Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 11:05 am
To: Sea Change
Subject: Seachange submission on Revitalise the Gulf proposal
Attachments: seachange submission.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Please find attached my submission of the Revitalise the Gulf proposal

regards

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

- your name s 9 (2)(a) [redacted]
- the name of your organisation, if you are submitting on behalf of your organisation **Personal submission**
- whether your submission represents the views of that entire organisation or a part of it **Personal submission**
- your contact details. s 9 (2)(a) [redacted]

My quick thoughts or concerns (**submission**) around this proposal to "Revitalise the Gulf" and an alternative option that would achieve a better result.

As the current proposal stands **I oppose this proposal** and feel it needs to be rewritten so it is more appropriate for our multi-cultural society, i.e. it needs to result in a level playing field (fishing ground) for everyone.

Unfortunately I do not have time to read or digest the 315 page Sea change document. This appears to be an approach used by central and regional government to discourage public reading and making submissions as Joe public is busy making a crust and does not have time to read lengthy screeds of paper which the consultants and DOC staff are paid to pull together.

My brief read of the (Revitalise the Gulf) document indicates to me that the new protected zones will permit customary fishing but exclude commercial or non-customary fishing.

My thoughts are that this document appears to have a vision of creating exclusive fishing zones for one particular ethnic group in New Zealand. Other ethnic groups will be excluded from fishing in these areas. I would expect 95% of the current fish extraction from these areas to cease and essentially result in the creation of a marine reserve for one ethnic group to have sole rights of harvest.

There was a policy a few years ago in a country called South Africa where different ethnic groups had different privileges, called apartheid. This document appears to be promoting a similar policy for the Gulf.

There is a lack of context around what is meant by customary fishing. Does this mean that the ethnic group that is permitted to harvest fish, from the areas no one else is allowed to fish in, use the technology they customarily used before the arrival of European's i.e. using hand lines made out of flax with bone hooks and paddle powered waka or will they be permitted to use modern European technology such as outboard powered vessels with GPS navigation, fish finders, wet suits, dive tanks and modern fishing rods and reels?

With the lack clear outcomes to be achieved, there is no way to measure if outcomes **are** being achieved. If "Revitalising the Gulf" had a proper outcomes

such as an increase of fish biomass available for recreational harvest then monitoring of the fish stocks could take place to see if outcomes are being achieved.

Alternative Option

If the goal of the whole exercise is to make more kaimoana available for iwi and the greater community (including all ethnic groups) then there is a better strategy available.
Simply push all commercial fishing 12 nautical miles away from land. I believe that 90% of the total fish biomass extracted from the sea (including discarded by-catch) can be attributed to commercial fishing. If this fishing was pushed offshore then the inshore fishery would multiply exponentially and all New Zealanders would have no trouble going out and catching a feed. This commercial fishing includes all scallop dredging, crayfish potting and netting of fish (purse seine, trawl and set netting)

I also feel all inshore fishing should be restricted to line fishing and diving, with the use of set nets and dredges banned.

Fundamentally I am not opposed to marine reserves and marine protection measures, so long as there is still plenty of marine structure for recreational fishing people to access and harvest a feed. Generally most marine protection areas are around marine structure and over time as more of these areas get locked up, it leads to greater fishing pressure on the remaining areas that can be legally fished.

I feel a better way to improve fish numbers that locking up areas in perpetuity would be to manage harvest of fish at critical breeding times to ensure the fish are unmolested during these breeding periods and there is potential for greater recruitment of replacement fish into the ecosystem. When the Mayor Island reserve when it was created 20+ years the fishing community was promised that it would result in better fish numbers in the greater Mayor Island area and within the reserve. This has failed to eventuate and it is still rare to see the large schools of kahawai and trevally that were common around Mayor 20 years ago when we first started to fish this area.

The main cause of this fish depletion has been overfishing by the commercial sector, that are harvesting tonnes and tonnes of fish in contrast to the recreational fisherman who is generally out to get a feed. The recreational fisherman is naturally constrained in fish harvest by the fact they need to go to work most of the week to pay their bills and taxes and then when they finally get time out for a relaxing fish the weather invariably limits their fishing. The commercial fishing sector on the other hand is out raping the resource 24/7 regardless of the weather as

they have large vessels that can cope with conditions that recreational fishing boats cannot handle safely.

What I am strongly opposed to is one rule for one and a different rule for others. No one ethnic group should have rights to harvest fish at a site that other ethnic groups are not permitted to fish.

The way this document is heading you can potentially see that in a few years time, non iwi people and commercial fishers will be restricted to fishing in limited areas (maybe 5-10% of the coastline) whereas people of iwi extraction will be able fish where ever they like and harvest as much as they like. If iwi are making the rules (customary practise management plans) you can bet your bottom dollar they will be looking after themselves. You only have to look at the Te Arawa fishery where only uri (descendants) from Te Arawa are allowed to harvest koura from the Rotorua Lakes and non Te Arawa people are not allowed to fish for, or harvest koura.

In ten years time are we going to see a customary practise management plan that only allows for uri of iwi from the Hauraki Gulf, permitted to harvest koura from the Hauraki Gulf marine area?

I have real concerns that what this document is proposing will lead to an apartheid system for fishing in New Zealand and you only have to look at what happened in South Africa and where it is now to see what this will lead to for New Zealand.

Regards

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 11:19 am
To: Sea Change
Subject: Protected areas updated

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hello.
How about stating/the true closed areas to bottom trawling that already exists in the inner gulf.
Show true catch effort by commer fishing in the gulf over the last 5 years.
The area is to have one governing body.
No take is no take no matter where you come from.
Yes Dregding should be banned.
A study of the snapper bio mass in the gulf to be under taken.
Recognition of the mussel farmers who donate mussels for the refurbishment of the mussel beds around the gulf.

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: Friday, 28 October 2022 11:26 am
To: Sea Change
Subject: SIRA Submission - Marine reserves possibly effecting Slipper Island
Attachments: SIRA Submission.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

To the person working on Submissions re Marine reserves
Please find our Organisations submission attached .
We request face to face meetings with you with regards to this negotiation moving forwards.
I can be contacted on s 9 (2)(a)

Kind regards
s 9 (2)(a)

On behalf of SIRA (Slipper Island Residents Association)

My Name: s 9 (2)(a)
Organisation: Slipper Island Residents Association (SIRA)
Contact Details s 9 (2)(a)
Note: This is our first submission and not our last
Meeting: We request a face to face meeting also please to discuss further

This submission represents the views of our entire organisation.

Firstly the 'High Protection Areas' are a 'woke' term for the traditional 'MARINE RESERVE' - being TOTAL 'no take' areas. We strongly disagree with these high protection areas to effectively reserve parts of the ocean for 'customary take' by Maori. We are all one people in NZ and separation of any group by race could be considered an act of racism. All kiwis collectively (including Maori) should have the same interest in preserving our oceans and coastal areas as one common goal and as such, agree to equal restrictions of seafood gathering . We all need to take the same action and responsibilities, or it simply won't work.

Our organisation will only accept a potential TOTAL NO TAKE Marine Reserve, or alternatively:

A reduction by negotiation in commercial quota and daily bag limits across the board for everyone, recreational and commercial…20 fin fish per angler per day is a huge amount of fish for one person!

Our organisation would accept x12 fin fish per person per day INSTEAD of Marine Reserves being put in place.

The islands in the gulf are hard to get to and expensive for families and educational groups wanting to experience the reserves. Why not put them at one end of a popular beach (using say ¼ of the beach length) and then extending past the end of that beach around the rocky head lands? This will also make patrolling the reserve to keep swimmers safe easier over summer (currents around the gulf islands can be strong and dangerous for swimmers viewing a reserve).

Also keeping the reserves to the mainland will have a lot more eyes for any poaching to be reported. There's often no one watching around the south end of Slipper Island in winter for sometimes a week or more at a time (some residents have experienced this over winter when the easterly swells are up. Successful management of the reserves on outer islands will often prove impossible and ineffective.

We want to know how do you intend to manage these reserves?

As residents of Slipper Island we have a genuine reliance on the seafood that the accessible island coastline provides us. The majority of that accessible coastline is at the south end of the island. Often for a week or more at a time residents' ability to safely go to the mainland for food and supplies is impossible when the swells are up. This needs to be a serious consideration in setting the boundaries of any potential reserve.

Other places have reserves, eg Mayor Island which has been in place for a number of years. The reserve is not in Sou-East Bay but around the back of the island leaving plenty of diving, swimming and fishing opportunities for the locals visiting. This proposal for Slipper Island will affect all residents as depending on weather we can rely on seafood to get us through, there are no stores with food supplies and for future generations to swim, dive and fish in safe waters.
We would support a Marine reserve that extends south of Penguin/Rabbit Islands, but not north of them. Or on the east of the Slipper Island.

Our organisation wants to have a say in the boundaries of any such reserves.

There's a sea grass that grows in the South Bay and only two other bays around the gulf. This is used by piper fish and other species for breeding they tell us...that grass was the reasoning behind making the South Bay at Slipper Island a reserve. The grass area is growing and has extended out of the bay and around toward Home Bay over the last 18 years (see the proposal doc showing the scientific research that supports this).
Without any intervention it's growing and extending with current conditions. This is what we want and it's occurring naturally. Why do we need to change anything in South Bay? The most damage by far that occurs to the sea grass as witnessed by local residents is days of Southerly swells entering the bay during bad weather. Swells pull the grass from the bays floor and heap it up in piles along the beach in large piles. Effects from anchoring and moorings in the bay are insignificant by comparison to the large southerly swells that occur reasonably frequently in South Bay.

Our organisation requires ongoing safe anchorage for Residents boats in South Bay and Home Bay by way of sheltered overnight boat anchoring and permanent moorings remaining in place. This is not negotiable as it's the lifeline to our Homes and has provided safe anchorage overnight for boats passing by forever.

Submission on behalf of Slipper Island Residents Association (SIRA).

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Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 11:41 am
To: Sea Change
Subject: Hauraki Gulf Proposed Protection Areas

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hauraki gulf - Brodie Campbell.docx

Attached is my hauraki gulf thoughts

Regards
s 9 (2)(a)

Hauraki Gulf Marine Protection Proposals

As a 2nd generation commercial fisherman out of leigh fishing in the Hauraki Gulf these proposals have a major impact on my fishing operations.

As Cray fisherman, I/we need the coastal grounds to spread our pots along and with your proposals mainly the Mokohinau Islands and in particular for me Little Barrier Island this will decrease our fishing area significantly.

Not only do the proposals make no sense in regards to location but also where was the thought behind them for commercial/recreational boaties needing to take anchor or be it a safe haven from the weather.

HPA 8a at the mokohinau Islands not only can you land there (BURGESS ISLAND) but it also has all the best safe havens from all wind directions around it so can only imagine the complications when a commercial vessel needs to go in there and say have a holding pot over the side etc., same with recreational, being an outer Island, many boats stay the night there, catch and hold bait before heading out to the outer-outer gulf to fish.

If anything, make FANAL ISLAND an HPA, you are not allowed to land there and there is not much shelter.

HPA 1- LITTLE BARRIER, not only does the HPA cover 1/3 of the Island it covers my main/most productive potting grounds, most of my fishing is done on the Northern and Eastern sides, closing the northern side will put immense pressure on the rest of the island which will not be able to handle it, from commercial and recreational.

Ideally if there was to be a HPA it would be on the western/southern side, not only is the rangers house there for monitoring but once again it keeps the main safe havens open being TE ANANUIARAU BAY, ORAU COVE, and WAI MAOMAO BAY. No one goes out when its blowing from the north or east fishing!

Why is potting not allowed in the SPA's but yet you can anchor in them, pots sit on top of the sea floor and anchors are designed to rip into it, this rule makes no sense, potting should be allowed.

Not only does this cut down more cray fishing grounds, all its doing is putting MORE pressure on remaining areas. The Mokohinau Island (8a,8b) having both HPA and SPA areas taking up all islands/ fishing grounds, to keep healthy stocks we need to be able to spread the catch around.

SPA 10b there is no reason for it to extend out past the TAKATU CHANNEL, both recreational and commercial pot along the back of KAWAU ISLAND, and there is no other interaction with the sea floor taking place that I'm aware of.

I feel the proposed protection areas are all clustered up in one area, there is already the cable zone acting as a HPA and yet most of the proposed areas are north of Auckland -being that joined to it or very near it. (Cable zone)

The POOR KNIGHT ISLANDS are already established and only slightly north, along with GOAT ISLAND, TAWHARANUI so why is there not more focus on the southern half of the gulf, FIRTH OF THAMES, CURVIER ISLAND, MERCURY ISLANDS and south of there.

While you have proposed HPA 14 –NOISES ISLAND also HPA 4 and 5 would it not be more appropriate to have a decent size HPA on WAIHEKE ISLAND coastline with the many opportunities/awareness it would bring to Aucklanders being on their door step and far more accessible for swimming/diving etc. as it's only a ferry ride away.

So to sum up:

*-I **strongly oppose** these proposed protection areas*

-It not only affects my business but others also.

-It will only put immense pressure on other open areas both by commercial and recreational leading to low stocks in open areas. "Crayfish functionally extinct in the hauraki gulf" saga all over again

-There is no thought behind proposed locations

*-potting **should be allowed** in SPA*

s 9 (2)(a)

s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 11:46 am
To: Sea Change
Subject: Hauraki Gulf Submission

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora,

Name: s 9 (2)(a)
Contact details:
Phone: s 9 (2)(a)
Email: s 9 (2)(a)

As a marine scientist, environmental educator and ocean-lover I strongly support the proposed marine protection. This is a fantastic start to revitalising the gulf and is a great first step to helping to support the recovery of the gulf.

Firstly:
- **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). This is absolutely needed to be able to protect taonga as they move and migrate and reduce spillover effects.
- **Strongly support the establishment of the 12 proposed High Protection Areas (HPAs).** I see this as a crucial first step towards revitalising the Gulf and developing a comprehensive network of highly protected areas. I would like to see MORE high-protection areas established to be able to create a cohesive network in our marine environment in the near future under the legislation created for the establishment of these HPA's.
- **Support the proposed Seafloor Protection Areas (SPAs),** but suggests 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 would like to see more of the Gulf protected by SPA's, there is no reason we shouldn't have the entire Hauraki Gulf Marine Park protected by SPA's. Our gulf is degraded and the bottom has so many different environmental impacts facing it. There are many fishing methods now which do not use destructive fishing practices and do not touch the bottom.

My mahi:
As an educator for Experiencing Marine Reserves my mahi centers around teaching students about the ocean by experiencing marine reserves and experiential learning opportunities. Every school should have access to marine reserves, as Wade Doak described them, marine reserves are 'wet libraries' providing students with the opportunity to see marine life as it should be - thriving, resilient and recovering. Rangatahi and tamariki should be able to access marine reserves, be able to see marine life as it would be without human impacts and overfishing.

When taking students to the marine reserves, you can really see the social benefits of marine reserves, the students are amazed at the amount of biodiversity and life in the waters - many of the students we work alongside live in really polluted areas and aren't able to go swimming due to bad access, poor visibility and unsafe water quality. For many, Goat Island is their first time seeing a healthy ecosystem and seeing so many animals and so much diversity brings them so much joy and inspiration for their action projects. All students should be able to access marine reserves and marine protected areas. It would be great to have MORE high protected areas near the coast in more accessible areas, this would enable people from all walks of life to be able to enjoy the benefits of marine protection, not just those who have boats or live near the islands.

As a researcher and past student of the University of Auckland, I have spent the last few years learning about the decline of the health of our Gulf and the lack of action. I am really excited for this proposal, it's a great first step to protecting our gulf and the health of our gulf. I would like there to be an expansion of these HPA's and the generation of a better-connected network of HPA's. While it is a great start, there are definitely opportunities for these to be made bigger or for there to be corridors of protection in the gulf.

Many thanks,
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 11:57 am
To: Sea Change
Subject: Hauraki Gulf Marine Park Submission
Attachments: Hauraki Gulf Marine Park Marine Protection Proposals.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded, Reply sent

Please acknowledge receipt of this submission.

Hauraki Gulf Marine Park Marine Protection Proposals - Submission form

s 9 (2)(a)

s 9 (2)(a)

We do not support the Government-proposed Marine Protection proposal for the Hauraki Gulf Marine Park because it doesn't go far enough.

● We support an integrated approach to managing both conservation and fisheries Management in the Hauraki Gulf Marine Park, acknowledging marine protection needs To align with fisheries management

● We want bottom trawling, mining, dumping, scallop dredging, and Danish seining banned from the Marine Park.

● We support 100% seabed protection for the entire Hauraki Gulf Marine Park.

●We object to the lack of information and detail around the proposal and implementation plan.

● We are in favour of 100% seabed protection, meaning low-impact activities such as commercial fishing, potting and small-scale long lining, Māori customary and recreational fishing can continue.

● We support extending the consultation deadline for marine protection to align with the Hauraki Gulf Fisheries Plan process which ends in February 2023.

- We are extremely disappointed at the lack of public communication about these proposals and the extremely short period for submissions and public responses

- We do not support the concept of racially based exemptions for the proposed High Protection areas for Maori Customary fishing. Such access should be for all New Zealand citizens

Sea Change

From: s 9 (2)(a)s 9 (2)(a)
Sent: Friday, 28 October 2022 12:02 pm
To: Sea Change
Subject: "Support for Revitalising the Gulf"

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

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

I support the intentions of the Revitalising the Gulf proposal, but it does not go nearly far enough

If a marine habitat is worth protecting then it deserves full protection on an adequate scale as with the marine reserve at Goat Island. I was a Marine Biology student who helped map the Goat Island reserve during the summer of 1979, so I am very familiar of the power of change the Marine Reserve option provided. The Hauraki Gulf needs more Marine Reserves and it is absolute madness that this has not happened since the Goat Island Marine Reserve was created. The success of the Goat Island reserve has been used to justify the proposal to create a series of small "semi-protected" areas around the Gulf. That assumption/conclusion/linkage is simply not correct. The proposal presents no scientific evidence that the proposed mini-protected areas will help replenish the Gulf in any substantive way.

Please – we need more areas in the Hauraki Gulf given full protection as Marine Reserves.

Thank you

Dr s 9 (2)(a)

Tel. s 9 (2)(a)
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 12:34 pm
To: Sea Change
Subject: Foundation North MPAs submission Oct 2022
Attachments: Foundation North MPAs submission Oct 2022.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora

Foundation North is making a short submission (as attached) in regard to the Marine revitalisation proposal.

Regenerating the Environment is a key focus area for us as a Community Trusts and protections are a major systems lever that can be pulled to assist in this endeavour.

If you wish to get in touch please don't hesitate to contact me via email or phone.

[redacted] (he/him)
Chief Executive
s 9 (2)(a)

Kimi ngātahi
Navigating together

READ our Annual Report & WATCH our Annual Public Meeting online

Allendale House, s 9 (2)(a)
[redacted]

SUBMISSION ON
Revitalising the Gulf – Government action on the Sea Change Plan
28 October 2022

We welcome this opportunity to provide feedback to the Department of Conservation on the Marine Protected Area proposals as part of Revitalising the Gulf – Government action on the Sea Change Plan.

Foundation North holds in trust for the communities of Tāmaki Makaurau and Te Tai Tokerau an endowment, or pūtea, currently valued at over $1.7 billion dollars. The endowment allows the Foundation to make grants each year to not-for-profit groups in its region. In 2016 Foundation North initiated the Gulf Innovation Fund Together (GIFT).

GIFT began as a $5m fund, with additional funding of $2m (2019) and $2m (2020) approved by the Foundation North Board. An additional $3m was approved to The Nature Conservancy by the Foundation North Board in 2019 to establish a Challenge Fund.

Between 2016 and 2022, G.I.F.T contributed more than $11 million in funding support across 69 projects which explored and refined approaches to test, scale and create new systems to restore the mauri of Tīkapa Moana/Te Moananui-ā-Toi (the Hauraki Gulf). Insights on restoring mauri https://giftreport.org.nz/gift-insights/

Our GIFT Year 5 Report, published in June 2022, draws together the impact of GIFT.

Nāu te rourou, Nāku te rourou,	With your gift, With my gift,
Kā ora ai te iwi	People will prosper

GIFT learnings demonstrate that kotahitanga is supported and enhanced through:

- Listening to and amplifying the voice of native species and ecosystems to inform regeneration
- Changing outdated practices and systems that exclude or undermine Indigenous knowledge and self determination
- Equity of resourcing
- Promoting leadership and learning for future generations
- Engaging and collaborating with warmth and respect.

Our submission is informed by our rich learnings through GIFT about what it will take to achieve system change in the Gulf https://giftreport.org.nz/systemic-change-through-gift/.

Innovative regeneration projects funded through GIFT https://giftreport.org.nz/grantee-impact/

Examples:

Noises: https://www.giftofthegulf.org.nz/the-noises
Waiheke Marine Project: https://www.giftofthegulf.org.nz/waiheke-marine-project
Ngātiwai Trust Board: To initiate Te Marae Moana o Ngātiwai to support and scale up

Support:

- The Marine Protection Proposals package to establish new marine and seafloor protection areas to restore the Hauraki Gulf Marine Park Tīkapa Moana / Te Moananui-ā-Toi.
- Recognition of customary practices of Mana Whenua
- Provision within HPAs for monitoring, research and regenerative practices driven by Mātauranga Māori, citizen observation and western science knowledge systems.
- Proceeding to the next stage of this process, where there will be an opportunity for further public consultation.

Propose:

- Practices embedded that support kotahitanga across the ecosystem
- Collaboration to ensure sustainable funding for regeneration, protection and monitoring

Query:

- How will the DOC protection proposals integrate with the innovative work mana whenua have underway.

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haukāinga, hapū and marae te taiao regeneration activities.

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¶

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 12:35 pm
To: Sea Change
Subject: Restore the Hauraki Gulf Marine Park / Tīkapa Moana / Te Moananui ā Toi
Attachments: s 9 (2)(a) submission marine protection.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hello,

Please find the attached proposal to restore the Hauraki Gulf Marine Park / Tīkapa Moana / Te Moananui ā Toi.

Sincerely,
s 9 (2)(a)

--
s 9 (2)(a) **. Director**
s 9 (2)(a)
s 9 (2)(a)

Submission for *Revitalising the Gulf* Marine Protection Proposals

s 9 (2)(a) s 9 (2)(a)
28.10.22

My name is s 9 (2)(a)

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

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.

The Government must act with urgency to set in place all proposed 19 protection zones in the Hauraki Gulf Marine Park by introducing legislation as soon as possible to enact these marine protection areas.

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.

IN ADDITION, to achieve maximum benefits for revitalising the Gulf, I implore the government to *move with pace* to deliver the Hauraki Gulf Fisheries Plan in close alignment with the marine protection proposals.

The extent of recovery within the High Protection Areas is 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.

I ALSO ASK that a pathway for other NEW marine protected areas (to be assessed and included), is provided in the Hauraki Gulf Marine Protection legislation. Without such a pathway, the legislation will act as a block to the creation of other marine protected areas and/or mana whenua-led initiatives in the Hauraki Gulf in the future.

The current proposals will result in approximately 6% of the Hauraki Gulf Marine Park being in a form of *no-take marine protection*. This excludes the cable protection zones which don't constitute marine protection under IUCN definitions.
Whilst this is an enormous step forward for the Hauraki Gulf, it is still a very small fraction of the Marine Park and *requires further ambition to reach a 30% target.*

Management of the Hauraki Gulf Marine Park must be ***active, adaptive and enduring*** to meet the current environmental degradation and the uncertainty created by direct and indirect effects of climate change.

FURTHER SUPPORT FOR INDIVIDUAL RESERVES AND ADDITIONAL AREAS:
I have personal experience of the following areas and strongly support their protection

1. **Te Hauturu-o-toi/Little Barrier (#1) and Craddock Channel Seafloor Protection Area (#6)**

The HPA should be extended to include the east coast of Hauturu to include further shallow reef areas that have been excluded from the Seafloor Protection Area.

The currently proposed High Protection Area on the northern coast of Hauturu, New Zealand's premier conservation reserve, will provide for the protection and restoration of a significant area of habitats typical of the Outer Hauraki Gulf. Manta are frequently seen in this area and it is also a highly productive area for seabirds due to upwellings on deep reef structures.

The proposed Craddock Channel Seafloor Protection Area to the east of Hauturu will provide a level of protection for reef and seafloor communities and is relatively large. However the area directly adjoining the east coast of Hauturu has been omitted from the proposal.

There is a strong argument to be made that the entire coast of Hauturu should be protected within a no-take marine reserve to reflect a consistent conservation vision for the land and sea.

2. **Mokohinau Islands High Protection Area (#8a) and Seafloor Protection Area (#8b)**

The Mokohinau Islands have exceptionally high conservation values both on land and in the sea. They contain highly diverse seabird populations, unique reptiles and land invertebrates. Protection will ensure connection through contiguous conservation reserves from land to sea, and including a range of shallow and deep reefs supporting large schools of reef fish as well as sub-tropical species. The "Mokes" has the potential to rival the Poor Knights as a spectacular land and sea reserve. ***Consideration should be given to extending the HPA to include Fanal Island.***

3. **Kawau Bay High Protection Area (#10a) and Seafloor Protection Area (#10b)**

This is an area of high geophysical diversity and high habitat diversity that has great potential for restoration and recovery. It has already had considerable recreational use. The Seafloor Protection Area will provide protection to the zone's seafloor communities including scallop beds and for nursery habitats for snapper, sharks and other species.

4. **Cape Rodney-Okarari Point (Goat Island) (#13)**

The proposed seaward extension to the existing reserve will significantly improve the ecological integrity of the reserve. The new area is based on better understanding of the movements of lobster and snapper. Goat Island is already an outstanding reserve area and is very popular for recreation – the extension will reinforce its status as an icon of marine conservation in New Zealand.

ADDITIONAL AREAS should be considered for protection at:

5. **Aotea/Great Barrier Island** : the northern coast on both the west and east side of the Needles and an area around Rakitu Island.

6. **Tawharanui Marine Reserve** : this should be extended to seaward (for the same reasons as of Cape Rodney- Okarari Point) and also to east and southern coasts of Tokatu Point.

7. **Leigh coastal area** : I would like to advocate a ban of spearfishing along the coastal area directly adjoining the land, from Goat Island marine reserve to Whangateau estuary, to protect our reef fish and marine nurseries.

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 12:38 pm
To: Sea Change
Subject: Cathedral Cove Marine Reseve

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

I would like to submit my submission for the extension of the Marine Reserve as published.
I would like to support the increase on the Northern boundary outwards by one km. approx.
I am against any increase along the Eastern boundary onto Hahei Beach and along the Western side of Mahurangi Island.
Our family has been ratepayers at s 9 (2)(a) for over 50 years and I attended previous meetings about the reserve and previous doubts about it intruding onto Hahei Beach and Mahurangi.
The same reasons to exclude these areas apply now only more so with the increase in people and boating activity.
The Marine Reserve has increased the sea life dramatically but also increased the people visiting the Reserve. They should pay to visit the reserve and it should not be a drain on ratepayers.
I used to always take visitors to our place toCathedral Cove on our boat but now there are so many people on the beach and so many kayaks and boats anchored we don't bother, it is disappointing.
We have always taken our children and Grandchildren to fish and swim in the sheltered waters on the West of Mahurangi, it is the only spot to seek shelter from a Easterly.
I am 85 years old ,my wife is 79, I have always had a boat and small yacht at s 9 (2)(a) We obviously love s 9 (2)(a) Beach, it has been our family Bach for over 50 years, please leve it alone.
I do not want to talk to anyone about my submission.
Thank You.

s 9 (2)(a)
Email. s 9 (2)(a)

Sent from my iPad

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 12:40 pm
To: Sea Change
Subject: High Protection Areas (HPA)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

I support the development of HPAs if they are closed to all fishing. Surely the purpose is to protect marine life. Exceptions for Customary Fishing makes no sense from an environmental point of view.

Best regards

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 12:47 pm
To: Sea Change
Cc: s 9 (2)(a)
Subject: Revitalising the Gulf Marine protection proposal Submission.
Attachments: Complete Submission - DOC Hauraki Gulf MPAS 28Oct2022 - Pelco NZ.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora,
To whom it may concern,

Please find attached Pelco NZ Ltd's submission on the Revitalising the Gulf Marine protection proposals.

If desired, feel free to make contact regarding this submission and the content within.

Nga mihi,
s 9 (2)(a)

28 October 2022

Attention: Department of Conservation

Via email: seachange@doc.govt.nz

Submission on the *Revitalizing the Gulf* Marine protection proposals.

Purpose Statement

These comments are provided by Pelco NZ Ltd in respect to the Revitalizing the Gulf Marine protection proposals. Comments have been made with the intention of establishing a collaborative working relationship with the Department of Conservation to enable the current proposals to be based upon an accurate reflection of current industry fishing practices, operational settings, and pelagic fish biology.

Pelco NZ Ltd – who we are

1. Pelco NZ Ltd is a privately owned and operated Māori family business that has been fishing pelagic species from FMA1 for over 25 years from their base at Mount Maunganui in the Bay of Plenty. Recently, Pelco has become the sole operator of the domestic purse seine (PS) fleet and are now the primary quota holder in the North-eastern North Island for species including Jack Mackerel (JMA1), Kahawai (KAH1) and Blue Mackerel (EMA1), and to a lesser degree - Trevally (TRE1). s 9 (2)(b)(ii) [redacted]

2. Pelco currently operate three PS vessels, that range between 32 and 36 m vessel length. The home port of these vessels is Port of Tauranga.

3. These three vessels primarily fish in the North-eastern coast of the North Island (e.g., Northland, eastern Coromandel, the outer Hauraki Gulf, and the Bay of Plenty), New Zealand. Operations do extend to the West Coast and to the Southeast coast of the North Island on occasion.

What we seek

4. Pelco seeks a collaborative meaningful relationship with the Department of Conservation (DOC) that can drive appropriate and effective management.

5. Pelco consider that management actions that incorporate the PS fishery needs to be based upon accurate information on the biology of pelagic fish, industry practice and focus.

6. Further, as the primary operator of domestic PS vessels, it is important to us that officials are aware of the operational state of the PS fishery and the kaitiakitanga exercised by Pelco NZ and not an outdated understanding of the fishery and its operators.

Pelco NZ Limited.
34 Portside Drive, PO Box 4472, Mount Maunganui South
Mount Maunganui 3149, New Zealand
P: + 64 7 574 9335 E: info@pelco.nz.com
www.pelco-nz.com

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:02 pm
To: Sea Change
Subject: Submission on the proposed protection zones designed to revitalise the Hauraki Gulf and its marine life
Attachments: Submission on proposed protection zones designed to revitalise the Hauraki Gulf and its marine life - s 9 (2)(a) pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hi,

Please find attached my submission on the proposed protection zones designed to revitalise the Hauraki Gulf and its marine life.

Regards,

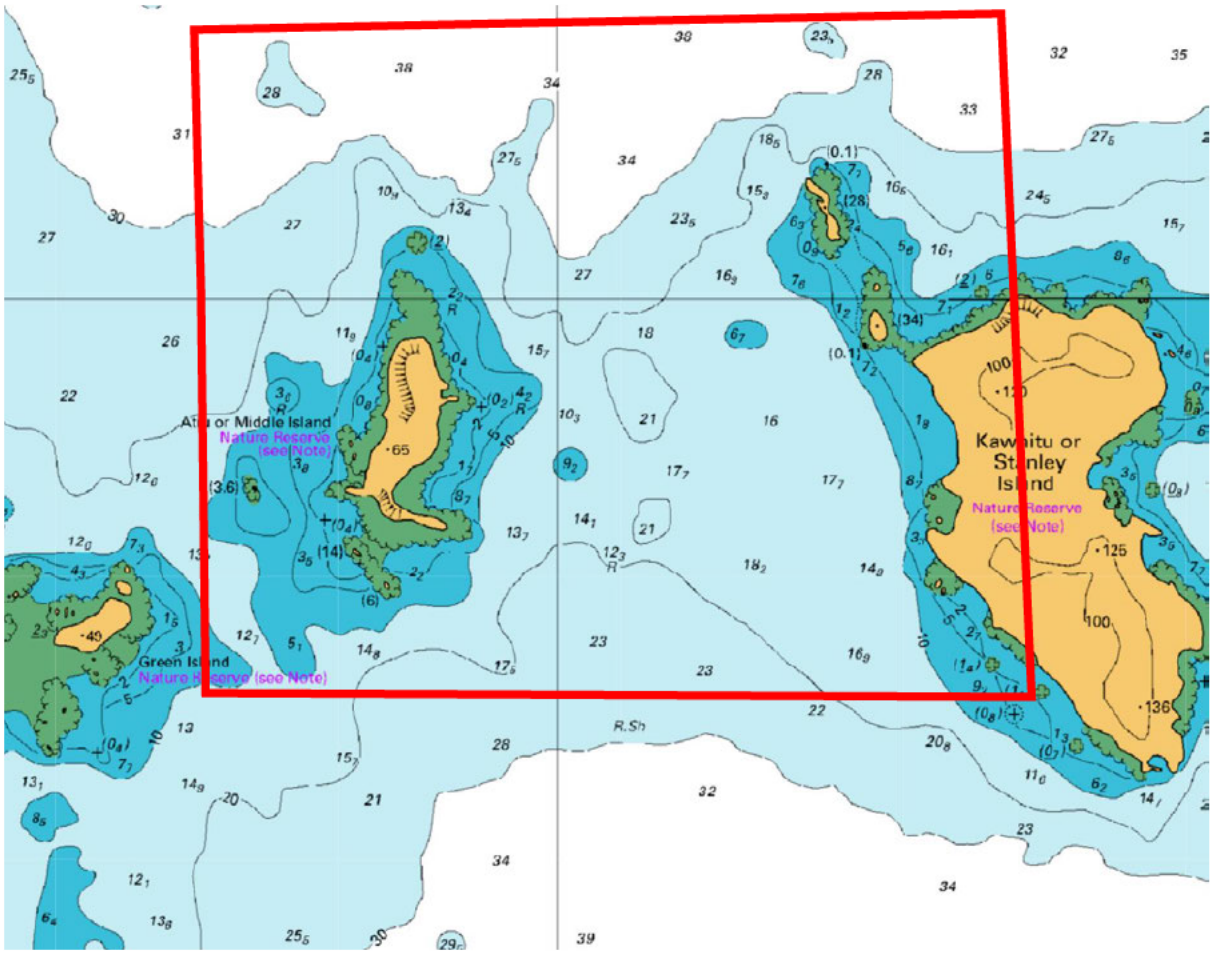
s 9 (2)(a)
s 9 (2)(a)

Submission on proposed protection zones designed to revitalise the Hauraki Gulf and its marine life.

My name is Callum Bruce and I am a user of the Hauraki Gulf Area, particularly in the East Coast of the Coromandel Peninsula area for the last 20-25 years. My predominant activities in this area include recreational spearfishing, fishing, scuba diving, and sailing. Over my time diving in this area, I have seen a clear decline in the abundance of marine life in the area around the Mercury Islands and East Coast of the Coromandel Peninsula in general.

I support the proposed increase of protection in the Hauraki Gulf area in general but have some specific comments/proposals.

1. Extension of Whanganui-a-Hei and Leigh Marine reserve area – These areas should be extended as **Marine reserves** and **not HPAs** to extend the area of total no take zone. Having dived with both reserves and directly outside the boundaries of these reserves there is a clear and stark contrast in the abundance of recreational species between the inside and directly outside of the reserve areas. Extension of these areas as Marine Reserves will also provide a good scientific opportunity to investigate ecosystem recovery rates with no external take pressure where an adjacent established no take area is present.
2. All proposed HPAs should be replaced with the full no take protection of a Marine Reserve to removal all external impacts on these areas to provide the greatest benefit to the Hauraki Gulf area with their closure to all extractive fishing/gathering.
3. Clarification is required around whether vessel anchoring is allowed in SPAs.
4. Extend the SPAs to cover the entirety of the Hauraki Gulf area to remove habitat destruction from bottom contact fishing (commercial and recreational) methods i.e., dredging and trawling.
5. Concern that closing relatively large recreational fishing areas is likely to put pressure on adjacent areas i.e. Areas 2, 9a and 9b are likely to result in increased pressure in the Mercury Bay/Mercury Island area. I believe that there is protection missing in the Mercury Island Group and propose that an additional Marine Reserve area is established in the Mercury Island Group potentially between Atiu/Middle Island and Kawhitu/Stanley Island (Proposed area below).


or Middle Island
Nature Reserve
(see Note)
Kawhitu or
Stanley
Island
Nature Reserve
(see Note)
Green Island
Nature Reserve (see Note)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:02 pm
To: Sea Change
Subject: Hauraki gulf submission.

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hi,

I am the partner of a family owned business my partner being commercial snapper longliner vessel- fishing out of s 9 (2)(a) as a home port. I am also a local resident and recreational user of the area.

I REJECT the government proposals in favour of 100% seabed protection

I do not support the Government-proposed Marine Protection proposal for the Hauraki Gulf Marine Park because I don't believe that MPA,s are the answer to fisheries management. Locking up a substantial reef areas in particular 9A and 9B will inturn shift effort in other reef areas that are not under a reserve which will have damaging consequences from overfishing.

I object the lack of information and detail around the proposal and implementation plan.

I support extending the consultation deadline for marine protection to align with the Hauraki Gulf Fisheries Plan process which ends in February 2023 and any working groups involving commercial and recreational users of the area.

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

Sent from my iPhone

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:03 pm
To: Sea Change
Subject: Submission Revitalizing the Hauraki Golf

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 2:05 pm
To: Sea Change; Helen Pastor; Trish Rea
Subject: Submission: Hauraki Gulf MPAs proposal
Attachments: Hauraki-Gulf-MPA-submission-28-Oct-2022.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Kia ora team

Please find attached a submission from the New Zealand Sport Fishing Council, LegaSea and New Zealand Angling & Casting Association and others in response to the Hauraki Gulf Marine Park proposed Marine Protected Areas.

Would you please confirm receipt of this submission and keep us informed of future developments?

Thanks in advance.

Regards
s 9 (2)(a)
For the New Zealand Sport Fishing Council
Fisheries Management Standing Committee and ors.
s 9 (2)(a)

s 9 (2)(a)
President
NZ Sport Fishing Council
s 9 (2)(a)
s 9 (2)(a)

Department of Conservation
seachange@doc.govt.nz

28 October 2022

Submission: Hauraki Gulf Marine Protection Areas proposals

Until the full package of proposals for both marine protection and fisheries management is made available for public consultation, and a genuine effort is made by officials to consider any feedback, we have no option but to oppose the current marine protection proposals issued by the Department of Conservation.

Submitters

1. The New Zealand Sport Fishing Council (**NZSFC**) is a recognised national sports organisation with over 38,500 affiliated members from 53 clubs nationwide. NZSFC has initiated LegaSea to generate widespread awareness and support for the need to restore abundance in our inshore marine environment. Also, to broaden NZSFC involvement in marine management advocacy, research, education and alignment on behalf of our members and LegaSea supporters. www.legasea.co.nz.

2. The New Zealand Angling and Casting Association (**NZACA**) is the representative body for its 28 member clubs throughout the country. The Association promotes recreational fishing and the camaraderie of enjoying the activity with fellow fishers. NZACA is committed to protecting fish stocks and representing its members' right to fish.

3. Collectively we are 'the submitters'. The joint submitters are committed to ensuring that sustainability measures and environmental management controls are designed and implemented to achieve the Purpose and Principles of the Fisheries Act 1996, including "maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations…" [s8(2)(a) Fisheries Act 1996].

4. Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this process. We would like to be kept informed of future developments. Our contact is Helen Pastor secretary@nzsportfishing.org.nz.

Proposals

5. On Wednesday 14th September 2022 we received advice from the Department of Conservation (**DoC**) they were consulting on the Revitalising the Gulf marine protection proposals. David Parker, the Minister of Oceans and Fisheries, and Poto Williams, the Minister of Conservation, will consider feedback to later inform a Hauraki Gulf Marine Protection Bill. Feedback is due by **Friday 28th October 2022**.

6. DoC and Fisheries New Zealand (**FNZ**) are currently implementing the Revitalising the Gulf – Government action on the Sea Change Plan, reforms intended to improve the health of the Hauraki Gulf Marine Park.

7. DoC is proposing to create 19 protected areas in the Hauraki Gulf Marine Park. To enable this outcome, they are proposing to create two new marine protection tools - High Protection Areas (**HPAs**) and Seafloor Protection Areas (**SPAs**). The 19 protection areas are:

    a. **12 High Protection Areas:** These areas will prohibit activities such as commercial and recreational fishing while providing for the expression of customary practices and fishing by mana whenua.

    b. **5 Seafloor Protection Areas:** These areas are aimed at protecting seafloor habitats by prohibiting activities that damage or disturb the seafloor, including bottom trawling and longlining, Danish seining, potting, set netting and mining, and allowing for activities that do not involve seafloor contact.

    c. **2 protected areas:** These will be extensions to the existing Cathedral Cove/Whanganui-a-Hei and Cape Rodney-Okakari Point (Leigh) marine reserves.

Discussion

8. The submitters have been actively addressing fisheries depletion and marine protection in the Hauraki Gulf Marine Park for more than 20 years. Our goal is to see marine abundance and biodiversity restored in the Hauraki Gulf for the benefit of future generations.

9. Our Kahawai Legal Challenge was successful in defining the need for the Minister of Fisheries (as the role was then titled) to have *particular regard* to the Hauraki Gulf Marine Park Act when setting the Total Allowable Commercial Catch (TACC)[1] for fish stocks within the Marine Park.

10. We have also been involved with Sea Change since 2013. After two years of intense, focused and deeply committed hard work the Stakeholder Working Group settled on the Sea Change plan, which was submitted to the Ministers of Fisheries and Conservation in late 2016.

11. In this context we submit the Minister of Conservation, Poto Williams, and the Minister for Oceans and Fisheries, David Parker, agree to extend the consultation period for the marine protection proposals from 28 October, to align with the consultation period for the inextricably and intimately connected Hauraki Gulf Fisheries Plan. FNZ intends to consult on that Plan from mid-November 2022 to mid-February 2023. There has been no reasonable

[1] Sanford Ltd and Ors v The NZRFC NZSFC. CA163/07 [11 June 2008].

explanation from DoC or the Minister as to why the consultation processes are not aligned. On 13 October 2022 we sent a letter to both Hon. David Parker and Poto Williams requesting alignment, and received a reply on 28 October advising *"we do not consider it necessary that the two consultation periods coincide"*.

12. Since June 2022 there have been two people representing recreational fishing interests on the Hauraki Gulf Fisheries Plan Advisory Group. These representatives have been unable to discuss how the content of the Fisheries Plan has evolved through the Advisory Group process due to the onerous conditions set out in the Group's Terms of Reference. It is this type of constraint that denies the public adequate information to make informed decisions even this far into the development process. This is not good enough.

13. There is already case law establishing the need for open minded consultation processes[2]. The current process purportedly seeks to revitalise the Hauraki Gulf. How can anyone have a view on what steps are most appropriate to revitalise the Hauraki Gulf when we are given a map with 19 protected areas on it, and very little else in the way of integrated management actions? A veil of secrecy over other information including the Fisheries Plan and the location of 'trawl corridors' is neither helpful nor informative.

14. We understand any marine protection changes under Revitalising the Gulf will be based on the Marine Protected Areas Policy and Implementation Standard 2005. This current consultation does not meet Planning Principle 4 in the Standard, as it is not possible to achieve this without an adequate timeframe or information: *"processes will be undertaken in a transparent manner that informs and allows for participation and input from the public".* [pg 18]

15. Until the full package of proposals for both marine protection and fisheries management is made available for public consultation, and a genuine effort is made by officials to consider any feedback, **we have no option but to oppose the current marine protection proposals issued by DoC.**

16. When the integrated package of measures to address both marine protection and fisheries management is released, providing adequate information and a reasonable consultation time, we will submit a substantive response.

[2] Wellington International Airport Limited and others v Air New Zealand [1993] 1 NZLR 671, at p. 675.

Sea Change

From: s 9 (2)(a) <s 9 (2)(a)
Sent: Friday, 28 October 2022 2:12 pm
To: Sea Change
Subject: Reject proposal

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hi,

I reject this proposal, especially where you are creating HPA and then allowing people to gather seafood based on race , this is unacceptable for the whole of New Zealand, allowing a certain race to have different rules is completely racist and the law / rule should be of all the people of New Zealand.

One nation of all residents of New Zealand, one law for all the residents of New Zealand, this is the only way forward for a democratic country.

Any reference or exception based on race or colour of your skin should be removed from this proposal.

Please do not release my submission under the information act as this is my private view and do not want this to be publicly available.

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

Sea Change

From: s 9 (2)(a)
Sent: Friday, 28 October 2022 2:13 pm
To: Sea Change
Cc: s 9 (2)(a)
Subject: Submission - Auckland Conservation Board
Attachments: ACB-2037 - DOC - Revitalising the Gulf - 28 Nov 2022 - DOC-7189171 (1).pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Please find attached a submission from the Auckland Conservation Board.

[I am sending this from my s 9 (2)(a) email address as the Board Support Officer is on leave, and I do not have permissions to send from the Board's email address.]

s 9 (2)(a) (he/him)
Statutory Manager I Pou Ture Whenua
Auckland I Tāmaki Makaurau Office
Phone: s 9 (2)(a)

s 9 (2)(a)

AUCKLAND CONSERVATION BOARD

Te Rūnanga Papa Atawhai o Tāmaki Makaurau

Board File Ref: ACB-2037

28 October 2022

Department of Conservation

Submitted via email: seachange@doc.govt.nz

***Revitalising the Gulf* Marine Protection Proposals**

The Auckland Conservation Board

The Tāmaki Makaurau Auckland Conservation Board is an independent statutory body appointed by the Minister for Conservation. The Board was established by the Conservation Act 1987, s 6L. The Board has a statutory role in advocating its interests in any public forum or in any statutory planning process.

General Feedback:

- The Board 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 Board wishes to see implemented are the greatest levels of habitat protection possible that can be agreed to by all the stakeholders.

- We note that the currently agreed international conservation principles (United Nations Convention on Biological Diversity, Target 3) are that strong protection of around 30% of the marine environment is required for future sustainability of its habitats and biota. As such, given that the full implementation of the current proposals will result in a maximum of only 5% of the Hauraki Gulf afforded strong protection (i.e., under Marine Reserve or HPA; 18% under any form of protection), it should be recognised that the current protection proposals for the Hauraki Gulf are the bare minimum currently needed, and that additional protection is likely to be needed in the future to adequately sustain its habitats and biota.

SERVICED BY
DEPARTMENT OF CONSERVATION
TĀMAKI MAKAURAU AUCKLAND
Private Bag 68908, Newton, Auckland 1141, New Zealand
Telephone (09) 307 9279 | Email aucklandconservationboard@doc.govt.nz

Feedback on Specific Proposals:

- The Board notes that the current marine protection proposals (as outlined in the Information Document) largely match those foreshadowed in the "Revitalising the Gulf" response, which in turn largely address the protection proposals outlined in the "Sea Change" Plan (but see further detail below). As such, the Board is pleased to see the ongoing detailed support for most of the original marine protection proposals outlined in the Sea Change Plan.

- The Board supports the inclusion of the Noises HPA in these current proposals, and trust that this implementation meets the overall aims of the relevant stakeholders.

- We note there are still decisions to be made (in conjunction with mana whenua) as to appropriate additional marine protection around Waiheke & Aotea Islands and encourage combined effort (and appropriate allocated resources) on advancing protection in these areas.

- The Board is pleased to see more detail presented on providing for customary practices within HPAs, and trust that this meets mana whenua concerns.

- We also note the current lack of specific proposals for protection of marine areas from on-going high sediment loads entering the Gulf, and their enormous impact on estuarine and adjacent shallow marine communities. This is specifically relevant to the original proposals in the Sea Change Plan for levels of protection to be afforded to the Whangateau Harbour and Firth of Thames. We recognise that (as outlined in the initial Revitalising the Gulf Report) an alternative, catchment-based management approach is likely needed to address these issues, and that they are thus somewhat outside the scope of the current proposals. However, we wish to highlight the crucial inter-connectedness of these issues, and that the current proposals will not afford sufficient protection to the health of the Hauraki Gulf without simultaneous management of sediment inputs. We thus highly encourage on-going support for the inter-agency actions on reducing sediment loads through catchment-based management.

In response to Specific Questions asked in the "Information Document":

1) The appropriate marine protection tool to be applied to the proposed extensions to existing marine reserves at these sites:

    - Given the very limited areas involved (29km2 in total, or 0.2% of the Hauraki Gulf), and the considerable scientific value in providing these areas with the same management and protection values as the original adjacent areas, we would encourage their designation as marine reserves, if at all possible.

    - In addition, considerable benefits to Hauraki Gulf fisheries have arisen specifically because of the strong marine reserve-level protection of these areas (see below). An extension of the same level of protection to a slightly greater area will very likely result in considerably greater benefit to the wider Hauraki Gulf fisheries.

2) Additional benefits for recreational and commercial fishing from protection proposals:

    - As already noted in the Information Document, there is considerable scientific evidence accumulated on the highly significant boost to snapper population size in the Hauraki Gulf that has been provided by the small Cape Rodney-Okakari Point Marine Reserve, and the subsequent boost to the recreational fishery and local economy. We believe it is worth highlighting recent research on this impact (Qu et al 2021), which has shown that “the economic valuation of this marine reserve's snapper recruitment effect demonstrated $9.64 million in total spending accruing to recreational fishing per annum and $4.89 million in total output to commercial fisheries annually”. That is, strong protection of only small, targeted areas can provide very direct financial improvements for both recreational and commercial fisheries.

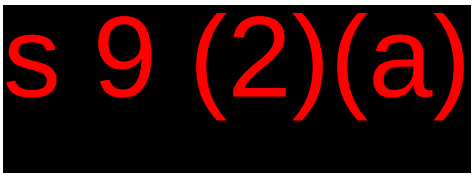
    - As such, we believe that the extension of strong marine protection to the area adjacent to the current Marine Reserve, plus additional protection to the other areas outlined in the current proposals, will very likely provide enormous directly measurable fisheries benefit.

Final General Comments:

- The Board 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.

Thank you for the opportunity to provide feedback on these proposals.



s 9 (2)(a)
Chair – Auckland Conservation Board

Reference:

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 134.

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:19 pm
To: Sea Change; s 9 (2)(a)
Subject: Submission of s 9 (2)(a)
Attachments: 20221028-PW-DOC-Submission on Hauraki Gulf Marine Protection.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Submission on 'Revitalising the Gulf' & proposed Hauraki Gulf Protection Bill

Please see attached.

Submission on ‘Revitalising the Gulf’ & proposed Hauraki Gulf Protection Bill

Name: s 9 (2)(a)

s 9 (2)(a)

email s 9 (2)(a)

mobile phone: s 9 (2)(a)

Submission:

I support in full the submission of the Friends Of The Hauraki Gulf.

I would like to address any committee or select committee.

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:26 pm
To: Sea Change
Subject: Protect the 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)
s 9 (2)(a)
--
s 9 (2)(a)
Writer and producer

UM?%576579:9<9<

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:27 pm
To: Sea Change
Subject: EDS submission on Gulf marine protection proposals
Attachments: EDS submission on Revitalising the Gulf Final.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Please find attached EDS's submission on Revitalising the Gulf: Marine Protection Proposals. EDS is keen to continue to be involved in the process so please advise us of any developments, including drafting of the Bill.

Ngā mihi nui | Kind regards

s 9 (2)(a)

[redacted] MNZM
Policy Director
Environmental Defence Society

Environmental Defence Society | 50 YEARS 1971 – 2021

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

For more information about EDS: www.eds.org.nz; www.edsconference.com
www.climateandbusiness.com **SUPPORT the work of EDS. Make a DONATION**

Department of Conversation
PO Box 10420
Wellington 6011

By email: seachange@doc.govt.nz

28 October 2022

SUBMITTER DETAILS

Full name:	Environmental Defence Society Incorporated
Address:	s 9 (2)(a)
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SUBMISSION ON REVITALISING THE GULF: MARINE PROTECTION PROPOSALS

Introduction

1. This is a submission on the Revitalising the Gulf: Marine protection proposals: Information Document **(Information Document)** prepared by the Department of Conservation **(DOC)**.

2. The Environmental Defence Society **(EDS)** is an independent not-for-profit organisation conducting interdisciplinary policy research and litigation. It was established in 1971 with the purpose of improving environmental outcomes in Aotearoa New Zealand. EDS has a special interest coastal and marine ecosystems and is currently leading research on future options for oceans system reform.

3. The Hauraki Gulf has been a core focus of EDS's work for many years. EDS strongly supported the Sea Change Tai Timu Tai Pari **(Sea Change)** process. EDS Policy Director Raewyn Peart was a member of the Stakeholder Working Group **(SWG)** that developed the Sea Change Marine Spatial Plan, was subsequently a member of the Ministerial Advisory Committee on Sea Change Tai Timu Tai Pari, and is currently a member of the Hauraki Gulf Fisheries Plan Advisory Group.

4. EDS has published widely on Hauraki Gulf issues. In 2016, EDS produced an environmental history of the Hauraki Gulf[1] followed by a 2017 lessons learnt review of the Sea Change process,[2] a 2018 investigation into fisheries management which included a Hauraki Gulf case study[3] and a 2019 report outlining potential options for improving the governance of the Hauraki Gulf.[4] In

[1] Peart R, 2016, *The story of the Hauraki Gulf*, Bateman, Auckland
[2] Peart R, 2017, *Turning the tide: Integrated marine planning in New Zealand*, EDS, Auckland, available form www.eds.org.nz
[3] Peart R, 2018, *Voices from the sea: Managing New Zealand's fisheries*, EDS, Auckland
[4] Peart R and B Cox, 2019, *Governance of the Hauraki Gulf: A review of options,* EDS, Auckland, available from www.eds.org.nz

2020 EDS published a report on protecting the Hauraki Gulf Islands as part of its landscape protection project.[5] More recently, EDS submitted in support of iwi-led proposals to temporarily close the waters around Waiheke Island and in support of the proposed Hākaimango-Matiatia (Northwest Waiheke Island) Marine Reserve.[6]

Summary of submission

5. Overall EDS strongly supports the proposals to increase marine protection in the Hauraki Gulf and commends DOC for putting them forward. The proposals largely reflect those presented in the Sea Change marine spatial plan which were developed through a three-year collaborative process with mana whenua and stakeholder representatives. It is now nearly six years since that plan was completed so these proposals are long overdue and sorely needed.

6. The Hauraki Gulf is a place of considerable importance to mana whenua, local and regional communities, the national and the international community. This was recognised through the creation of the Hauraki Gulf Marine Park. However, the intention that the international and national significance of the Park be protected in perpetuity has not been realised. A mere 0.3% of the Marine Park is currently protected from direct human-induced pressures within marine reserves.

7. The state of the environment of the Marine Park is of serious concern, as highlighted in the 2020 State of Our Gulf report. This paints a stark picture of long-term declines in biodiversity, depletion of taonga species and loss of important benthic habitat. Scallop and cockle beds have collapsed, kina barrens are expanding and the Gulf's seabirds are becoming even more threatened.

8. There is an urgent need to significantly increase marine protection in the Park to help reverse this decline. This is particularly the case in the face of a changing climate and rapidly warming and acidifying seas.

9. Marine protected areas are a proven tool that enable marine ecosystems to recover. Not only are they beneficial for marine life and habitats, they also provide enhanced opportunities for commercial and recreational fishing and other forms of recreation, tourism and educational activities. In addition, they generate economic benefits for local communities.

10. EDS supports the proposal to extend the size of the Cape Rodney to Okakari Point and Whanganui-ā-Hei marine reserves. The extensions should a be in the form of marine reserves, rather than HPAs, to maintain and support the important role these areas play in providing control sites for better understanding the impact of fishing on the marine environment. This would also avoid creating complicated management boundaries between different parts of what should be integrated marine protected areas.

11. EDS supports the proposal to create 12 new HPAs as these areas have a range of important ecological and biodiversity values that both merit and need protection. In particular, EDS supports the inclusion of the Ōtata/the Noises HPA in the protection package.

12. The HPA proposals do not include protection around Ahuahu/Great Mercury Island, an area that was proposed for protection in the Sea Change Plan. Such protection is urgently needed. EDS urges that this gap be closed as soon as possible, and that provision be made in the Bill for a subsequent HPA to be created around the islands.

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[5] Peart R and C Woodhouse, 2020, *Protecting the Hauraki Gulf Islands*, EDS, Auckland, available from www.eds.org.nz

[6] Recent submissions prepared by EDS are available from www.eds.org.nz

13. There are also gaps in coverage of the proposed HPAs around Waiheke Island and Aotea/Great Barrier Island, with the areas not being included in the Sea Change proposal. The existing proposal for the Hākaimango-Matiatia (Northwest Waiheke Island) Marine Reserve could potentially be included in the Bill alongside the other proposed HPAs. Provisions could also be made for future HPAs to be identified around Aotea/Great Barrier island and for other gaps to be filled.

14. Due to their damaging impacts, it is important that bottom trawling, Danish seining and dredging is excluded from on or near important benthic habitats in the Hauraki Gulf Marine Park. EDS supports the proposed SPAs but submits that the areas they cover should be extended in the future. Provisions should be made in the Bill for this to occur.

15. The overall impact of the marine protection proposals on recreational and commercial fishers appears small, and will likely be more than compensated for in the longer term by an increase in fish production generated by the new protected areas.

16. EDS generally supports the proposals relating to the development and role of Biodiversity Objectives. However, given the wide range of interests in the Hauraki Gulf, and the significant role that the Biodiversity Objectives play, it is imperative that wide input is sought in their development.

17. Active management might be required to assist the protected marine systems to restore themselves and it is good to see this provided for in the activities that can take place in HPAs. The Bill should require regular monitoring and review of the sites. It is also important that there is effective enforcement of the HPAs through a regular on-water presence. this will require more resourcing and this will need to be budgeted for.

18. Overall, EDS supports the proposals in the Information Document and urges the Minister to proceed with legislation to create the 12 high protection areas, 5 seafloor protection areas and extension of two existing marine reserves without delay.

The proposal

19. The Department of Conservation **(DOC)** has issued an Information document describing a package of marine protection proposals for the Hauraki Gulf. The proposals include establishing:

    - 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 to be established as HPAs or marine reserve extensions.

20. These proposals need to be considered within the context of the considerable importance of the Hauraki Gulf to mana whenua, local and regional communities, Aotearoa New Zealand and the rest of the world, and the ongoing degradation of this nationally and internationally significant marine area. In addition, as the proposals have been largely based on those set out in the Sea Change marine spatial plan[7], with some minor boundary changes, it is important to understand the genesis of the Sea Change process, how the marine protection proposals were developed,

[7] Sea Change Tai Timu Tai Pari, 2016, *Hauraki Gulf marine spatial plan*, Waikato Regional Council, Hamilton, at 18

and the broad cross-sectoral support for the Sea Change plan as a result of the collaborative process.

The importance of the Hauraki Gulf

21. The Hauraki Gulf is "is a taonga of the utmost cultural and spiritual significance to mana whenua through its rich history of settlement and use since the first waka (ancestral canoes) navigated its water many centuries ago."[8] It is a highly productive marine system, a major spawning and nursery area for snapper and other finfish,[9] and supports some of the most important commercial and recreational fisheries in the country.

22. The Gulf is an international seabird biodiversity hotspot, with over 70 species being sighted in the area, comprising some 20% of the world's total number of seabird species. At least 23 species breed in the Hauraki Gulf.[10] The wider Hauraki Gulf region and many of its islands are recognised as globally important with five species endemic to the region and breeding nowhere else in the world.[11] Around 50 Bryde's whales live year-round in the Gulf, and common and bottlenose dolphins are thought to use the Gulf as a calving and nursery area, possibly due to the year-round abundance of food.[12]

23. The national and international importance of the Gulf is highlighted by the passage of the Hauraki Gulf Marine Park Act in 2000 which establishes the Hauraki Gulf Marine Park "to recognise and *protect in perpetuity the international and national significance* of the land and the natural and historic resources within the Park".[13] This highlights the need to protect the area in perpetuity.

24. In section 7, the Act recognises *as a matter of national significance* the interrelationship between the Gulf, its islands, and catchments and the ability of that interrelationship to sustain the life-supporting capacity of the Gulf (which includes its waters and ecosystems).[11] Section 8 sets out management objectives for the Gulf which include "(a) the protection and, where appropriate, the enhancement of the life-supporting capacity of the environment of the Hauraki Gulf, its islands, and catchments".

25. To date, action towards achieving these objectives has been underwhelming at best. A mere 3,960 ha (or 0.3%) of the Hauraki Gulf Marine Park is protected within marine reserves. Only one marine reserve, the Te Matuku Marine Reserve on the south coast of Waiheke Island, was created after the establishment of the Marine Park in 2000 and the application for it was lodged prior to the Marine Park being in place.[14]

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[8] Ibid

[9] Zeldis J R and R I C C Francis, 1998, 'A daily egg production method estimate of snapper biomass in Hauraki Gulf, New Zealand', *ICES Journal of Marine Science*, 55, 522-534

[10] Gaskin C P and M J Rayner, 2013, *Seabirds of the Hauraki Gulf: Natural history, research and cons*ervation, Hauraki Gulf Forum, Auckland

[11] 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

[12] Stockin K A, 2008, *The New Zealand common dolphin (Delphinus sp.): Identity, ecology and Conservation*, PhD thesis, Massey University, Auckland; Dwyer S L et al, 2014, 'Overlooking a potential hotspot at Great Barrier Island for the nationally endangered bottlenose dolphin of New Zealand', *Endangered Species Research*, 25, 97-114

[13] Hauraki Gulf Marine Park Act 2000, section 32(a)

[14] Hauraki Gulf Forum, 2020, State of our Gulf 2020: Hauraki Gulf /Tīkapa Moana/Te Moananui-ā-Toi State of the Environment Report 2020, available from www.haurakigulfforum.org.nz, at 13
Hauraki Gulf Forum, above n 4, at 39

26. The Hauraki Gulf Forum has set a goal of at least 30% marine protection of the Hauraki Gulf Marine Park in its 2021-22 Annual Report,[15] recognising the growing need to provide significantly increased protection for the Marine Park.

27. The Forum's goal has been supported by a public survey undertaken in September and October 2021. Of the 1,000 respondents, 77% supported putting 30% of the Hauraki Gulf into marine protected areas. Only 5% were opposed.[16]

28. Mana whenua have been showing leadership in providing some protection in the absence of government action. In January 2021, Ngāti Pāoa placed a rāhui on the harvest of scallops, mussels, rock lobsters and pāua from the nearshore marine area around Waiheke Island. In February 2022, Ngāti Manuhiri laid a rāhui over the entirety of the Hauraki Gulf to prohibit the harvesting of scallops.

29. There is an urgent need to support these efforts by implementing strong area-based protection to meet the vision and objectives for the Hauraki Gulf Marine Park.

The need for greater marine protection in the Hauraki Gulf

30. The state of the environment of the Hauraki Gulf Marine Park is of serious concern. The latest assessment report, published by the Hauraki Gulf Forum in 2020, describes long-term declines in biodiversity, the depletion of taonga species, and the loss of important benthic habitat.[17] Cumulative effects of human-induced pressures, including overfishing, introduction of invasive species and poorly regulated land-based activities (ie sedimentation and nutrient run-off), have led to widespread degradation of the marine environment. This, in turn, has undermined the capacity of species and ecosystems to perform important ecological functions and provide ecosystem services including fish production.[18] Specific findings in the report, indicative of the ongoing poor health of the Gulf, include:

    - Tāmure and tarakihi are at levels where action is needed to actively rebuild their stocks (less than 20% of unfished stock biomass).
    - Kōura (crayfish) is regarded as functionally extinct in heavily fished areas.
    - Reductions in populations of tāmure (snapper) and kōura (crayfish), have allowed kina to flourish, causing the loss of kelp forests and expansion of urchin barrens on the Hauraki Gulf's subtidal reefs.
    - There has been universal decline in the density of harvestable (>30 mm) tuangi (cockles) over the last 20 years at the 12 monitored sites where harvesting is allowed year-round.

31. In addition, scallop beds are in a state of collapse with the biomass of commercially fished scallop beds declining by more than 80% in the Coromandel fishery over the past 10 years, representing a decline from 1,397 tonnes to 249 tonnes in biomass between 2012 and 2021.[19] Steeper declines have been observed within certain areas. For example, the biomass of core

[15] Hauraki Gulf Forum, 2022, Annual report Te Pūrongo ā Tau 2021-22, at https://gulfjournal.org.nz/wp-content/uploads/2022/08/HGF-AR-2022-10.pdf
[16] Horizon Research, 2021, *Hauraki Gulf survey*, prepared for the Hauraki Gulf Forum, at https://gulfjournal.org.nz/2021/11/results-of-hauraki-gulf-poll/
[17] Hauraki Gulf Forum, 2020, *State of our Gulf 2020: Hauraki Gulf /Tīkapa Moana/Te Moananui-ā-Toi State of the Environment Report 2020*, available from www.haurakigulfforum.org.nz
[18] Hauraki Gulf Forum, 2020, *State of our Gulf 2020: Hauraki Gulf /Tīkapa Moana/Te Moananui-ā-Toi State of the Environment Report 2020*, available from www.haurakigulfforum.org.nz
[19] Fisheries New Zealand, 2021, *Review of sustainability measures for New Zealand scallops (SCA 1 & SCA CS) for 2022/23*, FNZ Discussion Paper No 2021/30, available at www.mpi.govt.nz

scallop beds in the Hauraki Gulf declined from 1,005 tonnes in 2012 to 52 tonnes in 2021 with the current biomass only 5% of the 2012 biomass. Long-term declines have been observed at all commercially targeted scallop beds except for Pakiri, which hosts a relatively low biomass of 7 tonnes. Similar declines have been observed across recreationally targeted scallop beds located in the Hauraki Gulf.

32. Even more alarming is recent research on the expansion of kina barrens off Te Hauturu-o-toi/Little Barrier Island and the Noises. Kina barrens surrounding Te Hauturu-o-toi/Little Barrier Island have increased from 0.4% of the rocky reef system in 1953, to 11.6% in 1979 and 32.73% in 2019. The figures for the Noises are even more stark with kina barrens increasing from 23.97% of reef areas in 1978 to 49.52% in 2019. [20] Kina barrens are associated with the fishing down of large snapper and crayfish. Evidence from marine reserves indicate that a high level of marine protection (with all fishing excluded) will enable the kelp forests to recover. This further highlights the urgent need to increase marine protection in the Hauraki Gulf.

33. The loss of kelp forests in the Hauraki Gulf not only reduces biodiversity and productivity but it has potentially significant climate consequences. Kelp forests play a vital role in mitigating climate change. As explained in a recent article in the *Yale Environment Review*, as a kelp forest deteriorates, it releases sequestered carbon dioxide back into the atmosphere and the kelp forests become a source of carbon rather than a sink.[21]

34. The poor state of the marine environment is affecting other species including the Hauraki Gulf's internationally important seabird population. As described in the *State of Our Seabirds 2021* report, "many populations of resident seabirds remain in a poor state because of our devastation of the Gulf's food webs through overfishing and habitat damage".[22] The proportion of species that breed in the Hauraki Gulf Marine Park that are threatened have increased from 4% in 2002 to 22% today.[23]

35. In addition to fishing, other growing pressures on the marine environment make an increase in marine protection critical, in order to increase the resilience and ability of marine ecosystems to survive cumulative impacts. Foremost is climate change which is already having significant impacts on marine areas (and will have much greater impacts in the future) with seawater warming and acidification and increased sediment inputs from the greater intensity of storms.

36. This is highlighted by the severe marine heatwaves which have recently hit the Hauraki Gulf, with the 2022 episode being the longest marine heatwave on record. The heated water caused bleaching of large rocky reef sponges, with some appearing to 'melt' off the Hauraki Gulf reefs. This is somewhat alarming as the sponges play important ecological and biochemical roles within these rocky reefs communities.[24]

37. The situation is predicted to get much worse. Research has indicated that, by 2100, the 40-odd marine heatwave days we currently see in a normal year will increase to between 80 days (low emissions, best-case scenario) and 170 days (high emissions, worst-case scenario) by the end of

[20] Dartnell L, 2022, *The extent of kina barrens over time at Hauturu-o-Toi and the Noises Islands*, Masters of Marine Studies Masters thesis, University of Auckland

[21] Yale Environment Review, 2022, 'Kelp can help: Kelp forests reveal hidden potential for blue carbon sequestration', 2 May, available at https://environment-review.yale.edu/kelp-can-help-kelp-forests-reveal-hidden-potential-blue-carbon-sequestration

[22] 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, at 7

[23] Hauraki Gulf Forum, 2020, *State of our Gulf 2020: Hauraki Gulf /Tīkapa Moana/Te Moananui-ā-Toi State of the Environment Report 2020*, at 147

[24] Shears N, 2022, 'Marine heatwave and melting sponges in Te Moananui o Toi – the Hauraku Gulf, Aotearoa New Zealand', Youtube video, 9 June, at https://www.youtube.com/watch?v=Cvmp1jJQIJc

the century. In addition, average marine heatwave intensities are predicted to increase by 20% (best case) to 100% (double, worst case) by the century's end. For the North Island (including the Hauraki Gulf), this means an average marine heatwave could be between 0.5°C to 2°C more intense than they are today.[25]

38. The impacts of such pressures are not only ecological. It is now difficult to find, let alone harvest, many of the taonga marine species that were once abundant across shallow coastal waters of the Hauraki Gulf. The absence of rock lobsters, scallops, mussels and pāua around Waiheke Island has impeded the continuation of customary harvest practices and led local tangata whenua to show leadership in placing rāhui and requesting urgent fisheries closures.

39. Such impacts are very concerning because of the enormous importance of the Hauraki Gulf to regional communities and Aotearoa New Zealand as a whole.

The Sea Change Tai Timu Tai Pari process

40. The Seachange Tai Timu Tai Pari project had its inception in the Hauraki Gulf Forum's 2011 *State of Our Gulf Report* (now over a decade old) which highlighted the ongoing and alarming environmental decline of the Hauraki Gulf and the failure of current management approaches to turn things around.[26] It was clear that incremental change would be insufficient to address the size of the challenge and a step change in approach was required.

41. In response, Auckland Council and the Waikato Regional Council agreed to initiate a marine spatial planning project for the Hauraki Gulf, with DOC and the Ministry for Primary industries **(MPI)** subsequently joining the agency grouping. The project design drew on international best practice in marine spatial planning.[27]

42. A co-governance Project Steering Group **(PSG)** was established to oversee the project consisting of eight representatives of Mana Whenua and eight representatives from the statutory bodies involved in managing the Gulf (including territorial authorities, regional councils, DOC and MPI).

43. The PSG defined the purpose of the project as being to "develop a spatial plan that will achieve sustainable management of the Hauraki Gulf, including a Hauraki Gulf which is vibrant with life and healthy mauri, is increasingly productive and supports thriving communities."[28] It approved the Terms of Reference for the SWG and received and adopted the final Sea Change plan.

44. The plan itself was developed by the SWG which consisted of representatives from Mana Whenua, commercial and recreational fishing, farming, aquaculture, infrastructure, community and environmental interests. The role of the SWG, as set out in its Terms of Reference, was to "compile information and evidence, analyse, represent all points of view, debate and resolve conflicts and work together as a group to develop a future vision for a healthy and productive Hauraki Gulf … The future vision will be manifested as a physical document – the Hauraki Gulf Marine Spatial Plan." The group operated on a consensus basis which meant that "every member either supports or does not actively oppose (can live with) the decision."[29]

[25] Behrens E, 2022, 'Mean heat: Marine heatwaves to get longer and hotter by 2100, NIWA media release, 7 March, at https://niwa.co.nz/news/mean-heat-marine-heatwaves-to-get-longer-and-hotter-by-2100
[26] Hauraki Gulf Forum, 2011, *State of our gulf 2011*, Hauraki Gulf Forum, Auckland, at 13
[27] Hauraki Gulf Forum, 2011, *Spatial planning for the Gulf: An international review of marine spatial planning initiatives and application to the Hauraki Gulf*, Hauraki Gulf Forum, Auckland
[28] Sea Change Tai Timu Tai Pari, 2013, *Stakeholder Working Group: Terms of reference*, Auckland Council, Auckland
[29] Sea Change Tai Timu Tai Pari, 2013, *Stakeholder Working Group: Terms of Reference*, Auckland Council, Auckland, at 2-4

45. The SWG first convened in December 2013 and met approximately monthly for a 3 year period up until late 2016 when the plan was completed (with a break of several months during mid 2015). SWG members agreed that the plan would be science based as well as incorporating mātauranga Māori. Scientists from a range of research institutions presented their work directly to the SWG.

46. An extensive public process was undertaken alongside the SWG. This involved public meetings, 25 'Listening Posts', a web-based use and values survey and an active website and email updating programme. In addition, a 'Love Our Gulf' event and social media campaign was undertaken. This public engagement effort connected with more than 14,500 people overall, with 9,350 actively contributing their views to the project. The results of the engagement was summarised and made available to the SWG members to inform plan development.

47. A group of community stakeholders who had been present at meetings held to select the SWG members, called the 'Hauraki 100+', were convened every few months to provide an update on progress, discuss key issues and obtain feedback. The group was intended to act as a 'sounding board' for the SWG during the preparation of the marine spatial plan.

48. Spatial data sets were assembled on a web-based tool called SeaSketch which was used to identify and evaluate marine protection options. A technical team supported by two science advisors supported the SWG.

49. The work of the SWG was overseen by an Independent Review Panel comprising 5 experts in various fields including Paris-based Charles Ehler who was the co-author of the UNESCO guide to marine spatial planning. The Panel provided three reports and many of the recommendations were adopted by the SWG.

50. The resultant marine spatial plan was structured around four kete of knowledge: Part One Kaitiakitanga and Guardianship, Part Two Mahinga Kai – Replenishing the Food Baskets, Part Three Ki Uta Ki Tai – Ridge to Reef or Mountains to Sea and Part Four Kotahitanga – Prosperous Communities.[30] Amongst its wide-ranging and detailed recommendations was the creation of 13 new marine protected areas and extensions to two existing marine reserves. The marine protected areas were to be created by 2020.[31]

51. The Sea Change Plan was agreed to by all 14 members of the SWG and was received and adopted by the PSG. It was publicly launched on 6 December 2016 (now nearly 6 years ago).

52. It is clear that the Sea Change process and plan had wide agency, cross-sectoral and public support. The process was sponsored and overseen by the key implementing agencies including DOC and MPI. Mana whenua representatives were active participants in the governance of the project and development of the plan. However, implementation of the Sea Change Plan has been very slow, and meanwhile the State of the Gulf has continued to deteriorate. It is therefore urgent that additional marine protection, in broad alignment with the Sea Change Plan, is put in place without delay.

[30] Sea Change Tai Timu Tai Pari, 2016, *Hauraki Gulf Marine Spatial* Plan, Waikato Regional Council, Hamilton
[31] Sea Change Tai Timu Tai Pari, 2016, *Hauraki Gulf Marine Spatial* Plan, Waikato Regional Council, Hamilton, at 112 to 120.

The benefits of marine protection

53. "No-take" marine reserves are recognised as one of the most powerful and effective methods for protecting marine life and habitats.[32] They provide refuges where populations of exploited marine species can recover and habitats modified by fishing can regenerate.

54. Long-term studies at sites within marine reserves in Aotearoa New Zealand have identified the numerous ecological benefits of permanent marine protection.[33] The Cape Rodney to Okakari Point Marine Reserve **(Leigh Marine Reserve)**, gazetted in 1975, was the first to be established in the country. Two decades after protection, scientists observed significant increases in the abundance and size of snapper and rock lobsters; declines in the abundance of urchins; and the expansion of kelp forest across shallow rocky reefs within the reserve.[34] The total area of urchin barren habitat shrunk from 31.4% to 3.2% within 20 years, which increased primary productivity within the reserve by an estimated 58%.[35] Studies have shown that the increase in kelp habitat supports aggregations of marine invertebrates, which in turn provide an important food source for larger fish species.[36]

55. The increase in kelp habitat also provides significant climate benefits. A study of Australian kelp forests revealed that they sequestered around 1.3-2.8 teragrams of carbon per year accounting for 30% of total blue carbon sequestered in Australia annually and about 3% of the total global blue carbon budget.[37]

56. The potential benefits of marine reserves extend beyond their boundaries. Studies have shown that marine reserves can benefit adjacent fisheries through the spill over of adults and juveniles and the export of eggs and larvae to sites located down-current.[38] Studies have shown that the adult snapper in the Leigh Marine Reserve (extending over 5.2 km^2) contributed an estimated 10.6% of newly settled juveniles in surrounding areas covering around 400 km^2 and up to 40 km away.[39] This is because increases in the size and abundance of individuals within marine reserves result in increased reproductive potential thereby boosting the capacity of target fish stocks to maintain sustainable population levels.[40] Consequently, marine reserves can enhance opportunities for commercial and recreational fishing activities in surrounding waters.

57. An evaluation of the economic impacts of the enhanced recruitment evidenced from the Leigh Marine Reserve identified a boost to the commercial fishery of $NZ 1.49 million catch landing value per annum and $NZ 3.21 million from recreational fishing activity associated spending per annum. As the researchers emphasised "These values all come from the recruitment effects

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[32] See Ballentine B, 2014, 'Fifty years on: Lessons from marine reserves in New Zealand and principles for a worldwide network', *Biological* Conservation, 176, 297-307

[33] See Babcock et al, 1999, 'Changes in community structure in temperate marine reserves', *Mar Ecol Prog Ser,* 189, 125−134; Shears N T and R C Babcock, 2002, 'Marine reserves demonstrate top-down control of community structure on temperate reefs', *Oecologia*, 132, 131-142; and Shears N T and R C Babcock, 2003, 'Continuing trophic cascade effects after 25 years of no-take marine reserve protection', *Mar Ecol Prog Ser*, 246, 1-16

[34] Babcock et al, 1999, 'Changes in community structure in temperate marine reserves', *Mar Ecol Prog Ser,* 189, at 131

[35] Babcock et al, above n 23, at 131.

[36] Ballentine B, 2014, 'Fifty years on: Lessons from marine reserves in New Zealand and principles for a worldwide network', *Biological* Conservation, 176, 297-307

[37] Yale Environment Review, 2022, 'Kelp can help: Kelp forests reveal hidden potential for blue carbon sequestration', 2 May, available at https://environment-review.yale.edu/kelp-can-help-kelp-forests-reveal-hidden-potential-blue-carbon-sequestration

[38] Gell F R and C M Roberts, 2003, 'Benefits beyond boundaries: Fishery effects of marine reserves', *Trends in ecology & evolution*, 18(9), 448-455, available from www.aquadocs.org

[39] Le Port A et al, 2017, 'Temperate marine protected areas provides recruitment subsidies to local fisheries', *Proceedings of the Royal Society B Biological Sciences*, 284, 1865

[40] Ibid

associated with one species, from only 0.08% of the marine space in the Hauraki Gulf, New Zealand".[41] This indicates that increasing the area of marine protection will likely increase the available commercial and recreational harvest with associated economic and social benefits.

58. Marine reserves are also a tourism and recreation attraction and can provide substantial economic benefits at local and regional scales. An economic impact analysis of the Leigh Marine Reserve estimated there were 375,000 visits to the reserve in 2008, which contributed $18.6 million into the local economy.[42] In contrast, the operational costs associated with managing the reserve over the same period were relatively low at $70,000.[43]

59. The scientific benefits of marine reserves are of critical importance when we are moving into a period where environmental change is expected to occur at unprecedented scale, magnitude and pace. Marine reserves provide an opportunity to study the natural processes and ecology of areas that are protected from the direct effects of fishing. Results can then be compared with findings from fished areas to provide insights into the impacts of fishing on species and the wider environment.

The need to increase the size of existing marine reserves

60. When the Leigh Marine Reserve was established in 1975 the boundary was drawn just 800m offshore. This boundary was arbitrary. As explained by Bill Ballantine:

> *"there was virtually no precedent at the time and research scientists, including me, were obsessed with rocky reefs. Flat sandy bottoms didn't seem very real, which is quite wrong, but that's how it was then. The other consideration was that, at that time, trawling was not allowed within 0.5 nautical miles of land. That translates to 800 metres and that's where we set the seaward boundary. There was no scientific justification for it, it was just a piece of political pragmatism."*[44]

61. Despite its small size, the Leigh marine reserve enabled a wealth of science about rocky reef ecosystems and the impacts of fishing on them. Monitoring has been undertaken inside and outside the marine reserve, enabling a comparison to be made between the two areas, and providing insights into the impacts of fishing on marine systems.

62. The first species to show a marked recovery was crayfish. Four years after the reserve was created, their numbers had increased five-fold.[45] As the numbers within the protected area increased, so did the catches of crayfish outside the seaward boundary of the reserve, as the animals migrated past the narrow protective boundaries.

63. Although numbers within the marine reserves increased initially, when the crayfish populations declined in the surrounding CRA 2 fishery (thought to be a result of poor recruitment combined with sustained fishing pressure), it become apparent that the small areas protected by the Leigh Marine Reserve and the Whanganui-a-Hei (Cathedral Cove) Marine Reserve were not large enough to protect crayfish populations in the longer term. While the marine reserves continue to support much higher numbers and larger crayfish than surrounding fished waters, monitoring

[41] Qu Z, S Thrush, D Parsons and N Lewis, 2021, 'Economic valuation of the snapper recruitment effect from a well-established temperate no-take marine reserve on adjacent fisheries', *Marine Policy*, 134, 104792
[42] Hunt L, 2008, *Economic Impact Analysis of the Cape Rodney Okakari Point (Leigh) Marine Reserve on the Rodney District,* DOC Investigation Report 4052, at 2, available from www.howtokit.org.nz.
[43] Ibid
[44] Peart R, 2016, *The story of the Hauraki Gulf*, Bateman, Auckland, at 328-329
[45] Peart R, 2016, *The story of the Hauraki Gulf*, Bateman, Auckland, at 330

has showed declines inside the reserves of between 59–80% over the past 10-15 years, despite being in a strict 'no-take' area.[46]

64. The research indicated that the decline had been exacerbated by the continued capture of crayfish on the offshore boundaries of these relatively small reserves. Tracking research has shown that crayfish undertake seasonal movements whereby they move off the reef and out onto sandy habitats where they feed on bivalves. These movements often take them near to and beyond reserve boundaries where they are likely to be caught.[47] This indicates a need to expand the boundaries of these two marine reserves. As recently emphasised by Dr Nick Shears:

> *"Currently, less than 1 per cent of crayfish populations in the Hauraki Gulf are protected in marine reserves and these results highlight the urgent and overdue need to substantially increase the level of marine protection in the Gulf… This can be achieved through expansion of existing reserves and implementation of new marine protected areas that are well-designed and large enough to effectively protect these important species and their associated ecosystems."*

65. One of the significant contributions made by science based on the Leigh Marine Reserve was a better understanding of the phenomena known as 'urchin barrens'. During the 1970s, divers observed extensive strips of rocky reef that were bare of plant cover, most noticeably kelp. At first, scientists struggled to understand what was going on. But, as several marine reserves were established along the coast and the populations of snapper and crayfish recovered, the barren areas of rock started to disappear. As stated by the researchers, "no-take marine reserves provide real-world experiments that show the importance of species in food webs, and the consequences of fishing for ecosystems".[48] Such knowledge would not have been possible without full protection.

66. On reviewing 50 years' experience with marine reserves in New Zealand, Bill Ballantine concluded:[49]

> *"The scientific benefits of marine reserves proved so numerous that it became clear that* ***marine reserves are as important to science as clean apparatus is to chemistry****, and for the same reason. They are the controls for the uncontrolled experiment that is happening due to fishing and other human activities."*

67. It is important that the extensions to the Leigh and Hahei Marine Reserves are also marine reserves so they can be seamlessly integrated into the existing reserves. The Leigh Marine Reserve, in particular, has enabled a wealth of science to be undertaken in what is a largely unimpacted marine system providing an important 'control' site. Creating a boundary within them between two types of protected area will also likely create logistical problems with enforcing different rules and having different management approaches.

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[46] University of Auckland, 29021, 'Existing reserves too small to protect crayfish', 4 May, at https://www.auckland.ac.nz/en/news/2021/05/04/existing-reserves-too-small-to-protect-crayfish-.html

[47] University of Auckland, 29021, 'Existing reserves too small to protect crayfish', 4 May, at https://www.auckland.ac.nz/en/news/2021/05/04/existing-reserves-too-small-to-protect-crayfish-.html

[48] Leleu K, B Remy-Zephir, R Grace and M J Costello, 2012, 'Mapping habitats in a marine reserve showed how a 30-year trophic cascade altered ecosystem structure', *Biological Conserv*ation, 155, 193-201

[49] Ballantine B, 2014, 'Fifty years on: Lessons from marine reserves in New Zealand and principles for a worldwide network', *Biological Conservation*, 176, 297-307

The need to create 12 High Protection Areas

68. The proposals include establishing 12 HPAs which EDS supports. It is clear from the evaluation of different areas included in *Revitalising the Gulf* that they have high biodiversity values that merit protection. For example, they protect, amongst other things:[50]

    - Sponge and black coral assemblages and deep patch reefs (HPA 1)
    - Largest of the few remnants of subtidal seagrass habitat in the Gulf (HPA 2)
    - Shallow reefs, dog cockle and horse mussel beds (HPA 3)
    - Sponge dominated reef in high current areas (HPA 4)
    - Deeper reefs with large sponge assemblages (HPA 5)
    - Diverse high-current rocky reef assemblages and high biodiversity (HPA 7a)
    - Extensive reef systems with highly productive and diverse species assemblages (HPA 8a)
    - Outstanding underwater scenery and an abundance and high diversity of flora and fauna (HPA 9a)
    - Diverse rocky reef assemblages including kelp forests, sponges, hydroids, anemones and ascidians (HPA 9b)
    - Sponge assemblages, large rhodolith bed and horse mussel beds (HPA 10a)
    - High habitat diversity and ecological values supporting a diverse range of species (HPA 11a)
    - Unique geographical location that supports a regionally significant range of biogenic habitats (HPA 14)

69. These HPAs are generally in line with the Sea Change proposals with some refinement and boundary changes. During the Sea Change process, it was evident that there was strong public support for more marine protection in the Hauraki Gulf. The Sea change Plan reports:[51]

    > *"A common theme highlighted in the Listening Posts was a concern for declining species and habitats, and a clear desire for more marine reserves. A parallel result came from an Auckland Council People's Panel survey published in 2014 which showed that 39% of respondents had visited a marine reserves in Auckland, whereas only 24% had fished in the ocean. These results, along with extensive ecological analysis, led the Stakeholder Working Group to conclude that we had a clear mandate to recommend creation of more MPAs."*

70. In particular, EDS supports the inclusion of the Ōtata/the Noises HPA in the package of HPAs to be included in the Hauraki Gulf Marine Protection Bill. This is a biodiverse area with important benthic habitats and is of particular importance to seabirds that nest on many of the islands in the group. It urgently needs protection. This is highlighted by the alarming increase in urchin barrens on its reefs as described above.

71. The HPA proposals do not include protection around Ahuahu/Great Mercury Island which was proposed in the Sea Change Plan due to it high habitat diversity including diverse algal and encrusting invertebrate assemblages, diverse sponge assemblages and black and gorgonian corals.[52] The exclusion of the area from the current proposals was not because it did not have high biodiversity values that merited protection but on the basis that the Sea Change proposals did "not provide sufficient protection for the biodiversity of this area".[53] *Revitalising Our Gulf* identified this as a "gap" in protection that needs to be addressed.[54] EDS urges that this gap be

[50] DOC, Fisheries New Zealand and MPI, 2021, *Revitalising the Gulf: Government action on the Sea Change Plan*, Appendix 4
[51] Sea Change Tai Timu Tai Pari, 2016, *Hauraki Gulf Marine Spatial Plan*, Waikato Regional Council, Hamilton, at page 117
[52] Sea Change Tai Timu Tai Pari, 2016, *Hauraki Gulf Marine Spatial Plan*, Waikato Regional Council, Hamilton, at page 274
[53] DOC, Fisheries New Zealand and MPI, 2021, Revitalising the Gulf: Government action on the Sea Change Plan, at 65
[54] DOC, Fisheries New Zealand and MPI, 2021, Revitalising the Gulf: Government action on the Sea Change Plan, at 65

closed as soon as possible, and that provision be made in the Bill for a subsequent HPA to be created around the islands.

72. There are also gaps in coverage of the proposed HPAs around Waiheke Island and Aotea/Great Barrier Island, with the areas also not being included in the Sea Change proposal. The existing proposal for the Hākaimango-Matiatia (Northwest Waiheke Island) Marine Reserve could potentially be included in the Bill alongside the other HPAs. Provisions could also be made for future HPAs to be identified around Aotea/Great Barrier island and for other gaps in the network to be filled.

73. In respect of the Proposed Kawau (HPA) it should be recognised that there is an existing wastewater outfall located south of Martin's Bay which discharges treated wastewater into the area via a 500m long pipeline. In addition, we understand that Watercare Services is planning to install a second outfall structure to discharge wastewater from an upgraded Snells Beach Wastewater Treatment Plant in late 2025.

74. It appears that the current and proposed outfalls were not identified by the SWG or DOC when developing the proposals. The inclusion of the outfall area in the proposed Kawau Bay HPA creates potential issues as "discharge of sewage from outfalls" is proposed to be prohibited in HPAs. As well as creating practical challenges for the provision of wastewater services for the Martins Bay and Snells Beach community, the discharge of wastewater into a HPA ideally needs to be avoided. We suggest that the boundaries for this HPA be adjusted to exclude the existing outfall, including a commensurate additional area to compensate.

75. It should also be noted that Watercare operates a second outfall pipeline at Army Bay that extends 1000 metres into the proposed Tiritiri Matangi SPA (11b). While wastewater discharges are not prohibited in SPA, and do not create the same issues as with HPAs, it might be useful to explicitly identify this infrastructure in the legislation.

The need to create 5 Seafloor Protection Areas

76. EDS supports the creation of 5 proposed SPAs. As recently explained by Fisheries New Zealand:[55]

> *"It is well known that fishing with mobile bottom-contact gear, such as bottom trawling, has adverse effects on benthic communities and their habitat (Rice 2006, Kaiser et al. 2006). These effects consist of destruction of organisms by crushing, or their removal as bycatch, and physical disturbance to the habitat as fishing gear is dragged across the seafloor."*
>
> *"On soft sediments, bottom trawling can not only displace sediment and associated species, but also suspend sediment into the water column. Plumes of suspended sediment within the turbulent wake of trawl gear can take days to settle, and may be significant, relative to natural levels of suspension in areas with little seabed disturbance by currents or waves (Durrieu de Madron et al. 2005). There is a risk that bottom trawling on soft sediments near rocky reef systems could lead to suspended sediment deposition onto sensitive benthic species and affect their abundance, or health and condition."*

77. It is therefore important that bottom trawling is excluded from on or near important benthic habitats in the Hauraki Gulf Marine Park. In EDS's view, bottom disturbing fishing methods (including bottom trawling, Danish seining and dredging) should be excluded from the entire

[55] Fisheries New Zealand, 2022, *Review of commercial fishing sustainability measures for the Cape Brett to Mimiwhangata area*, Northland, Discussion Paper 2022/17

Hauraki Gulf Marine Park. It therefore supports the proposed SPAs but submits that the areas they cover should be extended in the future. Provisions should be made in the Bill for this to occur.

Impact on commercial and recreational fishers

78. The proposed HPAs, and to a lesser extent the proposed SPAs, will have some direct impacts on both recreational and commercial fishers. However, such impacts need to be put into context. In broad terms, the additional 12 HPAs, and extension to 2 marine reserves, will increase the area of the Hauraki Gulf Marine Park under a high level of protection to around just 6%. This means that 94% of the Marine Park will remain open to fishers. This does not seem unreasonable to provide some badly needed protection for the Gulf's marine ecosystems and species. In light of the Hauraki Gulf Forum's target of 30% marine protection it appears somewhat modest.

79. Martin Jenkins was commissioned to quantify the estimated impacts of the marine protection proposals on commercial and recreational fishers. For the majority of commercial fishing stocks (those managed according to the October fishing year), only 1% (530 tonnes) of the total catch within the Hauraki Gulf is currently caught within the areas to be protected, which is estimated to be just 2% ($1.37 million) of total port revenue derived from the Hauraki Gulf. This means that 99% of the tonnage and 98% of the revenue of the commercial fishing industry in the Hauraki Gulf will remain unaffected.[56]

80. It is important to recognise that the SPAs do not ban fishing per se, but only bottom impact methods, so the impacts are likely to be even less than the small percentages indicated in the Martin Jenkins analysis. Where bottom trawl is currently used in the proposed SPA areas, at least part of this effort could be transferred to other methods such as longlining. And at least part (if not all) of the remaining minimally affected catch could potentially be caught elsewhere within the respective quota management areas which extend far further than the Hauraki Gulf Marine Park itself.

81. In this respect it is important to note that for the most valuable finfish species in the Gulf, snapper, the SNA1 area from which harvest can be taken extends from North Cape right around the entire top half of the east coast of the North Island to East Cape. It seems extremely likely that any small reduction in harvest within the marine protected areas could be caught elsewhere within this vast area. As a result, any reduction in commercial catch/revenue is likely to be very small, if there is a reduction at all, as a result of the proposed protection.

82. It should also be borne in mind the benefits that marine protection will likely provide for commercial fishing. If the value of increased recruitment from the Leigh marine reserve, which comprises only 0.08% of the Hauraki Gulf Marine Park, provides an additional $NZ 1.49 million catch landing value per annum[57] it could be expected that the network of HPAs which will cover around 6% of the area would in the future provide added value that far outweighs the value of any immediate reduction in commercial harvest.

83. Rock lobster and pack horse lobster commercial catch is managed according to the April fishing year and separate figures have been calculated by Martin Jenkins for the impact on this industry. It concludes that 3% of the total Hauraki Gulf harvest for these stocks (4.47 tonnes) was caught

[56] Leung-Wai J and R Kulwant, 2022, *Revitalising the Gulf Stage 1 – Impact of the marine protection proposals on commercial fishers*, Martin, Jenkins & Associates Limited

[57] Qu Z, S Thrush, D Parsons and N Lewis, 2021, 'Economic valuation of the snapper recruitment effect from a well-established temperate no-take marine reserve on adjacent fisheries', *Marine Policy*, 134, 104792

within the proposed protected areas comprising 4% of total port price. This means that 97% of the lobster harvest in the Hauraki Gulf occurs outside these areas.

84. It should be borne in mind that this harvest is part of the CRA2 fishery which extends down the coast to the tip of the East Cape. There is therefore a large area from which the 3% of the Hauraki Gulf harvest displaced from the protected areas could be harvested from, meaning that marine protection may not result in any direct reduction in total harvest.

85. Also, a potential 4.47 tonne reduction in harvest (if indeed a reduction would occur at all) needs to be considered within the broader context of the fishery. In 2018 the total allowable commercial catch was reduced from 200 to 80 tonnes, a reduction of 120 tonnes. This was because the stock was "experiencing critically low levels of abundance".[58] This indicates that other factors are likely to have a much greater impact on the industry, than the proposed protected areas, which if anything will serve to help increase abundance over time.

86. Displacement of recreational fishing of snapper is estimated to be slightly higher at 5.7% in terms of weight, but this needs to be considered in the context that "recreational tāmure [snapper] catches dropped by around 27% between the 2011–12 and 2017–18." This decrease was put down to cuts in bag limits, increased size limits and fewer recreational fishers.[59] This means that, compared to other factors, the reduction in recreational catch due to increased marine protection is very small. As with commercial fishing, in the future it is also likely that increased protection will increase the abundance of fish stocks targeted by recreational fishers.

Development and role of Biodiversity Objectives

87. The Information Document sets out a framework for managing customary practices in HPAs. It indicates that 'Initial Biodiversity Objectives' will be developed for each HPA and will be incorporated into the Bill. These are to be identified with input from mana whenua. Once the HPAs are established, the Government will support mana whenua to co-design 'Biodiversity Objectives' for each HPA site. As indicated in the Information Document, it is important that the objectives are based on the best available science and mātauranga Maori and this requirement should be specified in the Bill.

88. The Biodiversity Objectives are important in the context of the Bill because it is proposed that:

- Customary fisheries regulations must give effect to the Biodiversity Objectives (ie customary fishing exercised under the regulations must not conflict with the Biodiversity Objectives);
- Customary Practice Management Plans (which customary fishing will need to be consistent with) will align with the Biodiversity Objectives; and
- They will inform management, research and monitoring for each site.

89. EDS generally supports the proposals relating to the development and role of Biodiversity Objectives. EDS recognises the importance of providing for the ongoing relationship of mana whenua with the Gulf including the ability to exercise their role as kaitiaki. The importance of enabling this, in respect of highly protected areas, was highlighted in the Sea Change Plan which provided for customary take within the areas on a case-by-case basis by special permit.[60]

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[58] Minister of Fisheries, 2018, *Fisheries sustainability measures for 1 April 2018: Decision letter*, at https://www.mpi.govt.nz/dmsdocument/27987-Ministers-Decision-letter-1-April-2018-signed

[59] Hauraki Gulf Forum, 2020, State of our Gulf 2020: Hauraki Gulf /Tīkapa Moana/Te Moananui-ā-Toi State of the Environment Report 2020, available from www.haurakigulfforum.org.nz, at 12

[60] Sea Change Tai Timu Tai Pari, 2016, Hauraki Gulf Marine Spatial Plan, Waikato Regional Council, Hamilton, at 118

90. However, given the wide range of interests in the Hauraki Gulf, and the significant role that the Biodiversity Objectives play, not only in guiding customary use, but also in the management, research and monitoring of sites, it is imperative that wider input is sought on the Initial Biodiversity Objectives and the proposed co-design of refined objectives. This includes from local people and community groups who have deep local knowledge about place. We note that the Sea Change Plan, which set out a series of design and management principles for Type One Marine Protected Areas (which include HPAs), indicates the intention that the co-design process be inclusive and include local communities and stakeholders along with Mana Whenua. It stated:[61]

    "Mana whenua, local communities and stakeholders will take a leading role in the implementation phase through a co-design process."

91. With respect to the proposal that customary fisheries regulations give effect to the Biodiversity Objectives (ie not conflict with them), EDS agrees and considers that it is important that this be included in the legislation to avoid undermining achievement of the Biodiversity Objectives.

92. EDS also supports the proposal that mana whenua will have the option to develop a Customary Practice Management Plan, to describe how they will manage their customary practices including fishing, and that the Plan align with the co-designed Biodiversity Objectives, with government offering support including with information.

Monitoring and review

93. Active management might be required to assist the protected marine systems to restore themselves and it is good to see this provided for in the activities that can take place in HPAs. The Bill should require regular monitoring and review of the sites. It is also important that there is effective enforcement of the HPAs through a regular on-water presence.

94. It needs to be recognised that a more active management approach which includes active enforcement, regular monitoring and potential recovery assistance will require more resourcing and this will need to be budgeted for.

Conclusion

95. Overall, EDS supports the proposals in the Information Document and urges DOC to implement the proposed HPAs and SPAs without delay.

[61] Sea Change Tai Timu Tai Pari, 2016, Hauraki Gulf Marine Spatial Plan, Waikato Regional Council, Hamilton, at 118

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:28 pm
To: Sea Change
Subject: Marine Protection Proposals - Submission
Attachments: SoTM Gulf Submission 2210.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Please find attached our submission.

Kind Regards

s 9 (2)(a)
Chair, Biodiversity & Research Subcommittee

Supporters of Tiritiri Matangi

SUPPORTERS of TIRITIRI MATANGI incorporated

s 9 (2)(a)

www.tiritirimatangi.org.nz

SUPPORTERS of TIRITIRI MATANGI incorporated

28 October 2022

Dear Revitalising the Gulf team

Our attention has been drawn to the Marine Protection Proposals as part of the ' Revitalising the Gulf' programme. We wish to make the following submission.

It is encouraging that marine protection proposed includes an HPA on the south-western side of Tiritiri Matangi Island whilst deeming the remainder an SPA. The area proposed as an HPA should be the absolute minimum, a larger area being desirable. It is recognised that the area proposed as an SPA is popular with fishermen but this would limit activities to those that are less destructive.

What is concerning is how little of the gulf is being protected under this proposal (18%). The majority of Tiritiri Matangi's seabirds do not feed in waters immediately surrounding the Island, preferring the more-productive, deeper waters. By not protecting these as well, there will surely be impact on seabird populations on many Islands in the Gulf, not just those of Tiri.

It is considered that 30% of the gulf should be in HPA and the remainder as an SPA. In this day and age, there is no reason why destructive fishing methods prohibited by an SPA, particularly bottom-trawling and dredging, should be permitted anywhere in the Gulf.

Thank you to all who have contributed to getting this proposal to this stage and we look forward to this becoming enshrined in law at the earliest opportunity.

Kind regards

s 9 (2)(a)

s 9 (2)(a)
Chairperson – Biodiversity & Research Subcommittee

Phone: s 9 (2)(a)
Mobile: s 9 (2)(a)
Email: s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:29 pm
To: Sea Change
Subject: Revitalising the Gulf: Marine Protection Feedback

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 2:39 pm
To: Sea Change
Subject: Re: Map of Proposed High Protection Areas

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

https://www.doc.govt.nz/parks-and-recreation/places-to-go/coromandel/places/northern-coromandel/things-to-do/port-jackson-campsite/

Nothing!

On 28/10/2022, at 2:37 PM, s 9 (2)(a) s 9 (2)(a) wrote:

"More information on the above proposals can be found in our information document and on pages 60 - 61 of Revitalising the Gulf (PDF, 4,798K) .
Zero information provide in where to find the larger maps. Found some semi decent maps at back of this document.

How are people meant to comment of the proposal with the lack of information provided?

I have only heard of the proposed bands a day before closing? Where is the public consultation? I have been up to the coromandel approximately 20 times this year. Not once have to heard of this proposal.

I have even been on the DOC Port Jackson website - nothing zero zip regarding this proposal.

Not good enough.

On 28/10/2022, at 2:27 PM, s 9 (2)(a) s 9 (2)(a) > wrote:

Hi,

Where can a detailed map/s of the areas be found?

The information document is lacking information and scale maps. Ie if camping at Port Jackson, where are the specific locations in detail. Thanks

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:48 pm
To: seachange@mpi.govt.nz; Sea Change
Cc: DLVC_SALTWATER SCIENCE LTD; s 9 (2)(a)
Subject: Submission on Revitalising the Gulf & HPA Process
Attachments: GoodFishing_Submission_RevitalisingtheGulf 281022.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Good day

We're pleased to make our submission on the proposed HPA's in the Hauraki Gulf.

Thank you for the opportunity to contribute to the process.

We'd welcome the opportunity to engage further in the discussion.

Best,

s 9 (2)(a) of Goodfishing
s 9 (2)(a)

Sea Change Team
Department of Conservation
CC. seachange@mpi.govt.nz, seachange@doc.govt.nz

October 28, 2022

— REVITALISING THE GULF SUBMISSION —

To whom it may concern,

Revitalising the Gulf is an important and necessary step forward for the Hauraki Gulf, which has declined as result of a century of overfishing, harmful land effects and a failure to acknowledge the interconnectedness of the marine ecosystem.

Good Fishing is a group of more than 300 recreational fishers committed to a healthy marine space and evidence-based policy. Goodfishers voluntarily take and advocate for measures to limit their impact when fishing, and are eager to see a move to ecosystem-based management and spatial marine management. We have made a number of submissions to Government, including directly to ministers.

In September last year we raised the notion of Special Management Areas with Minister of Oceans and Fisheries David Parker, suggesting that it could help:

- Ameliorate the effects of displaced effort (or spatial substitution) on adjacent areas;
- Protect vulnerable unprotected areas from further deterioration;
- Mitigate the effects of fishing-the-line of protected areas (or 'edge effect');
- Create buffer zones to effectively enlarge HPAs while permitting limited fishing;
- Provide an incentive to promote lower-impact fishing practices.

Minister Parker responded in a letter (attached), "I agree that the concept of SMAs presents an opportunity for carefully managed and targeted sport fishing with the potential for both utilisation and ecological benefits… Your research sounds like it would be particularly helpful in this regard, and I would welcome the opportunity for my officials to review it."

The ideas and research presented by Good Fishing below already have the interest of one minister, and offer some effective measures to mitigate otherwise vexing impacts.

DISPLACED EFFORT

Marine protected areas are necessary to protect and restore some valuable and vulnerable ecosystems, but it is important to acknowledge that while they may ultimately have benefits in terms of abundance of fish, crayfish and shellfish in unprotected waters, they are unlikely to significantly remediate the ecology of surrounding unprotected areas so long as poor fisheries policy continues there.

Basic modelling suggests that in the 5–10 years immediately following protection, adjacent areas will see increased fishing pressure. DOC's modelling suggests displacement of 5.7% of existing fishing effort, but this modelling was done without consideration of Ōtata/Noises HPA, and in particular assumes that displaced effort will be diffusely distributed.

University of Auckland has conducted a study which demonstrates that the Noises HPA displaces 3.6% (or 80.6 tonnes) alone, more than double the next biggest area (Kawau, 1.6%). This brings the total displacement of the HPAs to 9.1%. If we add commercial displacement (from both HPAs and SPAs) it's a further 8.6%. All displaced fishing is therefore close to 18% that becomes spatially substituted in the Gulf. However, that effort will not be diffusely displaced across the rest of the Gulf, but rather focused on similar habitat types in close proximity to the HPA from which it was displaced.

The Mokohinau Islands are a good example. DOC's modelling predicts 0.14% displaced recreational effort from the HPA. However with the Burgess Island complex closed to fishing and Fanal Island open, the most likely expectation from a human behaviour point of view is that effort from one island will displace completely to the remaining island, doubling the recreational fishing pressure at Fanal (212% according to University of Auckland data, without regard for commercial displacement). The effects of this displaced effort are largely unknown, but there is potential for accelerated trophic cascade at those sites. This example demonstrates that DOC may be underestimating the effect of displaced effort.

There are some mitigating factors—the remaining snapper in the shallows are predominantly transitory, so while there is concentration of fishing in hotspots, the fish themselves are highly mobile. Also a doubling of effort doesn't equate to a doubling of catch, especially on depauperate reefs.

Once a protected area has been restored to full ecological productivity, an influx of new larvae/eggs/fish will also have a balancing effect, but this may not compensate for permissive or destructive commercial or recreational fishing effort, and because tipping-points are almost impossible predict, the ecological flipping of a reef from verdant to barren may happen quickly.

In the absence of a plan to mitigate these spatial substitutions, large areas of the shallows around the proposed HPAs could be impacted in unknown ways, and current fisheries management, which is not spatial, will be unable to respond.

SPECIAL MANAGEMENT AREAS

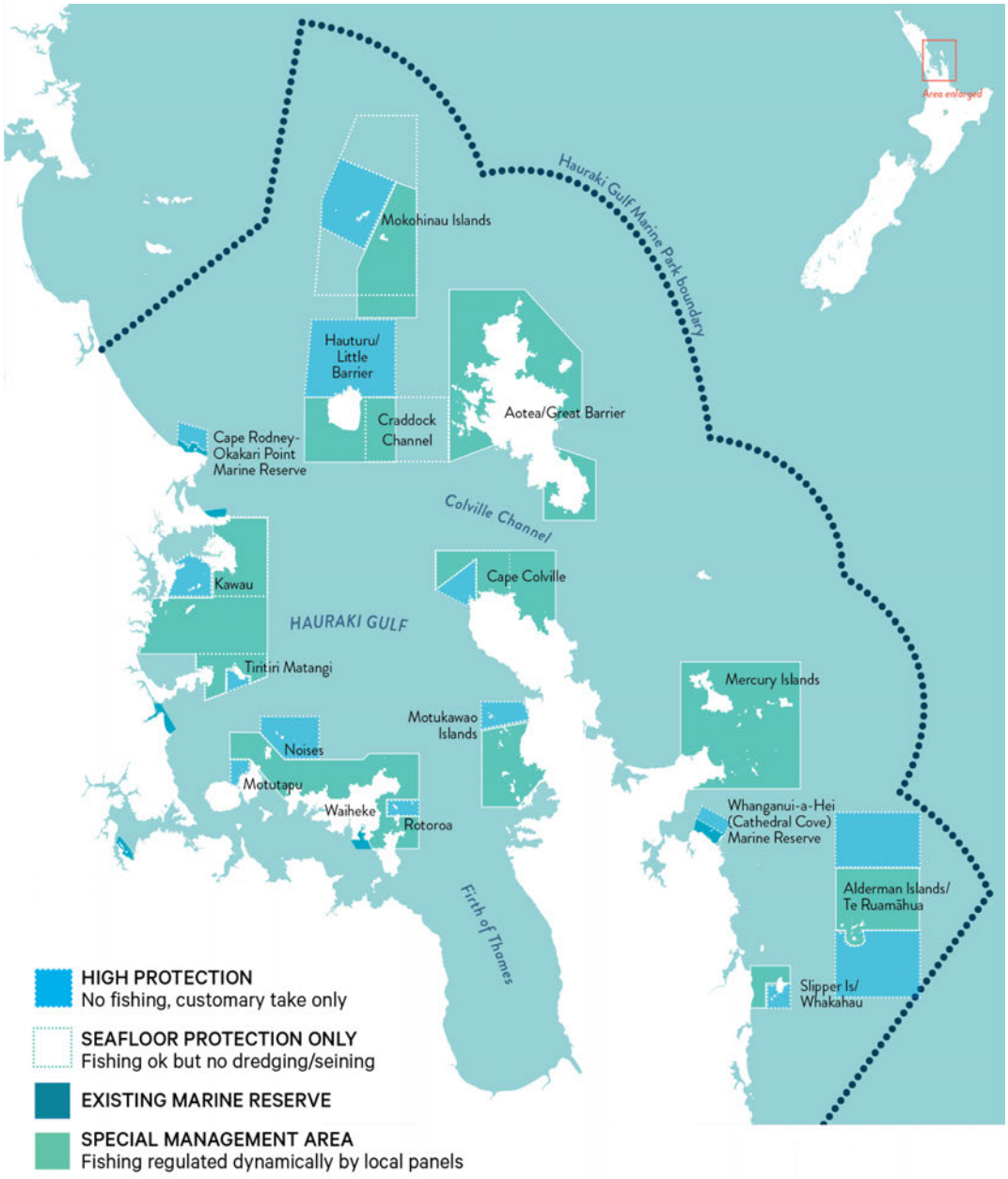
For the reasons stated above, Good Fishing supports an urgent investigation into fine scale spatial fisheries management instruments to mitigate damage to otherwise unprotected waters adjacent or close to new HPAs. Essentially, a mechanism to address displaced fishing effort in a responsive way.

There is a ready solution, available under the Fisheries Act, and mentioned a number of times within the Revitalising the Gulf proposal, but without details on how it might be implemented. Special Management Areas (SMAs) allow dynamic spatial management that is responsive to current and future conditions. They support limits or bans on species and fishing method by geographic area, making it the ideal instrument to use as buffers to no-take marine protection, or independently to protect vulnerable or valuable areas where limited, responsible recreational fishing can occur while ensuring and promoting marine ecosystem health and sustainability. (Ideally, SMAs could be locally administered by a panel comprised of fishers, iwi, scientists, officials and landowners where relevant.)

Good Fishing has created a map showing the proposed HPAs and corresponding suggestions for SMAs, located to protect adjacent reefs most likely to receive the substituted pressure because of the proximity to protected area, or sharing a depth or habitat profile that would make it a likely substitution from the perspective of the recreational fisher.

The sites marked on the map are relevant locations for SMAs to protect from overharvesting, displaced pressure from adjacent HPAs, where there are gaps in the network, high-value ecology, where there is existing vulnerability or existing evidence of trophic cascade. These examples demonstrate how and where limitations on fishing effort would be welcomed by recreational fishers in order to preserve an intact ecosystem.

It is obvious from the map that, rather than closed or open areas, there is a mosaic of protections which will result in a range of options for fishers, iwi and local communities.



SMAs could make a valuable contribution in the following contexts;

- At Broken Islands, Katherine Bay, Whangapoua and Rakitu at Great Barrier Island, the unprotected shallows of Little Barrier/Hauturu, and Fanal Island/Māori Rocks at Mokohinau Islands which are all likely to suffer additional pressure as a result of new HPAs at Mokohinau and Little Barrier/Hauturu. SMAs at sites such as these could protect crayfish, introduce a maximum size limit for snapper and/or reduce the bag limit to effectively prevent trophic cascade that would result in widespread kina barrens already evident at these locations.
- An SMA bridging the gap between the twin HPAs at the Alderman Islands could create a world-class charter and fishing park by requiring the certification of charter vessels and lower bag limit for rec fishers. It would also have the effect of promoting responsible fishing

among the charter community which has only this year formed an industry association and could well be acceptable to iwi who have rejected the notion of an HPA across the islands and would like to retain a sense of manamoana.

- The Noises HPA covers an area of roughly 50sqkm in the inner Gulf that sees 100 vessels fishing on a fine day mid-week in winter. Adjacent areas of Rakino and the already depleted reefs on the north coast of Waiheke (where we participated in a crayfish survey that found just 23 individuals over 18,000sqm of ideal habitat) will suffer from a near doubling of fishing intensity. The rāhui on Waiheke and associated 186A order does not cover any finfish species, making an SMA a valuable adjunct to protect this vulnerable habitat from overharvesting and consequential trophic cascade—precisely the pressure that caused the kina barrens at the Noises.
- In the instance that the Friends of the Hauraki Gulf proposal for a marine reserve on western Waiheke goes ahead, it would also be prudent to consider an SMA in Motuihe and Sergeants Channel to buffer the displaced effort into these areas—arguably the most heavily fished channels in New Zealand.
- The Sea Change process and officials assessing Revitalising the Gulf have also identified the Mercury Island Group—particularly the southern island sanctuaries—as a gap in the existing plan. In the absence of higher protections, an SMA at this site could set meaningful limits to both rec and commercial exploitation to protect these vulnerable reefs and the important land-sea connection that exists with large protected seabird colonies ashore.

Furthermore, rather than banning fishers from areas of interest, SMAs create a way for fishers to participate in the conservation enterprise, and benefit from the positive results of it. SMAs could also promote the growing interest in a more modern, responsible, lower-take fishing practice and releasing ecologically valuable species or size classes. (Evidence shows very high post-release survival rates—greater than 96% for snapper, and approaching 100% survival for kingfish).

The recreational fishing community could contribute to monitoring and recording compliance in partnership with Fisheries. For example, rec fishers wanting to fish a SMA could be required to hold a basic certificate for catch/release protocols, certified by retailers in the way that scuba licenses are administered by dive shops, and displayed by flying a compliance flag while fishing in the zone.

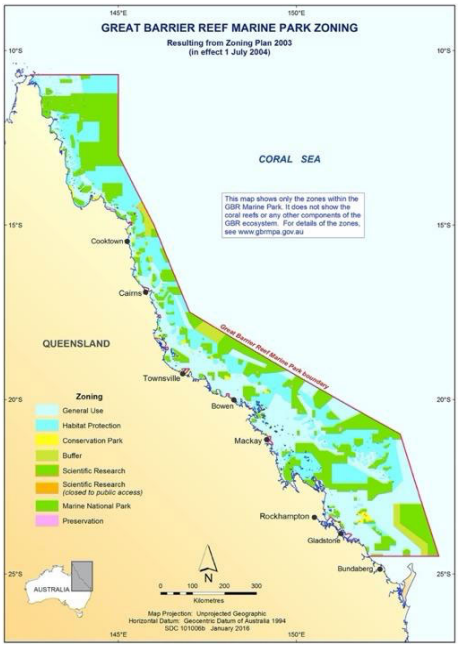
The rules for each SMA could be different to respond to different concerns, and be reviewed regularly according to ecosystem goals, rather than set in stone. On the flip-side, not using tools such as SMAs could condemn many of these sites to trophic collapse—the very problem Revitalising the Gulf was intended to avert.

Today, in the absence of SMAs, rāhui is the only tool with the same flexibility and ability to respond spatially. Indeed, the rāhui proposed for Aotea is partly in response to the rāhui on scallops in Mercury Bay and the fear that commercial effort will be displaced to beds adjacent to Great Barrier Island. While acknowledging the important role they play, rāhui typically protect kaimoana species rather than complete ecosystems and force iwi into the role of fishery regulators.

SMAs are a vital part of the fisheries management picture not currently available using other policy tools, though they have not featured in any detail in Revitalising the Gulf. They are also one of the few tools to manage the recreational fishery specifically outside of HPAs, and the only instrument that offers such spatial protections.

We need not look far for an example of the effective application of Special Management Areas—the Great Barrier Reef Marine Park on the north-eastern coast of Australia has a number of SMA-type zones (Habitat Protection Zone, Conservation Park Zone, Buffer Zone) each with different permissions forming a buffer between unprotected waters and the high protections in the form of Scientific Research Zones, Marine National Park Zones and Preservation Zones. It creates a mosaic of protection across the 2000-kilometre long reef and has proven to be effective in terms of maintaining the integrity of the ecosystem.

Despite the complexity of spatial protections, users have no problems discerning between permitted activities and zones which are clearly identified on a map on mobile devices, which also shows the position of the user. Research suggests compliance is greater than 90% in the GBRMP, and two-thirds of fishers supported the regime three years after its introduction.



ACTIVITIES GUIDE
(see relevant *Zoning Plans* and *Regulations* for details)

	General Use Zone	Habitat Protection Zone	Conservation Park Zone	Buffer Zone	Scientific Research Zone [2]	Marine National Park Zone	Preservation Zone
Aquaculture	Permit	Permit	Permit [1]	✗	✗	✗	✗
Bait netting	✓	✓	✓	✗	✗	✗	✗
Boating, diving, photography	✓	✓	✓	✓	✓ [2]	✓	✗
Crabbing (trapping)	✓	✓	✓ [3]	✗	✗	✗	✗
Harvest fishing for aquarium fish, coral and beachworm	Permit	Permit	Permit [1]	✗	✗	✗	✗
Harvest fishing for sea cucumber, trochus, tropical rock lobster	Permit	Permit	✗	✗	✗	✗	✗
Limited collecting	✓ [4]	✓ [4]	✓ [4]	✗	✗	✗	✗
Limited spearfishing (snorkel only)	✓	✓	✓ [1]	✗	✗	✗	✗
Line fishing	✓ [5]	✓ [5]	✓ [6]	✗	✗	✗	✗
Netting (other than bait netting)	✓	✓	✗	✗	✗	✗	✗
Research (other than limited impact research)	Permit	Permit	Permit	Permit	Permit	Permit	Permit
Shipping (other than in a designated shipping area)	✓	Permit	Permit	Permit	Permit	Permit	✗
Tourism programme	Permit	Permit	Permit	Permit	Permit	Permit	✗
Traditional use of marine resources	✓ [7]	✓ [7]	✓ [7]	✓ [7]	✓ [7]	✓ [7]	✗
Trawling	✓	✗	✗	✗	✗	✗	✗
Trolling	✓ [5]	✓ [5]	✓ [5]	✓ [5,8]	✗	✗	✗

Commuting lessons from the GBRMP to the context of the Hauraki Gulf is not one-to-one. The GBRMP is larger in area than all of New Zealand and is tropical rather than temperate, but nonetheless is impacted by both recreational and commercial fishing, sedimentation, pollution, invasive species and warming due to climate in a similar set of conditions.

The Hauraki Gulf is also not a blank canvas—there are existing marine reserves, existing rāhui, existing proposals for protection and a pattern of existing use, modification and ecological cascade. There are also community groups, iwi, land-based protections and predator-eradications which all create complexity and opportunity.

Fundamentally, however, a mosaic of protections that includes HPAs, unprotected waters and SMAs would create a pattern that shared the best of the GBRMP zoning but was locally relevant. Learning from the 'adaptive management' of the Australian example, building responsiveness and flexibility into the terms of the SMAs would be a good thing rather than setting the terms of those spaces in stone.

Good Fishing proposes that SMAs should allow for the regulation of fishing method and bag limit for recreational fishing, and prohibit commercial fishing, which is most aligned with the Conservation Park Zone in the GBRMP example.

HGMP Proposed Zoning	General Use	Seafloor Protection Zone	Special Management Area	High Protection Area
Aquaculture	✓ - Permit	×	×	×
Boating, diving, swimming, photography	✓	✓	✓	✓
Commercial charters, non-extractive	✓	✓	✓	✓
Commercial fishing charters, extractive	✓	✓	✓ - Panel decision	×
Commercial long-lining	✓	✓	× - Panel decision	×
Commercial trawling, dredging	✓	×	×	×
Habitat restoration	✓	✓	✓	✓
Marine dumping	×	×	×	×
Mining	×	×	×	×
Recreational fishing with nets, set lines	✓	✓	× - Panel decision	×
Recreational line fishing	✓	✓	✓ - Panel decision	×
Recreational dredging	✓	×	× - Panel decision	×
Research and monitoring	✓	✓	✓	✓
Vessel piloting, anchoring	✓	✓	✓	✓

Given the Minister Parker's apparent interest in the application of the instrument, and the mentions of SMAs within the Revitalising the Gulf proposal, Government should look into this as a matter of priority.

Indeed, establishing marine protection without regard for the effect this has on unprotected waters, and in the context of a poorly managed fishery, carries risks that need to be mitigated for the protections to work in a holistic sense. The Ministry of Conservation must work together with the Ministry of Oceans and Fisheries to investigate and implement SMAs as a spatial tool that is responsive to change in fishing pressure that may result from marine protections under Revitalising the Gulf.

COMMERCIAL SECTOR

Government must also meaningfully address the impact of the commercial sector. Good Fishing supports other agencies—including the Hauraki Gulf Forum, NZSFC and Legasea—in calling for a total ban on bottom contact fishing methods within the Hauraki Gulf Marine Park. Given the special quality of the Hauraki Gulf, the valuable and vulnerable habitat therein, the entire Hauraki Gulf Marine Park should be designated as a Seafloor Protection Area, not small pockets. It is disingenuous to allow commercial harvest of a national park of the sea.

Good Fishing also submits that MPI should review the TAC (total allowable catch) in the park with a view to creating a separate FMA (fisheries management area). The Hauraki Gulf Marine Park differs enormously from the wider SNA1 FMA in terms of ecology, depth, fish stocks and recreational pressure. This will allow authorities finer-scale management of catch and effort, and create some welcome separation between the Gulf which is dominated by recreational catch and the rest of SNA1 which is dominated by commercial.

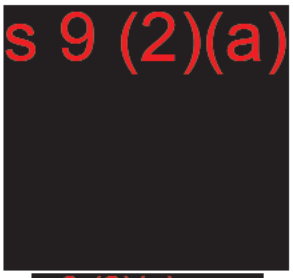
Currently, any concessions by recreational fishers to limit catch, to release fish, or to target alternative species within the marine park offer limited returns, because any recovery in a stock's biomass is ultimately reflected in an increased TACC—the conservation effort of rec fishers is simply caught later by the commercial sector. Recreational fishers feel this injustice acutely, and it creates a race condition that builds antipathy between the sectors and does no good for the ecology. Creating a separate TAC and FMA would alleviate this situation to a great degree, putting the weight of conservation responsibility on recreational fishers, involving them and rewarding them for conservation success.

SUMMARY

If DOC intends to proceed with Revitalising the Gulf, then officials must consider the wider effects of protection and make a plan to mitigate them. Special Management Areas are a tool that is already available under the Fisheries Act and presents a solution to many of these concerns, putting fishers, iwi and communities at the heart of conservation efforts, in the spirit of kaitiakitanga.

We would welcome the opportunity to add value to your discussions on these matters as part of your stakeholder engagement process.

Faithfully,



s 9 (2)(a) for Good Fishing

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:51 pm
To: Sea Change
Subject: Hauraki Gulf Marine Protection

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 2:52 pm
To: Sea Change
Subject: Sea change submission - In support marine reserve Slipper Island MPA 28Oct22
Attachments: Slipper Sea Change PDF.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Sea Change- Tai Timu Tai Pari Plan
Marine Protected Area (MPA)

Sea Change Plan Proposal for Slipper Island -Whakahau

Reference
7. Sipper Island, page 70-75.

28 October 2022.

s 9 (2)(a)
Email - s 9 (2)(a)
Organisation - s 9 (2)(a)
Recreational fishing and regular visitor to Slipper Island and conservation interests.

Submission:

Proposal - **In support of Marine Reserve Slipper Island.** MPA

Proposal -In support of Marine Reserve Alderman Islands and Protection areas.

Proposal - I reject- HPA Slipper Island.

Sea Change Plan Proposal for Slipper Island

Considerations

The area considered under the proposed protection plan appears to be **too small.** Fig.33.

The proposed protection areas would need to be a larger area, encompassing the entire Slipper Island coastline, including Penguin and Rabbit Islands, Watchman and inclusion of reefs.

The current situation around the coastal areas of Slipper Island are under stress from over fishing and collection of shellfish. The seabird habitats, flora and fauna, are also under stress from tree removal and landscaping, and the conservation measures is minimal.

There has been limited scientific research conducted at Slipper Island over the years for marine conservation and coastal fauna and flora management.

Recommend marine scientific research and studies on Slipper Island and associated Islands and their reefs.

Recommend studies to be undertaken of interest, are on the marine sea floor, marine species and their habitats and also on coastal seabird species and their environment.

In support of a “No-Take Policy” of marine shellfish and fish including sea birds (shearwaters)

In support of restricting the commercial fishing, trawling and nets.

Significance

The subtotal seagrass meadows are significant. They provide shelter and habitats to many marine species. Considered as rare habitats on off shore islands. (Schwarrz et al. 2006)
The seagrass area is threatened by anchorage disturbance usually during the summer months.

Slipper Island
Introduction

The Needham Family has been past owners of Slipper Island for 45 years and recently section owners on the Island.
We have been part of the Tairua and Pauanui community since the 1920’s.
Participation in regular travel to the Island for many years and a continuous interaction and experiences of life skills with the coastal and marine environment of Slipper Island.
Caretakers and Kaitiaki of Slipper Island.

Historical features.

The sand dunes on Slipper Island, of both Home Bay and South Bay are of old Maori burial grounds from past wars. These wahi tapu sites need to be highly respected and given immediate recognition for protection under historical sites and archaeology.

It is very important not to allow dogs to roam the dunes and beaches as from time to time, after storm conditions, the exposure of bones may be visible.

The local Kaumatua was Reremoana Jones. She has recently passed her role to her son and was quite active in forwarding to the Local Council (TCDC) submissions for protection on waahi tapu sites and the archaeological areas (headlands - Maori fortresses) for protection, on Slipper Island. Also the protection of significant trees. They are the Ngati Maru tribe local to Slipper Island and have been in Tairua Pauanui Slipper Island area for the past 550 years. Ngati Hei Iwi is known to be from Whitianga area and north on the Coromandel Peninsula.
Reremoana is a direct Maori iwi descendant of Slipper Island.

The depletion of marine shellfish and fish, Slipper Island marine life, it would only be fair to ask and to oblige by a “no-take policy” and have respect and fairness to all people to further protect the environment.

Protection of seabirds

The coastal environmental conditions of Slipper Island are exposed coastal cliffs, sandy beaches, rocky outcrops, boulder beaches, steep cliffs, marshlands and sand dunes.

The large pohutukawa trees are under threat from storm conditions by erosion causing tree attrition or removal for landscaping.
Coastal birds of shags rely on pohutukawas to nest.
Penguins and other shoreline species are under threat from their environment being disturbed by erosion, tree removal or dogs.
The beaches have at least 20 pairs of dotterel nesting annually in both Home and South Bays. Threats are from dogs and human footprint disturbance to the nesting areas and rodents.
The pied oyster catcher struggle to bring up chicks but are present in smaller pair numbers in both bays and are subject to the same threats.
Fairy terns were once present but are now are rare sight.

Marine Species Depletion

In support of a “No-Take Policy” of marine shellfish and fish including sea birds (shearwaters)

Shellfish species of tuatua, paua, and scallops appear to be in a steady decline and noticeable is the depletion of shellfish numbers over time.
South Bay and Home Bay scallop beds used to stretch as far over to Opoutere Beach on the mainland..
I am In support of restricting the commercial fishing, trawling and nets.
Years of commercial dredging and trawling has been depleting scallop beds.

Large schools of fish that were once quite visible from the sea shores are in a noticeable decline. The area has been commercially trawled and purse seine net trawled for many years, including by the aid of aerial fish spotting.
These fish species are tuna, snapper, kahawai, trevally and mackerel. Smaller piper-fish schools are also declining ie. are hard to find.

Kina -sea eggs are numerous across the bays, a possible imbalance in the ecosystem.

Crayfish - lobsters are often small and predominately undersize therefore they are returned to the ocean.

Marine Reserve Objective and Research

The Tauranga Polytech students has visited Slipper Island annually for the past 20 years. In part of there studies they have carried out underwater marine species mapping by line transect. This data collated may be useful for a marine reserve application.

The local council, TCDC, !0 Year Coastal Plan, submissions were in 2015.
I submitted to the council the issues on marine and coastal protection for Slipper Island. Also, proposing a Marine Reserve on Slipper Island.

The increasing population in the Coromandel area is putting pressures on the marine life on the coastlines, Islands and fishing areas. The traditional holiday population swelling over summertime has changed to more people living in the Coromandel area full time, over winter and all year round. The higher population numbers can be seen with recreational jet skiis, kayaks and small boats, people and dogs roaming the shores.

Creating a marine reserve on Slipper Island addresses bringing forward the issue of under regulated and over fishing and the little protection of the marine and coastal environments. The marine reserve is vital tool for protection for the area for the future and generations to come.

I would welcome more scientific marine research and archaeological studies to be done on Slipper Island and the adjoining Penguin and Rabbit Islands, Craters and Watchman Rock.

Increase the area of the marine reserve

I support adjusting the boundary of the MPA to increase the area.
To include an area of the ‘unique” boulder bank and creators in the northern boundary, Watchman Rock on the western boundary, the southern tip of Rabbit Island to the south, and the eastern flank of the lighthouse rocky outcrop.

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:57 pm
To: Sea Change
Subject: Hauraki Gulf MPA 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, Toby

s 9 (2)(a)

s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 2:59 pm
To: Sea Change
Subject: Consultation Feedback - Revitalizing the Gulf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Dear DOC

Thank you for taking the initiative to start protection of the Hauraki gulf. We appreciate the balancing act that DOC is try to strike with this recommended approach however we do not believe that it is ambitious enough.

These are the individual views of s 9 (2)(a) of s 9 (2)(a) .

Overall we believe that NZ Government must implement the UN recommendations that at least 30% of the whole Hauraki Gulf needs to be set aside as Marine Protected Area. These should be parceled into snall elements to be located in the areas of greatest potential development into complex marine habitats that will seed the adjacent areas. Examples of where this must happen include at least 1mile (nautical) marine protected area around Tiritiri Matangi and around the area known as the Noisies. Setting aside these areas creates the greatest single opportunity to protect the whole ecosystem from collapse. At the same time, those small areas already set aside as Marine Protected areas must be extended, including Goat Island and the western end of Waiheke. Then others areas should be identifed with the guidelines of mana whenua and marine biologists to create zones of revitalisation across the full spectrum of the gulf unique marine habitats. We support the proposed new Protected areas but expect these to be extended much further faster to effect the beneficial changes we need to save the gulf. All high protection areas should receive full marine protected area status.

On the proposed Seafloor Protection Areas. These should not be only in specific areas but should apply across the whole of the Gulfs Marine Area. All activity that disturbs the seabed should cease. This a devastating activity that must be stopped whether for recreational or commercial reasons. Tearing up the seafloor in this way is barbaric and would never be allowed on land. We urge DIC to use this opportunity to cease this practice in our precious ecosystem.

We would like to be kept informed as the proposals are developed and would be happy to speak on behalf of our submission.

We implore DOC and the New Zealand government to act now. Whilst none of these actions are easy, all are of a magnitude that can ensure that the next 20 years are not as poorly spent as the past 20 years. We support the views of NZ Geographic, the Blake Trust and Live Oceans.

Please be bold and act now.

Kind regards
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:02 pm
To: Sea Change
Subject: Hauraki Gulf
Attachments: Hauraki Gulf.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

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

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Ngā mihi,
s 9 (2)(a)

s 9 (2)(a)

Kia ora,
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Ngā mihi nui,
s 9 (2)(a)

Sea Change

From: s 9 (2)(a)
Sent: Friday, 28 October 2022 3:04 pm
To: Sea Change
Subject: Marine Protection Proposal
Attachments: Marine Protection Proposal Submission N Hazard.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Dear Sir/Ms

Please find attached my submission to the Marine protection proposals

Regards

s 9 (2)(a)

HC Hazard Consulting

Phone: s 9 (2)(a)
s 9 (2)(a)

Please click on the following link to send us large files: s 9 (2)(a)

28 October 2022

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

Boat owner and fisherman

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)

s 9 (2)(a)

s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:04 pm
To: Sea Change
Subject: Hauraki Gulf 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)

Marine Scientist, s 9 (2)(a) - but submitting individually.
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:08 pm
To: Sea Change
Subject: submission revitalizing the gulf
Attachments: doc submission gulf.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Find attached submission revitalizing the gulf

regards
s 9 (2)(a)

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

Submission regarding the Department of Conservations document; Revitalising the Gulf Marine protection proposals

We are making this submission as concerned commercial rock lobster fishers in the CRA 2 quota management area, and recreational fishers. My family will be adversely impacted by the proposal to create the HPAs and SPAs as it currently stands.
Any spatial restrictions imposed on fishers within the Gulf Marine Protection Proposals will have a negative flow on effect to the remaining CRA2 management area.

Our family have been involved in the rock lobster fishery for excess of 45 years and are 2nd generation fishers.
We wish to highlight our concerns listed below.

- There has been an Insufficient time frame for submission to be lodged.
- A lack of consultation with stakeholder groups
- Lack of information in the Martin Jenkins Commercial Fishing impact report. The release timing of this report gave little time to question or quantify the claims.
- The impact report is misleading using data for 2 years only, and when the Total Allowable Commercial Catch was the lowest in the fisheries history. Scientific stock assessments cover a period from 1990 To current year. The commercial impact report should reflect the same period for a true analysis of catch and value.
- Scientific studies show rapid increase of rock lobster biomass within the Gulf and rock lobster potting being a low impact method brings to question the rational of excluding rock lobster potting from the protected areas.
- Commercial lobster fishers have already been impacted by the inclusion of Marine Reserves, Rahui, and the Caulerpa weed, further closures of the important and productive areas will seriously affect the livelihood of many commercial lobster fishers. Rock lobster reside in rocky reefs. The ability for fishers to just move their fishing business to another area is not practical or achievable, for those who have the ability to move their fishing effort will do by relocating to areas already fished by other lobster fishers, this will lead to over concentration of effort and localised depletion, including stock out of the Gulf, creating a domino effect. This will also affect recreational fishers and add conflict between recreational and commercial as they compete for limited space. This was evident when the Motiti Protected Area was implemented in 2021, fishers, recreational and commercial were forced to travel further and fish in smaller spatial areas.
- Some of the proposed areas provide safe anchorage for vessels over night or in adverse weather, this will put vessels and lives at risk.
- Reduced / fouled fishing beds such as scallops are continually blamed on over fishing, in reality land run off contaminates from urban areas are fouling these grounds, no amount of fishing restrictions will resolve these issues.

- We do not support iwi having exclusive rights to HPA's for customary take. This sets a dangerous precedent for all marine reserves and protected areas.

Yours Sincerely

s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:08 pm
To: Sea Change
Subject: Submission on marine protection to revitalise the Hauraki Gulf
Attachments: s 9 (2)(a)_Submission_Revitalising the Gulf_28102022.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Kia ora
Please see attached submission in pdf format on the proposed marine protection to revitalise the Hauraki Gulf.

ngā mihi
s 9 (2)(a)

s 9 (2)(a) (pronouns he/his)
Programme Leader Marine Biology and Environmental Science
Department of Environmental Science
School of Science
Auckland University of Technology

E s 9 (2)(a) W s 9 (2)(a)

Submission on proposed protection zones designed to revitalise the Hauraki Gulf and its marine life.

Name: s 9 (2)(a) [redacted]

Contact: s 9 (2)(a) [redacted]

I support the implementation of the proposed high protection areas except that they:

- should be larger
- should include whole areas of habitat (rather than have legal boundaries dividing otherwise contiguous habitat)
- should represent at least 30% of each habitat type identified in the MPA policy (Department of Conservation and Ministry of Fisheries 2006)
- should include other areas important for marine biodiversity including the Firth of Thames, Western Coromandel, Eastern Great Barrier Island, the Mercury Islands, outer shelf and slope and the inner Gulf Islands including the proposed Hākaimangō-Matiatia (Northwest Waiheke) Marine Reserve, The Noises, the rāhui on take of shellfish around Waiheke Island and other areas proposed by the Waiheke Community Board described by Haggitt (2016) and others.

Note that protecting 30% of the area of the whole marine park would not necessarily represent 30% of the area of each habitat. The proposed small increase in the total area of high protection is completely inadequate in itself but is also unrepresentative of the range of habitats in the marine park. Many habitats receive little or no protection including seagrass, despite its importance for productivity and as nurseries for biodiversity conservation and commercial, customary and recreational fisheries.

The simulated annealing global search algorithm in Marxan was used to measure the “irreplaceability” of planning units in the Marine Park in contributing towards 30% percentage area goals for 32 marine habitats while minimising costs in area and perimeter and taking into account habitats in existing MPAs (Figure 1).

The legend on the map shows how many times a planning unit is selected in solutions from 100 runs of the algorithm aiming to meet targets for each habitat while reducing the cost in overall area and the boundary perimeter of each protected area. The map shows results from just one of a range of simulations using varying targets and other costs such as recreational fishing.

Habitat data were derived from several sources including:

- marine habitat maps digitised from high resolution aerial photos and interpreted fare sheet data digitised by Stacey Byers and Chris and Anna Wild at the Auckland Conservancy, Department of Conservation with additional coastal data from Environment Waikato, and modifications made by Vince Kerr and others
- a “Broad scale gap analysis of habitats and marine protected areas in the New Zealand Territorial Sea” (New Zealand Department of Conservation and

Ministry of Fisheries 2011) compiled from many data sources listed in the metatdata for this report.

- Finer scale habitat maps by Vince Kerr and the late Roger Grace of the north side of Waiheke using side scan sonar and underwater video.
- Polygons of intertidal shores around the Mercury Islands digitised from aerial photos flown for Environment Waikato.

The map clearly shows the area required to represent 30% of each habitat while minimising the total area protected. The additional areas for protection identified are apparent in Figure 1 and I also support the submission below by A. Henneker, A. Martino, C. Henneker, E. Jupp, F. Simmonds and L. Hu.

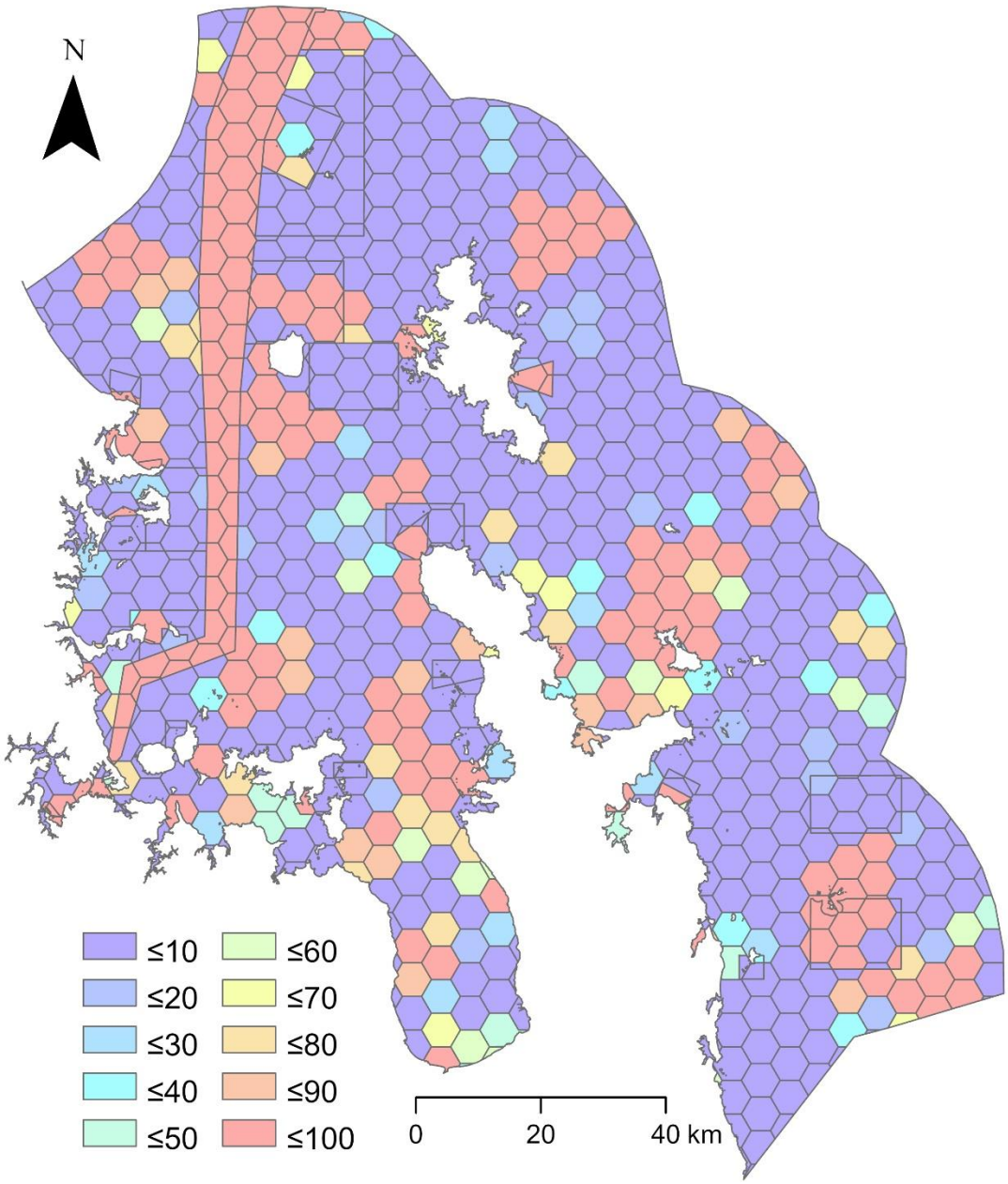


Figure 1. Number of times a plan unit is selected in 100 Marxan runs to represent 30% of each habitat while minimising the total area protected, taking into account existing MPAs and reducing the boundary perimeter of new MPAs.

Revitalising The Gulf (Fisheries) marine protection proposals submission

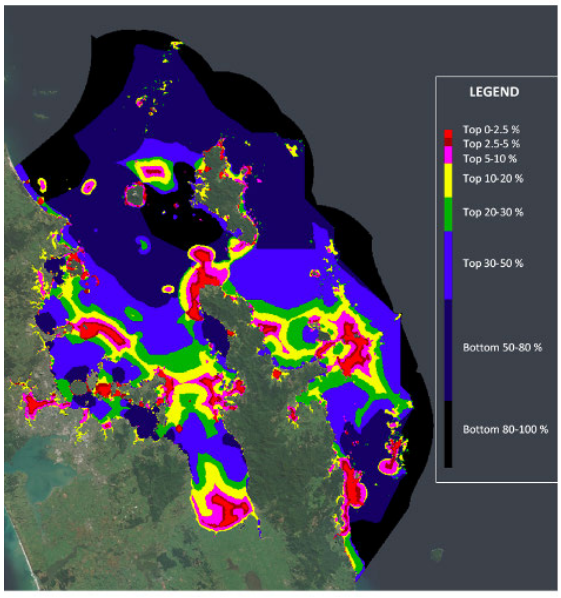
Contributing authors: s 9 (2)(a) [redacted]

The authors of this submission in response to the New Zealand government's Revitalising the Gulf marine spatial plan proposal firstly would like to recognise the significance of this plan for the Hauraki Gulf. The gulf has long been exploited by commercial and recreational fisheries and it's nearly past the time where we're able to rectify the damage we've caused (Forum, 2020). Only six marine reserves currently exist protecting approximately 0.3% of the Hauraki Gulf Marine Park (Tablada et al., 2022). We support any further addition to these numbers. However, this submission challenges some proposed High Protection Areas (HPA/HPAs) in the justification by the Revitalising the Gulf (RTG) working group and makes reasoned suggestions as to why.

Purely from a biodiversity perspective the HPA proposals don't deliver the biodiversity protection needed for the region (Tablada et al., 2022). While other factors are important to consider when developing a marine spatial plan, underperforming on biodiversity protection is a key flaw. This is interesting given that information used to inform HPAs, Seafloor Protection Areas (SPA/SPAs) and Cable Protection Areas (CPA/CPAs) were largely based on biodiversity and ecology data sourced by scientific advisers. The working group hasn't undertaken a systematic conservation approach to ensure a cross-section of all marine environments found in the Gulf are being protected. Our revised proposed HPAs aim to cover a larger area of the Hauraki Gulf, from the proposed 1,587 km^2 to 10,696 km^2 and cover a broader range of marine habitats to create a more comprehensive system of protection.

Figure 1

Zonation map of areas in the Hauraki Gulf that require top attention



Caption: Warm colours indicate higher priority areas for biodiversity representation, and colder colours indicate lower priority areas (Lundquist et al., 2020).

Figure 1, originally from Lundquist et al. (2020) visualises the different habitats in the Gulf and which habitats in which locations should be prioritised. This Zonation study is the basis for a lot of this submission's justification, and we have included it here for reference alongside the HPAs and SPAs proposed by the authors.

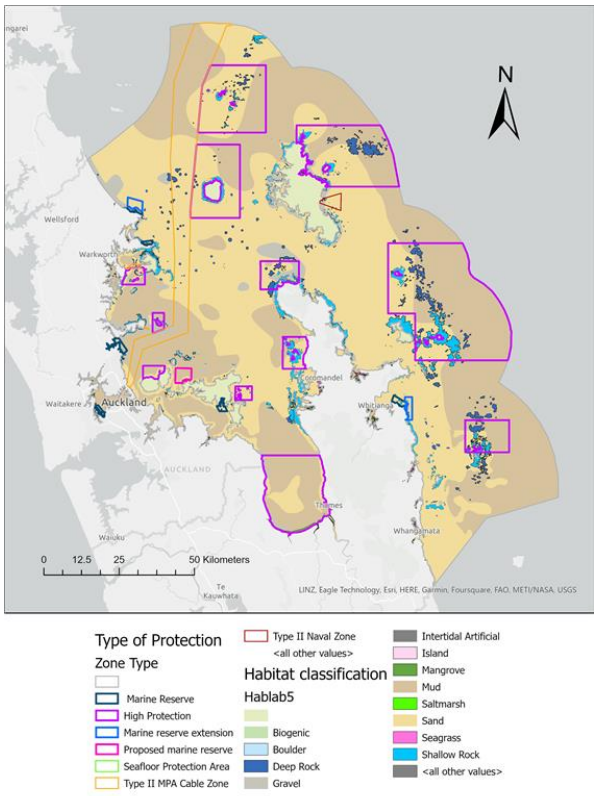
The authors also find that RTG does not have a broad criterion for what constitutes an HPA. For example, some proposed HPAs include buffer zones while others do not, some HPAs include whole reef systems while others are chopped in half without justification. It would be beneficial to understand why the working group decided to include components, rather than justify why habitats have been excluded (such as the reef habitats).

Our submission could be considered extreme, but the goal is to go hard in what we propose to allow for inevitable range reductions on all fronts. This was evident in the adjustments between the Sea Change proposal and RTG proposal. We have used available data on ArcGIS alongside available research and reports to analyse proposed HPAs and create our own version in response with relevant justification. Overall, we've found RTG isn't cohesive with other plans and proposals i.e., excluding Noises (which we acknowledge has now been included), Waiheke, and the Mercury Islands. We have made suggestions, based on research, as to where these locations should be protected by HPAs.

We would like to recognise that these revisions were done without consultation from Mana Whenua and communities who regularly use these areas. It's important to acknowledge we're not trying to restrict the use of areas for customary practices or suggest these extensions without prior consultation with local iwi.

Figure 2

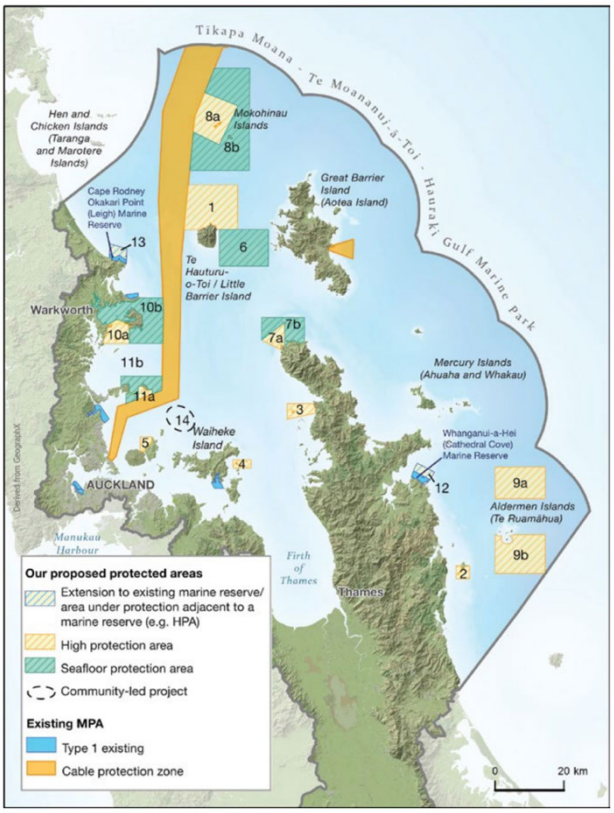
The authors' proposed HPA suggestions in response to RTG proposal



Caption: Proposed extensions and additions to HPAs proposed in RTG, created using ArcGIS.

Figure 3

RTG's proposed HPAs and SPAs in the Hauraki Gulf Marine Park



Caption: The HPA and SPA areas as outlined in Revitalising The Gulf. Retrieved from https://www.doc.govt.nz/globalassets/documents/our-work/sea-change/revitalising-the-gulf.pdf

The revised HPAs in our submission can be found alongside the current proposed HPAs by location in Revitalising the Gulf in Appendix 1. Figure 2 represents the authors' proposed revisions to Revitalising the Gulf's proposal across the entire Hauraki Gulf Marine Park, while Figure 3 is Revitalising the Gulf's current marine reserve proposal.

The revised HPAs in our submission can be found alongside the current proposed HPAs by location in Revitalising the Gulf in Appendix 1. Figure 2 represents the authors' proposed revisions to Revitalising the Gulf's proposal across the entire Hauraki Gulf Marine Park, while Figure 3 is Revitalising the Gulf's current marine reserve proposal.

Three Islands: approx. 24km^2

We propose a novel HPA around three islands: Pakatoa, Rotoroa, and Shag, within the inner Hauraki Gulf. From here on, referred to as Three Islands. Our main objective when we establish an HPA is the protection of biogenic areas – both soft and hard substrates and the species associated with the habitat (Forum, 2020). Also, natural environments provide more diverse ecosystem services that would build habitat resilience to future perturbations (Aguilera et al., 2020). Weighed by factors like heterogenous biogenic areas with distributions of both endemic and exotic demersal fish species, Three Islands falls within the top 10% of priority areas in the

spatial prioritisation models shown in figures 1 and 4 (Lundquist et al., 2020; Tablata et al., 2022). By establishing Three Islands HPA, we are incorporating more diverse and biogenic coastal and offshore habitats and protecting the associated animals too. For example, Three Islands hosts five permanent breeding populations of seabirds, including two species within order Charadriiformes and members from Sphenisciformes, Procellariiformes and Pelecaniformes (Gaskin & Rayner, 2017). Thus, this biodiverse region requires top priority in marine protection. Thus, the expansion of HPA to include more heterogenous habitats over larger scales is advantageous and efficient long term. Small populations of vulnerable species would benefit from the stability of larger environments, as smaller habitats – and the associated organisms – are more vulnerable to stochastic disturbances (Aguilera et al., 2020).

Motukawao Group: approx. 79km^2

We propose expanding the HPA range for the Motukawao Island group off the west coast of the Coromandel Peninsula. One of the main objectives when we establish an HPA is the protection of biogenic areas – both soft and hard substrates like sponges, soft corals and species associated with them (Forum, 2020). Furthermore, Motukawao falls within the top 10% of priority areas in the latest spatial prioritisation plans (Lundquist et al., 2020). Weighed by the heterogenous biogenic areas and overlapping distribution of both endemic and exotic demersal fish species (Lundquist et al., 2020; Tablata et al., 2022). By expanding the Motukawao Island group, we are incorporating more diverse, biogenic coastal and offshore habitats and protecting the associated animals too (Forum, 2020). The species and rare habitats that would be benefited are *Carpophyllum flexuosum* forests (absent in many other locations) to 3m depth. Coastal reef fishes and occasional sub-tropical fishes like silver drummers also utilise these shallow water habitats around the islands (Forum, 2020). Another example of uncommon habitats is macroalgal *Ecklonia radiata* occurring at exposed locations along intertidal zones, with dog cockles occurring below reefs and the occurrence of horse mussel beds. In areas south of the proposed area, there are the first records of tube-building worms *Galeolaria hystrix* with possible occurrence to the west of the islands. Studies found breeding grounds for white-faced storm petrels off the west coast of the coromandel (Gaskin & Rayner, 2017). Thus, we are supporting the nesting site and the natural resources necessary for the seabird populations in the area and the biodiverse range of flora and fauna.

Firth of Thames: approx. 475km^2

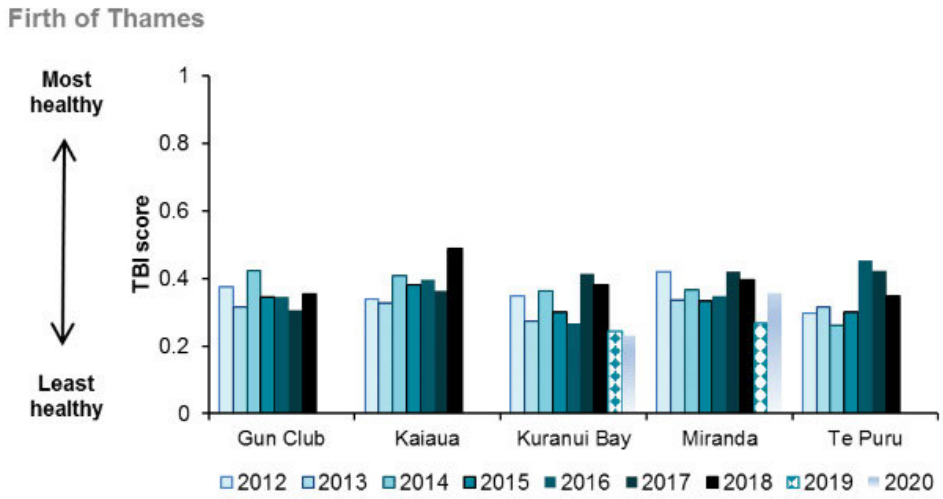
We propose a novel HPA in the inner gulf of the Firth of Thames that will protect biogenic habitats and the associated organisms, in turn increasing the health of the Thames (Tablada et al., 2022). Based on Zonation spatial planning, a recent study highlighted the inner gulf of the Thames as a high-prioritisation area (Lundquist et al, 2020; Tablada et al., 2022). The area consists of diverse biogenic substrates like shallow tidal flats of approximately 85 km^2 and includes shallow estuarine, shell banks, grass flats, mangrove forest, salt marsh, and limited freshwater swamp margins (DOC). Shell banks or Chenier plains are beaches full of fossilised bivalves (cockles) that not only provide nesting habitats for shorebirds but add great historical value with their rarity. RAMSAR convention of wetlands has assigned international importance to an estimated 8.5 km^2 of intertidal grounds of the Thames (RAMSAR). The inner gulf is the high tide roost and important foraging ground for dense populations of birds (RAMSAR). Approximately 74 species of seabirds, of which many are rare, are sighted in the Thames (RAMSAR). Specifically, this HPA will protect the breeding sites for black stilts, dotterels, pied shags, black-billed gulls, and Caspian terns (Gaskin & Rayner, 2017). Other rare species that utilise the mudflats of the Thames as over-wintering grounds are transequatorial migratory birds like Sharp-tailed sandpiper (*Calidris acuminata)* and eastern bar-tailed godwits (*Limosa lapponica baueri)*, where as many as 10,000 individuals can be present in summer (RAMSAR).

Waikato biodiversity forum has specified that the inner Firth of Thames is a “productive habitat for infauna like bivalves – pipis and cockles- and fish, particularly benthic soft-sediment feeders such as yellow belly flounder, dab flounder and short-finned eel”. Demersal species like snapper, yellow-eyed mullet, pilchard, Ahuru, and grey mullet are also found within the inner Firth of Thames. Shark species are also known to feed in the area.

In spring, the females of several species, including rig, hammerhead, bronze whalers, and schools of shark, utilise the upper Firth of Thames for birthing (Waikato biodiversity forum). It is known the area can be fished for snapper and flounder, with sand sharks being bycatch. By protecting riverine and estuarine environments, we protect the specific habitats necessary for commercially important juvenile snappers (Parsons et al., 2011).

Figure 4

Traits-based score of 5 sites within the Firth of Thames between 2012 to 2020.



Caption: sourced from Waikato Regional Council (2020).

A nine-year survey conducted by the Waikato regional council on the estuarine health of the Thames revealed that most sites sit in the moderately healthy zone of 0.3 - 0.5 (figure 4). The traits-based index (TBI) measures the number of organisms and their associated traits (feeding mode, body size) as a proxy for their ecological performance in the environment (Waikato Regional Council, 2020). The final score can range from one, the healthiest, to zero, the least healthy. The latest survey across all sites demonstrated that no area is above 0.5 (figure 4). Hence by including the inner Thames as an HPA, we are not only protecting the species that utilise the area but also restoring the mauri of degraded habitats like Miranda and Kaiaua. This new HPA would benefit from leadership and restoration works led by Mana Whenua, who have utilised the area for traditional and customary harvesting (RAMSAR). Therefore, consultation with iwi is compulsory. By adding this HPA, we also need to consider the connectivity of land and sea. Strict regulations should be applied to terrestrial activities like mining, farming, land, and housing development beside the major rivers like Piako and Waihou, which are large contributors to catchment run-off into the Thames (RAMSAR).

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Noises: approx. 57km2

We appreciate that RTG has reinstated and affirmed the need for protection at The Noises and surrounding islands. This was a serious hole in the marine spatial plan for the Gulf, and it's great to see such a significant High Protection Area proposed, encompassing all islands and reef habitats in that zone. It makes sense to include the Noises as part of the wider spatial plan, rather than a separate proposal and we support this. It's well-known by those in the boating community that this area has been pillaged and only has a fraction of the biodiversity it once had (Forum, 2020). An HPA in this area which restricts recreational and commercial fishing, outside of customary fishing practices, will be hugely beneficial for the area and allow for key species to replenish such as crayfish, scallops, and snapper (Forum, 2020).

Tiritiri Matangi: approx. 21km^2

RTG recognises the unique, high biodiversity value of Tiritiri Matangi's marine environment in its HPA justification (Department of Conservation et al., 2021). It's rich in a range of reef habitats and is a breeding ground for many juvenile fish species. It's also acknowledged that sea grass has previously been in the area north of the wharf of the western side of the island (Anderson et al., 2019). Our proposed HPA extension builds on this concept by incorporating the marine environment and some surrounding waters of the entire island, including Shag Rock. It will allow the extensive biogenic habitats, seagrass, reefs, sponges, and fish to thrive. This will accompany the surrounding SPA by creating a spill over effect over time for recreational fishing since juvenile fish in protected habitats will have time to grow without the impact of recreational and commercial fishing (Taylor & Buckenham, 2003). RTG also recognises the value of protected land-sea linkages and our proposed HPA revision allows for this connection between the Tiritiri Matangi Island Sanctuary and the corresponding protected marine environment. While not entirely similar given people cannot visit without a permit, Te Hauturu-o-Toi / Little Barrier is a somewhat comparable example in this proposal, where whenua and moana are equally protected to restore biodiversity. Our extended proposal will facilitate a tourist-friendly version of this area of the Gulf.

Kawau: approx. 53 km2 (with SPA area of 215km2)

It's great to see an HPA recommended off the Mahurangi coast and near Kawau Island. As stated in RTG, this area is a relatively pristine and highly diverse ecosystem (Department of Conservation et al., 2021). Data analysis by Anderson et al. (2019) shows the presence of once dense scallop beds on the southern end of Kawau island, some of the most dense in the gulf. Data also shows seagrass present in the area which is an important habitat for juvenile fish species (Morrison, 2021). However, this area is unprotected by RTG's proposed HPA and is instead covered by a proposed SPA. Justification for the SPA by RTG is to allow for commercial fisheries to continue in the area south of the island. We propose extending the area to cover the

southern end of Kawau Island, as seen by our revised HPA map in Appendix 1. While the SPA restricts bottom trawling methods, it still allows for non-invasive commercial fishing and recreational fishing and diving practices. An HPA will allow this area to replenish and bring back the unique diversity of the area. There is a goal to phase out harmful fishing practices from the Gulf, such as Danish seining and bottom trawling (Tablada et al., 2022). When better a time than through implementing a strong Revitalising the Gulf strategy that truly sets out to do what it says and starting this process now at Kawau?

Rangitoto and Motutapu: approx. 26km^2

RTG itself discloses the uncertainty about the effectiveness of the current Rangitoto and Motutapu HPA proposal. It questions the relatively small boundaries and their ability to adequately protect marine species from fishing outside of the area, given that species may have a much larger home range than the proposed HPA. Therefore, our proposal shifts this HPA to encompass the Western side facing Auckland's coast. It will help to protect the coastal areas of high biodiversity priority along Rangitoto and Motutapu as shown in figure 1. There are many fish species present in this area and an HPA will allow for the likes of juvenile snapper on sheltered reefs to grow. Furthermore, it's known that kina barrens are present in the area (which RTG acknowledges), indicating the removal of keystone species such as kōura over time has degraded the marine environment (Navarrete & Menge, 1996). An extension of the Rangitoto and Motutapu HPA will reduce the doubts of the effectiveness of a smaller HPA and undeniably benefit the habitats and species that call this abundant ecosystem home.

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Mercury Islands: approx. 1207km^2

The Mercury group of islands, including Ahuahu (Great Mercury), Whakau (Red Mercury), Moturehu (Double Island), Kawhitu (Stanley Island), and Aitu (Middle Island) were originally included in the Sea Change proposal, and then later excluded from RTG. According to the Sea Change Plan's document, this area is rich in biodiversity and unique habitat. The original proposal included 5km^2 of marine area, with a width of 2km and covering around 13km of coastline. This would have covered some shallow water rocky reef, only one of many interesting ecosystems and habitats surrounding the Mercury group. It was excluded from RTG with the reasoning that the proposed area of Type II MPA on the Mercury group wouldn't provide sufficient protection for biodiversity in the area. RTG explains that the gap in protection will be reviewed and will perhaps be addressed later. There has been no timeline included as to when or how this gap will be addressed, which we

think should be remedied as soon as possible. It's the least that should be done if our proposal for new HPA is ignored.

The Sea Change document specifies what ecological features this location sports. In terms of habitat, the area is host to reefs, both shallow and deep, sand, caves, pinnacles, and drop offs. This area is rich in biodiversity and is a high priority to conserve, according to the zonation map in Figure 1. Deep reefs, denominated by dark blue on our proposed map, are home to rare sponges, and black and gorgonian corals. Shallow reefs house red and packhorse rock lobster and brown seaweed, mainly *E. radiata*, which is important for habitat building (Nelson et al., 2018). Both species of rock lobster are fished, and the red lobster, kōura, are one of the most economically valuable fisheries in New Zealand (Shaffer & Rovellini, 2020). Hopefully, through the spill over effect, protecting their habitat here could help reinvigorate their populations outside of the HPA, on the untouched Ahauhu, which did happen at Leigh Marine Reserve (Kelly et al., 2002). Also, it is abundant in many diverse coastal fishes (Sea Change, 2021).

Where RTG proposes no HPA in this location, we see ample space, opportunity, and reason, to propose the largest one in the Gulf. We do miss Ahuahu Bay, which is unfortunate as it has some of the last remaining seagrass beds in New Zealand, that have already declined by 85% (Clark & Crossett, 2019). Our proposed area covers sandy bottom, the muddy seafloor of the outer shelf, as well as shallow and deep-water rocky reef. The idea that none of this huge area would be covered under RTG is appalling and should be fixed. We skipped over Ahauhu, understanding both that this is privately owned, and stakeholders can be difficult to deal with, and that the Mercury islands are a big hotspot for recreation. This way, recreational activities can still occur off the coast of Ahauhu.

Cape Colville and Channel Island: approx. 106km^2

Here, we are combining Cape Colville and Channel Island (7a and 7b) into one proposal. Cape Colville and Channel Island have been afforded a generous amount of protection by RTG. We only have a few issues with the proposed space. One key problem is that there is a great expanse of deep and shallow rocky reef, sandy bottom, gravel, and even mud. This is an incredibly diverse spot and is one of the biggest priority areas in Figure 1, so it's good that RTG gave it so much attention. However, under the parameters of an SPA, there are few benefits for reef ecosystems. Benthic organisms, including cockle beds that promote biodiversity, live in the soft substrate that would be protected by the SPA, but not reef systems.

There is also no buffer zone in between the proposed HPA and SPA, which can and will initiate the well-researched edge effect. With no buffer between the two, the size of effective HPA would be much smaller than the designated area, due to outside disturbance being too close to the edge of the HPA (Ohayon et al., 2021). Also, because some singular reefs sit across multiple zones, it would be very difficult to enforce boundaries for recreational activities. Using a triangular shape as the border of the area does nothing to help enforce it either, what is to stop someone from drifting straight through the 'point' while fishing?

One good thing about how much space this covers, is that it would allow for interconnected protection between intertidal shallow reef, deep reef, and soft-sediment benthic habitats. However, with the problems posed by the lack of buffer zone and awkward shape leading to a reduced area of effect, our proposal is more inclusive. We propose making the whole area from 7a and 7b combined from RTG into an HPA, thereby protecting this unique and biodiversity rich spot.

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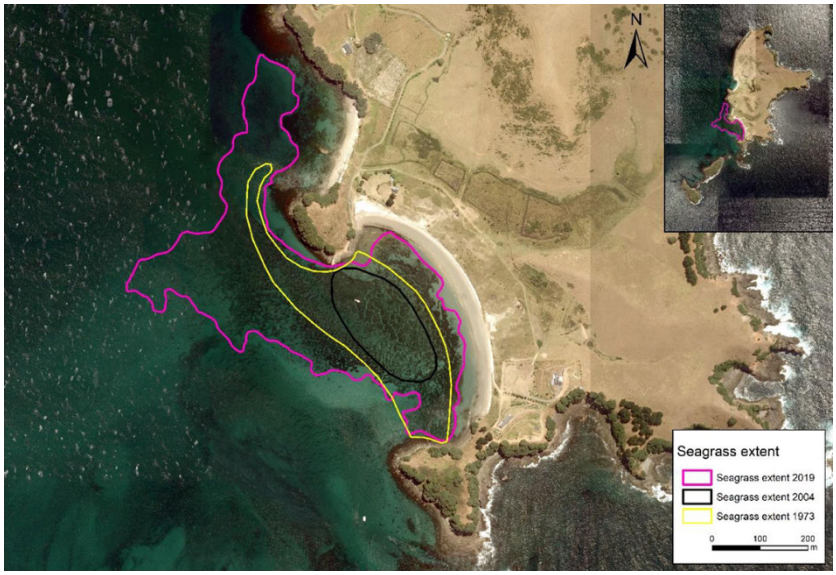
Whakahau (Slipper Island): approx. 14 km^2

This native seagrass (*Zostera muelleri*) meadow at Whakahau is one of the few subtidal seagrass meadows documented in Aotearoa and is a vital support for biodiversity in this area (Schwarz et al., 2006) (Figure 5). Seagrass beds are an essential nursery environment for juvenile fish (Parsons et al., 2014, 2016, 2020), and seagrass are vulnerable to erosion (Guilini et al., 2017). Erosion could lead to decreased physical density, which is what provides the shelter that juvenile fish are drawn to. Loss of seagrass meadows creates feedback mechanisms that no longer maintain the specific environmental conditions needed for seagrass meadows (Turner & Schwarz, 2006). Therefore, protecting existing seagrass is critical and regular monitoring to quantify trends in distribution, extent, and condition must be undertaken every 3-5 years (Morrison et al., 2014; Turner & Schwarz, 2006).

Figure 5

Seagrass presence at Slipper Island.



Caption: Extent of the seagrass meadow at South Bay (south) and Stingray Bay (north), Slipper Island, estimated in 2019, 2004 and 1973. Aerial imagery was taken in 2017 (supplied by Waikato Regional Council). Image and caption taken from Clark and Crossett (2019).

Clark and Crossett (2019) suggest further protection should include restricting further damage from anchoring, swing moorings, propellers, and dredging, (Figure 6) some of which may be protected by this HPA, but more extensive protection may stem from a combined HPA and SPA.

Overall, we are happy with the Slipper Island proposal. The proposed HPA will help continue the excellent water clarity at Whakahau by decreasing anthropogenic impacts such as substance discharge and physical disturbance. Additionally, because HPAs allow monitoring and research, the seagrass can be continually monitored and surveyed by GIS and through a potential citizen science initiative (accomplishable due to the likely increase of tourism experienced within the future HPA). It will also allow research into the susceptibility of seagrass meadows to *Labyrinthula* disease (which does infect some seagrass at Whakahau).

It is critical to recognise the uniqueness and importance of the *Z. muelleri* seagrass meadows by having additional benthic protection. This will be reflected in adjustments to the regulations of the HPA. These will include (alongside everything that the HPA restricts) restrictions on anchors, swing moorings, and dredging to protect this irreplaceable habitat.

Figure 6

Swing moorings scouring seagrass

Caption: Swing moorings pictured in South Bay, Slipper Island. Image from Clark and Crossett (2019).

Ruamaahu (Alderman Islands): approx. 155km^2

RTG proposed that the southern and northern areas of Ruamaahu be designated as an HPA. This is considered to increase ecological benefits and minimise the displacement of fisheries, the most prevalent being the the kōura fishery. We know that there is an abundance of kōura at Ruamaahu, forming an integral part of the commercial and recreational fishery, providing essential ecosystem services, and are a taonga species. Knowing this, it is important to not focus on creating a protected area that minimises revenue loss. Instead, we should look at the big picture. How can we provide the most protection for valuable species that will cause biomass spillover into fishable areas?

The Southern area of our proposed HPA specifically carries very high biodiversity and ecological values that would benefit from protection. A black coral reef is located southwest of the islands (Skipworth, 2020), which needs benthic protection.

It makes more sense to have a singular, large HPA with a southern SPA dedicated to the black coral reef rather than two small HPAs that exclude the main islands, as per the current proposal. Smaller MPAs often only work in specific circumstances, e.g., if they have complete no-take protection, are in sheltered locations with complex habitats, and have positive community involvement to generate kaitiakitanga (Turnbull et al., 2018).

The current Ruamaahu HPA proposal doesn't fulfil this. Our modified HPA/SPA gives high-level protection to key habits and species in Ruamaahu, such as extensive rocky reefs, volcanic formations, caves, and pinnacles, as well as black coral, anthozoans, fish, elasmobranchs, and marine mammals. This is necessary because in 1933, the Crown proclaimed Rumaahu a wildlife sanctuary, to which Māori responded in 1969 by gifting them to the Crown to endorse that purpose (Monin, 2010). They have incredible environmental and cultural value, which should be reflected in the protection they receive.

Whanganui-a-Hei (Cathedral Cove) Marine Reserve combined area of 24km^2

The current proposal is a seaward extension of the Whanganui-a-Hei marine reserve. Our proposal involves a modification that improves the protection of the rocky reef ecosystems around and to the south of Mahurangi Island. These reefs are more extensive than what is displayed in the original proposal and possibly support more biodiversity. This new extension accounts for offshore kōura movements, improving the ecological integrity of ecosystems protected within the marine reserve. We have included a keyhole in the area off Hahei beach to allow for recreational activities that don't overlay any important habitats.

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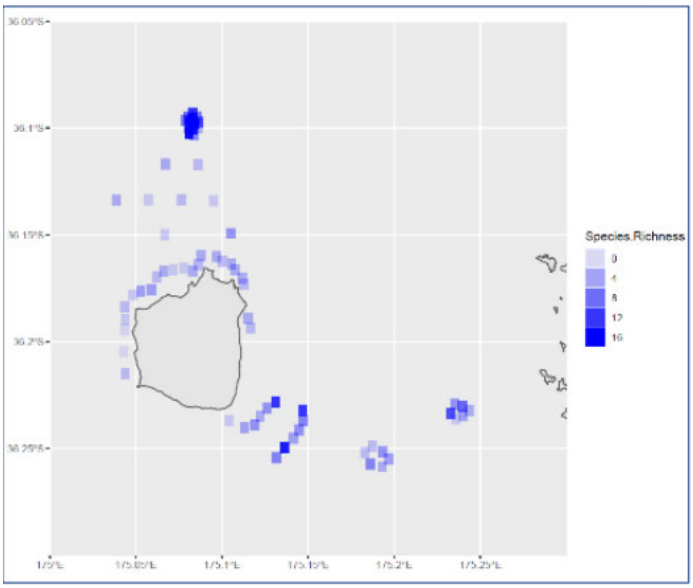
Te Hauturu-o-Toi (Little Barrier): approx. 349km²

The current plan to protect the marine habitats around Te Hauturu-o-Toi/Little Barrier Island have the HPA only protecting the northern half of the island and reefs. Our plan involves extending the HPA south to encompass the whole reef habitat of the island. This area is of specific and considerable economic value as a location in the Gulf with one of the highest levels of commercial fishing in recent years by green weight (Leung-Wa & Kulwant, 2021). The reef habitats surrounding Te Hauturu-o-Toi are the traditional habitat of

Chrysophrys auratus, one of the top 3 fished species in the Gulf (Leung-Wa & Kulwant, 2021), and thus are worthy of extra protections for the ongoing health and sustainability of fish stocks (Rees et al., 2021). The reef habitats are also home species of sponge, coral, and algae.

Figure 7

Fish species presence around Little Barrier



Caption: Dermal fish species richness around Little Barrier/ Te Hauturu-o-toi (Howarth, O.; Smith, A.N.H. 2020)

RTG's proposed northern area HPA successfully covers the species rich reef section known as "the coral patch" but neglects other areas in which demersal fish congregate (Sea Change, 2021). Specifically, the south-eastern reef area as identified in figure 7 derived from underwater baited videos.

Our suggestion for an enlarged HPA might limit some access to commercial fishing and considering that this area contains the largest fish stocks in the Gulf (Revitalising the Gulf, 2021), adjustments will likely have to be made for the boundary locations to suit fisheries' interests. However, this doesn't mean that we can't also take habitat locations into account in that process.

Craddock Channel: approx. SPA area of 133km²

As noted in the RTG justification for the Seafloor Protection Area in Craddock Channel, reef areas within the SPA wouldn't be adequately protected. Now that the HPA of Te Hauturu-o-Toi encompasses the reef areas, the channel SPA can focus on specific benthic protection. This area contains a variety of habitats for sponges, algal assemblages, and anemones, and is could also be an important thoroughfare for Bryde's whales and Bottlenose dolphins (Dwyer et al., 2014). As such, the proposed SPA is appropriate for the ecological needs of the area and should provide continuing protection and benefit to the local benthic species and rare or endangered mammals.

Cape Rodney-Okakari Point (Leigh): combined area of 21km²

In an area of high ecological value to the cultural and scientific communities of New Zealand, the proposed extension of the Marine Reserve at Cape Rodney-Okakari Point is an appropriate measure to ensure the continued preservation of species in this area. Providing for understood movement of species with additional sea area protections will allow for more effective conservation and the limiting of habitat edge effects (Revitalising the gulf, 2021). The extension represents 71% increase in size of protected area which will be of considerable benefit to researchers and students at the nearby University of Auckland Marine Science Laboratory, allowing for new areas of study and the observation of biogenic habitat improvement after an area is protected.

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Aotea/Great Barrier Island: approx. 583km^2

Currently there is no marine reserve around Great Barrier Island, apart from the Naval Base Zone which possesses the same restrictions as CPAs. The only marine reserve around is between Great Barrier Island and Little Barrier Island, and this is an SPA. Substrata around Aotea consists of some rocky reef and deep sand and mud areas. This habitat has the potential to support rich and biodiverse marine life. Sivguru, et al. (2004) conducted a study researching the habitat and biodiversity on a location within our proposed HPA. Conclusions found there was significantly rich marine life with 57 rocky bottom species, including unique black corals, sponges, and gorgonian corals. Alongside 76 benthic species including polychaetes, crustaceans, and molluscs. This research is important in presenting biodiversity and the range of substrate around Aotea, with emphasis on the area of the island opposite the current reserve (between east-coast of Aotea and Little Barrier Island). Providing data to support our proposed HPA, which expands slightly off the study location from Sivguru et al. (2004).

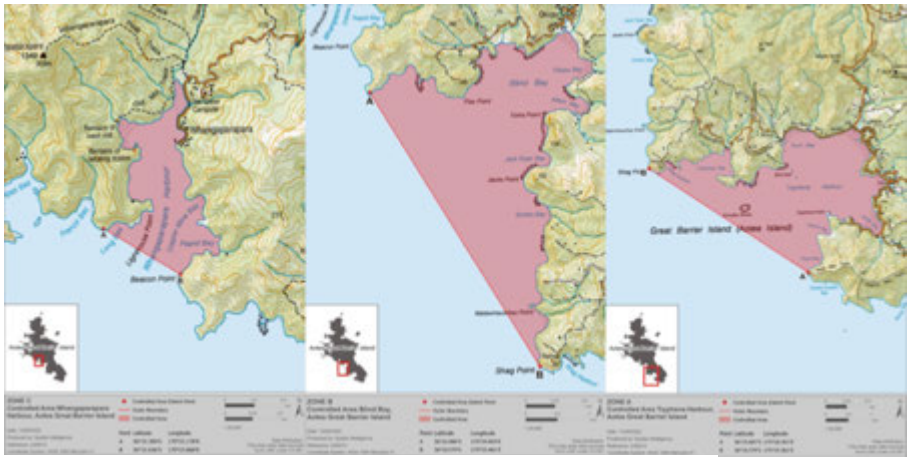
We are proposing an HPA on the north-west side of Aotea. Our intention stems from similar justification supporting the proposal submitted in 2008 by DOC for a Marine Reserve of 56,000ha. This reserve covers a substantial area of Aotea, and would cover a range of differing habitats, substrate, and ecosystems, supporting the spread of healthy ecosystems around the island and within the HPA.

This proposal area includes the Aiguilles Island, whereas DOC's proposal only included the eastern side of Aiguilles Island. This proposal was submitted in 2004 and was confirmed supported by The Ministry of Conservation and The Ministry of Transport in 2006, while The Ministry of Fisheries continued to not agree. Eventually, in 2008 The Ministry of Fisheries rejected the proposal for the marine reserve on the north-east coast of Aotea was never instated. One of the main factors contributing the rejection of DOC's marine reserve proposal around Aotea was the importance of the Hauraki Gulf and Great Barrier Island specifically, for recreational fishing. We agree on the importance of recreational fisheries for both Auckland and the local iwi of the island, though we believe implementing an HPA wouldn't significantly impact fishing activity around the island, as Aotea has extensive range to provide excellent fishing spots. We do expect the HPA to create positive impact to the fishing activity for local iwi and recreational fishing through a spill-over effect (Takashina, 2020).

Great Barrier Island currently has a rāhui and Controlled Area Notice (CAN) in place to combat the invasion of exotic *Caulerpa* species. Biosecurity New Zealand placed a CAN in Blind Bay, Tryphena Harbour, and Whangaparapara Harbour (figure 8). It was then extended for another 6 months from October 20th, 2022. The extension aims to continue limiting the spread of the *Caulerpa* species, and therefore the potential negative effects. This species is highly invasive, which raises concerns for the potential of Aotea's marine life to degrade due to loss of native species and niche habitats being influenced (Parreira, et al,. 2021). Rāhui locations are all harbours that often host boats, which is one way these species can spread. With the ongoing efforts to control *Caulerpa* on Great Barrier Island, the HPA is more important than ever. By having a HPA in our proposed location, it limits the frequency of boat traffic and doesn't allow for fishing activities at all, which are both recognised as ways in which *Caulerpa* species are spread. It also protects biodiversity and ecosystems in this zone.

Figure 8

Map of CAN restrictions on Aotea



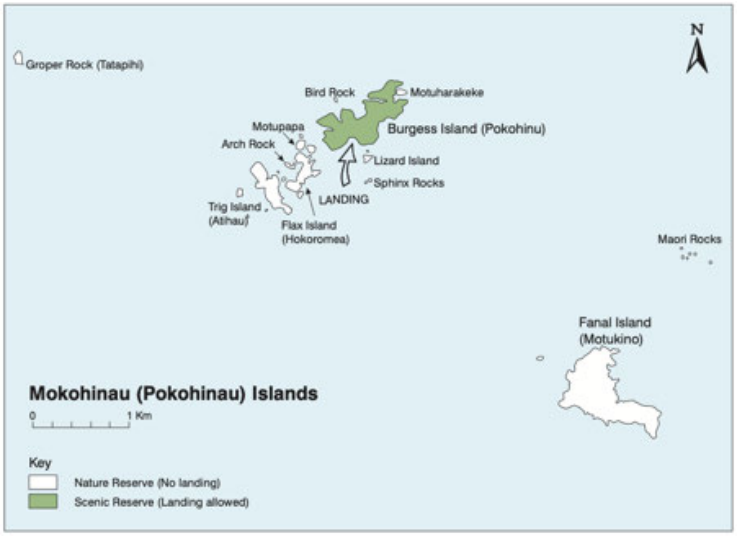
Caption: CAN restriction areas to combat and maintain the spread of *Caulerpa* species on Aotea. From Biosecurity New Zealand.

Mokohinau Islands

We are proposing to extend the current HPA proposal for the Mokohinau Islands. The current HPA proposal only covers Burgess Island, covering 16km of coastline, and the seafloor protection area extends over Fanal Island. The HPA we are proposing will cover both Burgess and Fanal Island, along with the surrounding islands and rocks. This HPA will continue to run along the easy edge of the CPZ. The Mokohinau Islands sit in the centre of the Hauraki Gulf entrance at 160ha of land, and are 100km from Auckland city, making it a location of interest for fishery activities. Smith (2004) identified Mokohinau Islands and Great Barrier Island to have relatively less biodiversity compared to the Poor Knights and Alderman Islands. This supports the importance of a larger HPA covering more variety and number of marine habitats, like the HPA we are proposing. Fanal, Flax, and Trig Islands are nature reserves and wildlife sanctuaries, this means that public landing is prohibited (figure 9). Though this doesn't stop fishing activity and boats around Fanal Island. We believe that by extending the HPA to include all the Mokohinau Islands, you would capture a greater range of biodiversity, as the diversity around this area is already relatively low. As well as restricting fishing activity around these wildlife sanctuaries as they are important for both terrestrial animals, as well as sea bird species. Due to the Mokohinau Islands being non-residential, there is no local iwi using the land for kai moana or cultural reasons. Therefore, placing a larger marine reserve would not affect local iwi and communities, and just limit the distance of recreational fisheries activities. An HPA of this size would also support recreational fishing activities by creating the potential for a greater spill over effect. As the Mokohinau Islands are already heavily fished, due to their proximity to mainland, these ecosystems require added support.

Figure 9

Mokohinau Islands nature and scenic reserves



Caption: from https://www.doc.govt.nz/globalassets/documents/parks-and-recreation/places-to-visit/auckland/mokohinau.pdf

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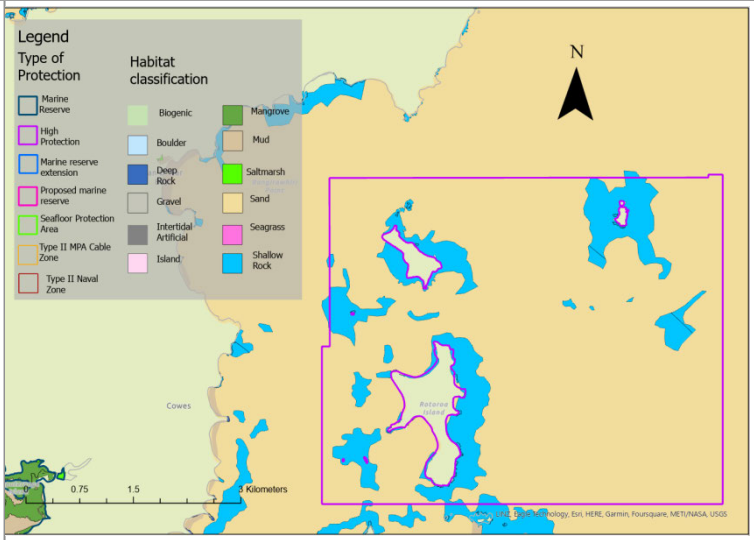
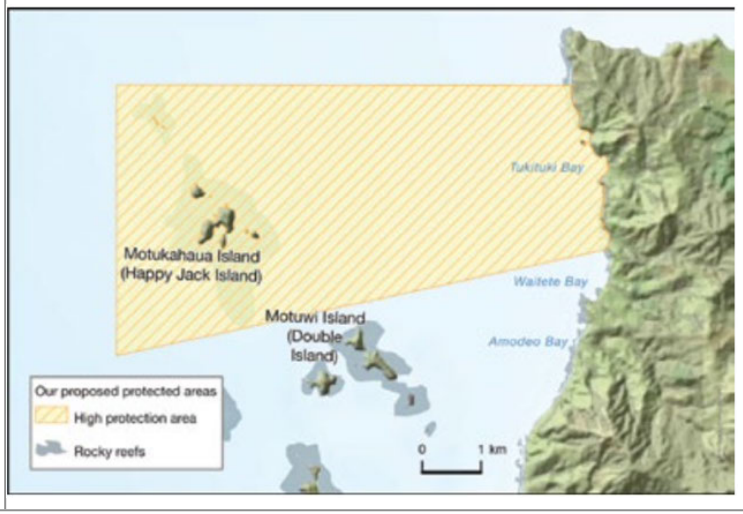
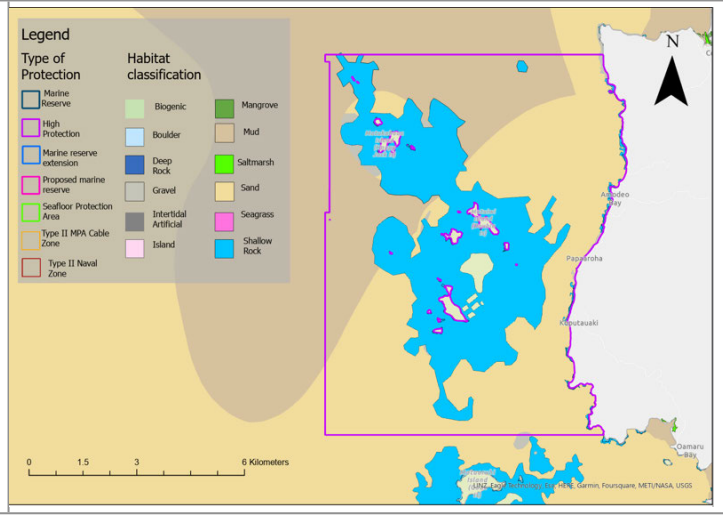
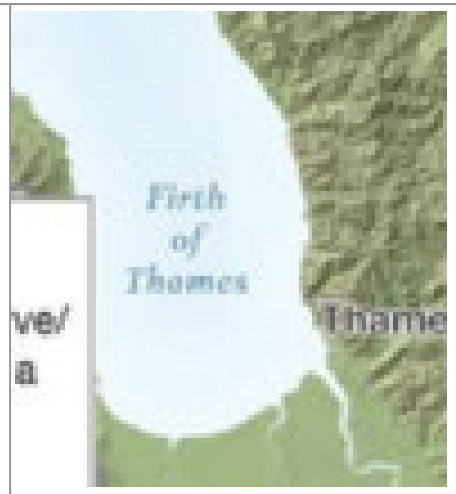
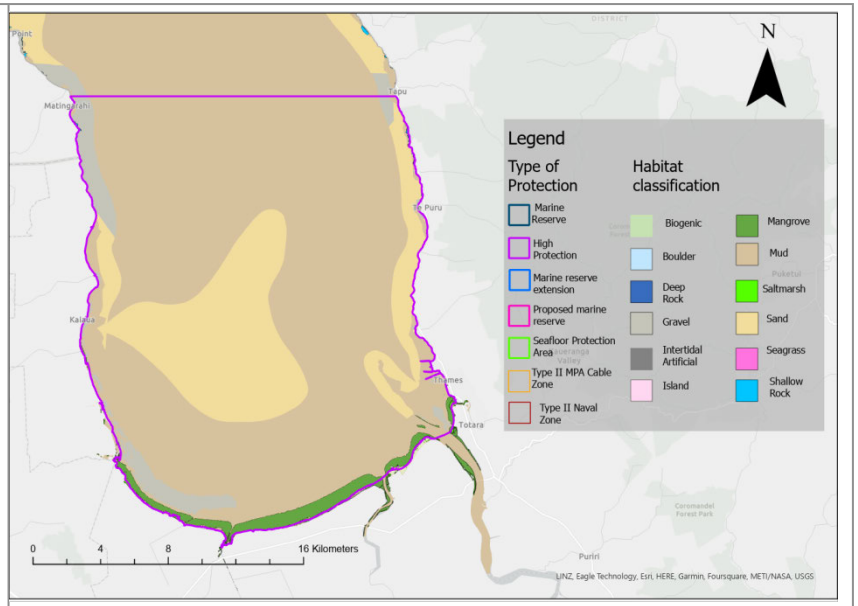
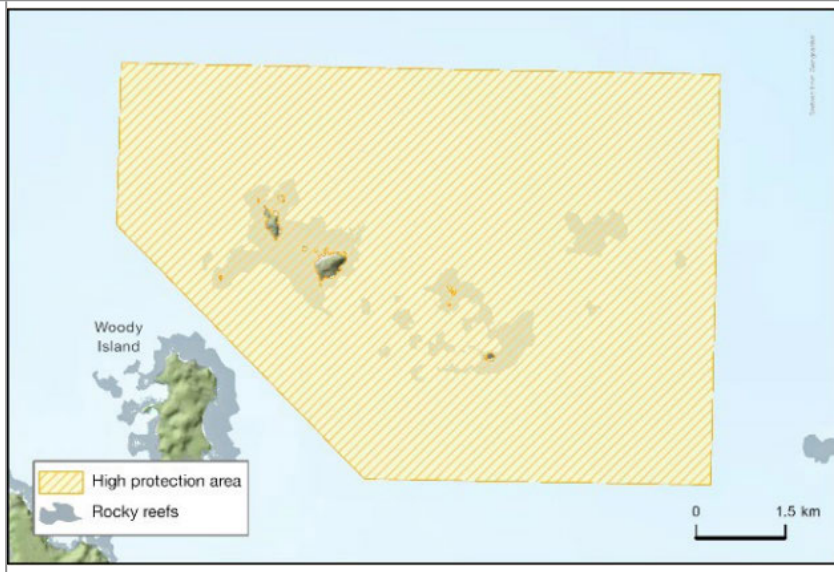
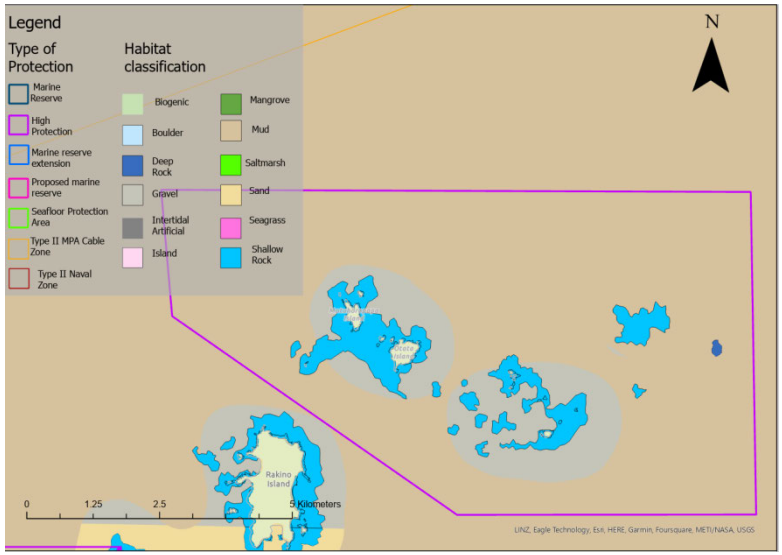
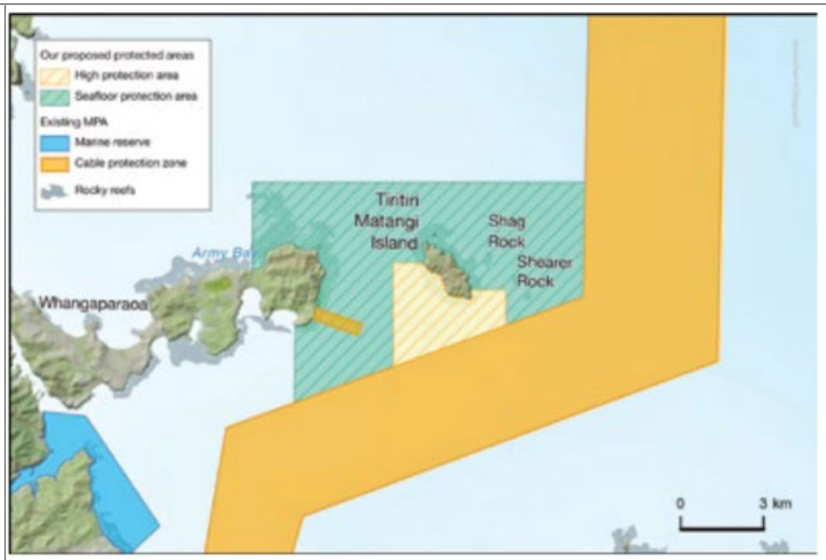
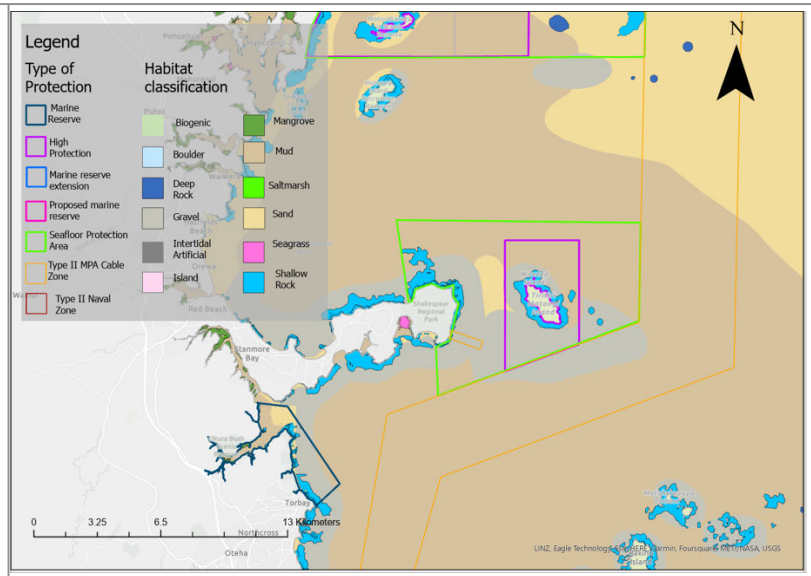
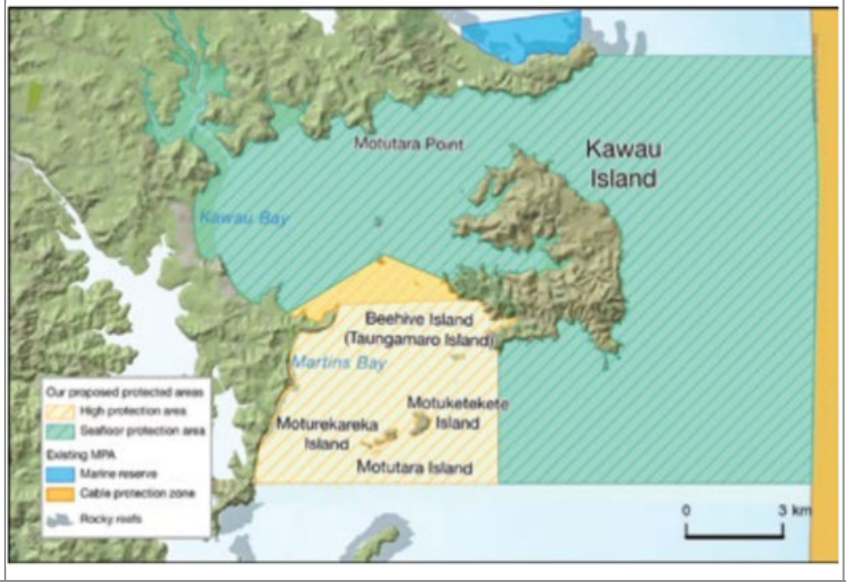
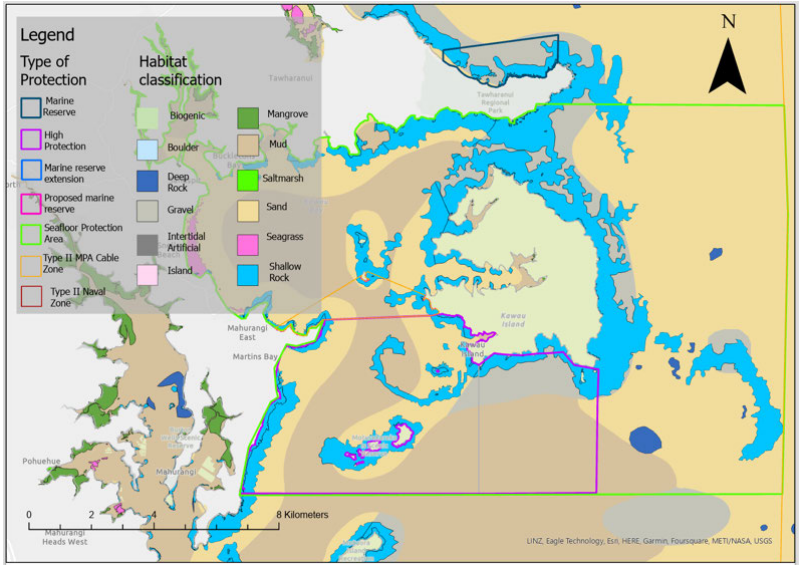
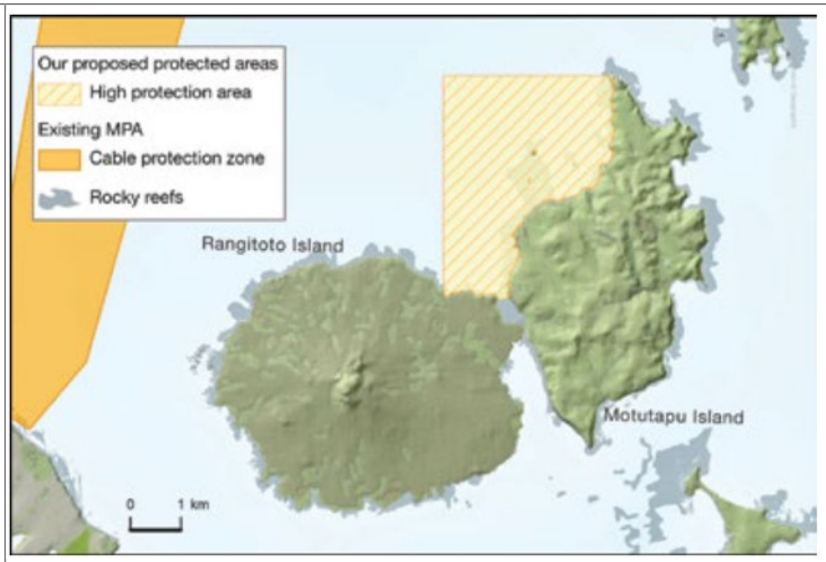
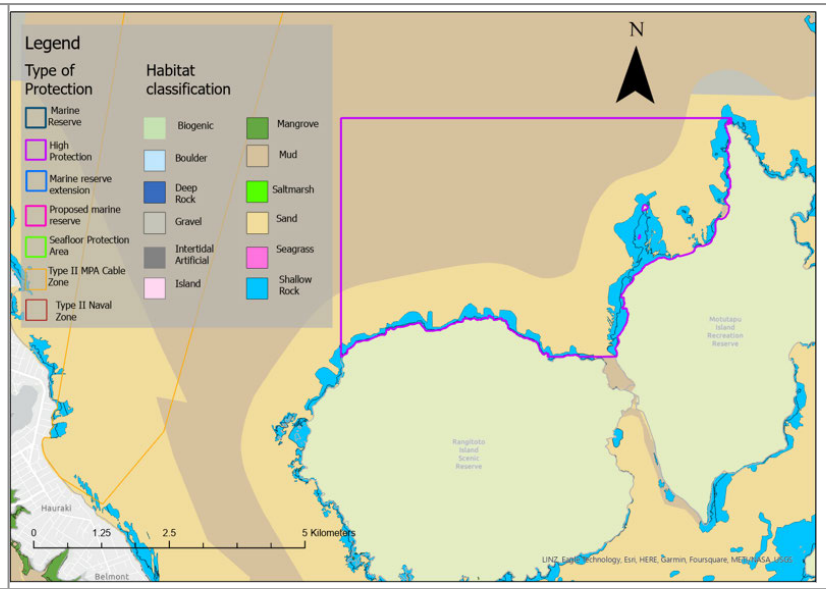
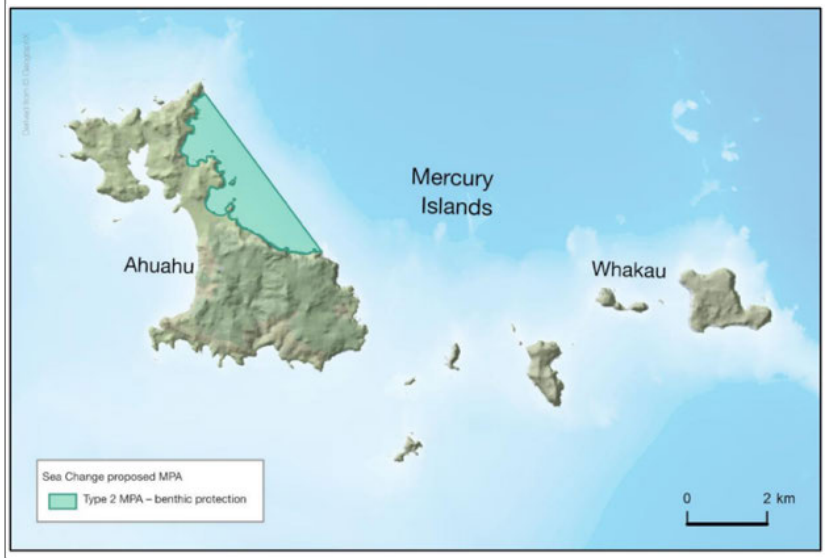
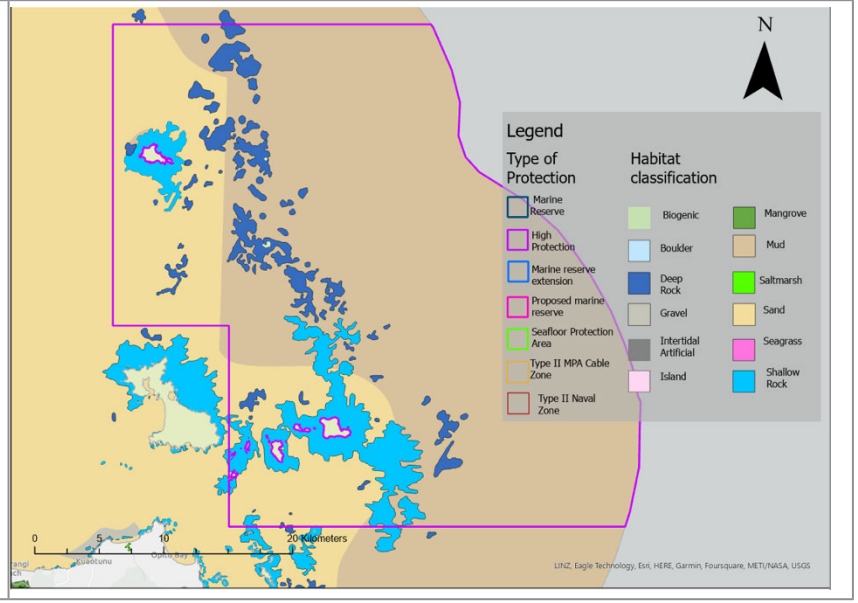
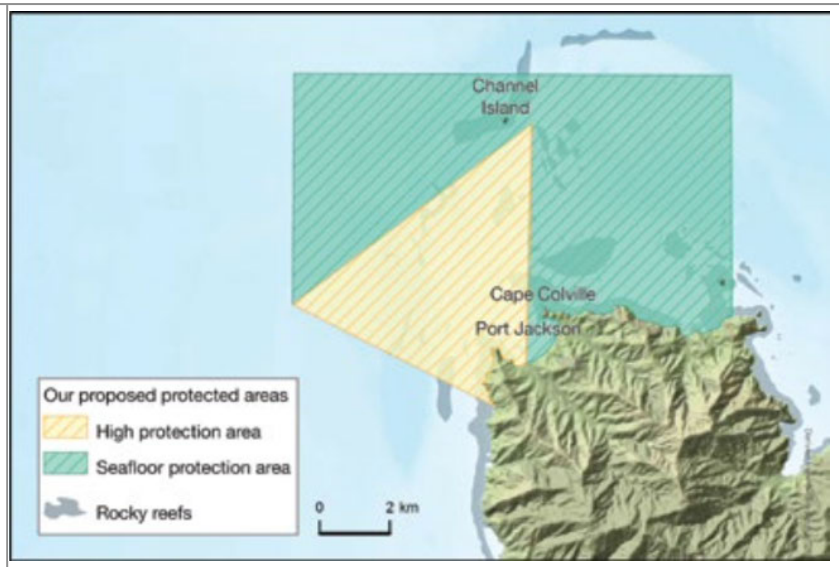
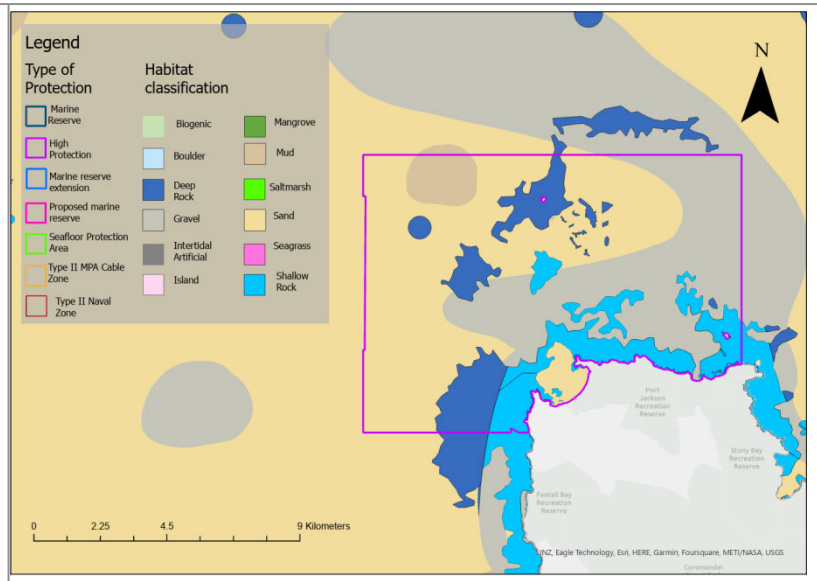
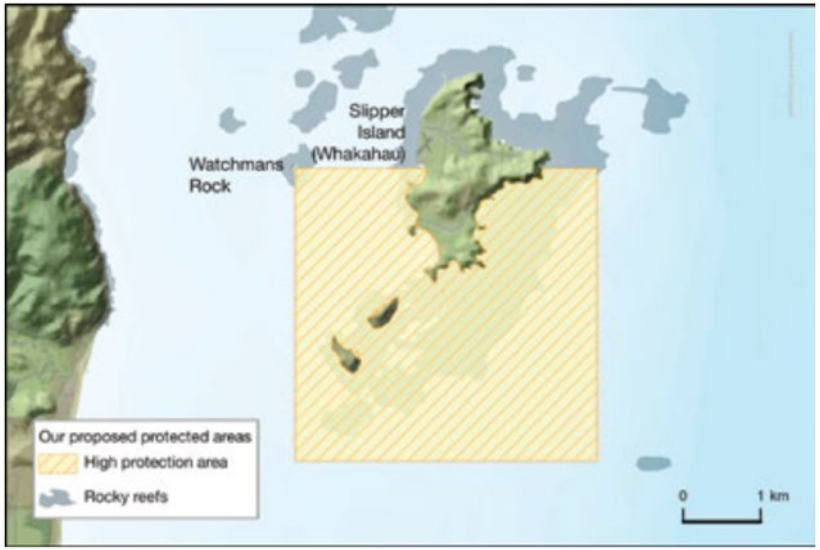
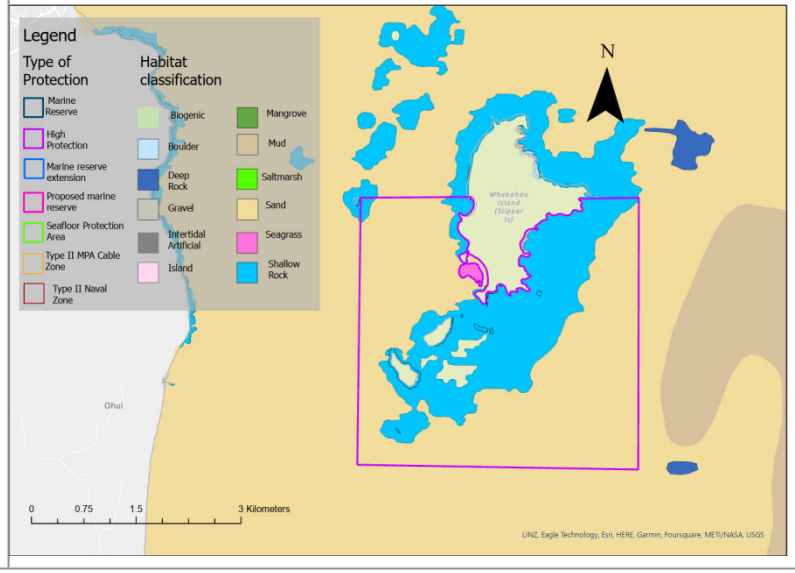
Appendix 1: table of proposed HPA revisions

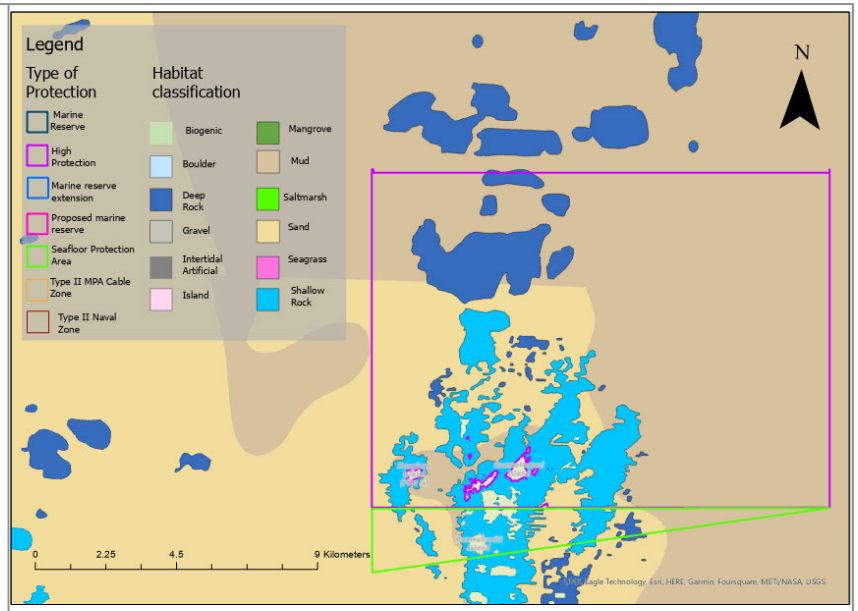
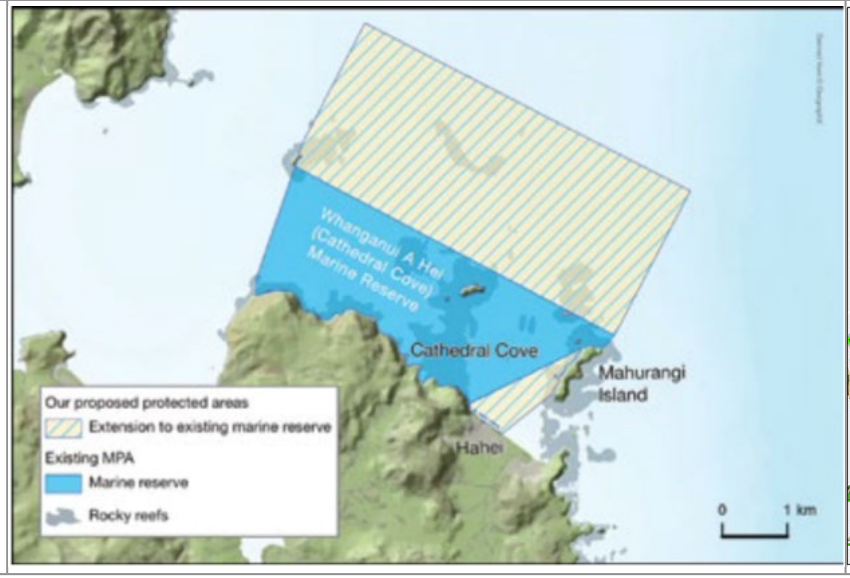
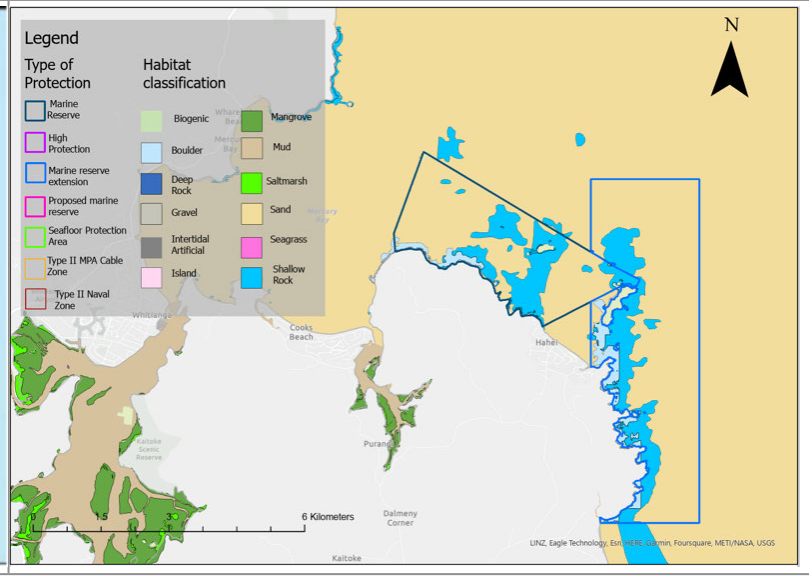
Marine reserve location	RTG proposal	Our proposal
Rotoroa Island		
Motokawao Group		

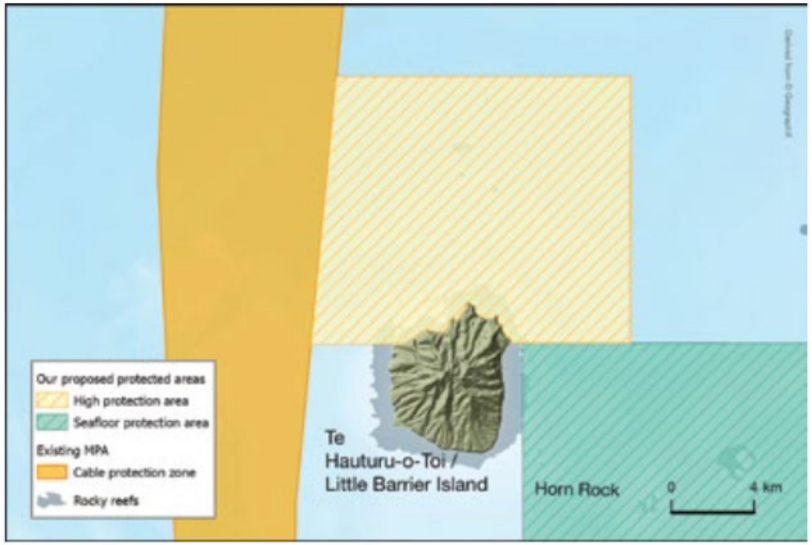
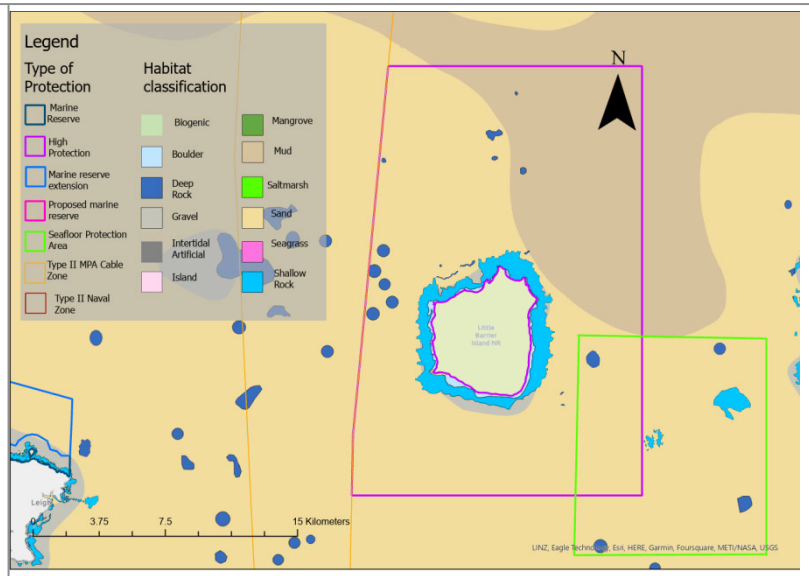
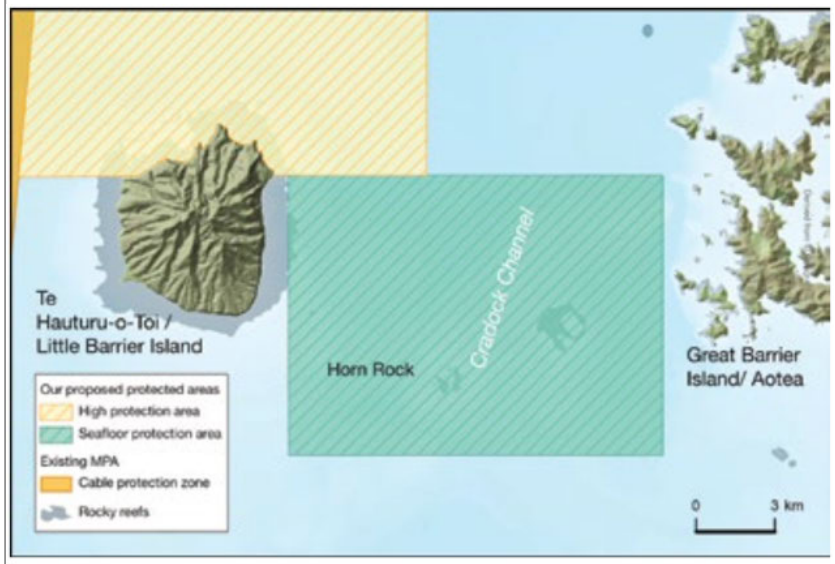
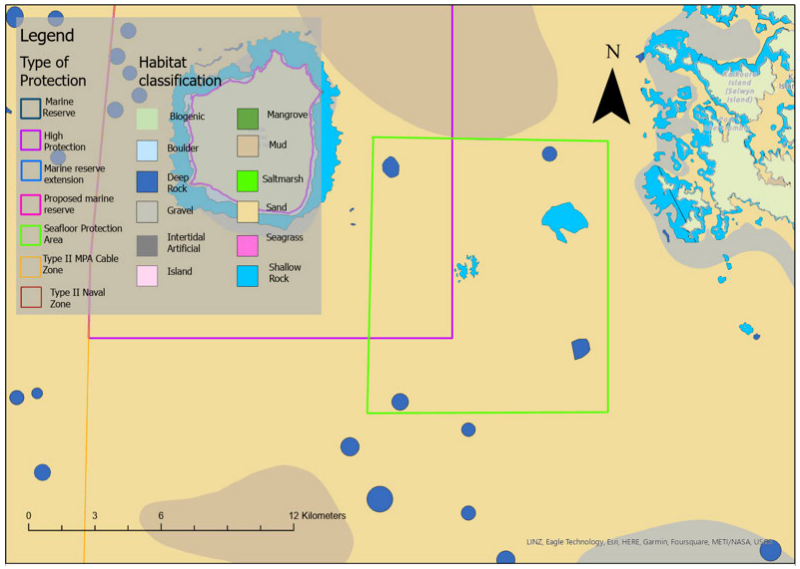
Firth of Thames		
The Noises		

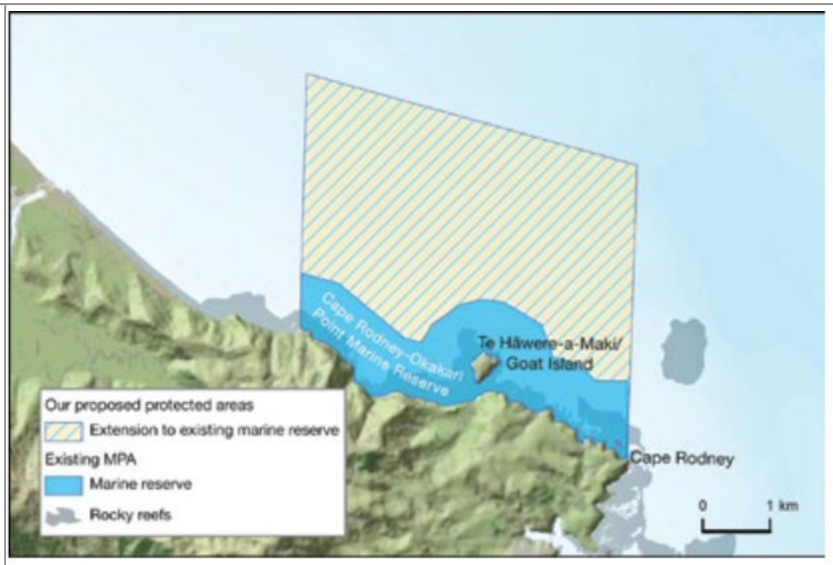
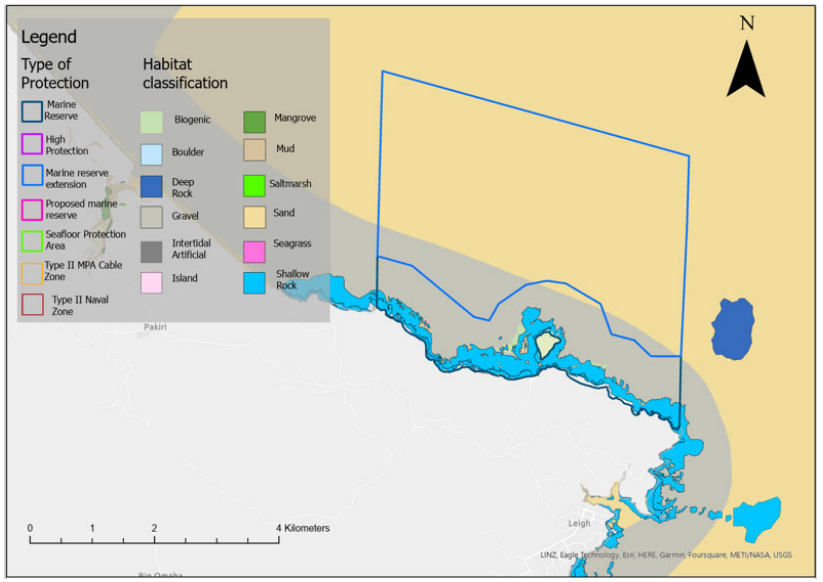
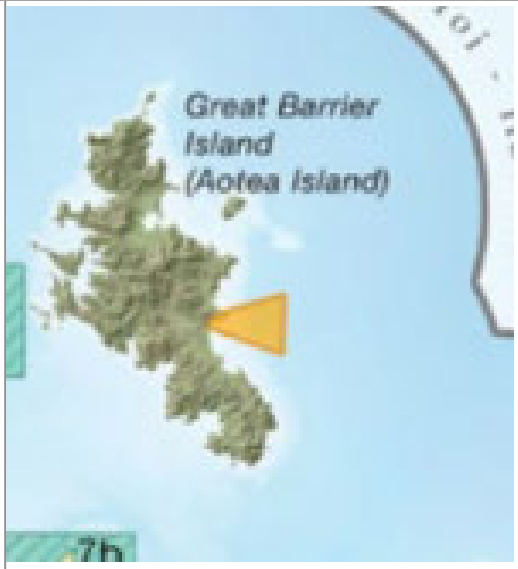
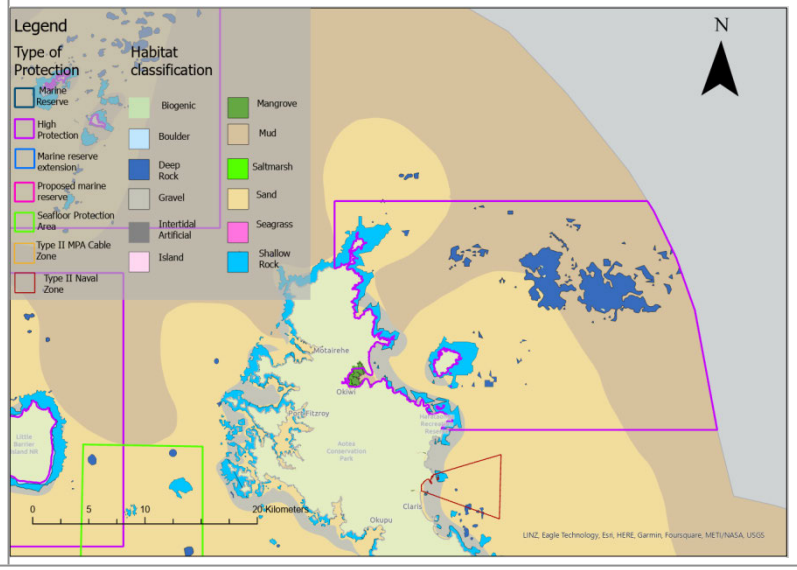
Tiritiri Matangi Island		
Kawau Bay		

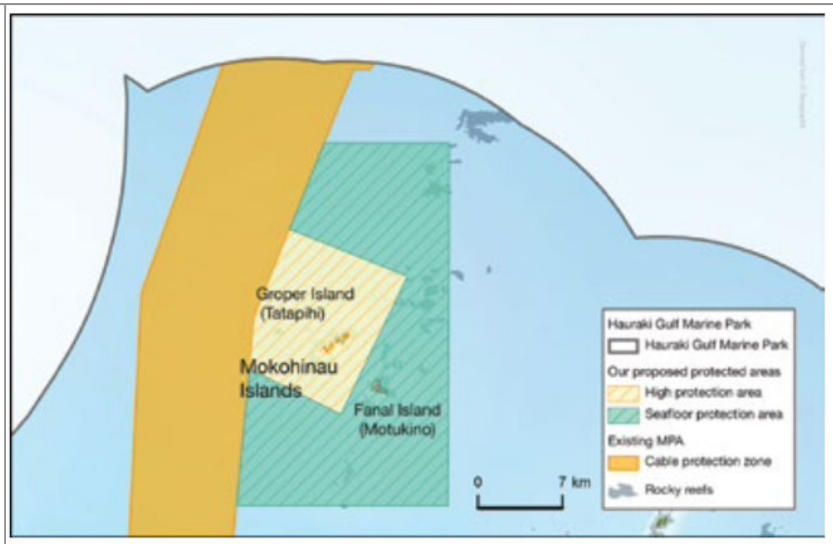
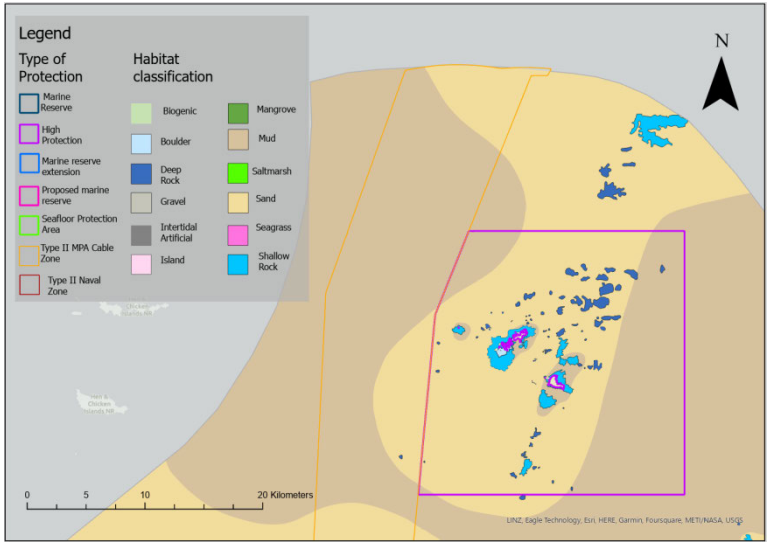
Rangitoto and Motutapu Islands		
Mercury Island Group (From Sea Change Proposals)		

Cape Colville		
Slipper Island		

Alderman Islands		
Whanganui-a-Hei (Cathedral Cove) marine reserve		

Little Barrier Island		
Craddock Channel		

Cape Rodney-Okakari Point (Leigh) marine reserve		
Great Barrier		

Mokohinau Islands		

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:12 pm
To: Sea Change
Subject: Proposal for Hauraki gulf protection

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

To Whom it may Concern
My name is s 9 (2)(a) I am a local business owner, running a bar in s 9 (2)(a) . I am an avid diver and fisherman as well.
As a whole I welcome the proposal of the Marine protection area however I am concerned of moving Goat Island to a Marine Protection area if the much needed enlargement happens. I am worried as a whole about fishing rights remaining in Marine protected areas, reducing the efficiency of them if the local Iwis still have fishing rights. On top of this, if Goat Island has fishing rights given to local Iwi, we will see this jewel that keeps my business going and a jewel I enjoy diving in deteriorate.
I am submitting this to agree with the planned areas of protection, especially the increase of the size of Goat Island. However if this is to work and be respected, everyone including Iwi have to give up rights to fish in these small areas. Otherwise if the Iwi fishing rights are included I cannot see this working or me being able to support this.
Thank you for considering my application
Yours
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:12 pm
To: Sea Change
Subject: Save our Marine Life

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 3:14 pm
To: Sea Change
Subject: Hauraki Gulf Marine protection

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

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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 3:18 pm
To: Sea Change
Subject: Submission: Revitalising the Gulf Marine Protection Proposals
Attachments: DoC RVTG submission final [redacted]-sl.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

To Whom it may concern.

Please find attached my submission.

Kind Regards
s 9 (2)(a)
MBs 9 (2)(a)

To: **Minister of Oceans and Fisheries, Hon David Parker**

Minister of Conservation, Hon Poto Williams

C/- Te Papa Atawhai Department of Conservation

By e-mail seachange@doc.govt.nz

28 October 20202

Re Submission: Revitalising the Gulf Marine Protection Proposals.

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

My family lives at the mouth of the s 9 (2)(a) and we have a strong connection and love for the moana in this area. Over the years I have operated three consecutive charter boats in the HGMP and my father operated a small commercial mooring and diving business for many years in the inner gulf. He also went on to be a commercial inshore long line fishermen (Northland) for many years. My early childhood outside of schooling was spent on the sea in the Hauraki Gulf and Northland. I hold a current commercial launch master's ticket. I have been involved in active and passive restoration initiatives in the gulf involving terrestrial restoration of islands via pest eradication projects involving both fauna and flora species on Waiheke, Rotoroa, Motuora, Kawau, Aotea, Rakino, Motuorea and Motutapu Islands. In recent times I have attended many of the Hauraki Gulf Park Forum meetings as an interested member of the public and welcome the opportunity to give feedback on the governments marine protection proposals and participate in the restoration of our moana.

I support the five proposed Seafloor Protection Areas (SPAs)

The five proposed SPAs are a small step in the right direction to protecting the seafloor within the entire Hauraki Gulf Marine Park.

I strongly support the Hauraki Gulf Forum's policy to remove all industrial bottom trawling, Danish seining and scallop dredging harvest techniques from the entire Hauraki Gulf Marine Park.

I 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[1]

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

- Prevent the ocean from sinking carbon[2]

[1] https://www.mpi.govt.nz/dmsdocument/51472-Aquatic-Environment-and-Biodiversity-Annual-Review-AEBAR-2021-A-summary-of-environmental-interactions-between-the-seafood-sector-and-the-aquatic-environment

[2] https://www.nature.com/articles/s41586-021-03371-z

- Choke sessile filter feeding animals
- Smother photosynthesising plants[3,4]

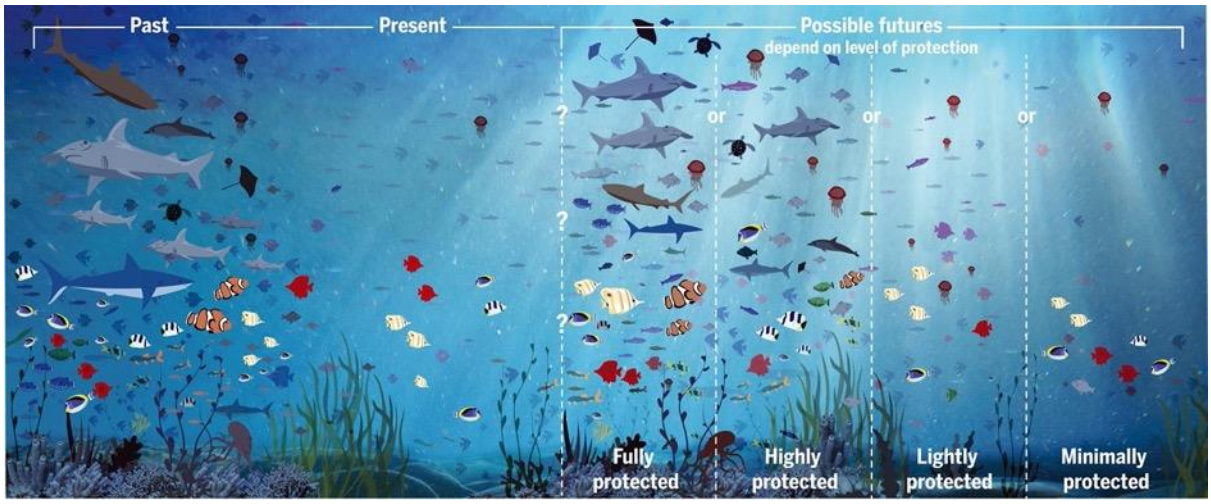
It is extremely important that any legislation used to create the current 5 SPAs enables future extensions (urgently) to cover the entire seafloor of the marine park.

Please note that 84% of respondents to a Horizon Research poll 2021[5] want to ban all bottom impact fishing from the Hauraki Marine Gulf Park. This needs to be achieved as soon as possible.

Why I support the 12 proposed High Protection Areas (HPAs)

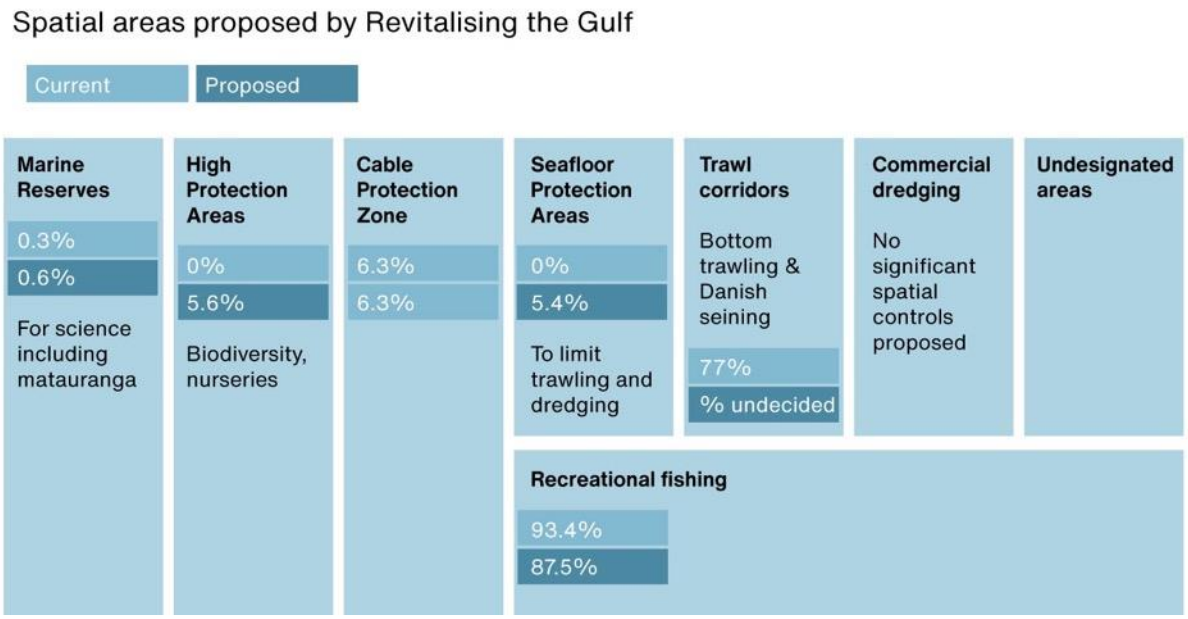
I was very pleased to see that *"active habitat restoration initiatives, such as the removal or addition of marine life (translocation) to improve habitats of interest."* Has been included in the HPA proposals. Active habitat restoration is likely to be an increasingly important tool to help combat biodiversity decline and needs to be allowed to be innovative, flexible and move at speed.

Although the biodiversity benefits of these HPAs have not been tried in Aotearoa / New Zealand I support the mechanism. It is important we act as quickly as possible to protect areas of the moana and if HPA's can provide meaningful biodiversity protection then I support this initiative.



https://www.science.org/doi/abs/10.1126/science.abf0861

[3] https://www.sciencedirect.com/science/article/abs/pii/S0924796315002328?via%3Dihub
[4] https://www.jstor.org/stable/2989840
[5] https://gulfjournal.org.nz/2021/11/results-of-hauraki-gulf-poll/



As you can see from the table above the current size of the HPAs are minimal. They are not big enough to fulfil the 30% protection target sought by the Hauraki Gulf Forum and the United Nations Convention on Biological Diversity (30x30).

Using the No anchoring and fishing areas helps lift the percentage of protected areas however using cable areas to show an increase in MPA's is not in line with the ICCA recommendations for marine protection. The current cable areas would need to change to the HPA or SPA protection status to be included in Gulf MPA network.

The Gulf MPA network needs to be much more ambitious and work hand in hand with the Fisheries Management Plan to restore abundance.

We are yet to see the Fisheries Management Plan which is unfortunate as this needs to be reviewed in conjunction with the proposed HPA's and SPA's. Both documents will need to be in alignment to achieve the end goal of a revitalised Gulf.

There should be more clarity on SPA prohibitions, for example, vessel anchoring?, other long line anchors? jig fishing? stray lining? ledger rigs? etc. This needs to be clearly defined as it will have a big impact on how well the SPA's will perform as a tool in revitalising the HGMP.

Please note that 77% of respondents to a Horizon Research poll 2021[6] want 30% of the Gulf in marine protected areas. 72% of the recreational fishers polled also supported the 30% target.

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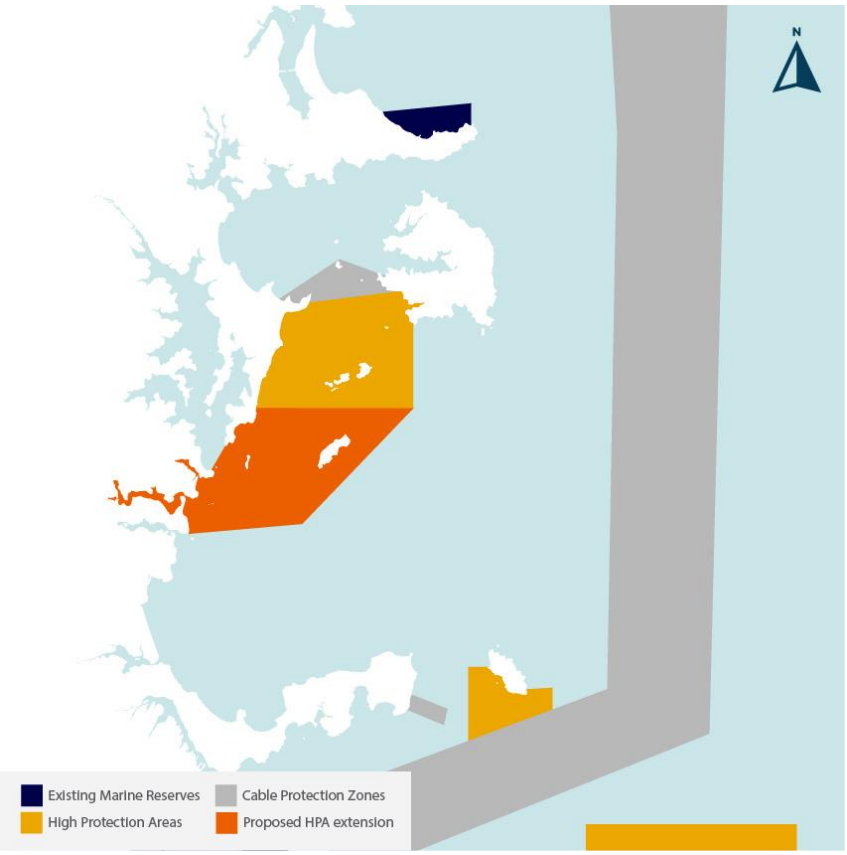
[6] https://gulfjournal.org.nz/2021/11/results-of-hauraki-gulf-poll/

Recommended Extensions to the HPA 10a

Extend the Kawau Bay HPA



I recommend that the proposed HPA 10a be extended to include Mahurangi East, Mahurangi West, Te Muri, Wenderholm regional parks, Te Haupa and Motuora Island.

The four regional parks in this area have dedicated many years of hard mahi and money in restoring these terrestrial areas. It does not make sense, nor is it in line with the current ecological strategy within the Auckland council ("*This is to establish a naturally protected sequence of ecosystems that run ki uta ki tai from ridgelines to the coast" Auckland Council regional parks management plan 2022)* to have the adjoining park land protected and being restored but not the moana.

I note in the Auckland Councils Regional Parks Mgmt Plan 2022.

https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/topic-based-plans-strategies/parks-sports-outdoor-plans/regional-parks-management-plans/Documents/regional-parks-management-plan-2022.pdf

references page 69-76.

"The council will investigate opportunities for enhanced protection when submitting on proposed marine protected areas, as part of a broader approach to ensuring marine protection outcomes. It advocates for higher levels of marine protection in areas adjacent to land that it is managing as

terrestrial sanctuaries. This is to establish a naturally protected sequence of ecosystems that run ki uta ki tai from ridgelines to the coast.

Regional parks are important for people to access the coast and marine areas for recreation, including fishing and collecting kai moana. Some parts of the regional parks network also have high investment from the community in protection and biodiversity enhancement. That is why in these areas, specifically at Tāwharanui and Shakespear where seafloor protection is proposed in the adjacent marine environment, the council believes a greater level of marine protection would be desirable. "

"*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."*

Whilst the Council's strategy in the management plan is to "particularly" link marine protection areas to adjoining main land sanctuaries Tāwharanui and Shakespear is positive, these areas are too small on their own and do not alleviate the severe pressure that the remaining regional parks marine coastline is under from current over harvesting practices.

The kia moana food basket is finite and declining whilst the pressure on the parks and moana is increasing (It is forecast that we will have 2.8m people living with in the Auckland Region by 2030). The regional park network along with DoC managed reserves provide the strongest and quickest opportunity for mountain-to-sea protection and restoration. It will contribute to helping us achieve the 30% protection target sought by the Hauraki Gulf Forum and the United Nations Convention on Biological Diversity (30x30).

Given the short time we have for the submission process I have only been able to have preliminary discussions with the CEO of Ngati Manuhiri Settlement Trust, Nicola MacDonald. Ngāti Manuhiri are the mana whenua for this rohe. In the discussions, Nicola was supportive of the proposal to extend the 10a HPA zone to include the Auckland Council regional parks coastal areas, extending out into the moana, to include Te Haupa and Motuora Island.

The proposed extension of this HPA is in line with a large-scale restoration strategy that Ngāti Manuhiri are implementing, initially in Mahurangi East. They are targeting to plant over 250,000 native plants and install 45km of fencing along this coast to improve the ngahere and mauri ora of the rohe. The programme is well under way with over 80,000 plants planted to date and 5km of fencing completed. The project includes waterway protection, stock exclusion and erosion control. The project partners with Auckland Council and includes multiple community planting days and private landowner involvement.

Having the HPA extended to include these areas will help support this important Kaupapa and ties in with Ngāti Manuhiri kaitiakitanga of the whenua and moana.

Obviously much more consultation would be needed to finalise HPA boundaries and Ngāti Manuhiri's position but the opportunity to align the kaupapa is immense.

I spoke to the Chairman of the Motuora Island Restoration Society, John Stewart. John was supportive of the extension to the 10a HPA zone to include the Auckland Council Region Parks coastal areas and extending the boundaries to include Te Haupa and Motuora Island. The Motuora Restoration Society are doing amazing work to help restore the ngahere and mauri ora of this very special island and once again it makes sense that the moana is protected too.

The Motuora Restoration Society are providing their own submission which will outline their thinking in more detail.

Estuaries need protection

At the moment none of the proposed HPA's or SPA's include estuary environments. It is scientifically documented that estuaries and salt marshes are highly critical in the healthy ecology of the moana. If HPA 10a is extended to include Wenderholm Regional Park and Te Muri Regional Park then at least two estuaries will be included in the MPA network. Both estuaries are predominantly surrounded by regional park land and are still pristine in today's standards. Currently only two small boats are permanently moored near the mouth of the Wenderholm Estuary so minimal antifouling contamination currently occurs. As noted previously Roger Grace identified these two estuaries as worthy sites for a MPA in 2014. Mussel beds use to be prominent at the mouth of the Puhoi river but have disappeared due to overharvesting. Mullet, Flounder, Juvenile Snapper, Kahawai, King Fish are still sighted in these estuaries as with many of our rare and endangered coastal birds such as Brown Teal, Dotterel, Variable Oystercatcher, Caspian Tern, Yellowed Eye Shag, Pacific Reef heron. Shearwater in their hundreds raft up in front of Te Muri and Wenderholm coastal moana in April prior to migrating north.

Please note Roger Grace proposed a marine reserve in 2014 (Wenderholm & Te Muri Regional Park)

This reserve is adjacent to three Regional Parks – Wenderholm, Mahurangi West, and the newly acquired Te Muri. There is no road access to Te Muri. Two estuaries are included – Puhoi River and the much smaller Te Muri estuary, both supporting appropriate quantities of mangroves and salt marsh habitat. The shoreline is moderately sheltered sand stone and mudstone strata. Shallow reefs drop to muddy fine sand close to shore, though there is the isolated Brazier Rock exposed off Wenderholm with extensive submerged rock reef. At the north the entrance to Mahurangi Harbour probably supports horse mussel beds important for juvenile fish. Two sandy beaches are included. Wenderholm is one of the most popular Auckland Regional Parks. Mid-north Forest and Bird was interested in a marine reserve in this general area about 15 years ago.

Roger's observations above still stand today though decline in the marine environment continues while we grapple with how to protect the moana.

Thousands of people visit these parks and islands and enjoy the conservation values that have made these reserves what they are today. A significant increase in the size of the HPA would:

- Align with Mana Whenua's aspirations and strategy for the rohe.
- The area was known for its abundance of kiamoana and was a kohanga for mangopare and ika. Increased protection will ensure fisheries sustainability and will improve the mauri of the rohe moana.
- Provide the only estuaries protected by an HPA in any of the current HPA proposed sites. It is well acknowledged how important estuaries and salt marshes are in the ecology and health of the moana.
- Reduce severe harvesting pressure on the coastal waters of the regional parks and islands.
- Support volunteer efforts to actively restore seabird colonies on the mainland and islands.
- Increase ecotourism and education opportunities for all interested parties.
- 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 boundaries.
- Better fit with the restoration ethos that has flourished within the regional parks and on the islands.
- Reduce ecotourism pressure on existing marine reserves like the one at Leigh.
- Be part of the blue highway outlined in the Sea Change 2017 marine spatial plan.
- Add scale to the current MPA's proposed.
- Extend nearby mussel restoration activity. There was a historic bed near the mouth of the estuary.

Actively restored kūtai / green-lipped mussel bed. Photo by Shaun Lee.

Enforcement

With Auckland growing quickly and with the implementation of new MPA's it is going to be critical that education and protection of the MPA's and Fisheries Management Plan is strongly supported. I support examples like Ngāti Manuhiri taking a proactive approach in providing the education and protection role and hope this can expand alongside the existing government agencies responsible for this mahi.

In Summary

The whole HGMP needs seafloor protection. We have seen local extinction of Scallops in the HGMP, Crayfish are functionally extinct in the HGMP, soft-sediment Green-lipped mussels have gone, Kelp forests are rapidly diminishing and many of our seabirds and marine species are at risk or in decline. Climate change is happening in front of our eyes, the moana needs **RESILIENCE** , over harvesting and destructive fishing methods need to stop. It's time to think big and urgently change the game.

There is no place for bottom trawling, Danish seining or dredging in the HGMP.

The whole HGMP needs to be one SPA.

Increase the size of the MPA mechanisms to help achieve the 30% protection target sought by the Hauraki Gulf Forum and the United Nations Convention on Biological Diversity (30x30).

Where possible use Regional Parks and DoC administered Islands as coastal boundaries for MPA's.

Protect estuaries and salt marshes.

The Fisheries Management Plan will need to be in sync with the new MPA's to achieve the end goal of a revitalised, resilient gulf.

Work in partnership with Mana Whenua to align with Mana Whenua's aspirations and strategy for their rohe. Collectively carry out education, monitoring and protection of the MPA's.

Nga Mihi Nuhi

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 3:24 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) [redacted]
Sent: Friday, 28 October 2022 3:33 pm
To: Sea Change
Subject: Help revitalise the 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.

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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) [redacted]

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:35 pm
To: Sea Change
Cc: s 9 (2)(a)
Subject: Submission on the proposed Hauraki Gulf Marine Protection plan

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Hello

I have always participated in water-based activities both on, in and under the water and am very concerned about the deteriorating state of the marine life in our beautiful Hauraki Gulf

I fully support any legislation that stops all bottom contact fishing

I support customary rights to fish but am concerned that allowing this to continue in the proposed HPAs whilst excluding other recreational fishers is a devise move that could lead to confrontations. It goes against the 'we are one' that is being promoted by the NZ Government.

Thank you

s 9 (2)(a)
Resident of the s 9 (2)(a)

Sea Change

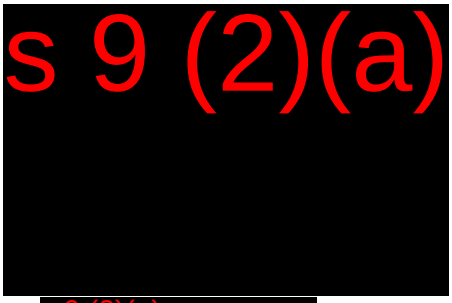
From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:36 pm
To: Sea Change
Subject: Revitalising the Gulf: Marine protection proposals

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

I strongly support all of the proposals to improve protection of the environment in the Hauraki Gulf.
I would consider these not even the bare minimum of what should be done, but am thankful for any protection.
I have a degree in Marine Biology from Auckland University, and spend a large amount of time in and on the ocean, swimming, surfing and snorkelling.
I am a strong advocate of look, don't take.
The scientific reports on the Leigh Marine Reserve show very clearly it needs the extension in size in order to function properly in the face of continual and increasing pressure from fishing on its boundaries.
I'm sure the same applies to the Whanganui-A-Hei reserve and these changes should made without hesitation.
I'm shocked and disappointed the Tawharanui marine reserve is not also getting an extension as, again, the science clearly shows it suffers under fishing pressure and needs to be bigger.
I would love to see an extension to the Tawharanui marine reserve included in the proposal and consider it vital to the kaupapa and mauri of that reserve.
I'm excited to see the proposed HPAs and SPAs, but they are still a minimal response to a massive problem.
However, I'll take whatever is going and continue to fight for more protection.
Well done on at least getting this far and please please please pass all of the proposals promptly.

Regards,
s 9 (2)(a)



s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:42 pm
To: Sea Change

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 3:45 pm
To: Sea Change
Cc: Alison Aldred
Subject: Submission on "Marine protection proposals for Revitalising the Hauraki Gulf"
Attachments: signature.asc

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Tēnā koutou katoa

I am making this submission on behalf of myself and my partner. Our contact details are:

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

We support these proposals for the following reasons.

As sailors and recreational fishers we are fortunate to be able to visit the Hauraki Gulf several times a year. My Scottish forbears were also commercial fishing folks.

Our family history tracks how inshore fishing from the North East of Scotland collapsed rapidly in the late 1800s thanks to overfishing by a huge influx of fishing vessels from across the North Sea and the advent of trawler fishing. New Zealand faces similar challenges 220 years later judging by our own anecdotal observations and the evidence presented in DOC's accompanying literature.

Over the 30 plus years we have been fortunate enough live in New Zealand we have observed the degradation in the quality of natural resources both on land and in our seas. Marine reserves and MPAs offered the hope of some protection for these resources and the hope of a more sustainable commercial fishing industry in the long term. But the concept has been applied in such a light handed and limited manner that the positive impact of such reserves has been very localised and extremely limited.

Whilst we believe the areas designated for protection are of high importance we also believe further protection and action is required. This extension of protection should take place after the current proposals are adopted as further delay in protecting the areas identified on your report would be devastating.

In making this submission we also recognise the customary rights of mana whenua and the outcomes of DOC's consultation with the relevant Māori parties.

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 3:45 pm
To: Sea Change; seachange@mpi.govt.nz
Subject: Hauraki Gulf Management Plan

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Can we please stop bottom trawling and sand mining in the Hauraki Gulf. Both activities destroy the marine environment and are simply not sustainable.

Frankly I am shocked that these activities are even considered acceptable in 2022
Regards
s 9 (2)(a)
s 9 (2)(a)

Sea Change

From: s 9 (2)(a) s 9 (2)(a) on behalf of s 9 (2)(a) s 9 (2)(a)
Sent: Friday, 28 October 2022 3:46 pm
To: Sea Change
Cc: s 9 (2)(a)
Subject: Feedback on Hauraki Gulf Proposed Protection Zones
Attachments: POAL Submission re Seachange Marine Protection .pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Recorded

Please see attached submission on behalf of the Ports of Auckland Limited.

Regards
s 9 (2)(a)

s 9 (2)(a)
General Manager Infrastructure
& Property

M: s 9 (2)(a)
W: www.poal.co.nz

28 October 2022

By email:
seachange@doc.govt.nz

RE: Submission on the Proposed Protection Zones Designed to Revitalise the Hauraki Gulf

Introduction

Ports of Auckland is located on the Waitematā harbour within the Hauraki Gulf. Ships pass through the Hauraki Gulf to access to the port.

The Port is a facilitator of trade in the supply chain. It provides significant economic infrastructure, which facilitates international trade for both producers and consumers within the economy and specifically Auckland. The Port's activities generate four key economic benefits:

a) direct benefits such as jobs and income through operation of the Port;
b) indirect benefits through employment and operations of commercial activities that rely on the Port such as importers and exporters;
c) benefits through income generated by employees of the Port and direct industries being spent in the economy; and
d) catalytic benefits through the Port's role as a driver of productivity growth and attractor of new firms into the economy.

The Port of Auckland is New Zealand's largest import port and second-largest port overall.

Research indicates that the Auckland market continues to be the largest source of import demand in New Zealand, with 70% of the imports that pass through the Port bound for the Auckland market.

It is estimated that the Port adds between $1.4 – $1.6 billion to the New Zealand economy each year.

To work effectively, the Port relies on having suitable land and sea links, with the key sea link being Auckland's shipping channel (the Waitematā Navigation Channel) and the berths at the Port. Efficient function requires that both the Channel and berths are capable of safely accommodating the vessels calling at the Port. POAL undertakes regular dredging of the port and channel to maintain safe navigable depths and to also accommodate larger vessels.

POAL must also respond to the global trend of increased container ship size. As the size of freight and cruise vessels has increased over time, the channel and ship berths have been dredged to safely accommodate them.

POAL is conscious of the state of the Hauraki Gulf and was an active member of the stakeholders working group that developed Sea Change Tai Timu Tai Pari Hauraki Gulf Marine Spatial Plan. POAL is also actively involved in other initiatives to enhance the Gulf, including:

- facilitation of the voluntary speed limit for ships transiting the Hauraki Gulf designed to protect Brydes whales
- an ongoing program of harbour health initiatives (in support of Seachange), designed to encourage biodiversity within the port and to assist with both natural and planned restoration efforts of adjacent areas of the lower Waitematā Harbour and inner Hauraki Gulf.

Submission

Ports of Auckland appreciates being able to submit on the Marine Protection proposals that have been developed from the **Revitalising the Gulf: Government action on the Sea Change Plan**. We are now some five years from the release of the Seachange Marine Spatial Plan in 2017 (Seachange 2017). The Plan outlines the pressures and stressors on the Hauraki Gulf Marine Park (HGMP) ranging from historical activities to growing regional population. Many of the significant changes that we have seen in the Hauraki Gulf date back to early in the 20th century but the significance of those changes were not recognised until more recently.

Much of the public awareness of the state of the Hauraki Gulf has been a result of the work of the Auckland Council / Hauraki Gulf Forum State of the Gulf reports and from the day-to-day experiences those who interact with the waters of the Gulf. Much of the negative change that has been identified and discussed has occurred because of human activity but not all. Seabird populations have changed significantly over time, but for some species much, if not all, the change has had natural origins.

One of the biggest issues associated with the implementation of Seachange is time. It's been 32 years since the Hauraki Gulf Marine Park was established and it is now nearly 10 years since Auckland Council initiated work on Seachange. Some of the timeframes identified by Seachange (2017) have passed (e.g., "Systematically identify by 2018 and protect by 2020 representative and ecologically important marine habitats throughout the Hauraki Gulf Marine Park etc.").

The Sea Change Tai Timu Tai Pari Ministerial Advisory Group (MAC 2020) reflected on the length of time it takes to undertake tasks. POAL considers that time needs to be considered as a key element in the process moving forward, especially as it relates to developing milestones and reporting. It is also important that the reality of timelines is considered so that the public understands what and when objectives may be met in-part or fully. Examples of such objectives in Seachange (2017) include:

"Halt any further decline in biodiversity within the Hauraki Gulf Marine Park by 2025"

"Understand seabird foraging habits (especially during their breeding seasons) and ensure that there is adequate food supply for Seabirds in the Hauraki Gulf Marine Park by 2025".

"Establish a baseline and achieve measurable improvements in the overall ecosystem health of the Hauraki Gulf Marine Park by 2025"

"Significantly increase the productivity of the Hauraki Gulf Marine Park by 2035"

Complexity of reversing changes

Seachange recognised that the changes that have occurred in the Hauraki Gulf are complex and manifest in nearly all aspects of the Gulf environment. By inference, the responses required to mitigate the environmental and ecological changes (especially fisheries and key habitats) that have occurred are complex and the responses can't be considered in isolation from each other. Seachange (2021)

recognised that “an integrated package of actions addressing the pressures on the Gulf was required to ensure outcomes”.

MPAs

MPAs have multiple roles and there are difficulties in assessing their contributions to ecological and other benefits, especially outside their boundaries. Theme 6 - biodiversity in Seachange (2017), described how biodiverse the HGMP is and how a number of key elements of the complex environment have been impacted. The plan identified that Marine Protected Areas have a role to play in protecting biodiversity within the Gulf., although it is crucial that MPA’s do not compromise the ability of ships to safely navigate the Hauraki Gulf. It is also critical for the Port to be able to undertake activities that enables this safe navigation such as dredging in designated navigation channels and in the port etc.

The Plan proposed providing additional protection through two types of MPA. These are Type 1 MPAs (or High protection areas – HPAs) and “seafloor protection areas”. Seachange (2021) discusses the MPA terminology (page 60, note 22). MPAs are defined as areas of biological diversity (Department of Conservation, and Ministry of Fisheries (DoC FNZ) 2005, Grorud-Colvert et al. 2021). Based on MPA hierarchy, DoC FNZ (2005) note that “an MPA could protect benthic habitat from bottom impacting fishing methods while allowing use to continue higher in the water column” (i.e., a benthic protection area).

Recommendation: It is somewhat disappointing that the consultation document does not include a preferred pathway for the designation of MPA’s. Given this, POAL recommends that for ease of understanding and acceptance amongst all parties, all MPAs selected as part of the Seachange process are protected through the Marine Reserves Act. Further, to ensure designation of MPAs occurs promptly, the legal method of incorporating the MPAs within the HGMP area should be resolved as soon as possible, preferably by the end of 2023.

The two types of MPA provided in the proposal include “full protection” (Type 1) and benthic protection areas (Type 2) that exclude activities that directly impact the seabed. Type 2 areas may provide buffer for Type 1 MPAs in some settings.

The Seachange MPA proposals have been assessed by Lundquist et al. (2020), DoC FNZ (2021) and Tablada et al. (2022). The MPA biodiversity benefits have been assessed based on existing available ecological data. Although that data is extensive and has rapidly improved in recent years it is still incomplete.

Recommendation: That a formal integrated work program on biodiversity in the Hauraki Gulf continue at such a level that ensures that the best decisions are made in the future in relation to the needs of the MPA network.

Recommendation: That a date (e.g., 2030) be set for a further review of the MPA network in the HGMP to ensure that the MPA network is meeting the biodiversity protection needs of the Marine Park and to ensure that commercial shipping routes and navigation channels are appropriately provided for.

Department of Conservation, and Ministry of Fisheries (2021), undertook a systematic evaluation of the Seachange MPA proposals. In Part 2 (page 131 of that report) it was concluded that the “seafloor” protection areas would not be considered MPAs due to “remaining recreational and commercial extractive use”. However, this appears somewhat contradictory as bottom protection areas would not

by definition allow 'extractive uses'. They would also allow safe navigation. It is therefore our view that "bottom protection" includes limiting fishing techniques that impact bottom dwelling fish species and as such should meet the MPA definition in DoC FNZ (2005). Resolving this matter has a bearing on the functionality of the proposed MPAs.

Traditional marine reserves ideally need buffer areas to minimise edge effects from activities along their boundaries. To large extent, the proposed bottom protection areas would provide this role.

Overall, the proposed MPAs certainly build upon the existing MPA network within the HGMP. A number of queries arise in relation to the proposals:

- In relation to Mercury Islands – Great Mercury Island (Ahuahu) and Red Mercury Island proposal was removed from the MPA proposals, POA recommends that the inclusion of an area or areas around the Mercury Islands be re-examined due to the biodiversity of this area which includes known key biogenic habitats.
- In relation to Te Hauturu-o-Toi / Little Barrier Island and Cradock Channel MPA areas, can the linkage between the HPA and SPA be improved and the linkage/relationship with the south and west side of Little Barrier and to the CPZ.
- In relation to the Rotoroa Island HPA, this represents one of the few MPAs proposed near Auckland. As noted in the MPA description, the area supports dog-cockles (these are likely remnants of historic beds). Remnant dog cockle habitat is likely through other nearby areas through the Waiheke Channel beds and around to Thumb Point at the east end of Waiheke. Further consideration of SPA areas adjacent to the HPA would be worthwhile to support the natural restoration of the biodiversity of the inner Gulf.
- In relation to Cape Colville. Shape of HPA will still provide compliance issues. What determined the northern and western extent of SPA? Is there any reason the SPA didn't include the complete reef system at Channel Island?

The current Seachange proposals appear to lack MPA proposals or recommendations in several areas. For instance, there appears to be little mention of intertidal ecological areas of significance within the current Seachange process. A number of biogenic habitats within intertidal areas (e.g., seagrass) do not appear to feature in the proposed MPAs. Based on the above, Auckland Council should **confirm** that its currently defined coastal significant ecological areas robustly support the MPA protection process as part of the HGMP regeneration process.

Further, while many of the proposed MPAs have linkages to existing nature reserves of extremely high biodiversity value, there are few MPAs proposed where historic high biodiversity values were known to be present. Consideration should be given in future to protecting areas known and valued previously for their high and diverse habitat values, as it is these areas that, if restored either naturally or with assistance, would provide the largest benefits to the wider Gulf ecosystem.

Although, the proposals do include three MPAs near greater Auckland (Tiri, Rangitoto and Rotoroa), **consideration** of further MPAs in proximity of Auckland where relicts of likely historic habitat are present. MPAs closer to Auckland are likely to have greater education benefits than those removed and distant to most Urban Aucklanders.

Measurable outcomes

The proposed improvements in the HGMP MPA network are part of a greater set of objectives and actions that aim to restore the biodiversity of the HGMP. The MPA assessment process (e.g., that

undertaken by the agencies), identified how each of the MPA proposals sat with the key objectives of Seachange. However, following the implementation of the proposals, there will be a need to be able to report to a wider audience on the success and benefits of the MPA additions. The MPA assessment compared each MPA proposal against Marine Reserve Sea Change Plan generic objectives. However, the proposal did not provide a clear indication of how the combined MPA proposal would potentially contribute to the key HGMP environmental and ecological issues.

Seachange (2021) sets out strategies for research, monitoring and reporting. In relation to research it identifies the formation of a Research and monitoring Advisory Group (p91) and it indicates that "an opportunity is available to develop a plan" (page 95). A formalised research plan needs to be implemented as soon as possible, as most research outputs take time to deliver.

Recommendation: To ensure good communication and flow of information, it is recommended that co-ordination of active research work on the HGMP occurs. Seachange (2021) indicates that a stocktake of research is underway. An information hub to be utilised (potentially through Hauraki Gulf Forum website or through a specific advisory Group website) on a long-term basis is recommended.

Recommendation: We note that Seachange (2021) identifies that a marine protection monitoring program will be implemented (page 65) and that a case study on this topic is underway (page 96). That the ongoing Seachange process, develops a long-term monitoring framework that includes benchmarking/performance indicators to allow the identification of changes (improvements) across all the key identified environmental issues within the HGMP.

Recommendation: That the ongoing Seachange process ensures that sufficient monitoring is undertaken to show the internal (within MPA) and external (greater HGMP) benefits of the proposed MPAs.

Recommendation: That the ongoing actions and outputs from Seachange, be reported to a wide audience. It is suggested that this becomes a component of ongoing Hauraki Gulf Forum, State of the Gulf reports.

Regards

s 9 (2)(a)

s 9 (2)(a)
General Manager Infrastructure & Property
M: s 9 (2)(a)
E: s 9 (2)(a)