

18 June 2021

By Email: HealthyEnvironments@waikatoregion.govt.nz

Waikato Regional Council

Dear Sir/Madam,

WAIKATO REGIONAL COASTAL PLAN REVIEW

Introduction

1. This feedback on the Waikato Regional Coastal Plan (**WRCP**) review and Policy Directions Paper is provided on behalf of the following organisations:
 - (a) The New Zealand Sport Fishing Council Inc (**NZSFC**);
 - (b) The Raglan Sport Fishing Club;
 - (c) The Matarangi Boat and Fishing Club;
 - (d) The Bowentown Boating & Sport Fishing Club;
 - (e) The Waikato Sport Fishing Club;
 - (f) The Whangamata Ocean Sports Club;
 - (g) The Tairua Pauanui Sports Fishing Club;
 - (h) The Mt Maunganui Sport Fishing Club;
 - (i) The Tauranga Sport Fishing Club;
 - (j) Te Aroha Angling Club (together "**the Clubs**").
2. This feedback addresses the following matters:
 - (a) Background to the Clubs and NZSFC;
 - (b) The maintenance and enhancement of indigenous biodiversity in the Coastal Marine Area (**CMA**);
 - (c) Public access to the CMA;
 - (d) Moorings;

0914676 / 702487

- (e) Noise effects on fauna in the CMA.

Background to the Clubs and NZSFC

3. The NZSFC is a recognised national sports organisation with over 37,000 affiliated members from 57 clubs nationwide. The council has a public outreach arm, LegaSea. The NZSFC participates in science working groups, management planning forums, and undertakes research on its own behalf. LegaSea generates widespread awareness and support for the need to restore abundance and diversity in our inshore marine environment.
4. The Raglan Fishing Club was founded in the year 2000 and currently have 640 members with another 600 anglers in contact who fish the area.
5. The Matarangi Boat and Fishing Club has 140 plus members.
6. The Bowentown Boating & Sport Fishing Club has more than 600 members.
7. The Waikato Sport Fishing Club, founded 1988, currently has 170 members who fish all points from Kawhia to Homunga Bay Coromandel.
8. The Tairua Pauanui Sports Fishing Club, has 1500 members, many of who fish, some who have boats on moorings, and all who are concerned with continuing access to our coastal and marine environment.
9. The Mt Maunganui Sport Fishing Club has 1154 members fishing the Bay of Plenty and Coromandel.
10. The Tauranga Sport Fishing Club has 2,407 members fishing Bay of Plenty and Coromandel.
11. The Te Aroha Angling Club, 80 members fishing Firth of Thames, Coromandel and Bay of Plenty.
12. Whangamata Ocean Sports Club is located on the South-East Coast of the Coromandel Peninsula. This club dates back to 1958 (previously being Whangamata Gamefishing & Boating Clubs) and has a current membership of 7549. This club's members are active in numerous forms of ocean sports, including, but not limited to; fishing, diving, boating, surfing, kayaking, water skiing, sailing, waka-ama, white-baiting.
13. It is a known fact that only 10% of recreational fishers belong to any fishing/boating club, so the Clubs and NZSFC seek to undertake the responsibility of representing all fishers.
14. Recreational fishing is by far the most common activity hosted in the marine environment; it puts food on the table and brings people to coastal towns to relax and enjoy the great outdoors. Recreational fishing pumps millions of dollars into the regional economy, supporting hundreds of jobs. The significant contribution of recreational fishing to the social cultural and economic wellbeing of the people and communities of the Waikato Region should be recognised in the review of the WRCP.

Maintain and enhance indigenous biodiversity in the Coastal Marine Area

15. The recommended approach in the Policy Direction Paper in relation to ecosystems and indigenous biodiversity is to: “Schedule and map significant indigenous biodiversity sites with policies and rules. There will also be policies and rules for non-significant biodiversity. This is a significant policy shift.”
16. The Clubs and NZSFC agree that this is a significant shift which needs to be seen in the context of the recent decision of the Court of Appeal which confirmed that there is jurisdiction under the RMA to control fishing activities maintain and enhance indigenous biodiversity: *Attorney-General v The Trustees of the Motiti Rohe Moana Trust & Ors* [2019] NZCA 532.
17. The Clubs and NZSFC submit that this decision enables the WRC to control destructive and indiscriminate fishing methods such as trawling that have significant adverse effects on indigenous biodiversity. This issue is strongly noted in councillor¹ and community feedback². The Clubs and NZSFC submit that controls on trawling out to the 12nm limit are needed to maintain and enhance indigenous biodiversity. Data shows that excessive bottom trawling through 1975 to 1985 depleted fish stocks and destroyed many special biodiversity and benthic seabed habitats. On the west coast Maui Dolphin relied on this ecosystem for their survival to the extent that no young survived to adulthood through this period. These issues remain acute today and warrant a resource management response in terms of rules that prevent trawling activities from disturbing the benthic environment.
18. That said, the Clubs and NZSFC oppose the use of the RMA to prevent low impact recreational fishing methods e.g. line and hook fishing. Controlling these low impact fishing activities is not needed to maintain and enhance indigenous biodiversity given the existing regulation under the Fisheries (Amateur Fishing) Regulations 2013. Preventing low impact recreational fishing activities is inconsistent with enabling peoples social and cultural wellbeing.

Public Access

19. The maintenance and enhancement of public access to and along the CMA is a matter of national importance under the RMA and strong policy direction is provided in this regard by the NZCPS. In some instances (e.g. slipways and jetties) structures are required to facilitate public recreational access to the CMA. Appropriate policy recognition is needed in the Regional Coastal Plan of the contribution of such structures to public access to and along the CMA. This submission appears to be broadly consistent with the recommended policy option 3 in the Policy Directions Paper.

Moorings

20. Moorings are important infrastructure for the recreational fishing community. The Clubs and NZSFC acknowledge that there are resource management issues with moorings that warrant regulation in the coastal plan, while enabling the wellbeing of people and communities. The Clubs and NZSFC therefore offer qualified support for the preferred policy option in respect of moorings:

¹ Coastal Plan Review – Policy Direction Papers, page 9.

² Coastal Plan Review – Policy Direction Papers, page 26.

- (a) Moorings in zoned areas: structures become permitted activities subject to holding a licence under the Navigation Safety Bylaw and subject to biosecurity requirements.
 - (b) Moorings outside zoned areas: This would require a resource consent. New policy is proposed to define criteria for appropriate locations.
21. The important qualification is that this approach would not be supported if it included a policy to focus boat storage on land or in marinas. This is simply not possible or affordable for all people and types of craft. The policy approach to moorings outside zoned areas should include recognition of the benefits these structures provide to people and communities and the functional requirements for such structures.

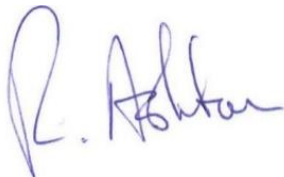
Noise effects in the CMA

22. Recreational fisher people are conscious to take all practicable steps to ensure that noise from engines is not unreasonable. Consistent with this, the feedback recorded in the Policy Directions Papers does not identify an issue with recreational fishing craft and the recommended policy option does not propose associated rules. The Clubs and NZSFC support this approach.

Conclusion

23. The Clubs and NZSFC are grateful for this opportunity to provide feedback on the policy directions to the WRCP review. The Clubs and NZSFC are happy to discuss any aspect of this feedback.

Yours faithfully
BROOKFIELDS



Rowan Ashton
Senior Associate
Partner: Andrew Green

Direct dial: +64 9 979 2210
email: ashton@brookfields.co.nz