf Marine Protected Area propsal

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

To whom it may concern,

I am writing to express my support for the proposed protection zones in the Harauki Gulf. It is good to see policy changes being made following the Sea Change process. This is an important first step towards protecting this highly valued coastal area, but further measures will need to be taken if we are to truly revitalize the Gulf. For example, global protection targets are 30% and this proposal only protects 18% of the total area. I would like to see the protection go further and ban all bottom contact fishing methods from the Gulf. These fishing methods have been shown to have far-reaching negative impacts on coastal ecosystems. My apologies for the late submission. I hope you will take my comments into consideration.

Kind regards,

s 9 (2)(a)
PhD (Marine Science)

Sea Change

From: s 9 (2)(a)s 9 (2)(a)
Sent: Saturday, 29 October 2022 9:18 am
To: Sea Change
Subject: Submission

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hi Team at DOC,

My wife and I oppose dredging and trawling in the Hauraki Gulf and down the East Coast of the Coromandel Peninsular.
We have also talked the our MP Scott Simpson over time to establish a series of small No Take Marine Reserves (like Hahei). These could be half a km square say, every 3.5 KMs up the coast of this entire region. The reason for this is to protect the genetic information/DNA of breeding stock for the future.
Conversely, it could be 1km sq every 7 KMs of coastline.
It's a move toward Restoration!!
We have to go there !!!!!

Love your work 😄
Kind Regards,
s 9 (2)(a)
s 9 (2)(a)
.

Sent from my iPhone

Sea Change

From: s 9 (2)(a)s 9 (2)(a)
Sent: Saturday, 29 October 2022 10:44 am
To: Sea Change
Subject: attached proposal
Attachments: Seachange DOC proposal 27 10 22 (002).docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Good Day,

I would like to provide my support for the Sea Change Proposal as attached.

Regards,
s 9 (2)(a)
s 9 (2)(a)

Seachange
Department of Conservation
Seachange@doc.govt.nz

25 October 2022.

Submission on proposed High Protection Zones in the Hauraki Gulf

My/our concerns about this process and the proposal itself can be summarised as follows:

It is not democratic

- Very little time has been given for people to hear about, understand and respond to these marine protection proposals .
- The source documents are complex and the most important information about the size and reach of the proposed High Protection Areas are located in the appendix (slides 124 to 142) of a 144 page report
- Not all relevant stakeholders or intermediaries between the proposal and the affected groups have been directly contacted by DOC or HGF to alert them to this proposal. For example, bait and fishing supply shops had no idea of this proposal yet it is their customers who will be directly affected by the establishment of no fish zones around the inner gulf areas including 50 km2 area around the Noises.

It is potentially very divisive.

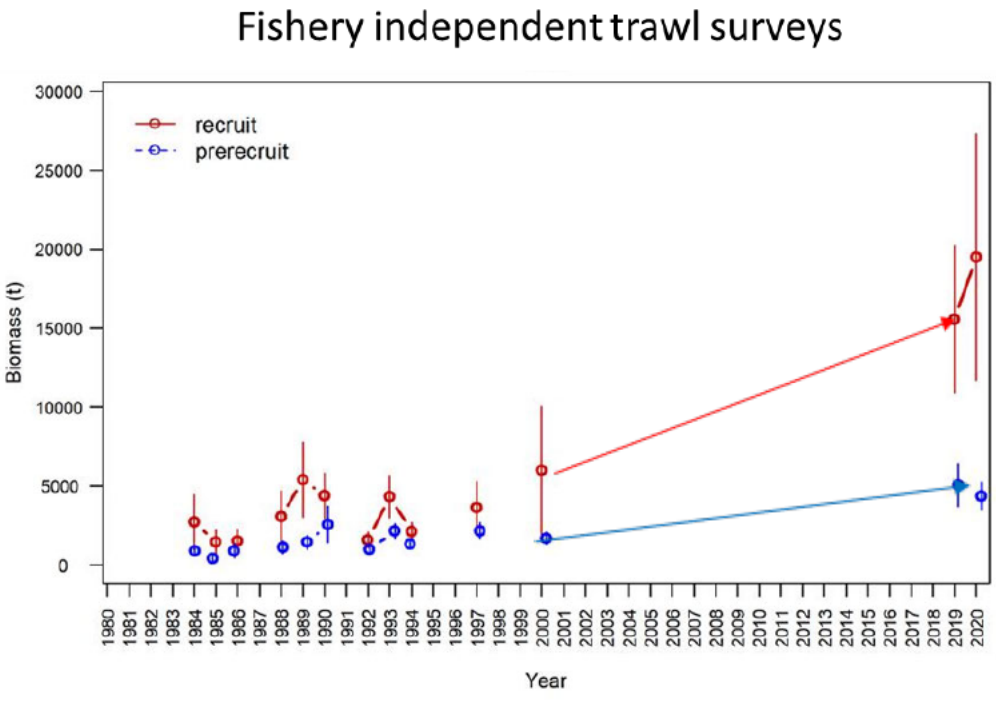
The proposal expressly prevents any recreational or commercial fishing in these areas but allows for :

The customary practices of mana whenua, including customary non-commercial fishing, will be provided for within HPAs. Customary practices will be managed to achieve the biodiversity objectives agreed with mana whenua for each site. Protected Customary Rights (PCR) and Customary Marine Title (CMT) recognised under the Takutai Moana Act will be unaffected.

Inevitably this will be reinterpreted as two different sets of rules for the same area of water that was once accessible to all. There is no guidance within the documentation on how this work in practice in large areas such as the Noises (50 km2) or the Motukawao Group (30 km2) which is a very popular and productive fishing area across all cultural groups, Maori, Pakeha, Pacifica and Asian

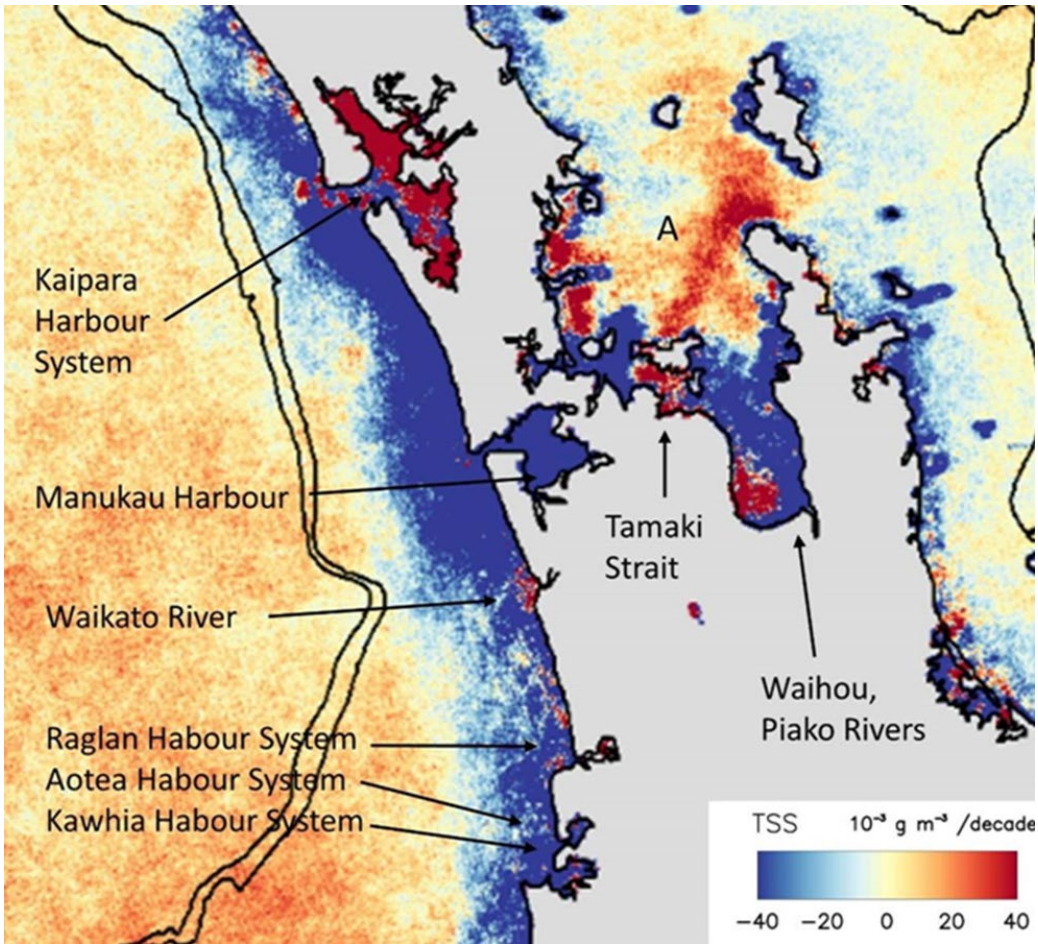
It inconsistently applies its own guidelines to justify the HPA's .
The purpose of the High Protection Ares is to *support the recovery of some of the most biodiverse regions in the Gulf*.
Some of the most at risk marine ecosystems include scallops, crayfish and the loss of kelp forests, in part, to a greater or lesser extent, due to the encroachment of kina.
Yet few of the detailed assessments outlining the ecological objectives and justification for an HPA specifically mention the protection or restoration of scallops or crayfish and in some cases the report acknowledges that *most of the soft-sediment habitat within the area has unknown values; it is thought to be dominated by mud substrate (Motukawao group).*
Nor is there any data or observations that set the benchmark on how the establishment of the specific HPA's will improve the pre-HPA ecosystems around these areas.

Part of the fundamental rationale for the establishment of these HPA's are out of date or no longer apply .
Much of the work on the establishment of these HPA's began 6- 7 years ago; well before the Gulf wide government moratorium on scallop collection or dredging, or collection of crayfish or the establishment of rahui to protect coastlines. But the rationale for these HPA's do not reflect these important advancements in the protection of sea-life and the sea floor.
The narrative of the DOC proposal and its supporting documentation also predates the publication of the NIWA trawl survey data in 2021 that shows snapper stocks and many other species have significantly recovered over recent years. See slide below :



HPA's are not strategically aligned to solving the biggest future threat to the Gulf, particularly the inner Gulf

With the reduction of commercial fishing pressure, decreases in recreational bag quota and the moratoriums on crayfish and scallop harvesting the pressure on the future of the Hauraki Gulf increasingly shifts towards land based, not sea-based activities.
The biggest threat to the recovery of the Gulf is sedimentation; from rural and forestry-based activities in the Waikato and Coromandel catchments and the rapid development of rural land for housing and commercial developments along the northern and southern coastlines of the Auckland region.
The increasing rate of subdivision, combined with higher frequency high volume rainstorms has accelerated the flow of sediments down the many streams and rivers to the estuaries that feed into our coastlines from Long Bay north to Leigh, and on Waiheke Is land. (See map of spatial trends in sedimentation of the Hauraki Gulf (Niwa 2022)



The extension of the northern motorway is only going to push that rate of sedimentation along the very coastline that feed into the HPAs for Tiritiri Matangi, Mahurangi, Kawau Is land right up to Goat Is land itself. If we need to see what the future of suffocating sedimentation looks like, visit Long Bay reserve after a storm, or compare the health of the Waitemata harbour to what it was 6 years ago.
The danger is that the establishment of HPA's creates an illusion of protection and revitalisation when sedimentation will continue to spread across the Gulf irrespective of these new boundaries.

In summary we oppose the creation of these HPA's for the following reasons:

- It is based on out-of-date data and assumptions about the biggest threats to the Gulf,
- The process for gathering feedback is undemocratic
- The establishment of the HPA's is potentially very divisive between manu whenua Māori and other long-established groups of gulf users.
- It will not solve the fundamental problems facing the health of the Hauraki Gulf, particularly the inner part of the Gulf ,which are now essentially land use -sediment based.
- It will reduce people on modest budgets and small boats to catch fish for themselves and their whanau

However, we understand that this is only a preliminary phase in the development of new legislation to help protect and enhance the ecosystem of the Hauraki gulf for all to enjoy. We look forward to being part of those vital conversations.

Thank you, for your consideration.

Regards

Murray Campbell
s 9 (2)(a)
s 9 (2)(a)
s 9 (2)(a)
s 9 (2)(a)
and on behalf of the following charter boat operators at s 9 (2)(a)
s 9 (2)(a) Dr Hook Charters s 9 (2)(a)
Alan Seasprite Charters s 9 (2)(a)
s 9 (2)(a) s 9 (2)(a) Princess Carol Charters
s 9 (2)(a) Snap Attack s 9 (2)(a)
s 9 (2)(a) s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Saturday, 29 October 2022 12:56 pm
To: Sea Change
Subject: Marine Protection Hauraki Gulf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora,

I wholeheartedly support the introduction of new marine and seafloor protection areas to restore the mauri (life-force) of Tikapa Moana, the Hauraki Gulf Marine Park, and urge the government to proceed to the next stage.

We have experienced the obvious benefits of marine protection at reserves such as the Poor Knights. These include but are not limited to, protection of biodiversity, abundant life and increased productivity, fisheries spillover through egg and larval movement, increased resilience against ocean stressors such as climate change and sedimentation, and the provision of a measurable benchmark of ocean health. From a social perspective, protected areas provide opportunities for science and education, to connect New Zealander's with te Moana and for the protection of cultural values. They also provide significant economic value through recreational and tourism opportunities, increased visitor numbers, and considerable economic growth in townships adjacent to the marine protected areas.

The implementation of this proposal will increase the Highly Protected Areas from 0.3% to 6% of the Gulf. Although this is still a far cry from achieving the 30% protection that will ensure the longevity of resources, it is a step in the right direction. The current health of Tikapa Moana is unacceptable, with kōura (crayfish) now considered functionally extinct, a 93% reduction in scallop populations in the last 10 years, prolific kina barrens, and 20% of our seabirds threatened with extinction including fairy terns and black petrels.

It is disappointing to see that the scientific community was not adequately consulted in the placement of proposed Marine Protected Areas and that such a large proportion was designated due to commercial convenience rather than biodiversity value. The majority is also not adjacent to the coastal mainland, meaning the reserves are less accessible to New Zealanders.

In saying that, the implementation of this proposal puts us on a positive trajectory to achieving future change. If we are able to restore a thriving marine environment adjacent to the largest population in New Zealand, we can act as a global leader in this space, showing it is possible to achieve positive outcomes for multiple stakeholders.

Ngā mihi nui,

s 9 (2)(a)
Director/ Sports Massage Therapist
[THE MUSCLE MECHANICS]
s 9 (2)(a)
http://www.themusclemechanics.co.nz
s 9 (2)(a)

Sea Change

From: s 9 (2)(a)
Sent: Saturday, 29 October 2022 2:18 pm
To: Sea Change
Subject: FW: Hauraki Gulf Marie protection
Attachments: Marine Protection Proposal Submission s 9 (2)(a) (002).docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Dear Sir/Ms

Please find attached my submission to the Hauraki Gulf Marine protection proposals.

Nga mihi
s 9 (2)(a)

28 October 2022

Submitter: s 9 (2)(a) s 9 (2)(a)

Boat owner, Protector of Nature

Contact : s 9 (2)(a)

SUBMISSION ON MARINE PROTECTION PROPOSALS

- I strongly support increased no fish reserves. While accepting that there can be iwi customary practices this has to be strictly controlled.
- I think marine reserves should be reserves for ALL ie no customary fishing. Lets face it we are protecting for all and it will have the effect of increasing stocks for all. Reserves should be a place where all sea creatures feel safe.
- This also makes compliance a lot more cut and dried.
- I accept we have to protect the commercial fishery within limits that are sustainable.
- I strongly oppose scallop dredging in the gulf which should be banned at least in all the designated areas of the marine protection proposal (19 areas). Ideally recreational and commercial scallop dredging should be banned in the entire gulf.
- The HPA's do provide a level of protection however marine reserves remove grey areas around what can be taken under HPA guidelines.
- Compliance is a serious concern. There is no point in establishing reserves if there isn't sufficient monitoring of compliance. Increase compliance monitoring/penalties.
- I strongly support at least 18% of the gulf becoming protected in some form.
- I strongly support the extensions to Cape Rodney-Okakari Point and Whanganui-a-hei as marine reserves not HPA's. Main reason is to avoid compliance grey areas and to simplify compliance in a high visitor areas.
- I strongly support the HPA at the Noises and understand it is supported by the owners of the islands. I believe this should be a marine reserve not an HPA for reasons stated above.
- I strongly support the establishment of the Proposed Hākaimangō-Matiatia (Northwest Waiheke) Marine Reserve. I note this is not shown in your document.

s 9 (2)(a)

Ph: s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Sunday, 30 October 2022 2:44 pm
To: Sea Change
Subject: Submission
Attachments: Submission on behalf of the Shakespear Open Sanctuary society Inc completed by s 9 (2)(a) .docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

I am aware that this is late, but twice it has been returned to me.
I hope that this succeeds
s 9 (2)(a)

s 9 (2)(a)
s 9 (2)(a)

Submission on behalf of the Shakespear Open Sanctuary society Inc completed by s 9 (2)(a)

After consultation with members of our committee we applaud your plans for more protection within the gulf. We would suggest that inclusion of the shores of Shakespear regional park including Okoromai and Te Haruhi Bays could be added.

We are aware of the deterioration of the gulf such as the Reef dwelling crayfish being functionally extinct with kina taking over these areas and destroying the kelp beds.

We have also observed the benefits of the protected areas at the Leigh Marine reserve and North of Tawharnui regional Park.

We are concerned that your current proposals are not going far enough to provide substantial improvement of the Hauraki gulf

I can only be sure of the committee members at this time.

s 9 (2)(a)

Deputy Chairperson

Shakespear Open Sanctuary Society

Email: s 9 (2)(a)

Sea Change

From: s 9 (2)(a) <kgoddard@northtec.ac.nz>
Sent: Sunday, 30 October 2022 5:32 pm
To: Sea Change
Subject: Mountain to Sea Conservation Trust submission
Attachments: MTSCT submission_October 2022_KG.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora,

I emailed on Friday 28th October requesting that a submission by the Mountains to Sea Conservation Trust (MTSCT) on the proposed marine protection zones in the Hauraki Gulf be accepted on the 30th October. Due to unforeseen circumstances, it couldn't be emailed on Friday.

Please find attached the submission from the MTSCT, which I am submitting as the Chairwoman. If you have any questions, please feel free to contact me. I would appreciate acknowledgement of the submission please. Thank you.

Ngā mihi

s 9 (2)(a) | **Tutor/Kaiako** MSc Marine Science
Applied and Environmental Sciences
s 9 (2)(a)

NorthTec
TAI TOKERAU WĀNANGA

Te Pūkenga

Noho tata, haere tawhiti – Stay Close, Go Far

s 9 (2)(a)
s 9 (2)(a)

Department of Conservation
seachange@doc.govt.nz

Submission

The Mountains to Sea Conservation Trust (MTSCT) vision is that the biodiversity of our ocean, coastal areas, streams, rivers, lakes, and wetlands are respected as taonga (treasure). We view these systems with no boundaries. Restoration of any part of the system supports the whole.

Our mahi is primarily through our unique freshwater and marine inquiry-based, outdoor education programmes and a multitude of community events that encourage participation in communities through Experiencing Marine Reserves (EMR) and Whitebait Connection (WBC) over the last 20 years.

The Mountains to Sea Conservation Trust wishes to formally support the application for the Revitalising the Gulf proposal for 19 new marine protection zones specifically for the educational, ecological, and scientific benefits.

About 6.5% of the Hauraki Gulf is currently protected from fishing, and almost all of this area is in the cable protection zones, as the existing six no-take marine reserves make up less than 0.5% of the Hauraki Gulf marine environment.

The State of the Gulf reports highlight the urgent need for marine restoration. Habitat destruction, overfishing and loss of biodiversity and ecological function. This proposal will increase the total area of the Hauraki Gulf protected to about 12% (or 18% if the cable zones are included). Overall, this is a small increase in total area to be protected

from fishing, but the proposal includes some large, well-designed and significant High Protection Areas (like marine reserves). The MTSCT fully supports the inclusion of these large offshore areas, such as at the Mokohinau Island, Hauturu-o-Toi – Little Barrier, the Noises and the Te Ruamāhua - Aldermen Islands. We also support the smaller near shore areas proposed and specifically the extensions to two existing marine reserves at Leigh and Hahei which will enhance the effective protection of larger mobile predators like crayfish and snapper. Research from both Leigh and Hahei marine reserves have highlighted the effects of the reserve size and need to extend them. The MTSCT support this ecological and scientific justification but also supports the wider social and educational benefits of increasing these two existing marine reserves.

The MTSCT support the nested marine protected areas approach being proposed, as in some areas it will offers a buffer of protection. These High Protection Areas will prohibit commercial and recreational fishing and the seafloor protection areas will prohibit bottom impact fishing (trawling and dredging) but still allow other forms of fishing including recreational fishing.

For over twenty years, the MTSCT have observed an abundance of marine life within the

Through our EMR – Te Kura Moana programme, students can observe the benefits of experiencing healthy functioning marine ecosystems and abundant kelp forests. This is an amazing experience for a young person and sadly not often experienced outside

s 9 (2)(a)

of our existing marine reserves or no-take rāhui due to the effects of fishing, especially in Northeastern New Zealand. Since the Trust was established, EMR has taken nearly 90,000 people into our marine reserves and nearly 31,000 people have been engaged in EMR organised marine conservation events. We have snorkeled with nearly 160,000 people throughout NZ and have run over 320 community engagement events nationwide.

orkeling in marine reserves provides the most inspiration *"I saw a massive snapper!."* We see marine reserves as rich educational tools and often refer to them as 'wet libraries.' We also snorkel at a variety of other marine habitats and marine protected areas, such as rāhui, mātaitai and taipure. The MTSCT and EMR support all forms of marine protection that are led by communities and enhance marine biodiversity and the for future generations.

We will continue to enhance the waterways that enter the Hauraki Gulf through our Whitebait Connection programme. We engage communities and generate community ownership of marine protected areas through EMR and support marine reserve monitoring, including through the Dr Roger Grace memorial fund.

The late Dr Roger Grace was an absolute champion for our marine environment and was highly engaged in the development of the Seachange proposal. He dedicated his life to marine conservation and tirelessly shared his wealth of knowledge with others. Roger was a trustee of the Mountains to Sea Conservation Trust from 2002 – 2018 and an honoured patron from 2018. A memorial fund has been established which supports marine conservation and the establishment of no-take long term marine protection. This memorial fund is administered by the MTSCT.

The MTSCT current chairwomen, Kat Goddard was also involved in Seachange as a key Stakeholder Working Group member who helped design marine protection for the Hauraki Gulf. While marine protection alone will not fully restore the ecological health and function of the marine environment in the Hauraki Gulf, it will go a long way to supporting this, alongside other management measures.

s 9 (2)(a)

The MTSCT supports the boundaries of the areas chosen based on the best available information and supports the educational, biological, environmental, and socio-economic benefits highlighted for each of the proposed marine protected areas.

The MTSCT supports the 12 High Protection Areas, 5 Seafloor Protection Areas and 2 existing marine reserve extensions, because this new protection in the Hauraki Gulf will help restore the health and Maui of the Hauraki Gulf for everyone to enjoy, which aligns with the Trust strategic goals. We look forward to the government stepping up and implementing more protection in the Hauraki Gulf, and around the rest of Aotearoa New Zealand.

If you would like to discuss this submission and the work the MTSCT and EMR programme does in the Hauraki Gulf or around Aotearoa New Zealand please don't hesitate to contact Samara Nicholas (Poutokomanawa/Co-director - Marine Lead) at s 9 (2)(a)

On behalf of the whole MTSCT team, thank you for the opportunity to submit.

s 9 (2)(a)

s 9 (2)(a)

Chairwomen MTSCT

s 9 (2)(a)

Mountains To Sea
Conservation Trust
Nga Maunga ki te Moana

Whakamana te maunga
Whakamana te wai
He mauri o ngā tangata
Ngā mea katoa he pai

If we look after the water from the mountains to the sea, it will look after us.
It is our life force.

s 9 (2)(a)

Mountains To Sea
Conservation Trust
Nga Maunga ki te Moana

s 9 (2)(a)

Mountains To Sea
Conservation Trust
Nga Maunga ki te Moana

s 9 (2)(a)

Mountains To Sea
Conservation Trust
Ngā Maunga ki te Moana

s 9 (2)(a)

Mountains To Sea
Conservation Trust
Nga Maunga ki te Moana

s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Thursday, 27 October 2022 12:57 pm
To: Sea Change
Subject: Submission Revitalising the Gulf marine protection proposals
Attachments: Revitalising the Gulf submission s 9 (2)(a) 27.10.22.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

To whom it may concern at the Department of Conservation.

Please find attached a copy of my submission on Revitalising the Gulf marine protection proposals.
Please acknowledge receipt of this submission.
Thank you,

s 9 (2)(a)

Email: s 9 (2)(a)

s 9 (2)(a)

Submission on Revitalising the Gulf marine protection proposals

Thank you for the opportunity to comment on the Revitalising the Gulf Marine protection proposals. Please accept the following as my submission.

I support moves to enhance the health of the Hauraki Gulf. The 'Revitalising the Gulf' plan represents a step in the right direction, but it doesn't go far enough.

High Protection Areas

I am dismayed to find that the proposals do not include a single new 'no-take' area - scientifically proven as the most effective type of marine protection.

The proposed 'High Protection Areas,' which will allow customary take rights - exclusive to iwi and at their discretion - make the stated objective of marine protection secondary to iwi fishing concessions.

In effect the High Protection Areas will allow exclusive–to–iwi fishing reserves. This flies in the face of the collective responsibility we all have - i.e. to protect the Gulf. This is also contrary to the Treaty of Waitangi, which promises "ngā tikanga katoa rite tahi" - equal rights for all.

No-take marine reserves under the Marine Reserves Act are a more effective way to restore the health and biodiversity of the Gulf. **Therefore, I recommend the 'High Protection Areas' be replaced with a higher level of marine protection such as a marine reserve classification.**

Extensions to Whanganui-aHei (Cathedral Cove) and Cape Rodney – Okakari Point marine reserves.
I recommend that the two proposed protected areas adjacent to these reserves be no-take marine reserve extensions – not High Protection Areas.

Seafloor Protection Areas

The proposal for new 'Seafloor Protection Areas' is welcome. However, this proposal doesn't go far enough. I recommend that bottom trawling, scallop dredging and Danish seining – in fact any destructive fishing methods – be banned from the entire Hauraki Gulf Marine Park. Restricting these practices to 'trawling corridors' does not ameliorate the destruction - it is still environmental vandalism.

In summary, I urge the following:

"Let us put self-interest aside and unite in our commitment to do the best we can for the health and well-being of the Hauraki Gulf."

Thank you.

s 9 (2)(a)

27 October 2022

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Monday, 31 October 2022 9:18 pm
To: Sea Change
Subject: Submission

Kia ora,

I wholeheartedly support the introduction of new marine and seafloor protection areas to restore the mauri (life-force) of Tikapa Moana, the Hauraki Gulf Marine Park, and urge the government to proceed to the next stage.

We have experienced the obvious benefits of marine protection at reserves such as the Poor Knights. These include but are not limited to, protection of biodiversity, abundant life and increased productivity, fisheries spillover through egg and larval movement, increased resilience against ocean stressors such as climate change and sedimentation, and the provision of a measurable benchmark of ocean health. From a social perspective, protected areas provide opportunities for science and education, to connect New Zealander's with te Moana and for the protection of cultural values. They also provide significant economic value through recreational and tourism opportunities, increased visitor numbers, and considerable economic growth in townships adjacent to the marine protected areas.

The implementation of this proposal will increase the Highly Protected Areas from 0.3% to 6% of the Gulf. Although this is still a far cry from achieving the 30% protection that will ensure the longevity of resources, it is a step in the right direction. The current health of Tikapa Moana is unacceptable, with kōura (crayfish) now considered functionally extinct, a 93% reduction in scallop populations in the last 10 years, prolific kina barrens, and 20% of our seabirds threatened with extinction including fairy terns and black petrels.

It is disappointing to see that the scientific community was not adequately consulted in the placement of proposed Marine Protected Areas and that such a large proportion was designated due to commercial convenience rather than biodiversity value. The majority is also not adjacent to the coastal mainland, meaning the reserves are less accessible to New Zealanders.

In saying that, the implementation of this proposal puts us on a positive trajectory to achieving future change. If we are able to restore a thriving marine environment adjacent to the largest population in New Zealand, we can act as a global leader in this space, showing it is possible to achieve positive outcomes for multiple stakeholders.

Ngā mihi nui,
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Tuesday, 1 November 2022 8:13 am
To: Sea Change
Subject: Submission to Revitalising the Gulf Marine protection proposals

Revitalising the Gulf Marine protection proposals

A personal response to the consultation to the Minister of Conservation seachange@doc.govt.nz.

From: s 9 (2)(a) Director LandMan Limited

s 9 (2)(a)

This is a copy of a submission from a friend who I have the utmost respect for an with whom I have worked with on marine protection issues. He expresses my views far better than I would be able to and so his submission is also mine.

1 November 2022

Summary

1. 1) The proposed "High Protection Areas" are **hopelessly inadequate** to address the stated goal to "protect and enhance marine communities, ecosystems, and habitats". Nothing short of 30% protection can be accepted: this the the goal of the Hauraki Gulf Forum and United Nations Convention on Biological Diversity (30x30). The Government proposes to give only 6.2% of the Hauraki Gulf Marine Park a level of protection from fishing, and the 18% figure quoted by the Government is disingenuous. The public overwhelmingly support 30% protection and the Government's proposal is a nothing more than a sop to the commercial and recreational fishing lobbies.
2. 2) **"Seafloor Protection Areas" should extend to 100%** of the Hauraki Gulf Marine Park. There is no excuse in these times to allow heavy machinery to be dragged across the sea floor to destroy the ecosystems just in order to catch fish for money. "Seafloor Protection Areas" offer no protection from other fishing and the Government should stop disingenuously claiming these and the "Cable Protection Area" in the figures for "an effective network of marine protection."
3. 3) **Honest marine protection means "no take".** The Government purports to create new "marine protection areas" but then proposes to permit certain undefined people to remove undefined quantities of undefined species from these areas. Proper marine protection is afforded by the current Marine Reserves Act. These reserves are proven to be effective at restoring mauri of the moana. In contrast, partial protection in so-called HPAs and SPAs are experimental at best. The majority of Maori supported the no-take Hakaimango-Matiatia Marine Reserve proposal and the Government should have the courage to support this majority view.
4. 4) The proposals make **no reference to Waiheke Island**. The Government is sitting on the Hakaimango-Matiatia Marine Reserve proposal and could have endorsed it in the consultation but did not. That proposal received overwhelming 93% support during its consultation, including 73%

Maori support and 95% Waiheke support. The Sea Change process promised to listen to the people of Waiheke, who have spoken and must be respected.

5. 5) The Government should **dismiss Legasea's attempts to wreck marine protection**. The campaign by the New Zealand Sports Fishing Council (Legasea) on this consultation is

typical: they pretend to be good conservationists (asking for 100% sea-floor protection) while asking others to reject the proposals because they do not go far enough. They do not represent most fishers and their objections must be treated accordingly.

Marine Reserves and High Protection Areas

New Zealanders should be able to trust their government to be honest when presenting information for consultation. The Government should not communicate through green-washing.

The Government should be honest enough to acknowledge that:

1. 1) The proposal does not include the addition of any new Marine Reserve. Whatever HPAs end up being, they are not Marine Reserves of the type that people understand, and that have been established under the Marine Reserves Act.
2. 2) Even the HPA and SPA areas are not imminent, but subject to a new Hauraki Gulf Marine Protection Bill. No date is set for this, and there is no guarantee that future governments will enact this.
3. 3) The claim of 18% protection is sophistry: the Cable Protected Zone and Sea-floor Protected Areas have no protection except from bottom fishing. The actual figures for Marine Reserves and High Protection Areas is less than 6% of the Hauraki Gulf Marine Park,
4. 4) The Government claims that "the protected areas would also bring us a step closer to achieving global goals and targets under the United Nations Convention on Biological Diversity" (i.e. 30% marine reserve protection). This is also a policy goal of the Hauraki Gulf Forum. The claim is dishonest as it implies the Government is on track to achieving 30% protection whereas they have no such road map.

The Government should have the courage to announce a plan for 30% protection. This is what the majority of New Zealanders is asking for: 77% of respondents to a Horizon Research poll in 2021 want 30% of the Gulf in marine protected areas. And 72% of the recreational fishers polled also supported the 30% target.

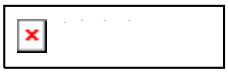
The new reserves will not come into effect until the passage of a new "Hauraki Gulf Marine Protection Bill." It is not reasonable to consult of these new marine protection areas without publishing a draft Bill. The consultation describes High Protection Areas differently to the existing Marine Reserves Act reserves. Apart from the customary-take provisions, what other differences will there be? How can the public make informed decisions without seeing the legislation?

I accept that adding further High Protection Areas will add a degree of additional protection to the Hauraki Gulf environment. To that extent I welcome the addition that the Government is offering. It is better than nothing.

However, the reserves should be bigger. The present proposals loos like a compromise between environmental enhancement and fishing interests. The Government should place environmental restoration as the highest priority. This would mean entire islands surrounded by HPAs or Marine Reserves – not just parts, as with the Little Barrier and Tiritiri Matangi proposals. This is what makes ecological sense: fish will not know that when they swim around the corner they can be caught.

I support and endorse the proposals by Shaun Lee for larger marine protected areas. His submission provides a clear rationale for extended areas, and the Government should adopt these proposals.

New marine protection areas adjacent to existing Marine Reserves should be Marine Reserves and not High Protection Areas. This includes the Whanganui-a-Hei (Cathedral Cove) and Cape Rodney- Okakari Point marine reserves. These could be established immediately using existing legislation.



Having two different types of protection on opposition sides of an invisible line in the sea will rightly be seen by the public as crazy, and will be difficult to enforce and police. Many people – Maori and non-Maori - will not take kindly to seeing some Maori gathering food in HPAs immediately adjacent to the Marine Reserves.

Seafloor Protection Areas

I accept that adding new Seafloor Protection Areas will add a degree of additional protection to the Hauraki Gulf environment. To that extent I welcome the protection that the Government is offering. It is better than nothing.

However Seafloor Protection Areas should be extended to 100% of the Hauraki Gulf Marine Park. It is outrageous in these times to allow heavy machinery to be dragged across the sea floor to destroy the ecosystems just in order to catch fish for money.

This activity destroys vital plant and animal communities across the Gulf and while this is permitted in such a large percentage of the Gulf it will set a limit beyond which ecological restoration cannot pass.

The Government should stop claiming that the SPAs and the "Cable Protection Area" add to "an effective network of marine protection." All fishing through the water column can still take place.

The Government should have the courage to provide 100% protection. This is what the majority of New Zealanders is asking for: 84% of respondents to a Horizon Research poll 2021 want to ban all bottom impact fishing the Gulf.

No-take Marine Reserves vs Customary Take High Protection Areas

In the mind of the public, marine protection areas means "no-take". The Government purports to create new "marine protection areas" but then proposes to permit certain undefined people to remove undefined quantities of undefined species from these areas, through a process that is undocumented.

The Government proposes that each HPA will have its own “biodiversity objectives” and that these may permit some Maori groups to take fish from “their” HPAs. This makes no sense from an ecological perspective, since the only honest “biodiversity objective” if one is attempting to restore the health of the Gulf is to maximise biodiversity by leaving fish in the sea. This applies equally to every HPA.

(The one exception to this would be to permit taking of kina from areas of kina barrens, and only until snapper and crayfish populations recover enough to restore the natural balance which is currently lost).

From a political perspective “customary-take” within HPAs would becomes a political and legal nightmare.

Customary-take within HPAs promises conflict between different groups of New Zealanders: not just Maori-Pakeha mistrust, but also conflict between different groups of Maori as they fight for the right to obtain the customary marine title (CMT). There is the chance of legal conflict between Maori groups and

the Crown. There is the chance of conflict between groups with protected customary rights (PCR) and different groups with customary marine title (CMT).

(The Government should publish the names of the different groups who have claimed CMT and PCR within each HPA. I suspect that every HPA will have many claimants. That process would

identify the scale of the conflict yet to come).

The Government should recognise that there is more than one Maori view on marine protection. During the consultation on the Hakaimango-Matiatia (North-West Waiheke) Marine Reserve, the majority of respondents identifying as Maori supported the Marine Reserve status. The consultation process invited people to identify as Maori, and of those who did 70% supported the establishment of the no-take Marine Reserve.

The details of this proposal, and the breakdown of responses from Maori, can be found in this Response to Objections document. This document includes a forward by Danella Roebeck, Co- Chair, Ngāti Paoa Trust Board in which she endorses the Marine Reserve.

Rather than planning for customary-take within HPAs, the Government and mana whenua might consider beginning a process that acknowledges rights and status, that agrees that nevertheless the health of the Gulf is best enhanced by no-take Marine Reserves, and to give an actual degree of say in the management of the new reserves, and of the Gulf, perhaps through new provisions within a revised Hauraki Gulf Marine Park Act.

By using the Marine Reserves Act 1971 the HPAs could be implemented as Marine Reserves immediately. Marine Reserves are proven to improve the health of the Gulf, whereas HPAs are an unknown quantity, experimental at best, and who knows how many years down the road.

Hakaimango-Matiatia Marine Reserve

The Hakaimango-Matiatia (North-West Waiheke) Marine Reserve proposal should be approved by the Government and included within the Revitalising the Gulf plan.

This is a proposal submitted under the terms of the Marine Reserves Act. The proposal, and the response to objectors document, are available on the Friends of the Hauraki Gulf website.

It is a community-driven process and overwhelmingly supported by the public: 93% of those who submitted a response to the consultation were in favour of this new Marine Reserve. Yet after many months I understand that DoC have not yet placed this proposal on the desk of the Minister of Conservation for a decision.

The Government is failing in its responsibilities here. The Sea Change document commits to:

By 2018, identify any gaps in the MPA network with specific attention to Waiheke Island and Aotea – Great Barrier Island. Establish further MPAs if required.

And:

Well, the people of Waiheke have decided: 95% of submitters who identified as Waiheke Island residents or landowners supported the Marine Reserve.

The Government has a duty now to do its part to honour the Sea Change process. The Government should approve the Marine Reserve proposal (as a no-take Marine reserve, and not as an HPA,

The Stakeholder Working Group was approached by community representatives from Waiheke and Aotea (Great Barrier) seeking that marine protected areas be included in the Plan for both islands. Because the SWG also heard conflicting views and concerns at not being consulted regarding proposals it was considered more appropriate for the location of MPAs for the two islands to be decided by those communities as part of the implementation of Sea Change.

which is not what the people have demanded).

Wrecking attempts by New Zealand Sports Fishing Council (Legasea)

The Government must recognise the work by the New Zealand Sports Fishing Council (Legasea) to wreck efforts at establishing Marine Protected Areas.

Legasea is a pressure group working on behalf of some recreational fishers. Their strategy is clear. It is to ensure that no new marine protection areas should get in the way of the "right" of their members to fish wherever they want to.

Their tactics are also clear. They pose as friends of the environment and take what superficially seems to be the environmental high-ground: they demand that commercial fishing activities such as bottom-trawling are stopped. At the same time however they object to other marine conservation projects such as Marine Reserves. They reject meaningful protections by saying they do not go far enough.

This approach can be seen in their website for the current consultation: Make a submission on the Hauraki Gulf Marine Park marine protection proposal

Here they begin by saying:

the DoC proposals don't go far enough... We need you to support a 100% Seafloor Protection Area for the entire Hauraki Gulf Marine Park.

From there they move on to criticise other aspects of the proposal:

The public consultation process by DOC has flown by with minimal consultation time, a lack of detail, and research to substantiate biodiversity outcomes of proposed sites, ignoring economic or social implications while no alternatives are available in place of the predetermined outcome.

And then call on their supporters to:

REJECT the government proposals in favour of 100% seabed protection and more meaningful public consultation.

and:

Legasea took the same approach in their response to the Hakaimango-Matitia Marine Reserve proposal: they said they could not support it because it did not go far enough, and also that existing provisions (rahui on shellfish around Waiheke) were sufficient. The pattern of their opposition can be seen in the Response to Objections document – search this document for "Legasea".

By taking this approach, they are at odds with most recreational fishers. They are also acting against the best interests of recreational fishers since it is well established that fish travel out from Marine Reserves to populate other areas of the Gulf.

do not support the Government-proposed Marine Protection proposal for the Hauraki Gulf Marine Park because it doesn't go far enough.

Analysis to the responses received to the Haikaimango-Matiatia Marine Reserve consultation shows:

Of the approximately 325 submissions that indicated an interest in Recreational Fishing or Non fishing Recreation through diving or snorkelling there were 265 submissions in support 6 in partial support, 55 were in objection and 5 in partial objection.

The Horizon Research poll 2021 shows that 72% of the recreational fishers polled supported the 30% target for marine protection zones. It is clear that Legasea are at odds with most fishers, and the Government must reject their claims to the contrary.

Legasea willfully ignores evidence that Marine Reserves are good for fishing elsewhere in the Gulf. This research by Zoe Qu of Auckland University Economic valuation of the snapper recruitment effect from a well-established temperate no-take marine reserve on adjacent fisheries shows:

shows that 10.6% of newly settled juvenile snappers sampled up to 55 km outside of the [Leigh Marine Reserve] were the offspring of adult snappers from [Leigh]. This suggests a significant boost to the commercial fishery of $NZ 1.49 million catch landing value per annum and $NZ 3.21 million added from recreational fishing activity associated spending per annum.

So the tiny area of the Leigh Marine Reserve contributes a more than 10% of snapper in the Gulf. Think how much better it will be with more Marine Reserves.

Conclusion

I give the Government 2 out of 10. Well done for proposing some addition protections, and I will pocket those while they are on offer.

But the Government must acknowledge that their proposals fall way short of what New Zealanders expect. The people will continue to clamour for a proper level of protection. The Government should do what they have been elected to do – to lead, and to serve the people.

Customary Take, if implemented, will be a nightmare and will lead to animosity at many levels. It will benefit only lawyers. Government should recognise that many/most Maori are not calling for customary take within Marine Reserves. Time and effort should be better spent giving Maori a proper role in "revitalising the gulf".

Finally, the Government must not allow the recreational fishing lobby to determine the health of the Hauraki Gulf.

s 9 (2)(a) s 9 (2)(a) . With thanks to s 9 (2)(a) for his excellent submission.
28 October 2022

Sea Change

From: s 9 (2)(a)s 9 (2)(a)
Sent: Friday, 4 November 2022 8:39 am
To: Sea Change; Sam Thomas
Subject: CRAMAC 2 Submission on Revitalising the Gulf
Attachments: 03. CRA 2 submission Revitslising the Gulf DoC Oct 22.docx

Kia Ora

Please find attached the submission from the CRA 2 Rock Lobster Management Co in regard to the Department of Conservations Revitalising the Gulf proposal.

Thank you for providing CRAMAC 2 the opportunity to give input on this proposal and we look forward to more discussions with DOC, regarding the proposal, in the future.

Kind Regards
Executive Committee
CRA 2 Rock Lobster Management Co Ltd

s 9 (2)(a)
North Island CRAMAC Executive Officer
Rock Lobster Industry
s 9 (2)(a)

CRA 2 ROCK LOBSTER MANAGEMENT COMPANY LTD

s 9 (2)(a)
s 9 (2)(a)

Submission regarding the Department of Conservations document; Revitalising the Gulf Marine protection proposals

This submission is made by the CRA 2 Rock Lobster Management Co Ltd (CRAMAC 2). CRAMAC 2 is recognised as the commercial stakeholder organisation that represents the interests of the commercial rock lobster industry, in the region from Te Arai Point just south of Whangarei all the way to East Cape.

The submission voices the concerns of CRAMAC 2 in regard to the marine protection proposals that constitute some of the suggested actions in the *Revitalising the Gulf* initiative. In particular we are submitting on the proposal to establish 12 High Protection areas (HPAs), 5 Seafloor Protection Areas (SPAs) and 2 protection areas adjacent to Whanganui-a-Hei and Cape Rodney-Okakari Point marine reserves within the area designated as the Hauraki Gulf Marine Park.

CRAMAC 2 DO NOT support the proposal in its current form.
The current proposal will have a significant adverse impact on the livelihood of at least two CRA 2 commercial fishers, their families and the staff they employ.

The proposal will also adversely impact the livelihoods of most other CRA 2 commercial fishers over the next few years as fishing effort is forced to shift to areas of the Gulf already fished by both commercial, recreational and customary fishers.

IMPACTS OF THE PROPOSED AREA CLOSURES ON THE CRA 2 ROCK LOBSTER INDUSTRY

The two commercial fishers in the CRA 2 quota management area (QMA) who will, in the immediate future, be most impacted by the proposed closures, rely on rock lobster fishing for 100% of their annual income as do most fishers in CRA 2.

The two most impacted fishers catch upward of 75% of their TACC in the proposed closed areas. This loss in catch and subsequent income would be financially unsustainable for both these fishers.

THERE IS NO OPTION TO MOVE CATCH TO OTHER AREAS. The reasons for this are:

1. Not all reef areas are productive rock lobster habitat. Just because an area is reef habitat does not mean it is productive rock lobster habitat. Areas that are productive may also vary in levels of productivity between years, largely due to natural fluctuations in environmental conditions.

To optimise catch whilst minimising effort, fishers target the productive reefs and these productive areas are known from years of experience in the fishery, both the fishers personal experience as well as experience handed down from Fathers and Grandfathers who also commercially fished in years gone by. Fishers within CRA 2 target their fishing effort into their own defined areas within the CRA 2 QMA and this allows the effort to be spread across all of the CRA 2 QMA, mitigates localised depletion and has allowed the productive areas to remain productive over many years.

If these productive areas are closed the only option that remains, to both commercial and recreational fishers, is to move their effort to the remaining PRODUCTIVE fishing areas. These remaining areas are fished already by either, or both, commercial and recreational, and customary fishers. The subsequent medium to long term effect of this increased fishing effort is decimation of the productivity of these remaining areas.

2. The proposed closures will not only create a problem of increased fishing effort being concentrated on smaller areas within the Gulf region and the subsequent adverse effects this will have on the productivity of CRA 2 overall but, the closures will also mean an unreasonable increase in running costs for those commercial fishers who will be impacted by the closures.

   The extensive cut in total allowable commercial catch (TACC) that happened 1 April 2018 had a considerable adverse financial impact on all CRA 2 commercial fishers with several fishers at that time, being put out of business. Those that have remained have had to manage their businesses on very tight budgets in order to survive the large loss in income that resulted from the 2018 cuts.

   To maintain a cost effective and viable business, fishers target productive reefs that fall within an economically viable distant from their home port and the running costs of their businesses are budgeted towards this level of fuel consumption. With the current increases in the cost of running a business, especially fuel costs, having to travel greater distance to productive fishing grounds will make the businesses of a number of CRA 2 fishers financially unviable.

UNCOORDINATED MANAGEMENT OF THE HAURAKI GULF

CRAMAC 2 appreciate this submission is in regard to the DOC proposal to close areas within the Hauraki Gulf that DOC believe require high protection or seafloor protection status. However, it needs to be highlighted that these areas are just part of an ever increasing package of productive fishing areas, within the CRA 2 QMA, that have already been closed to most or all methods of fishing and to most or all sectors of the fishing community or, are being identified for potential closure in the near future. Even anchoring (especially with fishing gear or catch on board) in these closed areas is very difficult.

This continual bombardment of proposals that are lobbing to close areas of habitat that support productive rock lobster biomass and a productive fishery within the Hauraki Gulf region (and indeed within CRA 2 QMA as a whole) are coming from numerous government agencies, between which there is no evidence of any structure or coordination in how best to manage the marine environment of the Hauraki Gulf. The end result of this uncoordinated, unstructured chaos is commercial fishers losing their livelihood, recreational fishers losing their ability to enjoy a rewarding fishing experience and increased conflict between and within all fishing sectors as all fishers run out of areas in which to fish.

CRAMAC 2 also wish to express their concern and frustration at the lack of adequate engagement with both the commercial and recreational fishing sectors as the *Revitalising the Gulf* initiative has progressed. There are areas of good reef habitat throughout the Gulf that could be closed while still allowing commercial fishers to maintain a viable business and recreational fishers to maintain a productive recreational fishing experience for the Revitalising the Gulf initiative to meet its objectives.

Far more extensive engagement with the commercial and recreational sectors is required in order to not only determine areas that could be closed but areas that are socially as well as biologically appropriate and acceptable for closure.

CRA 2 are also concerned at the lack of good quality science that has been undertaken or used to inform the choice and extent of the proposed HPAs and SPAs. For an initiative that has such expansive impacts on all sectors of the community that utilise the Hauraki Gulf for income and recreation, using the currently best available information on which to base choice of HPA or SPA is not adequate.

A structured research programme is required in order to not only understand the biology of the marine environment in the Hauraki Gulf but also how New Zealanders interact with this marine environment and how these interactions can be managed in manner that allows sustainable utilisation of this environment and what is appropriate and acceptable by all sectors of the community.

We look forward to further discussions with the Department of Conservation as we work towards positive actions for Revitalising the Gulf that are productive in their outcomes while being suitable and acceptable for **all** sectors of the community that utilise the Hauraki Gulf for income and recreational purposes

Yours Sincerely

s 9 (2)(a)
CRA 2 Rock Lobster Management Co. (Chair)

28/10/2022

Minister of Oceans and Fisheries, Hon. David Parker
Minister of Conservation, Hon. Poto Williams
c/- Te Papa Atawhai Department of Conservation
Email: seachange@doc.govt.nz

Submission: Revitalising the Gulf Marine protection proposals

This submission is made on behalf of the membership of the New Zealand Marine Sciences Society (NZMSS). It is made in good faith in my role as President of the NZMSS and in accordance with the Code of Ethics and Rules of the Royal Society of New Zealand.

NZMSS supports the "Revitalising the Gulf Marine protection proposals" resulting from the Sea Change – Tai Timu Tai Pari – Hauraki Gulf Marine Spatial Plan stakeholder-driven process. In summary, NZMSS:

- ***Strongly supports the extension of the two marine reserves under the Marine Reserves Act 1971.***
- ***Strongly supports the establishment of the 12 proposed High Protection Areas (HPAs).*** As outlined in our submission below we see this as a crucial first step towards revitalising the Gulf and developing a comprehensive network of highly protected areas.
- ***Supports the proposed Seafloor Protection Areas (SPAs), but suggests that these areas be considered and incorporated as part of the Fisheries Plan*** in order to protect a much larger proportion of the Gulf from bottom-impact fishing.

The premise for Sea Change was that the Hauraki Gulf Marine Park (HGMP) is in a degraded state, and that substantial transformative change is required to reverse this trajectory. NZMSS congratulates the Department of Conservation (DOC) and Fisheries New Zealand (FNZ) for advancing these proposals that have resulted from a long and extensive stakeholder-driven process and consultation with mana whenua. While we note that a small increase of ~6% in HPAs and an additional ~5% of SPAs is unlikely to reverse ongoing and widespread decline, it will protect biodiversity and promote recovery in some areas of very high ecological significance including important offshore island ecosystems that are not currently afforded any protection in the HGMP.

Given rapidly changing climatic conditions and increasing human pressures in the HGMP, there is an urgent need to start the process of increasing protection. We

therefore submit that **the proposed protected areas be implemented with urgency, but further steps should be initiated using a more integrated and systematic conservation planning approach** aimed at revitalising the gulf and increasing its resilience in the future.

We are not aware of any current or targeted engagement with the marine science community on these proposals. NZMSS are happy to contribute our expertise on a range of topics including providing guidance and updates on the current state of the Gulf, the ecological effects of proposed MPAs, the potential for displacement impacts, how much take could occur without impacting biodiversity values, and ways to enhance the current and future MPA proposals in the Gulf.

The reasons for our positions on the three types of protected areas are outlined in more detail in our submission below. Please contact the NZMSS President at the email address provided below for any further information regarding this submission.

s 9 (2)(a)

s 9 (2)(a)
President
New Zealand Marine Sciences Society

Address for service:
Email: s 9 (2)(a)

Submission: Revitalising the Gulf Marine protection proposals

The New Zealand Marine Sciences Society

The New Zealand Marine Sciences Society, known as 'NZMSS', was formed in 1960 as a constituent of the Royal Society of New Zealand, to encourage and assist marine science and related research across a wide range of disciplines in New Zealand and to foster communication among those with an interest in marine science.

NZMSS is a professional science body and a non-profit organisation. We identify emerging issues through annual conferences, annual reviews, a listserv and our website http://nzmss.org/. NZMSS membership covers all aspects of scientific interest in the marine environment and extends to the uptake of science in marine policy, resource management, conservation and the marine business sector. We speak for members of the Society on matters of interest on marine research in New Zealand and we engage with other scientific societies as appropriate. Our current membership comprises over 250 members.

Our submission is consistent with the Royal Society of New Zealand Code of Ethics and Rules, in particular principles 2.1 Integrity and professionalism, 4.1 Compliance with the law and relevant standards, and 10.1 Protection of the environment (www.royalsociety.org.nz/organisation/about/code).

Submission

1. Extension of existing marine reserves

NZMSS strongly supports the extension of the two marine reserves under the Marine Reserves Act 1971. While NZMSS supports the provision for customary practices to occur in the newly proposed HPAs, in the case of extending existing marine reserves we believe the Marine Reserves Act 1971 provides the simplest and least ambiguous option to extend these existing marine reserves.

The scientific evidence to support the offshore extension of these reserves has been well established as outlined in the Revitalising the Gulf document[1]. For example, the offshore boundaries of the existing reserves do not protect offshore feeding aggregations of rock lobster[2].

In principle, the extension of the reserves into deeper water will have similar ecological benefits regardless of which management mechanisms is used, assuming that limited customary fishing practices will occur in the deep soft sediment habitats in the offshore extensions. However, a major technical consideration is the high degree of ambiguity that would arise from using a different management mechanism for the proposed reserve extensions as to that of the existing marine reserve.

[1] https://www.doc.govt.nz/globalassets/documents/our-work/sea-change/revitalising-the-gulf.pdf
[2] https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/csp2.362

MPA design guidelines[3] call for simple boundaries to aid enforcement and compliance, which ultimately help to maximise biodiversity values of MPAs. Encompassing the existing marine reserves in an HPA would therefore ignore this guideline and likely lead to unnecessary public confusion and compromise compliance and enforcement. We therefore submit that **it is essential a single management regime is applied to the entire area and as a result support the extension of these reserves through the Marine Reserves Act 1971**.

2. High Protection Areas (HPAs)

NZMSS strongly supports the establishment of the 12 proposed High Protection Areas (HPAs) as a first step in increasing the extent of highly protected areas in the Gulf.

NZMSS recognises that the locations of the proposed HPAs were agreed as a result of the stakeholder-lead process of Sea Change. We support the scientific evaluation of the proposals carried out by DOC and FNZ[4] and support the recommended adjustments to boundaries based on MPA design guidelines and best available information. We note that it was not in the scope of this process to propose increased coverage or new HPAs, but rather to evaluate and where necessary adjust the boundaries, not locations, of the agreed stakeholder proposals.

Individually the proposed MPAs are generally well-designed and consistent with NZ MPA design and planning guidelines[5]. The proposed HPAs are large, with simple boundaries, protect entire ecosystems and provide sufficient buffers around important ecosystems such as rocky reefs. One notable exception is the Alderman Islands HPAs (a and b) which has a complex inshore boundary and excludes shallow reefs, therefore violating principles of ecological connectivity between inshore and offshore habitats.

While a number of significant HPAs have been proposed, the stakeholder-lead process has meant the proposed HPAs will have relatively little impact on recreational and commercial fishers. The proposed HPAs will only prohibit fishing from a further ~6% of the Gulf and overall, only a relatively small proportion of fishing occurs in these areas. For example, 9.1% of recreational snapper catch in 2017/2018 was within the proposed HPAs[6]. The greatest recreational catch was within the proposed HPAs at the Noises, Kawau Bay and Rotoroa Island (all islands located within the inner HGMP), which accounted for 3.6% (80.6 tonnes), 1.6% and 1.1%, respectively, of the recreational snapper catch in the HGMP (in 2017/2018). While a high proportion of local catch has historically occurred within some of the proposed HPAs it cannot be assumed that (1) this effort and catch will simply be spread into

[3] https://www.doc.govt.nz/globalassets/documents/conservation/marine-and-coastal/marine-protected-areas/mpa-classification-protection-standard.pdf

[4] https://www.doc.govt.nz/globalassets/documents/our-work/sea-change/marine-protection-technical-document.pdf

[5] https://www.doc.govt.nz/globalassets/documents/conservation/marine-and-coastal/marine-protected-areas/mpa-classification-protection-standard.pdf

[6] van Dort, R. (2022) Does displacement of fishing effort from marine protected areas impact the wider environment? A review and case study for displacement within the Hauraki Gulf. MSc Thesis, University of Auckland, 112 p.

and taken from surrounding areas, and (2) any resulting increase in effort will have greater negative impacts on biodiversity beyond those already occurring in the area as a result of fishing[7]. The proposed HPAs provide an opportunity to undertake research into the occurrence and impact of displacement, and any potential impacts weigh up against the wider biodiversity values of protection in the HPAs.

Many of the HPAs will protect offshore island ecosystems that are of very high ecological significance and beyond the influence of land-based impacts such as sedimentation. As such, fishing represents the greatest impact to biodiversity in these ecosystems and some of the impacts of fishing have been well documented in these areas[8]. For example, recent studies have documented extensive kina barrens within a number of the proposed HPAs such as at the Noises, Hauturu-o-Toi and Mokohinau Islands[9]. Large reef predators such as snapper and crayfish are rare in these areas and populations are dominated by small individuals. As such, predation pressure on kina is low which promotes their proliferation and establishment of kina barrens. While this is a well understood example of the ecosystem effects of fishing on reefs, wider understanding of fishing impacts on key underwater habitats, species (e.g. coastal seabirds), food-webs (e.g. pelagic), and ecosystem function and connectivity (e.g. land-sea) is limited. The proposed HPAs will provide a number of unique opportunities to better understand the impacts of fishing, particularly around our highly valued island ecosystems, and how these impacts can be reversed through marine protection.

NZMSS recognises that the HPAs were not developed as part of a systematic conservation planning exercise with the aim of developing a comprehensive and functioning network of MPAs. The proposals have therefore not been assessed with respect to MPA network connectivity or representation across geographic/latitudinal ranges. There are many significant gaps where no protection is provided (Firth of Thames, Great Barrier Island, Waiheke) and overall, the total area to be given a high level of protection is well below current draft CBD targets of 30%. Nevertheless, the proposed HPAs provide a strong basis on which to build a more comprehensive network based on more recent information available since the stakeholder process (e.g. new biodiversity models, more point records, new biogenic habitat models etc). This will allow the development of a MPA network that is more effective for the restoration of biodiversity within the HGMP.

NZMSS encourages urgent implementation of these proposed HPAs to prevent further impacts of fishing and to start the recovery process in these key areas. However, we also urge that the next steps are initiated towards developing a more comprehensive network of MPAs in the HGMP that at least meets the CBD target of 30% protection.

---

[7] Ballantine (2014) Fifty years on: Lessons from marine reserves in New Zealand and principles for a worldwide network. Biological Conservation 176: 297-307.

[8] https://www.aucklandcouncil.govt.nz/about-auckland-council/how-auckland-council-works/harbour-forums/docsstateofgulf/state-gulf-full-report.pdf

[9] Lawrence, K. R. (2019) Mapping long-term changes in reef ecosystems using satellite imagery. MSc Thesis, University of Auckland, 62 p.
Dartnall, L. (2022) The extent of kina barrens over time at Hauturu-o-Toi and the Noises Islands. MSc Thesis, University of Auckland, 61 p.

3. Seafloor protection areas

NZMSS supports the proposed Seafloor Protection Areas (SPAs), but suggests that these areas be further considered and incorporated into the Hauraki Gulf Fisheries Plan in order to protect a much larger proportion of the Gulf from bottom-impact fishing.

The impacts of bottom contact methods on the biodiversity of soft sediment habitats have been well document globally and within the Hauraki Gulf[10].

Our understanding from the "Technical analysis of the plan's marine protection proposals"[11] is that all of the proposed SPAs will prohibit dredging, bottom trawling and Danish seining, but the Mokohinau Is SPA will also prohibit other fishing methods that interact substantially with the seafloor including potting, set netting and bottom longlining.

We therefore note that in the case of the proposed Mokohinau Is SPA, the bulk of commercial fishing methods will be prohibited in this area of high ecological significance[11]. This will not only protect benthic biodiversity in this area from bottom impact fishing, it will also benefit exploited species that are the targets of these methods, e.g. snapper and rock lobster. This therefore has the potential to also enhance recreational fisheries for such species in this SPA.

The primary purpose of the SPAs is to "protect marine benthic habitats from the adverse effects of bottom-contact fishing", but our understanding is the Fisheries Plan for the Hauraki Gulf will provide further restrictions on bottom impact fishing methods over much larger areas of the Gulf, e.g. through prohibition of recreational scallop dredges and development of "trawl corridors". As outlined below, this process is expected to provide seafloor protection over much larger areas of the Gulf, which has the potential to make some of the SPAs unnecessary and obsolete.

The main methods of bottom-impact fishing in the Hauraki Gulf are bottom trawling, Danish seining, and recreational and commercial scallop dredging. These methods are currently spatially limited by existing legislation (e.g. trawl ban in inner Gulf and scallop rahui/fishery closure) and also the discrete nature of some of the stocks (e.g. scallop beds). The Fisheries Plan is expected to further reduce the footprint of these activities.

To our knowledge the only fishing occurring in the inner Gulf (approximately south of Kawau Is) with benthic impacts is recreational scallop dredging. There is however wide public support and initiatives underway to ban recreational scallop dredging [12]. Consequently, if recreational scallop dredging is banned, the entire inner Gulf would not be impacted by bottom fishing.

---

[10] Turner et al (1999) Fishing impacts and the degradation or loss of habitat structure. Fisheries Management and Ecology https://doi.org/10.1046/j.1365-2400.1999.00167.x
Thrush et al (1998) Disturbance of the marine benthic habitat by commercial fishing: impacts at the scale of the fishery. Ecological Applications https://doi.org/10.1890/1051-0761(1998)008[0866:DOTMBH]2.0.CO;2

[11] https://www.doc.govt.nz/globalassets/documents/our-work/sea-change/marine-protection-technical-document.pdf

[12] https://legasea.co.nz/2021/03/26/its-time-to-ditch-the-dredge/

More generally, under the Fisheries Plan, trawling and bottom trawling will be restricted to trawl corridors. If recreational scallop dredging is prohibited across the Gulf and commercial scallop dredging is restricted to predefined fishery areas, the remaining area of the Gulf outside trawl corridors would ultimately be protected from benthic fishing impacts.

While we support the proposed SPA's, we submit that a much larger proportion of the HGMP be protected from bottom impact fishing. This can easily be achieved through greater alignment between SPA implementation and other processes underway in the HGMP, such as scallop rahui, trawl corridor development, ahu moana etc. Without this alignment, there is a substantial risk of multiple independent spatial interventions occurring with little consideration of their relevance to other spatial planning processes, resulting in a confusing spatial design that is difficult for stakeholders, the public and mana whenua to interpret.

Sea Change

From: NZMSS secretary s 9 (2)(a)
Sent: Friday, 4 November 2022 3:44 pm
To: Sea Change
Subject: Submission: Revitalising the Gulf Marine protection proposals
Attachments: NZMSS HG Submisison 28-10-2022.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hello,

Please find attached the submission from the New Zealand Marine Sciences Society for the Revitalising the Gulf Marine protection proposals.

Kind regards,
s 9 (2)(a)

Secretary
New Zealand Marine Sciences Society

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Wednesday, 9 November 2022 3:30 pm
To: Sea Change
Cc: s 9 (2)(a)
Subject: Te Ohu Kaimoana response to Revitalising the Gulf-Marine Protection Proposals
Attachments: TOKM Final Response- Revitalising the Gulf-Marine Protection Proposals.pdf

Categories: Recorded

Kia ora

Please see attached the Te Ohu Kaimoana response to the Revitalising the Gulf- Marine Protection Proposals.

We look forward to discussing this response further on Friday with your team, and appreciate the flexiblity in allowing an extension.

Ngā mihi
s 9 (2)(a)

s 9 (2)(a)
s 9 (2)(a)

s 9 (2)(a)

teohu.maori.nz | s 9 (2)(a)
s 9 (2)(a)

Te Ohu Kaimoana

9 November 2022

Department of Conservation
Conservation House
18-32 Manners Street
Te Aro, Wellington,
6021

Tēnā koe

Tēnei a Tangaroa, Tangaroa whiti tua, Tangaroa whiti aro, Tangaroa kōpū, Tangaroa, nau mai
Kia piri, kia tata Tihei Mauri Ora

Here is Tangaroa (the God of the sea)
Tangaroa who surrounds us, Tangaroa who is the source of life Welcome Tangaroa- draw near, draw close, Now there is life.

1. Ngā mihi maioha ki a koe i roto i ngā āhuatanga o te wā. Te Ohu Kaimoana Trustee Ltd (Te Ohu Kaimoana) is writing to provide feedback on the *Revitalising the Gulf*- Marine Protection proposals.

2. Te Ohu Kaimoana was established to protect and enhance the interests of Māori and further the agreements set out in the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992 (the Fisheries Settlement) and later settlements reached under the Māori Commercial Aquaculture Claims Settlement Act 2004, both of which are recognition in law of the Crown's obligation to uphold Te Tiriti o Waitangi.

3. We work on behalf of 58 Mandated Iwi Organisations (MIOs) who in turn represent all Māori who own Fisheries Settlement Assets (Individual Transferable Quota and shares in Aotearoa Fisheries Limited which, in turn owns 50% of Sealord Group).

4. Our interest in this proposal stems from the impacts on the iwi whose rohe moana is included in the Hauraki Gulf Marine Park and neighbouring areas who will be impacted by displacement of fishing activity, as well as the precedence it would set for fisheries and marine protection at a regional and national level.

s 9 (2)(a)

5. We do not intend for our response to conflict with or override any response provided independently by Iwi, through their MIOs, Iwi Aquaculture Organisations or Asset Holding Companies (all statutory organisations with responsibility for Treaty Settlement assets on behalf of their iwi members).

Appropriate mechanisms should be used to protect biodiversity

6. We agree that Tīkapa Moana is an area of significance, culturally, biologically, and economically. Te Ohu Kaimoana is committed to the ongoing positive relationship between Māori and Tangaroa, including the protection of fisheries and the ecosystems they depend on for future generations. However, protection of marine biodiversity should be seen as part of a broader conversation about environmental management, where the right tools are applied to achieve the desired outcomes without undue impacts on other activities.

7. We do not agree that the biodiversity outcomes desired through this proposal will be achieved using the proposed mechanisms, particularly the control of fisheries. It is not clear that fishing is the key threat to the health of Tīkapa Moana, in fact this proposal has failed to clearly identify threats, and advocates for widespread marine spatial management rather than threats-based management. Further, little information has been provided regarding the proposed response to land based threats to the health and biodiversity of Tīkapa Moana.

8. The proposals are intended to be implemented through the development of bespoke legislation. We consider that it is remiss to apply such methods without providing options of available tools under existing legislation such as the Fisheries Act 1996 (the Fisheries Act). The development of bespoke legislated tools runs the risk of non-compliance with existing legislation and policy guidelines. For example, we note that the proposals replicate protection of particular habitats to an excessive degree which is inconsistent with the Marine Protected Areas policy guidance, nor does it apply the least cost approach to biodiversity protection.[1]

9. According to the Legislation Guideline's objectives for high quality legislation "Legislation should be fit for purpose—it should be used only when necessary, but when used it should be effective for that purpose (including by minimising unintended costs)." [2] We consider that the implementation of the proposals through the proposed bespoke legislation will not meet this objective. Further "Unnecessary legislation should be avoided because it involves significant

[1] Marine Protected Areas Policy and Implementation Plan 2005 page 16

[2] LDAC-Legislation Guidelines 2021 Edition page 9

costs."[3] It is unclear what assessment of existing legislation has been conducted to fulfil the purpose of the proposals. It seems to be doing things in the wrong order to decide that multiple duplicate areas need to be consulted on when you are yet to determine what the biodiversity objectives are for each site.

10. We reiterate our concern that the approach to *Revitalise the Gulf* runs a high risk of doubling measures to control certain activities. Specifically, the Fisheries Plan for the Hauraki Gulf is currently being developed, and this aims to significantly contribute to the desired outcomes of this proposal at a lesser cost approach for fisheries impacts. It is unclear why this fisheries management tool is not being used to manage fishing risks to biodiversity and then determining if additional protection is required.

We consider that impacts on fisheries have not been adequately described or recognised

11. We are concerned that this proposal will lead to significant displacement of fishing effort, leading to more intensive fishing in adjacent areas increasing the risk of localised depletion and adding pressure to marine biodiversity values outside of these protected areas.

12. In the Sea Change Report, it was recommended that if protections of this scale were required, support would be needed to be provided to fishers who were displaced. Support was suggested in form of opportunities to transition to alternative livelihoods, sufficient transition time or financial support. This proposal has failed to provide for these.

13. We consider that the Sea Change principle agreed by Iwi participants in that process: "*A key principle guiding the implementation of the plan will be the preservation of the integrity and value flowing from the current and future Treaty settlements. Accordingly, none of the Sea Change proposals, restrictions, actions or other measures will diminish or detract from any commercial or non- commercial Treaty settlements or related interests of any kind, whether capable of being held or exercised individually or collectively*" should apply to all measures in *Revitalising the Gulf.*

14. We are concerned that despite this clear principle, these proposals continue to deviate from preserving Treaty Settlements.

[3] LDAC-Legislation Guidelines 2021 Edition page 15

The Fisheries Act is the appropriate legislative tool to manage fishing

15. While we do not support the proposed mechanism of protection, if fisheries activities need to be managed to protect marine biodiversity, the Fisheries Act is the appropriate legislative tool to do so.

16. The use of mechanisms under the Fisheries Act aligns with the agreements made under the Fisheries Settlement and better provides for the ability to ensure protection of biodiversity through appropriate controls while still enabling levels of customary commercial and non-commercial use consistent with that protection. In that regard, options exist under the Fisheries Act that support the expression of rangatiratanga. Those include (but are not limited to):
    a. Iwi–led and developed fisheries plan approved under s11A of the Fisheries Act.
    b. Implementing a Mātaitai reserve and bylaws.
    c. Implementing a Taiāpure-local fishery.
    d. Imposing a temporary closure under sections 186A and 186B.
    e. Use by a tangata kaitiaki/tiaki of Regulation 14 (sustainability measures) of the Kaimoana Regulations.
    f. The ability to nominate any person to the Chief Executive to be appointed as an honorary fishery officer under the Fisheries Act.

17. The Fisheries Act itself contains tools to manage any risks from fishing, including adverse effects on the aquatic environment. Section 9 of the Fisheries Act sets out the environmental principles that decision-makers must take into account, including the maintenance of the biological diversity of the aquatic environment.

18. There is no clear rationale in this proposal which would indicate a need for a new Hauraki Gulf Marine Protection Bill, rather than utilising existing legislation such as the Marine Reserves Act and the Fisheries Act that jointly ensure that integrity of the Fisheries Settlement is maintained.

Proposal as it stands undermines the Fisheries Settlement

19. The effect of protection mechanisms, such as those proposed in *'Revitalising the Gulf'* needs to be assessed recognising the full extent of effects on Māori interests, these interests are extensive and complex and are not only customary non-commercial as alluded to in the proposal.

20. The Fisheries Settlement addressed Māori claims regarding their customary fishing rights- which included commercial and customary non-commercial components. The customary

practices that are mentioned in this proposal are only a small subset of those customary interests which are recognised and provided for in the settlement.

21. We are extremely concerned that this proposal is seeking to not only define what customary practices are, but moreover that it is aspiring to manage customary practices under the biodiversity objectives proposed through new legislation. To do either would undermine the promises made in the Fisheries Settlement. It is entirely inappropriate that Department of Conservation officials will determine what is acceptable customary practices.

22. The Fisheries Settlement also provided iwi 10% of all quota for species already managed under the Quota Management System (QMS), and 20% of the quota for any new species entered into the QMS after the date of the Fisheries Settlement (along with money to buy a 50% share of Sealord). Where protection proposals affect commercial interest in fisheries, as is in this case, proposals in turn affect numerous iwi quota holders. In terms of customary commercial interest, all iwi with quota within Fisheries Management Area 1 are directly impacted by the proposals. In addition, Aotearoa Fisheries (trading as Moana New Zealand), the largest inshore fishing company who has extensive activities in the Hauraki Marine Gulf Park, is also a Fisheries Settlement asset. All iwi throughout the country have income shares in Aotearoa Fisheries and so will be indirectly affected by the proposals.

23. Protection of the settlement interests should be provided for not only through processes of participation, but also as a principle that must be given effect in decisions. Despite agreement that ensuring the integrity of the Fisheries Settlement was a key principle guiding the implementation of the Sea Change plan, the current proposal has failed to provide for this and is a real risk to undermining the Fisheries Settlement. We expect that any bespoke legislation that is proposed will continue to include all the safeguards to protect the Fisheries Settlement that are present in the Fisheries Act, the Marine Reserves Act and the mechanisms agreed with the Crown on these matters after the Settlement was delivered.

24. Further, while there are statements about involving mana whenua it is not clear that there has been any direct involvement of the MIOs recognised under the Māori Fisheries Act 2004 that stand to have their settlement rights diminished through this proposal. No other bodies have the legal right to agree to any proposals that affect those settlement rights. We have noted in previous submissions regarding this project that such involvement is not only required of the MIOs that have their rohe moana within the boundaries of the Hauraki Gulf Marine Park, but also of MIOs who have their rohe moana within the wider fisheries area (due to spill over consequences of displaced efforts).

25. Overall, we are extremely concerned about this marine protection proposal. We consider that this approach is inconsistent with the guidelines for developing legislation in that:

    a. We do not agree that appropriate mechanisms are being utilised to protect the biodiversity in Tīkapa Moana – not fit for purpose.
    b. Current legislative mechanisms already exist to meet objectives -superfluous policy and unnecessary costs.
    c. The suggested mechanisms threaten the integrity of the Fisheries Settlement – not constitutionally sound.

26. We look forward to an opportunity to discuss this feedback further.

Noho ora Mai,

s 9 (2)(a)

s 9 (2)(a)

Te Mātārae- Chief Executive

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Wednesday, 16 November 2022 11:18 am
To: Sea Change
Cc: s 9 (2)(a)
Subject: Emailing: Hauraki Gulf Marine Park HPAs, SPAs marine reserves submission/feedback.
Attachments: Hauraki Gulf Marine Park HPAs, SPAs marine reserves submission. number 2.doc

Hello all,

Attached find our submission /feedback on the DOC proposal to exclude static commercial fishing from the HGMP seafloor protection areas.

Regards,

s 9 (2)(a)

President ,

Whitianga and Coromandel Peninsula Commercial Fishermans Association.

WHITIANGA & COROMANDEL PENINSULA COMMERCIAL FISHERMEN'S ASSOCIATION

s 9 (2)(a)
[redacted]

15/11/22

Hauraki Gulf marine protection proposals.

This Commercial Fisherman's Association currently has thirty-four members which includes eighteen men involved in inshore and coastal bottom longlining and several Cray fishermen.

Collaboration.
During the lengthy "Sea Change" formation of the spatial plan process the proposed SPAs were to include static bottom commercial fishing methods.
This Sea Change spatial plan formation system involved stakeholders from different disciplines discussing and getting consensus on the way forward for their specific subjects such as sedimentation (which I put a year of meetings into as a fisher representee) along with other farming and forestry representatives.
This consensus is what the spatial plan was all about.
Now look at what has happened, a proposed non collaborative change in the rules around SPAs and a late change at that.
The proposals contained in the information document prohibit significantly more fishing related activities in the SPAs than was proposed in "revitalising the Gulf"

There has been a lack of evidence to justify the additional prohibitions.

Large areas of the 6 SPAs contain low level benthic biodiversity such as shell, dog cockles, scallops, and some invertebrates. Deploying and recovering bottom long lines and crayfish pots by the age old and excepted method of placing the vessel and hauling station directly above the line or pot will have a minor effect on this benthos.

Regarding the effect of static bottom contact.

Bottom long lines-

The nylon backbone is weighted for sea bird bycatch mitigation. When recovering the longline the accepted and most effective way is to have the vessel hauling station directly over the line as it leaves the sea bed. The weighted backbone is not dragged across the sea bed. Sharks can cause breakages; however intermediate floats are spaced out along the longline enabling the recovery of the line.

Craypots are very similar; they are lifted vertically and not dragged along the sea bed. Both methods have minor effects on the benthos biodiversity.

On storms.
I have spent most of my life commercial fishing and the evidence I have seen both on the islands shores with tonnes of kelp washed ashore, often twenty feet up rock ledges, and the sight under water (recovering jammed craypots) of boulders the size of vehicles turned over so the "white side" is uppermost had to be seen to be believed.
The effects of intense storms on the sea floor completely and utterly out way what must be the perceived effect of static bottom longlines and cray pots upon the benthos biodiversity within the 6 sea floor protection areas.

Mokohenau Islands 8b,
This closure will have a big financial effect on bottom long liners and Cray fishermen whom periodically fish the area.
Static fishing gear such as bottom long lines and craypots are the most popular methods of commercial fishing in this highly productive area which has been commercially fished for years but is said to still contain excellent benthos biodiversity.
Set netting over the foul ground content of 8b is dangerous in the wrong hands and should be discouraged.

Little Barrier Island SPA number 6.
This is a highly productive seasonal area for both snapper bottom liners and cray fishermen and its closure will have a big financial effect on snapper bottom long liners and cray fishermen.
At least half of this area contains shell and muddy bottom. In our opinion the benthos biodiversity is not at risk in any way from static fishing methods such as bottom long lining and cray fishing. I have fished this area both as a Danish seiner and latterly as a snapper bottom liner for many years and am convinced that bottom liners and cray fishermen have a negligible effect upon the benthos because of the previously stated gear recovery methods.

Areas 10b Kawau Island, 11b Tiritiri Matangi Island.
Seasonal snapper bottom long lining and seasonal set netting and limited crayfishing is carried out here.
These are seasonally productive fishing grounds and most of the sea bed in the vicinity of 10b have long been covered in mud from increasing sedimentation which began with the removal of Kauri and is now suffering under urban development. 10b will have dog cockles and other shell fish in the cleaner areas. These shell fish and other sediment

reduced benthos biodiversity will not be unduly affected by static fishing methods including set netting.
10b is not at risk from static fishing methods. It is at risk from unaltered and continuing sedimentation issues.
Closure of 10b and 11b will have an unessary negative financial effect on the methods stated.

11b Tiritiri Matangi Island.
Limited crayfishing, seasonal set netting and bottom long lining in the clear sea bed areas are" the go to" static bottom fishing methods used here. Along with 10b these areas have a significant amount of recreational anchoring and bottom fishing year-round. For the same reasons stated about vertical gear recovery by commercial fishers the risk to sea floor benthos biodiversity is minor.

Cape Colville and 7b.
This is a very productive seasonal cray fish and snapper longline ground.
Because of high seas encountered here especially in windward tide conditions operators are careful when they fish for the same reason of staying on top of your line or pot during recovery.
I would say that 100 years ago steam trawlers reduced the sea bed biodiversity to what is present there today.
Significant recreational presence here in good weather.
Static commercial fishing methods such as bottom longlines and crayfish pots will have minor affects on this current affected benthos biodiversity.
Again, close this area to the static fishing methods described is an unnecessary, financial burden on those commercial operators described.

Regarding our "Sea Urchin NZ" member and fisherman.
This operator has historically fished (free dived for sea urchins) at 8a, 8b, 1, 6, 10b, 7a, 7b and 9b.
These proposed closures will have a large effect on his company's income. He would have zero affect on benthos biodiversity and is contributing in helping the ecosystem by removing large numbers of sea urchins.

On the new "ecosystem" form of fisheries management in NZ.

The east coast of the Coromandel Peninsula contains a lot of steep mountain range with significant areas planted in short rotation plantation forestry.
I live at Mercury Bay and the brown sediment enriched water exiting our harbour after high rainfall is distressing.
As a fisherman I have seen the same plumes of brown water exiting Whangapoua Harbour, Tairua Harbour, Wharekawa River (Opoutere) and Whangamata Harbour.

The head waters and catchments of these river systems are all suffering from areas of short rotation plantation forestry planted and harvested (clear felling) off unsuitably steep slopes.
Hill slope angles were assessed by aircraft using LiDAR laser surveying.
As an example anyone when driving from Whitianga to Whangamata can see in certain areas that clear felling and replanting is alive and well on slope angels that would fail the NESFPF classification for the Coromandel Peninsula.
LiDAR is not accurate enough in this steep, high rainfall unstable country and a reassessment of suitable slope angels needs to be carried out.

"Mountains to the sea" ecosystem management does not mean a thing to the Waikato Regional Council who issue the resource consents to foreign owned logging interests on the east coast of the Coromandel Peninsula.

The inner Firth of Thames is under threat from nutrient enrichment, run off contaminates and land use sedimentation. Not a lot has changed since I was on the Sea Change sedimentation round table stakeholders' group which identified these stressors.
This is not "mountains to the sea" ecosystem fisheries management.

While on the matter of protecting things out on the water.
The commercial fishing industry especially those operating around Aotea have strict monitoring of interaction with the endangered black petrel and the less endangered flesh footed petrel.
The threat from unknown deaths of sea birds, particularly the black petrel and flesh footed petrel at the hands of recreational and amateur charter vessels is the elephant in the room. It has been raised with various government agencies but goes nowhere.
This needs to be addressed now as I believe the death rate of these sea birds by non-commercial stakeholders would frighten the ornithologist's involved in their protection.

It seems to me that the commercial fishing industry operating in the Hauraki Gulf Marine Park is receiving challenge upon challenge to remain viable while sedimentation, sea bird protection and mis information reign supreme.

Yours faithfully,
s 9 (2)(a)
President,
WCPCFA.

Sea Change

From: s 9 (2)(a)
Wednesday, 30 November 2022 2:36 pm
To: Sea Change
Cc: s 9 (2)(a)
Subject: FW: Fisheries Inshore Supplementary Submission Revitalising the Gulf Marine Protection Proposals
Attachments: Fisheries Inshore New Zealand Supplementary 30 Nov 2022.pdf

---

From: s 9 (2)(a) s 9 (2)(a)
Sent: Wednesday, 30 November 2022 11:00 am
To: s 9 (2)(a) s 9 (2)(a)
Cc: s 9 (2)(a) s 9 (2)(a) s 9 (2)(a) s 9 (2)(a) ; s 9 (2)(a) <s 9 (2)(a)
Subject: Fisheries Inshore Supplementary Submission Revitalising the Gulf Marine Protection Proposals

Tena koe s 9 (2)(a)

On behalf of s 9 (2)(a) please find attached a supplementary submission from Fisheries Inshore NZ on the marine protection proposals.

Nga mihi
s 9 (2)(a)

Fisheries Manager
Fisheries Inshore New Zealand Ltd

s 9 (2)(a)

FISHERIES INSHORE NEW ZEALAND Committed to Healthy Oceans; Sustainable Fisheries

FISHERIES
INSHORE NEW ZEALAND

s 9 (2)(a)

28 November 2022

s 9 (2)(a)
Department of Conservation
Bledisloe House
Level 7
24 Wellesley Street West
Auckland 1010

SUPPLEMENTARY SUBMISSION ON HAURAKI GULF MARINE PROTECTION PROPOSALS

1. Fisheries Inshore New Zealand (Fisheries Inshore) was a party to an industry submission dated 11 November 2022. We continue to support that submission.

2. At the meeting on 17 November 2022 with the Department of Conservation (DOC) to discuss DOC's Hauraki Gulf Marine Protection Proposals, DOC representatives invited the industry parties to make a supplementary submission relating to the proposals if industry parties considered changes could be made to the proposed areas which would reduce the impact on industry activities while still preserving the biodiversity values. This supplementary submission is in response to that invitation.

3. As a consequence of that meeting and the processes outlined to us by DOC officials, we have chosen to also comment on wider aspects of the consultation in addition to the area specific recommendations.

Role of Fisheries Inshore

4. Fisheries Inshore is the industry body that represents the interests of stakeholders in the inshore finfish sector. The waters of interest to Fisheries Inshore stretch out generally to the edge of the Territorial Sea and occasionally extend beyond that. The Gulf includes those waters from the shore to the Territorial Sea limit and stretch from Mangawhai Heads to Waihi in the south.

5. The stakeholders we serve include not only industry participants but also the consumers and members of society who collectively have the right to enjoy the benefits of the New Zealand's waters and in this instance the Hauraki Gulf. New Zealanders have a right to enjoy the benefits of their domain including a supply of fish - the commercial fishing sector has the right to provide society with that fish from society's domain. We believe that the fishery benefits of the Hauraki should be made available to all parts of society, not just those that have the resources to catch their own fish or those that prefer the fish to stay in the water. Approximately 80% of New

Zealanders eat fish from New Zealand waters at least once a month but less than 10% of us catch fish once per year. Utilisation is an integral component of the benefits. We all wish to have a healthy Hauraki Gulf that can provide a sustainable flow of benefits now and into the future. But Fisheries Inshore also wants to ensure that Aucklanders can not only derive benefits from seeing a healthy gulf and knowing the Gulf is well-stocked with fish but can also enjoy eating fish from that Gulf.

6. That underpins our interest in the Hauraki Gulf. We all want a healthy Gulf but we want the benefits to be shared equitably, including those who chose to consume fish from their Gulf.

The Inclusion of Lining and Potting in Seafloor Protection Areas (SPAs)

7. At that meeting, the DOC ecologist clarified that the consultation paper contained an error in that it suggested potting and lining would be prohibited in all Seafloor Protection Areas (SPAs) whereas it was intended that potting and line fishing would be allowed in all SPAs except the Mokohinau Islands SPA.

8. It is difficult to accept given the level of scrutiny applied in drafting consultation material that the error was not detected prior to the public release of the material. It is also unacceptable that, having become aware of the error during the consultation period, DOC did not advise stakeholders as to the error.

9. Industry and doubtless other submitters were misled by the error and the matter will arise further when any decisions are announced and all stakeholders become aware of the error.

10. However, we endorse the approach outlined by the DOC ecologist and appreciated the clarification even at that late stage. We reiterate that there should be no restrictions on bottom longlining and potting in the SPAs – these activities can continue without compromising the biodiversity you are seeking to provide protection for. While we realise final decisions will be taken by Ministers, we trust that your analysis and recommendations to them will make clear that prohibitions of bottom long-lining and potting are not needed to protect the biodiversity in the SPAs.

Choice of Revitalising the Gulf Fisheries Plan or DOC Hauraki Gulf Marine Protection Proposals?

11. Fisheries Inshore has major reservations as to the continuation of this consultation process.

12. At the 17 November 2022 meeting, DOC officials indicated that Ministers were concerned with the slow progress of the *Revitalising the Gulf* process and wished to get something over the line by the last quarter of 2023. This DOC consultation was a response to that request.

13. The proposals are largely as contained in the earlier "*Revitalising the Gulf*" proposals.

14. A key element of *Revitalising the Gulf* is a Hauraki Gulf Fisheries Plan (the Fisheries Plan). Fisheries New Zealand is developing that plan with a consultation planned in the near future. The Minister for Oceans and Fisheries will consider the draft plan under section 11A of the Fisheries Act and approve sustainability measures under Section 11 to give effect to the plan. Once approved, the Plan will have statutory status as a matter that must be taken into account by decision makers under the Fisheries Act and must be had regard to by councils when preparing regional plans under the RMA or its successor Act.

15. A fundamental mechanism proposed in the Fisheries Plan is that bottom trawling and Danish seining will be prohibited throughout the Gulf with the exception of "suitable corridors"' established under the Plan[1]. The areas closed to bottom trawling and Danish seining will be far more spatially extensive than the proposed SPAs. Rather than the DOC approach of the Gulf being open to trawling except for those specified areas where trawling and/or seining is prohibited by HPAs or SPAs, the Fisheries Plan approach is based on the whole Gulf being closed to trawling and/ or seining except for those specified areas where it is specified that trawling and/ or seining is permitted. These measures will be implemented through Section 11 sustainability measures and become operative when approved by the Minister. The DOC approach would close approximately 1,520km^2 (10% of the HGMP) to trawling and Danish seining whereas the Fisheries Plan could result in significantly more of the Gulf being closed with some scenarios being considered closing more than 50% of the Gulf.

16. The selection of permitted areas open for trawling and Danish seining will be based on a more informed assessment of both conservation and utilisation spatial values. The Plan seeks to ensure that the current areas of high conservation and utilisation value are preserved for those purposes so that biodiversity is protected but without significant displacement of fishing elsewhere in or beyond the Gulf. The degree of overlap between those two values has been shown by analysis to be small. It is hardly surprising that areas where there is an absence of high levels of commercial fishing will be areas that can retain high conservation value. Generally, these are areas where the nature of the substrate will cause more damage and cost to fishing gear than any catch return. Overlaps may occur where fishing activity is lighter. The trade-off decisions for these areas will be better informed and subject to a more collaborative process than the current DOC proposals.

Use of Available Information

17. We note that this DOC consultation based on implementing the earlier "*Revitalising the Gulf*" proposal but makes no direct reference to and seemingly fails to take advantage, in determining either the High Protection Areas (HPA) or the Seafloor Protection Areas (SPAs), of the updated information available from the Zonation based mapping of conservation and utilisation values underpinning the measure within the Fisheries Plan to implement trawl corridors. While we understand that the updated detailed mapping of conservation and utilisation values was not available at the time the initial *Revitalising the Gulf* MPA proposals were developed, it has become available subsequently and prior to the release of the consultation document. We would have expected DOC to incorporate that new information into and update the proposals on which it is now consulting.

Biodiversity Information

18. We have appended the Zonation current biogenic habitat layer and the aggregate mobile bottom contact fishing commercial fishing layer in Appendix I of this submission. We are aware that the material in the Appendix was released to the HGMP working group on a confidential basis. However, we see no reason why informed and detailed mapping resources should not be shared between the two proposal processes – they contain only information that will become public in the near future and which is highly relevant to the selection and spatial definition of

[1] Draft Hauraki Gulf Fisheries Plan, Revitalising the Gulf – Government action on the Sea Change Plan

both HPAs and SPAs. Given that the information is highly relevant and material to this consultation, we make no request for the information to be treated as confidential.

19. Fisheries Inshore notes that there are significant differences between the Zonation conservation values and the areas defined in the current DOC proposal as HPAs and SPAs. We would have expected the areas to have a high degree of correlation, both in identification and spatial distribution of the high value biogenic habitat/biodiversity. That seemingly does not exist. Below we include thumbnails of the DOC proposal and the current biogenic habitats layer[2] for comparison. Larger copies are contained in the attached Appendix.

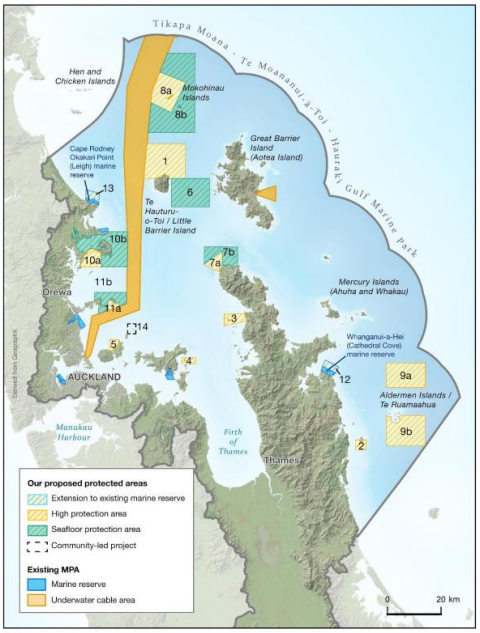
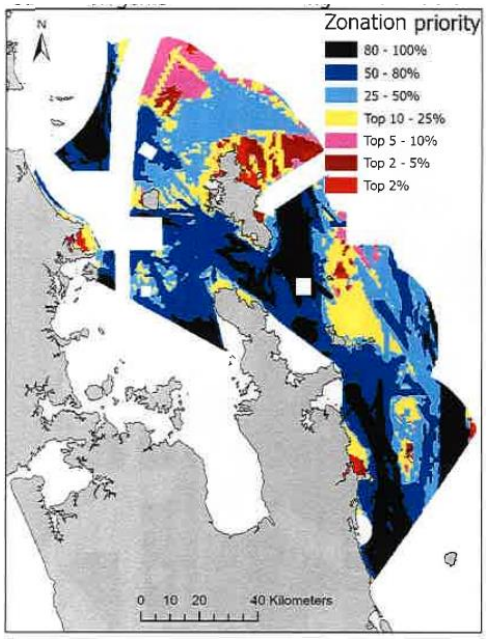


Figure 57. Agency recommended protection areas.



20. Our comparison of the two maps indicates:

    a. the high value Te Hauturu-o-Toi / Little Barrier Island biogenic habitat consists of a 0.5km rocky reef fringe with additional high value biodiversity extending from the western shore and otherwise surrounded by low value marine biodiversity - in comparison the Te Hauturu-o-Toi / Little Barrier Island HPA covers 185 km^{2}primarily consisting of low value soft sediment but excluding the western shore. Adjacent to this is the Cradock Channel SPA with an area of 141 km^2 of soft sediment containing little biodiversity of value.

    b. The high value Mokohinau habitat consists of the coastal fringe and a reef structure extending some 5 kms to the northeast of the island with very little habitat of value to the south of the island. In comparison the HPA consists of an area of 118km2 including some but not all of the reef, with the SPA covering some of the high value habitat to the north but only low value habitat to the south of the island. Interestingly the HPA/SPA proposal documentation contains the same Ecological Values statement for both areas despite the strong differences in the habitat value layers.

[2] Exploring Options for balancing fishing and habitat protection and recovery, NIWA paper to HG-BGSAP Workshop 3: 16 May 2022

c. The high value Aldermen Islands habitat extends 12 kms northwards from the Aldermen Islands to include the Sugarloaf Reefs. There appears to be little to the south. In comparison, the Aldermen's North HPA (138 km^2) includes only the top 2 kms of the Sugarloafs and an extensive area of otherwise low value biodiversity. The Aldermen South HPA (150 km^2) includes the Aldermen Islands and a small section of the Sugarloafs. Again we note the two HPAs share the same Ecological Value statement despite significant changes in the biodiversity content. The majority of the Sugarloaf Reef would not be protected by the DOC proposal.

21. That there are significant differences in value and spatial distribution for every HPA and SPA casts serious doubts on the credibility of the HPAs and SPAs in this consultation as being areas worthy of additional protection.

22. That concern is heightened when the exactly the same worded Ecological Values statements are used in different HPA and SPA descriptions. The ecological value statements are, on the face of the information, of dubious validity and should not be used to justify the HPAs and SPAs.

Fishing Information

23. In addition to the improved information on the biodiversity, the Zonation layers now available, and which could have been used in the DOC consultation, include significant information on the fishing values of the Hauraki Gulf.

24. We have included in Appendix 1 the aggregate fishing value layer for bottom trawling and Danish seining. The layers are drawn from FNZ catch and spatial data reported by fishers and provides a visual indication of the value of the Hauraki Gulf water space to fishers. Such information is vital to understanding the impacts on fishers and fishing activity. This information was available to DOC for inclusion in the consultation documentation but was omitted.

25. One of the valuable outputs of the fishing activity layers is that it provides an indication of how fishers operate within the space. It should not be assumed that all areas are identical and can be fished in any random pattern to achieve the same catch levels. Fishing is a conscious process based on good knowledge of where the fisher expects fish to be given the particular fish being targeted, the time of year, the gear used, tides and currents, and the nature of the underlying substrate and habitat. Fishers fish where they expect fish will be – that means they will often follow a contour line knowing that fish will swim by preference along the contour rather than across the contours. Some species are better caught with reference to the direction of the current. Consequently, not all tows will be a straight line.

26. DOC made available to stakeholders a report from Martin Jenkins on the current level of commercial fishing activity within the proposed protected areas. The report was based on catch information reported by fishers and assessed by FNZ to have been caught within the areas. To obtain a valuation, Martin Jenkins applied export prices for the species or, in the absence of a species export price, the port price. Some adjustment to the port price could have been applied but the value of such species is likely to be of no material value.

27. The outputs of the exercise were not verified by any party.

Implementation Aspects

28. In terms of achieving operational status, the DOC proposals require new special legislation to be enacted but DOC seeks to make significant progress by late 2023. Government has admitted it has an extremely busy legislative programme and will be hard pressed to pass the legislation it

has already in the pipeline. The prospects of special legislation being passed as the key mechanism to protect the Gulf biodiversity by the end of the 2023 year appears extremely slim.

29. In contrast, the Fisheries Plan will use existing Fisheries Act regulatory provisions. Section 11 measures can be developed as a consequential adjunct to the formal Fisheries Plan consultation. The time to implementation of protection through the Plan could likely be achieved within a nine-month window. In all probability, it would be in place before the special legislation for the DOC Hauraki Gulf is introduced into the House for its first reading. If the Government wishes to achieve marine protection for the Gulf in 2023, the Fisheries Plan offers a far greater prospect of success.

Our Recommendation – Halt the Process, Complete the Fisheries Plans and then Re-consider the Need for Additional Protection

30. In our earlier submission we recommended that "*Instead of continuing the current consultation for the proposed HPAs and SPAs, the fishing industry recommends that central and regional government should work with tangata whenua and stakeholders to implement an ecosystem approach to effectively manage the full range of threats to marine biodiversity across the entirety of the Gulf using existing tools available to government and Regional Councils. For fishing-related threats, the first priority should be the completion and implementation of the proposed actions in the Hauraki Gulf Fisheries Plan. Actions under a comprehensive fisheries plan can fully manage all fisheries-related threats to marine biodiversity more effectively, and at significantly lower cost, than the proposed HPAs and SPAs. The need for any additional biodiversity protection, such as HPAs and SPAs, could be assessed and addressed in that wider context*".

31. Having re-considered the material in order to respond to DOC's agreement to receive Fisheries Inshore proposals for some boundary changes for the HPAs and SPAs, we are even more convinced of that course of action. The priority task for DOC and the Hauraki Gulf parties should be to finalise the Fisheries Plan and have it ready for consultation early in the new year.

32. The current DOC proposal should be halted and re-considered in the light of that plan. The reliance on and identification of trawl corridors renders the SPAs redundant. We are opposed to their inclusion in the consultation.

33. There will doubtless be a need for measures in the wider plan to create *no-take* and wider protection for areas of outstanding marine biodiversity and measures to reduce fishing pressure on the Gulf. The HPAs will have a role in that protection. However, they should be integrated into the Fisheries Plan process and covered under Section 11 measures until special legislation can be passed.

34. Marine protection for the Gulf should not be an inter-agency race using separate instruments, with a needless and extensive call on resources from the agencies and all stakeholders to contribute to duplicating initiatives. For marine protection to work and be accepted by all the parties both on and off the water, the protection needs to a considered, integrated, well managed, pan-agency, collaborative initiative.

Comments on the Proposed Protection Areas

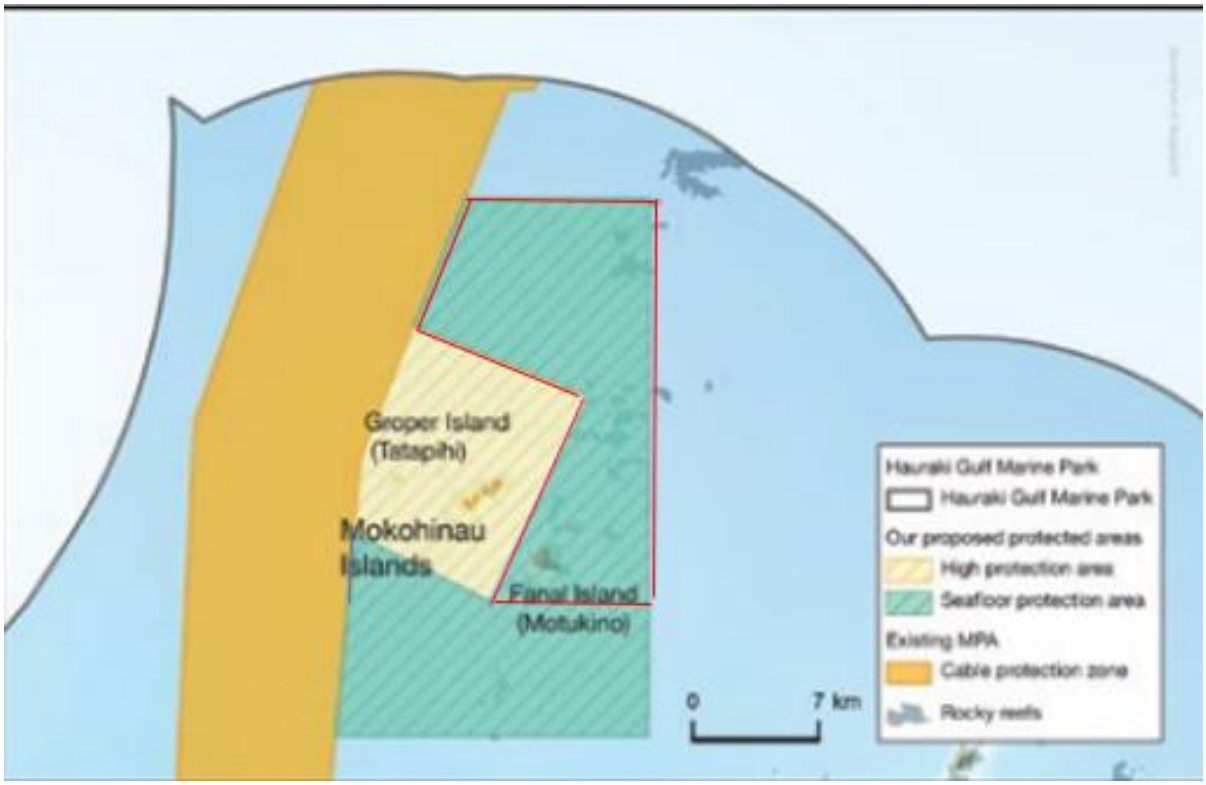
35. Notwithstanding the opposition expressed above, Fisheries Inshore makes the following comments in respect of the HPA and SPA areas. We have focused our attention on the larger areas which will impact on our trawl and Danish Seine activity. The changes proposed below would reduce the impact on fishers but would in all cases protect the valuable productive

biogenic habitats of the areas. We have superimposed our preferences in red boxes onto the existing maps.

Mokohinau Islands HPA/SPA

36. Fisheries Inshore recommends that the southern section of the SPA be removed, reducing the impact of the measure on fishers. The existing HPA would be retained, as would protection over the rocky reef habitats, including black coral habitat within the SPA. The area to be removed contains moderate deep mud and moderate deep sand habitat which accounts for 91.57 km^2.(28%) and 221km^2 (68%) respectively of habitat within the SPA. Both of which habitat types are extensively protected within the adjacent cable protection zone (364km^2 of moderate deep mud and 60km^2 of moderate deep sand).

37. Moving the southern boundary, in conjunction with the northern boundary of the Little Barrier HPA (see below), increases the spatial size of the "open area" between the SPA and HPA thereby allowing for fishing operations to occur. The DOC proposed current narrow gap between the two areas highly constrains the practical use of the area for fishing meaning the restriction on fishers will extend beyond the closed areas.

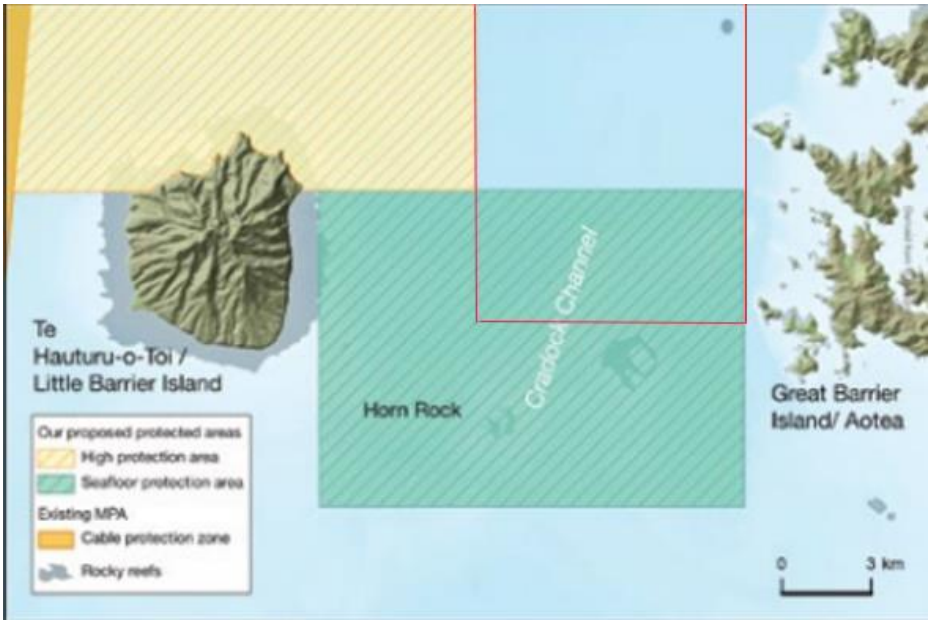


Te Hauturu-o-Toi / Little Barrier Island HPA/SPA

38. Fisheries Inshore recommends that the HPA be focused more tightly on the island and the "Coral patch" area to the north towards the Mokohinaus with the northern limit dropped by 4 km. That would open up an area that only contains moderate deep mud but retain protection for the higher value reef and coral area. The top of the area should link with the top of the moved Craddock SPA that we propose below.

Craddock SPA

39. Fisheries Inshore recommends that the SPA should be moved northward by 5kms. While trawling and Danish seining activity in the SPA is limited, the move northward would reduce the impact on trawl activity and industry revenue in the area while offering greater protection of the biogenic habitat that occurs between Little and Great Barrier Islands (see Appendix Map 2).

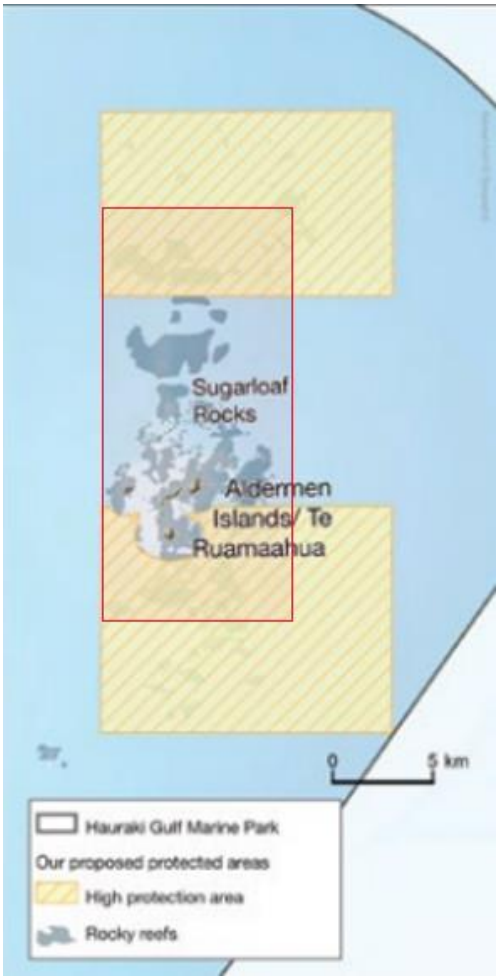


Aldermen Islands (Ruamaahu) HPA (north and south)

40. Fisheries Inshore expected that the HPA would have been one continuous area focused on the rocky reef and biogenic habitats that exist between the islands and the Sugarloaf Rocks northwards. This would enable the eastern margin to be brought inwards, and the northern margin down by 2 kms and join the two areas into one contiguous block as shown in red. This would have the benefit of increasing the amount of rocky reef and biogenic habitat under

protection, while allowing fishing to continue in some of the moderate deep mud habitat that makes up 122.7km^2 (98%) of the northern area and 76km^2 (49%) of the southern area for fishing.

41. We would however seek guidance from the recreational and customary non-commercial sectors as to the value of the area for their fishing activity. If they valued the area highly, Fisheries Inshore would recommend that at least some of the contiguous area be designated to be a SPA to provide for such fishing activity.



s 9 (2)(a)

s 9 (2)(a)
Executive Chair
Fisheries Inshore New Zealand

APPENDIX 1 MAPS

MAP 1: PROPOSED HIGH AND SEAFLOOR PROTECTION AREAS

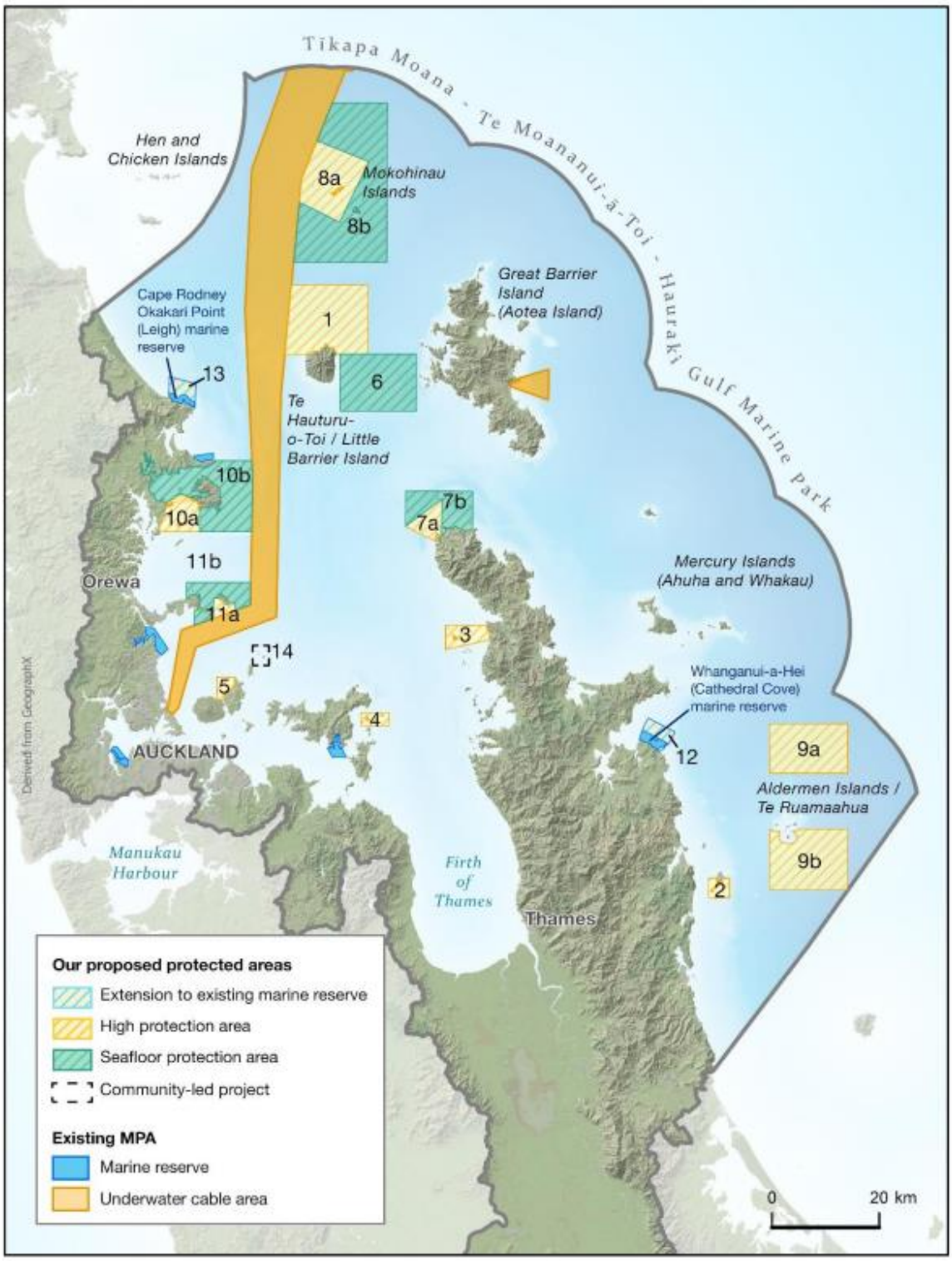
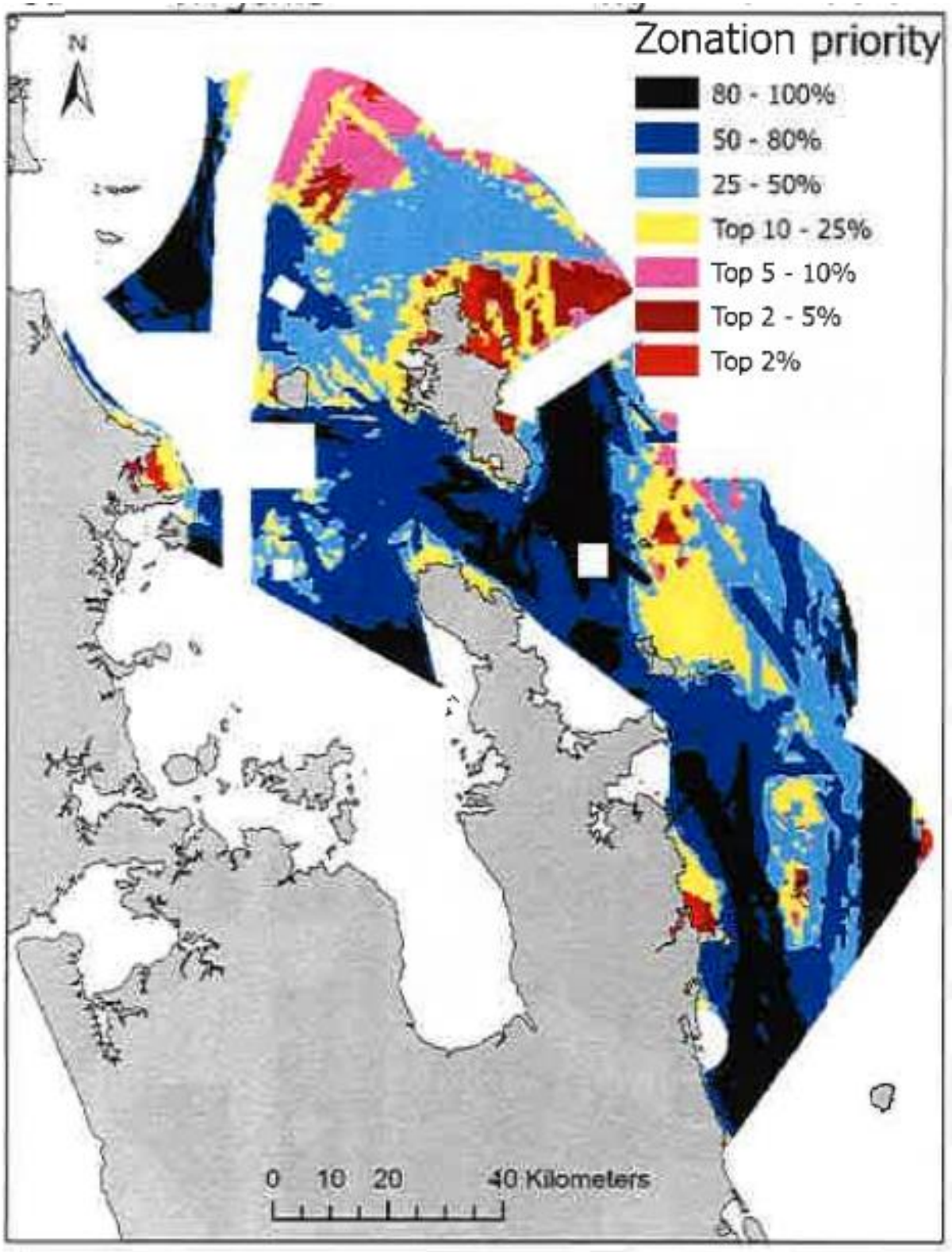
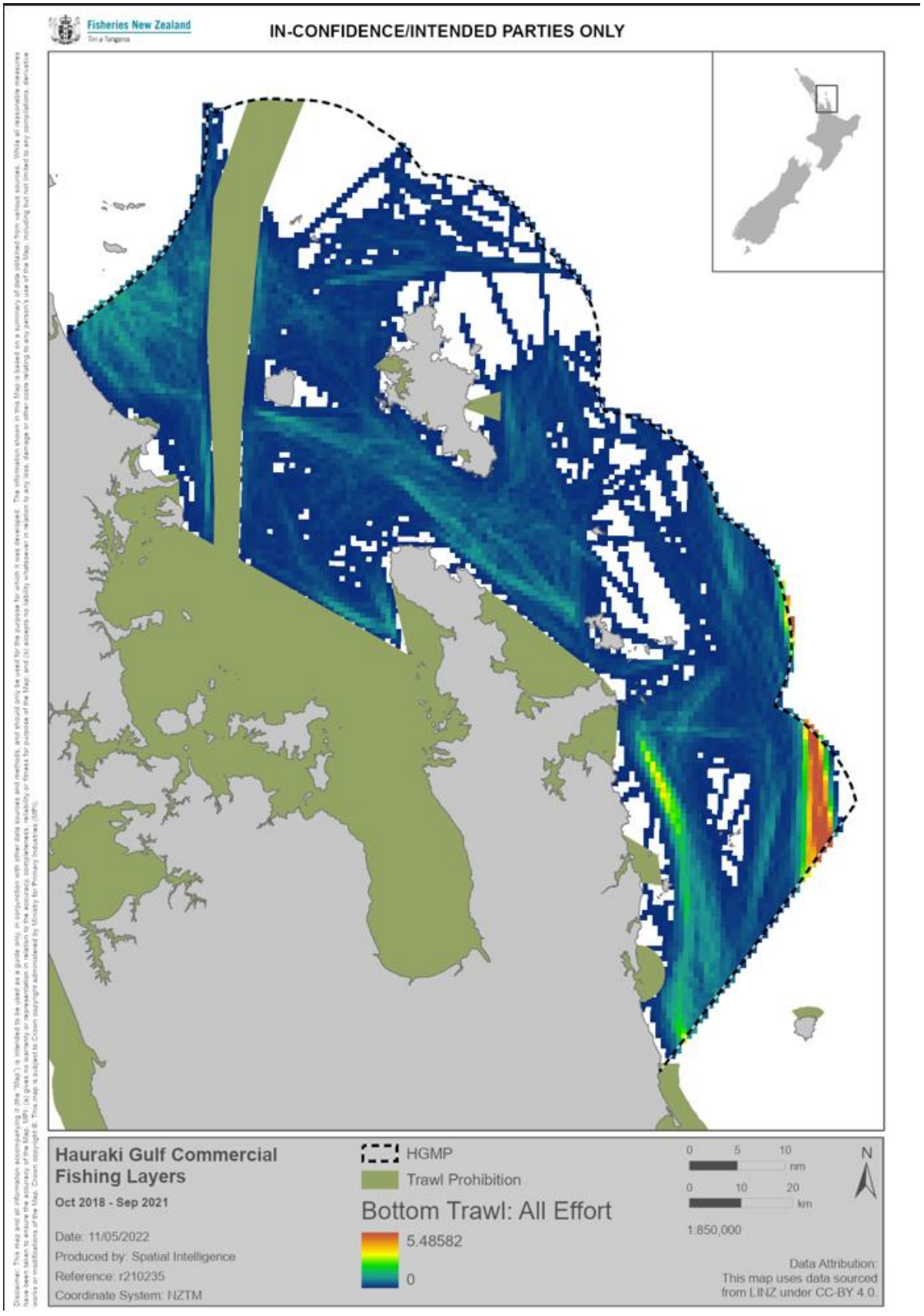


Figure 57. Agency recommended protection areas.

MAP 2: CURRENT BIOGENIC HABITAT PRIORITISATION



MAP 3 BOTTOM TRAWL EFFORT



MAP 4 DANISH SEINE EFFORT