



## **Submission**

### **Proposed Marine Protected Area for New Zealand's South-East Coast**

**To: South-East Marine Protection Forum**

**From: New Zealand Sport Fishing Council, affiliated members and  
LegaSea supporters.**

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# Part 1. Introduction

- 1.1 On 25<sup>th</sup> October 2016, the South-East Marine Protection Forum, referred to as ‘The Forum’, released the Proposed Marine Protected Area for New Zealand’s South-East Coast consultation documents. A series of public and meetings have been held around the region. Submission deadline is 20 December 2016. The submitters appreciate the extended deadline for receipt of this submission by The Forum, to 23 December.
- 1.2 The New Zealand Sport Fishing Council (NZSFC) Fisheries Management - Marine Protection team reviewed the consultation documents and issued a Preliminary View. Feedback has been sought from members and supporters. That feedback has informed this submission.
- 1.3 The New Zealand Sport Fishing Council (NZSFC) is a National Sports Organisation with over 33,000 affiliated members from 56 clubs nationwide and a growing number of organisations aligning with our policies and principles.
- 1.4 This submission is a joint effort by the New Zealand Sport Fishing Council, affiliated members, and LegaSea supporters, collectively referred to as ‘the submitters’.
- 1.5 Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this review and would like to be kept informed of future developments. Our contact is Dave Lockwood, secretary@nzsportfishing.org.nz.

# Part 2. Submission

- 2.1 The submitters wish to express their support for the submissions from our affiliated local club, Tautuku Fishing Club and members. We acknowledge that their submissions were written with a high level of local knowledge around current fishing practices and conditions in the region.
- 2.2 The submitters note the truncated consultation period has restricted the involvement of national organisations such as ours. As representatives of a large number of individuals with an interest in coastal management and marine protection, a considered response to proposals of this magnitude is time consuming. The available timeframe simply did not allow for the research and consultation needed to properly submit on the 20 proposals individually, as requested by The Forum.
- 2.3 It is due to the preceding points that we have formed our submission based on the recommendations from our local members and the Tautuku Fishing Club.

2.4 Our recommendations are as follows:

**2.4.1 A. Tuhawaiki to Paeroa (Type 2) – Support**

**2.4.2 B. Waitaki Coastal (Type 1) – Support**

**2.4.2.1 B. Waitaki Coastal (Type 1) Extension – Oppose**

**2.4.3 C. Waitaki (Type 2) – Oppose**

**2.4.4 D. Pleasant River to Stoney Creek (Type 1) – Support**

**2.4.5 E. Bryozoan Bed (Type 2) Option 1 – Oppose**

**2.4.6 F. Saunders Canyon (Type 1) Option 1 – Oppose**

**2.4.7 G. Bryozoan Bed (Type 2) Option 2 – Support**

**2.4.8 H. Papanui Canyon (Type 1) Option 2 – Support**

**2.4.9 I. Harakeke Point to White Island (Type 1) – Oppose**

**2.4.10 J. White Island to Waldronville (Type 2) – Oppose**

**2.4.11 K. Green Island (Type 1) – Oppose**

**2.4.12 L. Akatore Estuary (Type 2) – Oppose**

**2.4.13 M. Akatore Coastal (Type 1) – Oppose**

**2.4.14 O. Long Point (Type 1) – Oppose**

**2.4.15 P. Long Point Offshore (Type 2) – Oppose**

**2.4.16 Q. Tahakopa Estuary (Type 1) – Oppose**

**2.4.17 R. Tautuku Estuary (Type 2) – Oppose**

**2.4.18 S. Haldane Estuary (Type 2) – Oppose**

**2.4.19 Kelp Forest – Support**

## Part 3. Further Points

- 3.1 These proposals show a lack of consideration for the safety of small vessels. Many of these proposed sites cover large portions of popular, inshore fishing areas. Without access to these areas local owners of small vessels may be unable to safely venture beyond the MPA borders, therefore restricting their fishing entirely.
- 3.2 The South-East Coast is plagued by adverse weather conditions. Due to this the number of days available to fish are limited. Removing areas that may provide shelter would have an undue adverse effect on the number of fishable days for our members and other non-commercial fishers.
- 3.3 The Forum states, “The fact that there is an adverse economic or social impact is not a reason to exclude a habitat in the MPA network”. The submitters disagree with this statement. The point of public consultation is to obtain the views of all involved and to take all opinions into consideration. Economic and social impacts must be taken into account when deciding the final outcome.
- 3.4 The purpose of the current Marine Reserves Act is very narrow. The requirements of the new Marine Protected Areas Act have yet to be written and enacted. The MPA discussion document was publicly consulted on with submissions closing on the 11th of March this year, the outcomes are expected to be announced in the near future. It seems counterproductive to consult on the implementation of MPAs without knowledge of the requirements of the new Act and a clear idea of the tools that will be available. For example, there is currently no MPA legislation in place to implement the Type 2 MPAs as described, however, there are opportunities available by using Fisheries Act tools.
- 3.5 The submitters note the proposals are deliberately tailored towards protecting the commercial sector, especially the trawl fishermen. The proposed sites are positioned in most cases, to avoid impacting the majority of trawl effort, we note there has not been the same level of effort given to avoiding areas important to recreational fishing. This may be a reflection of inadequate consultation with recreational interests and representation on The Forum.
- 3.6 Proposed MPA J. White island to Waldronville is opposed due to a lack of discussion as to how the reduced bag limits would be enforced and the mechanics around these rules. Any such proposal needs to be supported with an explanation around the system that would work in practice.
- 3.7 The establishment of these MPAs needs to be supported by reliable scientific evidence to show the benefits that will be received, the submitters will not support the implementation of MPAs for the sake of it.
- 3.8 Statements such as “Little is known specifically about this deeper offshore part of the Catlins coast however it is known that the seafloor terrain has some interesting features near the southwest corner of the site,” and, “This could also be an area where biogenic habitats, in particular bryozoans, are still in reasonable condition.” Using such a description demonstrates uncertainty around the selection process and leads us to the

inevitable conclusion that more consideration could have been given to the selected areas. We submit if you want durable outcomes from this process the implementation and information provided needs to be far more robust.

- 3.9 In order to justify the cost of implementation, monitoring and enforcement as well as the negative effects to the public, there must be clear evidence that there will be significant benefit to the ecosystems in that area.
- 3.10 We know from the recent economic study carried out by the New Zealand Marine Research Foundation that residents and visiting fishers spend over \$172 million on this activity in the South Island. How much of that is spent in this southeast region is not defined, but we do know that anyone willing to go out in these waters spends their hard-earned cash on equipment and vessels that will give them a good return for their effort and get them home safely. This contribution to the local economy needs to be factored into any cost/benefit analysis associated with these proposals.
- 3.11 The Forum states, “At present, there is no reliable means of calculating recreational fishers catch in any given area.” We submit these proposals would be better informed about recreational harvest by using the results of the planned 2017 MPI Panel Survey. This would provide a greater insight into the effects of the MPAs.
- 3.12 At present there is little information to show the total exclusion of recreational fishing is needed to achieve the protection of any of the outlined habitats.
- 3.13 The estimates of commercial displacement are unreliable. In light of revelations around [mass fish dumping from trawlers](#) working on the East Coast of the South Island, and subsequent QC report, it is obvious that the self-reported data from commercial fishers cannot always be relied upon and should not be used in support of decisions of this magnitude.
- 3.14 A full cost-benefit analysis of each individual proposed MPA needs to be carried out and the results made publicly available. This would outline to the public the full extent of what is being sacrificed to implement these measures and what benefits are sought.
- 3.15 We submit the only reasonable conclusion after considering these proposals is that they are ideologically based and not designed to address particular threats. We have a policy of: first management then protection. These proposals do not address any significant fisheries management need on the South-East Coast.
- 3.16 There is no statement outlining what would be considered a success or the tools and methods that would be used to measure this. This would be an important part of these proposals in order to better understand the outcomes.
- 3.17 As it stands, there is a lack of information regarding the goals and rationale for these proposals. Until the threats to the marine environment have been clearly identified, and the measures of success have been explained then we do not support the implementation of measures to restrict recreational fishing based on ideology alone.