



South-East Marine Protection Forum

Summary of Submissions



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1 Executive Summary

1. This summary of submissions has been prepared to assist the South-East Marine Protection Forum (the Forum) in making a recommendation to the Minister of Conservation and Minister for Primary Industries on a network of Marine Protected Areas (MPAs) on the south-east coast of the South Island from Timaru to Waipapa Point.
2. The Forum has been through a process of fact finding, stakeholder consultation and deliberation in order to prepare a series of proposed MPAs for public consultation. The proposed sites for potential inclusion in a network of MPAs were publicly notified on 25 October 2016 inviting submissions which closed on 20 December 2016.
3. The consultation material invited submissions on three key matters: (a) Comments on proposed sites including support, oppose and recommend changes; (b) Comments on creating a MPA network; and (c) General comments.
4. Submissions were received via Seasketch (online system), by email or in hard copy.
5. A final figure of 2803 submissions were received – noting this includes a total number of 1964 proforma submissions. Three significant proforma were received, and of these approximately 20% contained additional comments. Two of the proforma came from groups in favour of marine protection, with the third being from a section of the recreational fishing community opposing the majority of proposed MPAs. Submissions were received from a cross section of the community with over 75% of these coming from submitters within the Dunedin City or Clutha Districts.
6. The general themes contained in submissions are:
 - The need for protection of marine biodiversity in general, as well as particular habitats or particular species.
 - Identification that some of the proposed MPAs are too small, not adequately linked and the overall proposed areas fall short of the national targets, as well as seeking additional areas for inclusion.
 - Consideration of only banning commercial fishing or certain fishing methods within proposed MPAs.
 - The need for effective monitoring and enforcement.
 - The potential to reduce catch limits, fish size or fisheries management as an alternative.
 - Identification that the restrictions resulting from a MPA would create increased fishing pressure (displacement) on other areas.
 - Concerns regarding safety for small recreational boats should the MPAs be implemented.
 - Impacts on the commercial fishing sector.
 - Impacts on recreational fishing.
 - The need for ‘rebalancing’.
 - Impacts on customary rights and Treaty of Waitangi settlements.
 - Discussions on specific additional locations for MPAs.
 - The potential for staging the implementation of MPAs.

- Weather conditions limiting fishable days.
 - MPAs providing opportunities for tourism and study.
 - The need for more information including evidence and understanding of the effect of displacement of fishing effort.
 - Impacts of discharges on the marine environment.
7. Submitters on MPA network creation fell into two categories, those who provided information referring to MPA guidelines (such as Habitats and Ecosystems and Design Principles) and those who provided other relevant information such as how the creation of MPAs could impact on existing discharge permit holders, a lack of supporting information, and the need for monitoring.
 8. A proportion of submitters who commented on MPA networks also provided a proposed network (i.e. a combination of sites).
 9. Submitters had the opportunity to support, oppose or recommend changes on twenty proposed sites at various locations. In addition, submitters provided comments to accompany their stated position for a site. Changes typically suggested by submitters were an extension or reduction of a site, or more or less protection for a site. Additionally, some sites had options proposed, such as extensions, which were also submitted on. Specific comments are summarised for each site. For the most part comments made in relation to sites were of a general nature, with some providing technical or factual information in support of their position.
 10. In addition to requested extensions to sites, submitters also suggested alternative sites for consideration.

2 Introduction

11. This summary of submissions document provides an analysis of the submissions received from the public for the Forum's proposed MPAs for the south-east coast of the South Island.
12. This summary of submissions will be used by the Forum to assist in the final recommendations to the Minister of Conservation and Minister for Primary Industries on MPAs for the south-east coast of New Zealand.
13. The Department of Conservation engaged Opus International Consultants Ltd (Opus) to undertake an independent analysis and prepare a summary of submissions report. All submissions received by the Department were provided to Opus for analysis and summary. This report is that analysis and summary.

2.1 Report Structure

14. The report in Sections 2 to 5 provide an overview of scope of the report, background and methodology. Section 6 discusses the consultation process. Sections 7 and 8 provide an overview of submissions received. Section 9 discusses submissions on the creation of a network while Section 10 discusses submissions each site. Finally, Section 11 summarises those submissions on additional or alternative sites or MPA networks.

3 Scope

15. Opus were contracted by the Department of Conservation (DOC) on 31 October 2016 to:
 - Prepare an advance draft template of the summary of submissions report for Forum approval, in consultation with DOC Project Director and Forum Chair and consistent with the MPA Policy, and to agree any categories to be used.
 - Enter key information from submissions into a spreadsheet to confirm all contact and position information.
 - Analyse and document the points raised by each submitter and note any useful trend information.
 - Provide a draft summary of all submissions as per the pre-approved template, to be presented to the Forum.
 - Provide a final report summarising all submissions as per the pre-approved template, to be presented to the Forum.

4 Background

16. In 2014, the South-East Marine Protection Forum (Te Roopu Manaaki ki te Toka) was appointed by the Minister of Conservation and the Minister for Primary Industries to make recommendations for a network of MPAs for the south-east coast of the South Island, from Timaru to Waipapa Point.

17. Since 2014, the Forum has engaged with the community to find out aspirations for their coastline. Public meetings were held throughout the region, from Christchurch to Bluff. Forum members have each sought the views of their respective sectors to better understand sector views and ensure each sector has a voice at the table. At the same time, the Forum has developed more awareness of the multiple values of the area.
18. Using the information gathered from the community, scientists and literature, along with their own knowledge and experience, Forum members identified 20 proposed MPAs for public consultation. The proposed MPAs are located between Timaru and Waipapa Point.
19. Each proposed site is either labelled 'Type 1' or 'Type 2'. Type 1 sites are proposed as marine reserves or 'no take' areas. Type 2 sites are proposed as MPAs with restrictions specific to what is being targeted for protection; 'a fit-for-purpose' set of restrictions. Type 2 MPAs still allow some fishing and harvesting, but restrict specific fishing methods and other activities (e.g. mining) in the interests of biodiversity protection, particularly those that cause sea bed disturbance.
20. The views of the public were sought on all of the identified MPAs. Consultation documents detailing information on each proposed site were released on 25 October 2016 and public submissions invited. The information from the submissions will be used to assist the Forum in making their final recommendations to the Minister of Conservation and the Minister for Primary Industries.

4.1 MPA Implementing Principles

21. Published by the Department of Conservation and Ministry of Fisheries in 2005, *Marine Protected Areas – Policy and Implementation Plan* includes a set of implementing principles when designing a MPA Network and a set of planning principles – to guide MPA planning and management. These principles are contained in full in Volume II of the consultation material and not repeated here.
22. These principles are often referenced in submissions. In Section 9 of this report submissions are assessed against the MPA guidelines for selecting sites for inclusion in a network.

4.2 Role of Treaty Partners

23. *Marine Protected Areas – Policy and Implementation Plan* also includes, within MPA Planning Principles 3-5 specific recognition of the special status of manawhenua and Treaty rights in the Marine Protected Areas planning process. These are:
 - Planning Principle 3: The special relationship between the Crown and Maori will be provided for, including kaitiakitanga, customary use and matauranga Maori;
 - Planning Principle 4: MPA establishment will be undertaken in a transparent, participatory and timely manner; and
 - Planning Principle 5: Adverse impacts on existing users of the marine environment should be minimised using MPAs.

24. The MPA Guidelines require the Forum to consider information on traditional use, values, current economic value and Treaty settlement obligations. In addition, the MPA Guidelines require the Forum to constructively involve and engage with tangata whenua whose interest in marine areas may be affected by protected areas.
25. Submissions on these matters, such as traditional use and Treaty settlement obligations are summarised in Sections 8, 9 and 10.

5 Methodology and Report Structure

26. The purpose of this section is to provide an understanding of the process that has been undertaken to produce this report, and how to interpret each section.
27. Within these sections submitter numbers are referenced with ‘#’ and then a number for example (#185). These submissions (in redacted form) will be made publicly available on the Forum website.

5.1 Submission Input

28. Submitter information was inputted into a spreadsheet and submission content separated by General Comments, Network Comments and Site Specific Comments for the purposes of undertaking analysis. These fields were derived from the submission form.
29. Due to a number of submissions being extensive in length and / or also containing, graphs, tables, figures and other externally referenced material, these submissions could not be included within the spreadsheet in their entirety however key information (such as support / oppose / request changes) for specific sites was captured. Despite not being included in full in the spreadsheet these large submissions were analysed in the preparation of this summary.
30. Identifying whether a submitter supported / opposed or requested changes was taken directly from where this was indicated on the submission form (‘tick box’) and was not re-interpreted from the body of the submission.

5.2 Submission Analysis

5.2.1 General Comments

31. General comments provided within each of the submissions is captured and summarised to form the general comments section of the report (Section 8.2). This section includes the key themes that were present within that were present in the general comments section of submissions (as opposed to site specific comments which are covered elsewhere).
32. The general comments section (Section 8.2) summarises submitter comments where the submitter made a comment under the general comments section within the submission form, or within their submission.

33. It should be noted that not every submission contained a general comment but instead commented on the network creation section or just responded regarding a site or sites.
34. Additionally, submission content from the general comments part of a submission that referred to specific sites is recorded under that respective site within the report. Likewise, the comments made on a specific site within a proforma submission were also identified under each specific site within the report.

5.2.2 Network Creation Principles and Concepts

35. Submissions that provided comment on MPA network creation principles and concepts are summarised in Section 9 into common themes based on the MPA policy and design guidelines. The information is analysed and presented in this way to provide more feedback in relation to the concept of an MPA network rather than a summary of various proposed MPA network options (see 5.2.3 below). Not all comments made by submitters relating to MPA principles and concepts fit 'neatly' under the policy and design guidelines. A 'best fit' approach has been applied to this information in terms of the heading it is noted under and this section should be read with this in mind.

5.2.3 Proposed MPA Networks

36. Submissions that identified a specific MPA network are discussed in Section 9.3. Please note that where a submitter has expressed support for a site or sites, but has not identified those sites as part of a specific network are not included in this discussion, nor are they represented in the chart illustrating preferred networks in Appendix 1. This chart should be read from left to right – it indicates the number of submitters that identified a particular network, and what the networks was e.g. A, B, D, G, H, T or O, P, Q, R.
37. The number of submitters that proposed a common MPA network combination ranged from 484 down to 2. There were also a number of unique MPA networks proposed. An overview of the range of proposed MPA networks can be found in the matrix within Appendix 1. The submitter responses that inform this matrix has been derived from those submissions that identified their preferred options for a proposed network within the 'Part C: Creating a Network of MPA' response section.

5.2.4 Site Analysis

38. Submitter feedback on individual sites has been analysed and summarised under each site. Submitters had the opportunity to oppose, support or recommend changes regarding each site. These comments have been grouped into these positions with key themes / views being presented. Note that this report is a summary of submissions and not a verbatim list of all comments.
39. Not every submitter who chose a position of oppose, support or recommend changes made comments to support their choice. It should also be noted that submitters identified support for a site, but made adverse comments, and vice versa. These comments sit in terms of the expressed position of the submitted and are not reinterpreted from the body of the submission.

40. Where a submitter indicated support for a site (or sites) and was silent on the remainder this was not interpreted as opposition to the remaining, 'unticked' sites, or vice versa.
41. Some submitters supported their submissions with references to technical publications or supporting factual information either within general comments or site specific comments (often of considerable length). These submitters have been captured in a table (Appendix 25) to provide an ease of reference to find such material. Appendix 25 provides a signpost to this information, it does not provide a comprehensive summary of this information.

5.2.5 Additional sites

42. This section discusses any additional sites that submitters have proposed that were not included in the series of proposed MPAs consulted on.

5.2.6 Use of Quotations

43. Some submissions, or excerpts from submissions are provided in italics throughout the report as a quote from the submissions. These were used where the submitter provided a particularly useful comment supporting their position.

5.2.7 Scientific Information

44. A considerable amount of scientific information was provided by submitters. Much of this information was technical in nature, and beyond the scope of a general summary. The Forum engaged an independent scientist to summarise scientific information in the form of a supplementary report. Therefore, scientific information contained in this summary of submissions document has been broadly summarised.

5.2.8 Commercially Sensitive Information

45. Some submitters requested that commercially sensitive details not be made public. This summary has not included such details where such a request has been made. Information regarding commercially sensitive information was provided to the Forum separately.

5.2.9 Appendices

- Appendix 1 provides a matrix presenting visually the submitters preferred option for an MPA network.
- Appendix 2 provides the submitter network maps.
- Appendix 3 – 22 contains the submitters proposed boundary changes to the sites proposed by the Forum.
- Appendix 23 contains additional sites proposed for MPAs.
- Appendix 24 presents submitters other points of interest that were created through Seasketch to identify areas of importance.

- Appendix 25 contains the reference guide to technical information provided within some of the submissions.

6 Consultation Process

46. Consultation began on 25 October 2016 when two documents were publicly notified to inform the consultation process. These documents were:
 - Proposed Marine Protected Areas for New Zealand's South Island South-East Coast, Volume 1 – Public Consultation Document 2016
 - Proposed Marine Protected Areas for New Zealand's South Island South-East Coast, Volume 2 – Supporting Information or the Public Consultation Document 2016
47. The consultation period closed at 5pm on 20 December 2016. Submissions were accepted via a number of methods:
 - Seasketch Online Submission Form at: <http://bit.ly/OurSeaYourSayConsultation>
 - Submission Form on the website: <http://south-eastmarine.org.nz>
 - Email to: sempf@doc.govt.nz
 - Via post to South-East Marine Protection Forum, PO Box 5244, Moray Place, Dunedin 9058
48. During the consultation period, public information sessions were held from Christchurch to Bluff.
49. This document summarises the submissions received during the consultation process. This summary of submissions document will inform the Forum's final recommendation to the Minister of Conservation and the Minister for Primary Industries.
50. Figure 1 illustrates the process to date.

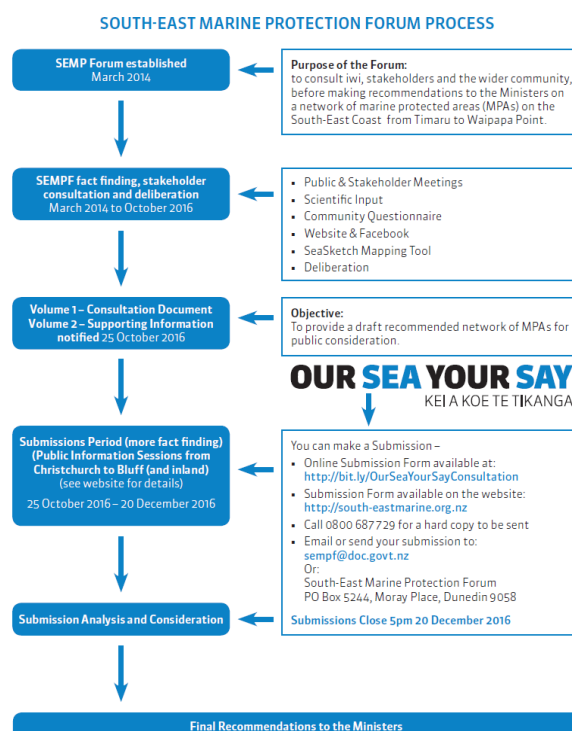


Figure 1 South-East Marine Protection Forum Process

7 Submissions Received

51. A total number of 2803 submissions were received. Of those submissions 990 were submitted via hardcopy, 1331 via email and 482 via Seasketch.
52. A number of submissions were received after 5pm on Tuesday 20 December 2016. These submissions have been accepted by the Forum and included in this summary of submissions Report.

7.1 Duplicates

53. Of the 2803 submissions received a number of duplicate submissions were identified. These are classified as being the exact same submission received from the same person. There were instances with Seasketch submissions where people had not finished completing the online form before submitting and then subsequently resubmitted the rest of the information in a separate submission. These have been classified as one submission rather than two.

7.2 Proforma Submissions

7.2.1 Nature of Proforma Submissions

54. Three separate proforma submissions were received over the submission period and have been identified based upon the organisation that initially produced them. For the purposes of this Summary of Submissions, a proforma submission is one where the body of the submissions is identical, aside from the details of the person who ‘made’ the submission.

55. The submission numbers below identifies where these proforma submissions have been referenced in this report.
- Fish Forever (#1628)
 - Forest and Bird (#1482)
 - Tautuku Fishing Club (#216)
56. Graphs are provided on a site by site basis identifying how many proforma were received on a site.

7.2.2 Number of Proforma Submissions

57. All of the proforma submissions provided an opportunity for submitters to provide further comment and this option was taken by some submitters.
58. The below table summarises these figures:

	Forest & Bird	Fish Forever	Tautuku Fishing Club
Proforma Submission	868	124	615
Proforma Submission Plus Additional Comments	216	17	124
Total	1084	141	739

7.2.3 Proforma Content

59. It should also be noted that the Forest & Bird and Fish Forever Proforma are identical in their comments on sites A – T and the discussion on additional protection needed. Where they differ is the Fish Forever Proforma has an additional section titled ‘Creating a Network of MPA / General Comments’.
60. Of submitters who lodged Forest and Bird or Fish Forever Proforma, those who provided additional comments were largely of a general nature or related to the network. Very little additional comment was received being related to individual sites.
61. The Tautuku Fish Club Proforma responds to Network Creation only, as well as providing additional comment on a lack of information regarding uses in the proposed areas. Again, there were some additional comments attached to this proforma.

8 Overview of Submissions

62. This section provides a summary of the views expressed in the submissions received. These submissions may also include comments on the overall process and policy.

8.1 Submitter response by District

63. Submission responses were received from across New Zealand with a number being received from international locations. This data is presented in Figure 2 below.

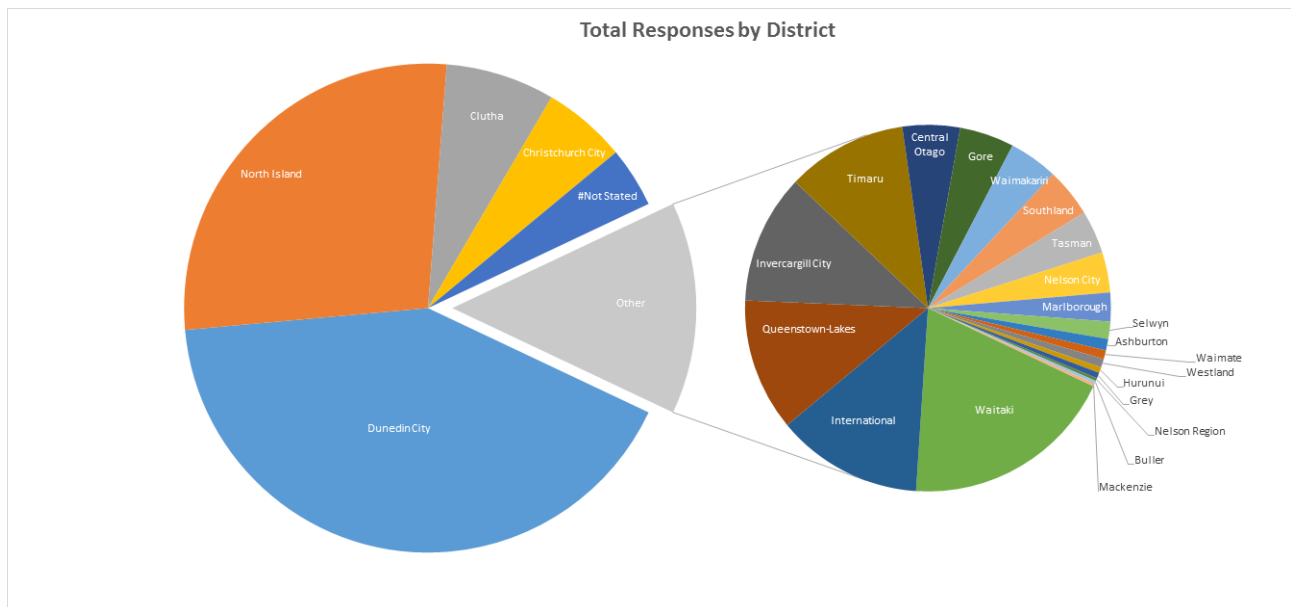


Figure 2 Submitter Location

8.2 General Comments

64. The purpose of this section is to provide a summary of the general comments that were received from submitters within the 'General Comments' response section of the submission form (as opposed to Site Specific Comments covered in Section 10). These themes relate to the proposed MPAs in general, rather than individual sites.
65. On assessment of the general comments, there were a range of submissions both in support and in opposition to the proposed MPAs. The following general themes (in no particular order) were identified:

8.2.1 Sustainability

66. Those submissions in support of the MPAs considered now was the time to move towards more sustainable practices with the proposals seen as the most effective management technique for preserving marine species and the overall health of ecosystems. Some considered it necessary for the safeguarding of their existence into the future and saw the

proposals as an opportunity to set a nationwide precedent, and to make a positive and lasting change, while achieving a balance between marine protection and fishing.

8.2.2 Biodiversity

67. Those who considered the MPAs beneficial from a marine biodiversity perspective, also considered there to be educational, social, scientific, tourism and recreational benefits, alongside the benefit of ensuring the future of fish stocks and the fisheries. The MPAs would not only provide “spillover” for some species but also provide important foraging habitat and movement between land areas for species such as the Yellow-eyed penguin, Little blue penguin and Hector’s Dolphin.

8.2.3 Size

68. A number of submissions considered the proposed areas too small (‘size matters’), best practice in design has not been adopted, and that there has been a fragmented approach. For example, a 400m wide reserve was considered insignificant in the context of a marine environment and in light of the vast array of marine life including dolphins, whales, seabirds, penguins, sea lions and seals. It was noted that a global MPA study suggested that a minimum size of 100 km² was necessary for conservation success.
69. Some of those in support of the MPAs considered that the overall areas proposed amounted to approximately 5.3%, falling considerably short of the Government’s MPA policy of achieving 10% and significantly short of the “Ocean Health Index” of 30% protection. It was also suggested that the proposed MPAs do not adequately protect the full range of habitats.

8.2.4 Staging

70. Some submissions stated that consideration should be given to staging the MPAs as an opportunity to not only test their effectiveness but also to reduce the impact on recreational fishing.

8.2.5 Specific Sites

71. While various submissions recommended the inclusion of specific sites, those most commonly mentioned were Shag Point, Nugget Point, Karitane, and an extension of Long Point. Submitters also felt The Catlins were of significant value and while protection was considered important, it was also noted as providing a safe place for recreation, in particular for children. Likewise, the protection of estuaries was considered important not only as a breeding ground for fish or as a feeding area for coastal birds, but also as a valuable and safe environment in which to teach children to fish.

8.2.6 Monitoring and Evaluation

72. Submissions noted that monitoring and evaluation of their effectiveness was prudent if MPAs are implemented. In addition, many submissions noted the lack of monitoring and enforcement of fishing in general, and that this would be imperative to ensure people were not fishing within MPAs.

8.2.7 Tourism

73. Submitters felt that the sites had considerable tourism potential, or currently contributed to tourism, particularly those close to Dunedin.

8.2.8 Catch Limits

74. A theme running through the submissions, both in support and opposition, was the need to reduce catch limits for recreational fishing. Many submissions considered 30 fin fish per person was too high. Submissions also referenced the need to increase the size of fish to be caught with some considering 30 cm too small. Some submissions also mentioned reducing the catch limit for pāua or increasing the number of areas where the catch limit is reduced.

8.2.9 Fishery Management

75. Many submissions considered more effective fishery management would have greater benefit to all than a blanket ban, including the consideration of a closed season for all to allow fish breeding. Reduced quota and effective monitoring and enforcement would at least retain popular fishing areas for future generations. However, education and enforcement was considered of utmost importance to ensure compliance with catch numbers.

8.2.10 Commercial Fishing

76. There was general concern regarding the impacts of commercial fishing over recreational fishing with many submissions seeking the prohibition of commercial fishing. Some also sought bans for particular fishing methods and in particular bottom trawling or dredging as these methods destroy important habitat and feeding grounds.
77. Others were also concerned the impacts on commercial users have not been substantiated.
78. Submitters also identified that there will be significant cumulative impact and that there is a need to 'rebalance' fisheries when establishing any MPA that displaces fishing catch and effort. A rebalancing exercise would require an assessment whether compensation is due to rights holders. This exercise is an assessment of the extent to which the MPA is likely to result in displacement of fishing pressure into other areas, and addressing this through an appropriate market led response and / or an appropriate fisheries management response to address that pressure.
79. The industry proposes a network of five MPAs.

8.2.11 Weather and Safety

80. The exposed coastline, weather and rough sea conditions provided a natural barrier, severely limiting the number of days in which fishing could take place was a common reason for opposing the MPAs. Many noted that there were very few days in year that allowed accessibility for small boats for family/recreational fishing. Weather conditions was considered a primary limiting factor on fishing in this respect.

81. There was also concern regarding the safety for families and small boats with MPAs forcing recreational boats further out to sea or placing increased pressure on other areas. With rapidly changing weather conditions and distance from the coast, many are concerned for the loss of shelter particularly those with young children, although others noted that areas between the MPAs did provide some access to shelter.

8.2.12 Recreational

82. Many were concerned of the significant impact this would have on their way of life with recreational fishing for families being a part of their culture and heritage, not just for locals but all New Zealanders. The ability to fish was identified as a key reason for people choosing to live in a particular location. Retention of safe and popular fishing sites easily accessible near towns, holiday homes, harbours and launching sites was considered an important aspect of the fishing culture for educational and learning purposes.

8.2.13 Treaty Partners

83. Ngāi Tahu Whanui are concerned at the loss of traditional gathering areas for kai moana and mahinga kai, and wish to retain sites to learn traditional food gathering practices for future generations. Customary gathering of food in the area is an integral cultural component for Ngāi Tahu Whanui. The need to consider Mātaitai Reserves and Taiāpure was also raised.

8.2.14 Lack of Information or Evidence

84. Some submissions were concerned that there was either a lack of information or scientific evidence to support the proposals. Many question the effectiveness of MPAs to achieve their intended objective and sought more information in respect of understanding the positive and negative impacts of creating and implementing MPAs, and the displacement effect on existing fishing.

8.2.15 Discharges

85. Some submitters expressed their concerns regarding the impacts of discharges originating on land to the sea and suggested these too needed to be taken into consideration. Others provided details of discharge permits they hold or have issued.

8.3 Submitter's Site Specific Position

86. Submitters had the opportunity to support, oppose or recommend changes in relation to the 20 proposed MPAs. Figure 3 below presents an overview of submitter positions in relation to each site. While the figure indicates that majority of the sites are clearly supported, the actual analysis of the data appears different to how it is presented as it does not accurately reflect the comments received by the submitters.
87. A number of submitters supported each of the sites in 'general', i.e. through the selective option, but also made comment requesting additional changes be made to the relevant site. There was also a number of submitters that had ticked both support and recommend changes which has not been separated within the data to avoid misrepresentation of

submitter views. Submitters that ticked support and recommend changes have been classified as recommend changes.

88. There were also submitters that had ticked oppose to the site options yet in their comments expressed general acceptance of the site provided changes be made.
89. Noting these numbers have also been influenced by proforma submissions a further breakdown of the number of proforma on a 'per site' basis is provided in each site analysis.

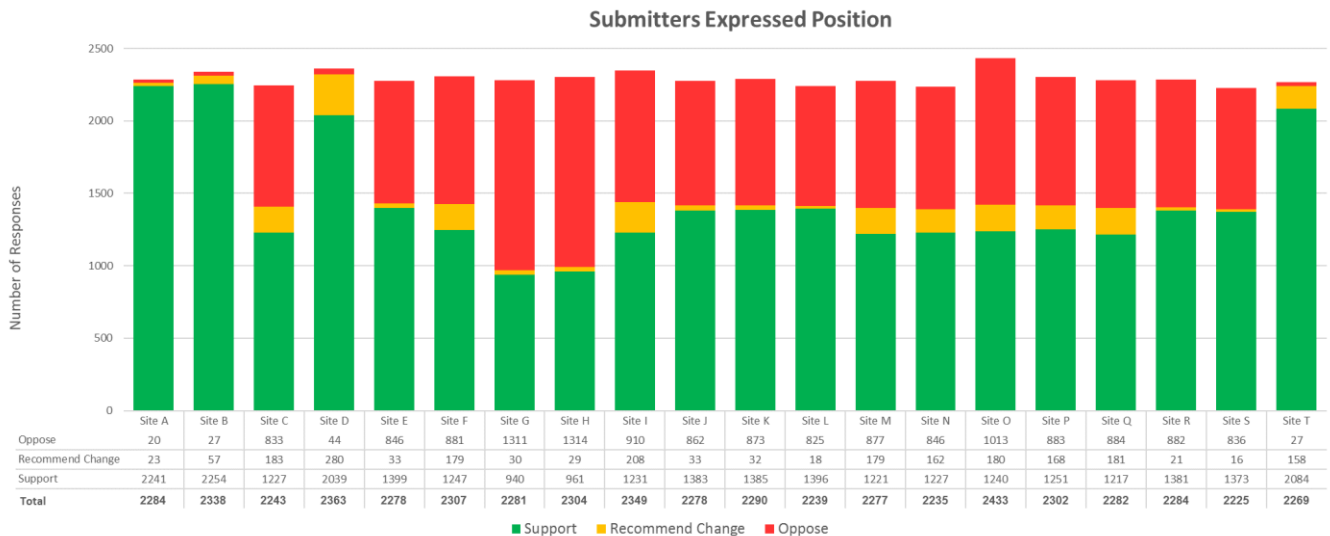


Figure 3 Submitters Position

9 Submissions on creating a Network of Marine Protected Areas

90. This section collates feedback from submitters in relation to preferences for the creation of MPA networks. Feedback has been grouped in relation to relevant policy requirements on the concept of creating a network of MPAs.
91. Commentary on individual sites in relation to submitters' recommended changes, and views for support or oppose for each individual site has been captured under the site analysis sections (Section 10 of this Report) and is not discussed here.
92. It is noted the Forum consulted on proposed MPAs for potential inclusion in a network of MPAs. The Forum did not consult on a 'network'.
93. Establishing a network of MPAs is a directive from the MPA policy. According to the consultation document, an MPA network is considered to be most effective when each type of habitat is represented in more than one MPA, and when individual MPAs are big enough and close enough to each other to protect a large range of different species across all of their life stages. Furthermore, it is stated that MPA networks can provide insurance against catastrophe; i.e. if one example of a habitat in a network is badly damaged, the habitat is

still protected elsewhere (and may contribute to the recovery of that particular habitat at the first site). In addition, because an MPA network is better able to take into account existing users, it will likely have less negative impacts compared to a single large MPA.

9.1 Creating a Network

94. Volume 1 of the consultation document provides a background of the MPA Policy requirements that need to be met when creating networks of MPAs and reasoning for such requirements. To provide context to the various submitters feedback, these requirements for network creation have been summarised below.
95. The consultation document suggests a single MPA within the region that would be large enough to protect all habitats (as required by MPA Policy), is impractical because of the geography and potential impacts on existing users. Thus, a single large MPA would be considered an unacceptable solution due to the various adverse impacts on many existing users of the coastal environment. Rather, establishing a network of suitably sized MPAs may be a viable alternative in meeting biodiversity objectives while reducing the potential adverse impacts compared to if the same objectives were to be achieved within a single large reserve.
96. As part of the consultation, submitters had the opportunity to make comment on the inclusion of the proposed sites and the consideration of these in a proposed MPA network.
97. The proposed sites when considered as part of a network are represented in Figure 4 (below).

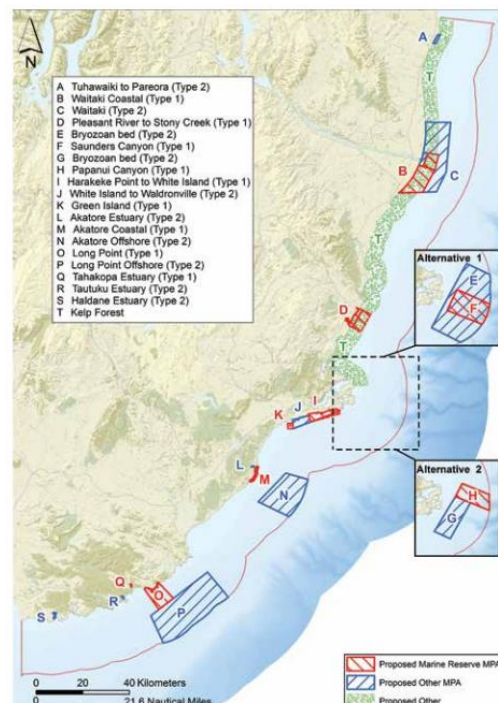


Figure 4 Showing Proposed Marine Protected Areas

9.2 MPA Guidelines

9.2.1 General

98. The MPA guidelines for selecting sites for inclusion in a network include the ability to protect a full range of habitats and ecosystems, and protect whole habitats and ecosystems. The consultation document cites that a well-designed MPA network is one where the individual MPAs complement each other and the combined benefits are greater than the sum of the individual MPAs.
99. Comments regarding the creation of an MPA network from submitters have been summarised in relation to these general guidelines below for the purposes of understanding how submitter feedback aligns with the MPA guidelines.

9.2.2 Submitter Feedback

100. A large proportion of the submissions regarding the creation of a network of MPAs were substantially of a general nature. Comments were in relation to the process and sites individually rather than specifically about the technical requirements for MPA network creation and the reasoning for multiple sites being part of a network. Comments from submitters that generally aligned to technical requirements or design guidelines for network creation have been grouped accordingly below, with other common comments also being recorded.

Range of Habitat- *Suggested network will protect the full range of marine habitats and ecosystems. Rare, distinctive, internationally or nationally important habitats and ecosystems should be included.*

- I support this being part of the network because of its unique deep mud habitat, the distance from other proposed areas, and the proximity to many unprotected reefs. (#713)
- Support as all sites are needed of protection. (#144, 381, 461, 477, 554, 593, 646, 692, 736, 2491, 2494, 2516, 2521, 2523, 2528, 2791, 2797, 2821, 2830)
- Support MPAs in a network to protect a diverse range of habitat and species. (#193, 194, 208, 466, 714, 720, 722, 729)
- Most of the habitat types are covered here and should include much of the biodiversity, so this could be a super reserve. (#426)
- This is great start and offers a diverse range of important habitats. I hope it becomes a reality and this network ensures future generations can enjoy all our coast offers. (#381)
- Diverse areas of species. Diverse number of sea and shore structures. Areas A, B, D, G have spawning areas of endangered sea life. (#193)
- These areas are diverse and provide both different species of both fish and shell fish. Provides differing shore structures. Areas with seaweed provide shelter and attachment

for juvenile fish spawn and crayfish. ABD areas have been left by both commercial and recreational fishers as they are breeding grounds for several fish species. Seaweed in these areas should not be harvested due to them being breeding areas. (#194)

- (T) Kelp forest (type other). This is an ideal place for the breeding of fish species and will also preserve the kelp forest it is in a reasonable sheltered area. (H) Papanui Canyon (Type 1). Gives a deep water reserve which is handy to Otago Harbour probably an excellent area for deep water research. (B) A recognised area for spawning for several fish species has advantages of being near a major river has good access also has kelp habitats for fish retention. (#278, 279)
- The following comments relate to benthic habitat, the component with which I'm most familiar. I think that as a minimum, MPAs in the Forum area should include sites representing inlets/estuaries, open coast rocky shore and subtidal reef, ocean beach and open shelf sediment and biogenic, and canyon/upper slope habitats. Sites should be replicated where possible. I appreciate, however, that detailed information on benthic habitats and assemblages along this coast is sparse. At least in terms of their physical attributes which appear to be suitable as proxies for biological characteristics inlets and estuaries of south-eastern New Zealand cover a range of types, with a primary division being between large marine inlets and estuaries. Sites that would appear to be most important to include to represent open coast intertidal and inner shelf habitats are B and C, D, I and J, M and O. And sites to represent mid-shelf habitats are E & F, N, and P, as well as C if it were extended to 12 NM. (#427)
- There is no protection in the northern offshore area, between Kakanui and Oamaru where there are unusual concentrations of sea tulips and tubeworms, and foraging areas for Hector's dolphins and Little blue penguins. (#577)
- As a recreational fisher, water sports enthusiast and beach user, the south-east in particular contains some of the most spectacular New Zealand marine and coastline experiences for both its intrinsic qualities, natural beauty, wildlife as well as fishing and diving opportunities. Having said that, I am concerned that this state has been and will continue to deteriorate unless sensible precautions are taken to sustainably manage the current fish stocks, habitats and biodiversity of the region in order to allow stabilisation and regeneration of these regional natural assets. The benefits of these assets are seldom quantifiable in short term commercial metrics and the broader, long term benefits to local communities' well-being, through sustainable food gathering, recreation, education and having a connection with the natural environment are immeasurable. I am in favour of all the options presented with a preference for Options F and E (Saunders Canyon Type-1 and Bryozoan Bed Type-2). (#646)
- While I'm in favour of all the options presented due to them having unique habitats contributing to a holistically interrelated ecosystem and marine network, I am particularly interested in the MPA options that are accessible to Dunedin for both scientific study and recreational usage (I, J and K) and potentially form a network accessible to a large local population and visiting tourists. (#646)
- Options F (Saunders Canyon Type-1) and E (Bryozoan Bed Type-2) are my preferred options due to the larger feeding area for penguins and marine mammals and restriction of set netting. Option F will also include Saunders Canyon head with a larger

area of deep canyon area and hence increased biodiversity and range of habitats for the support of local marine populations. (#646)

- The fishing industry (#2467) supports a network of five MPAs, comprising three marine reserves and two Type 2 MPAs, as follows: MPA (A) Tuhawaiki to Pareora – Type 2 MPA with Fisheries Act prohibitions on bottom trawling and dredging; MPA (B) Waitaki Coastal (excluding the extension) – Type 1 MPA (marine reserve); MPA (D) Pleasant River to Stony Creek (excluding the estuaries and offshore extension) – Type 1 MPA (marine reserve); MPA (G) Bryozoan bed – Type 2 MPA with Fisheries Act prohibitions on bottom trawling, dredging and Danish seining; and MPA (H) Papanui canyon – Type 1 MPA (marine reserve). Together the five proposed MPAs represent nine regional habitat types and two sensitive habitats (bryozoans and *Macrocystis* beds). Along with the habitats in existing *mātaimai* reserves, 23 regional habitat types, two sensitive habitats and one additional habitat (estuarine boulder beach) would be under some form of protection within the region. All 26 habitat types would be represented in areas in which all commercial fishing was prohibited (either marine reserves or *mātaimai* reserves) with duplicate representation of six habitat types in Type 2 MPAs. The habitat protection provided by the proposed network and seven existing *mātaimai* reserves is shown in Figure 6 of the submission. (#2467)
- Submitter (#2880) supports the above.
- There are 36 classified habitats within the south-east region. The twenty MPAs proposed in the Forum’s consultation document together represent 22 of these regional habitats, two sensitive habitats (bryozoan beds and *Macrocystis*) and two additional habitat types (exposed boulder beach, estuarine boulder beach). The number of habitats that would be protected in the industry’s proposal is therefore the same as in the twenty MPAs proposed by the Forum, but with far less impact on marine user groups. (#2467)
- The industry’s support of the proposed 5 MPAs as identified is subject to no additional MPAs are proposed or implemented in the south-east region; and the Forum recommends that the Government must address any displacement of fishing effort from the MPAs by ‘rebalancing’ the affected fisheries as described in this submission. (#2467)
- Currently only 0.4% of mainland New Zealand’s Territorial Seas are fully protected in no-take marine reserves. Our marine environment desperately needs a comprehensive network of MPAs to enable marine species to flourish. Some of New Zealand’s critically endangered marine animals such as Yellow-eyed penguins, NZ Sea Lions and various albatross species live in the South-East region. However, the current proposal does not do enough to protect their foraging habitats. The network of MPAs in the south-east region must include protection for the full range of habitats and enough no-take reserves that are big enough to restore and maintain healthy ecosystem. (#2473)
- Protection should extend to endangered coastal species, irrespective of their commercial value. (#616)
- Currently only 0.4% of mainland New Zealand’s Territorial Seas are fully protected in no-take marine reserves. Our marine environment desperately needs a comprehensive network of MPAs to enable marine species to flourish. Some of New Zealand’s critically endangered marine animals such as Yellow-eyed penguins, NZ Seal Lions and various

albatross species live in the South-East region. However, the current proposal does not do enough to protect their foraging habitats. The network of MPAs in the South-East Region must include protection for the full range of habitats and enough no-take reserves that are big enough to restore and maintain healthy ecosystem. (#1628 Fish Forever Proforma x 141)

Whole of Habitat - *Whole habitats and ecosystems are protected, particularly where these are small scale, such as an individual reef.*

- I believe the deep water areas may require some sort of protection from commercial fishers and maybe a reduced bag limit for recreational fishers. (#22)
- Provides a significant opportunity to improve protection for the Yellow-eyed penguin and the habitats and wider ecosystem that support it. (#95)
- The principles I support when establishing a regional network would be: Sites identified as having special features (e.g. bryozoans) should be prioritised for protection. Otherwise areas of special geographic importance in terms of natural beauty should be prioritised. Lastly the network of protected areas should be spread across a geographic region to ensure resilience. (#118)
- Submarine canyons are among the most productive deep sea habitats yet described, supporting exceptional biomass of benthic invertebrates, demersal fish and top predators, including marine birds, pinnipeds and cetaceans. The south-east region is one of only two places in New Zealand where submarine canyons extend inside territorial waters and can therefore be protected within a marine reserve network. Although the mechanisms by which canyons enhance productivity are not fully understood, it is likely a combination of complex bathymetry and interaction with the local hydrology. Therefore, for conservation of marine biodiversity, the best option proposed by the SEMPF is site F, because the Saunders Canyon has the steepest and most complex bathymetry inside the territorial limits. (#401, 2472)
- I would support a network of MPA along the Catlins Coast. Would like to see the 3 estuaries (Tahakopa, Tautuku & Haldane) included in this, but all as Type 2 MPA. I think Long Point could also be included. This is for all of the Long Point area in a Type 2 MPA. I would have included The Nuggets if it had been included as an MPA for consultation. (#696)
- Estuaries are poorly represented and more should be fully protected as marine reserves. They are nursery grounds for flat fish, eels, white bait, and feeding grounds for shore birds. (#577)
- Sites E and F should certainly be included in any network as they provide the best opportunity to protect major bryozoan beds, and outer shelf and upper slope / canyon habitat. Sites G & H, or else a Type 2 MPA covering just the bryozoan beds combined with Option F, are less attractive alternatives in terms of biodiversity conservation. (#427)
- Option I (Harakeke Point to White Island) for instance, would be particularly beneficial for inclusion due to the intact and concentrated pāua population and to assist in inshore

reef recovery along with the correlated attraction of sea bird, mammal and penguin populations around the Dunedin coastline. (#646)

- Due to the mobile habits of many of the iconic species within the SE region, individually the proposed MPAs may not offer them much protection. However, if all of the sites, several of which are identified foraging grounds for more mobile species (Hookers sealions, Yellow eyed penguins, whale and dolphin species), can be adopted then the protection offered to these species will be more effective. (#736)
- We also recommend the creation of a marine reserve between The Brothers Point and The Sisters, in the Catlins area. This reserve should be from the coast offshore to 12 NM to give representation of deep subtidal gravel habitats within the area of highest current speed inside the Forum's boundaries. This habitat type is not represented in the proposed MPA network. A reserve here would also represent Yellow-eyed penguin foraging habitats associated with Forest and Bird's Te Rere Yellow-eyed penguin reserve. (#1270, 1271, 1272, and 1273)
- The only chance to save the entire ecosystem- fish, crustaceans, sea birds, sea mammals, etc. to any extent is to have a continuous network. (#407)
- I believe selected areas of the kelp forests along the coast should become marine reserves. I believe it is important the public can access such reserves and it allows fish stocks to flourish and increase undisturbed. (#702)
- There are several important omissions in the proposals, specifically around Katiki Point (North Otago), the Nuggets and Te Rere in the Catlins. All these sites are important for marine biodiversity, specifically for Yellow-eyed penguins but also the overall marine ecosystems that they represent and should be included as Type 1 marine reserves. Specific boundaries for these additional sites should be determined based on expert advice. (#477)

9.2.3 Design Principles

101. The MPA guidelines also identifies four key considerations when designing a network of MPAs, which were included in Volume 1 of the consultation documents. These four considerations are: size, connectivity, replication and minimising adverse impacts. Comments from submitters regarding the creation of an MPA network have been summarised in relation to these considerations below.

Size

- MPAs need to be much larger to be effective. (#25, 121, 355, 359, 394, 554, 625, 642, 736, 738, 719, 770)
- If a network is to work at all marine reserves need to be close and of a good size. A complements the existing Mātaitai for which iwi are to be commended. B and C need to be both supported to increase their effectiveness. E, F, I, J, K is clearly the best network if there is going to be any area of significant size - any sort of flagship that will turn the public's view away from the fisherman's knee-jerk fear, into the support that exists where reserves have been established for some time, and their effectiveness known

which brought about this entire process. O and P must be supported, The Nuggets is a classic example where fear rules over facts. (#49)

- The proposals in total allow for less than 6% of the total available area to be protected. (#153, 239)
- This is well short of international best practice, which recommends a minimum of 10%. For this reason, I have selected all the options. I recognise that in some cases they overlap, and the Forum will have to exercise some judgement in choosing which to take, but I am signalling to you that my view is that the overall proposed network is the bare minimum that should be protected. (#153)
- The Forum's current proposals protects only 5.3% of the regions Territorial Sea (TS) as no-take marine reserves (Type 1 MPAs). This will not meet the Government's own MPA Policy or our international obligations to conserve and protect marine biodiversity. (#1628 (Fish Forever Proforma x 141))
- The Forum's current proposal offers a mere 5.3% protection in Type 1 MPAs. This is not enough. There are obvious opportunities to extend that protection to 18%, outlined below, and I call on the Forum to work towards a goal of at least 30%. With less than half a percent of New Zealand's marine environment fully protected and with no reserves currently in the South Canterbury, Otago and Southland regions, a comprehensive network of marine reserves and MPAs is essential to allow fish and other marine species a chance to thrive. Such a network will provide species in the region with some resilience from human impacts and this will in turn benefit the region as a whole. The proposed reserves must also be modified to reflect best practise in the MPA Design Guidelines. (#1482 (Forest and Bird Proforma x 1084))
- Adequately protecting the marine environment in all its diversity requires areas of sufficient size encompassing each and every habitat, and not just one example, but multiple examples of each. It is well known that the edges of protected areas offer only partial protection, so there needs to be a buffer zone in any protected area. (#150)
- A marine protection network needs to have at least a few big reserves that reach out from the coastline to the sea, protecting enough space so that large marine animals can find food and safely thrive. In this proposal, Sites B, C, E, F, L, M, N, O and P provide this, and are the backbone of the network. (#355)
- This exhaustive role of marine reserves and other protected areas to have capability and capacity for ecological integrity means I have come to consider that, while the panel's proposals are a good starting point they lack sufficient size and extension to provide the necessary representation, resilience and connectedness to meet a network's demands. I hope my recommendations go some way in addressing these demands. (#595)
- A recent review of literature concluded that conservation benefits were greatest for marine reserves larger than 100 km². Only the proposed sites F (and the alternative site H), and B (with the extension), exceed this threshold. The decision makers should heed these design guidelines when considering proposed modifications to the existing proposals. (#401, 2472)

- We believe the size and dimensions of many of the 'pocket' reserves will not provide adequate marine reserves. Minimum widths need to be at least 2km. (#585)
- I support creation of a south east marine protection area for ecological and sustainability reasons. In my view for any network to be successful it needs to encompass areas of ecological value, be at least a critical mass and be able to be easily accessed and viewed by our communities. (#608)
- As described on a site to site basis, several of the proposed MPAs border terrestrial sites of conservation value, by having a larger network of marine reserves this increases the ecological value of the protection offered, especially as many of the more iconic (and endangered) species forage at sea and breed on land within the south east South Island region. (#736)
- Due to the small size of all the individual proposed MPAs within the region it is necessary to have all of the sites approved and have them all form part of a marine protected areas network. (#736)
- The Forum's current proposal of 5.3% proposed for protection is not enough and or the proposal does not meet the goal of protecting 10% of our coastline. (#375, 401, 420, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2472) and the only other way to increase effectiveness of the current proposal, and meet government policy, is to increase the size of each of the Type 1 reserves. (#375)
- The establishment of this network of marine reserves is a step in the right direction, but that it is critical to extend the boundaries and protection levels in order to establish a truly sustainable marine ecology. Tourism is an important part of the economy on the south-east coast; MBIE monthly regional tourism estimates for the Dunedin region show annual visitor spend as \$684 million to 1 December 2016. The vast majority of this spend, \$458 million, comes from domestic visitors with the remaining \$174m from international tourists. (#2499)
- The proposed network is inadequate and needs to be extended. The Forum should seek to propose at least 30% of each marine habitat in a network of highly protected MPAs. (#2885, 2886)
- The MPAs currently proposed are too small to provide full ecosystem level protection. While they may protect smaller, less mobile species, other species such as marine mammals, seabirds, and many fish will be unprotected. (#2889)
- Extend out to the 12 NM mark to be more effective. (#774)

Connectivity

- In this proposal, sites BC, EF, LMN and OP provide this, and are the backbone of the network. They are, however, a bit far apart for connectivity, so it makes sense to have smaller protected areas between them, such as sites AD and IJK. The Catlins estuaries O,Q,R and S also provide connectivity with the land, much of which is also protected in the Catlins Forest Park. (#355)

- The spacing of reserves in a network is also an important consideration. Inter reserve distances from tens to about 100km can enhance both conservation and fishery benefits, because they approach without exceeding the mean larval dispersal distances estimated for many fished coastal marine species. The proposed network meets these guidelines, provided that all the coastal marine reserves are designated. (#401, 2472)
- Linkages are important. Protected corridors between reserves would give them more chance of success. We do not know enough about The Yellow-eyed penguins life at sea - roaming foraging etc. Same for Hector's dolphins and Albatross and many species of fish. (#433)
- We believe the connectivity of the network is weak. 'Edge effects' will render the viability and value of some of the reserves to be insignificant. Gaps from Shag Point to Otago Peninsula are not going to adequately protect the marine ecology for future generations. Many boundaries appear to be aligned for recreational and commercial fishers. This should not be the priority. (#585)
- The proposed sites are spatially disjointed with distances of 20 to 50km between adjacent MPAs. Considering that most mobile marine fauna (i.e. crustaceans, fish, marine top predators such as seabirds or seals) that would benefit from a network of MPAs have smaller foraging ranges than most of the proposed MPAs are distanced from another. Hence it seems unlikely that there will be any substantial exchange of occupancy between any of the proposed sites, which would be a core requirement for a network of MPAs. (#733)
- The principles state that when identifying and selecting sites maximum connectivity should be aimed for. To fulfil this aim all of the sites (with exception of Bryozoan Bed G Option 2 which if Option 1 E goes ahead will be incorporated within the boundary of Option 1 E) should form part of the network. (#736)
- It is essential that marine organisms are able to connect between protected areas, therefore, to be effectual, they must be of a sufficient size, number and distance from each other to ensure this. (#738)
- Greater connections between the proposed sites to form true biodiversity corridors within this environment is required. (#18, 43, 49, 559, 719)
- A connection between these MPAs to make a large reserve along the south coast of the Otago Peninsula down to Green Island will be a significant step in insuring the long-term health for the marine ecosystem along the South Island. (#2672)
- It is best for marine ecosystem health to create as much connection between areas as possible. (#9, 56, 157, 727, 728, 761).
- It allows the movement of organisms between areas to promote gene flow, and to escape the effects of global warming in areas at higher risk. (#56)
- Recognise the importance of establishing a network of MPAs in that a network is a far more effective way of providing resilience to coastal communities and habitats than individual, distantly spaced areas. (#65)

- Connecting all MPAs will provide for the “whole to be greater than the sum of the parts.” (#156, 367)
- MPAs should be located alongside partially protected areas including Mātaitai and Taiāpure. (#642, 2467)
- I consider it to be extremely important to aim for an extensive network of representative and valuable biodiversity areas, ensure they are well connected and large in size rather than agree to a minimal set of reserves as a misguided compromise. (#2644)
- Lack of thinking about the relationship of land and sea. (#2879)

Replication

- More areas should be protected and included in the network. (#5)
- If there is no replication of a particular habitat within the proposed network, then each proposed reserve must be accepted. (#401, 2472)
- Currently the overall proposed network is the bare minimum that should be protected. MPAs are far more successful if they are designed to represent and number of representative, replicated habitat types that are connected by dispersal and recruitment. The greater the number of MPAs, the greater the likelihood of success. (#625)

Minimising Adverse Impacts

- The inclusion of all proposed areas into an MPA may disadvantage some fishermen but this may be offset by a spill over effect into commercial fishing areas and potential for marine tourism. (#97)
- The idea of a network allows for protected corridors without excluding all other users from other areas. (#379)
- General support in environmental choice, with submitters identifying specific areas that would be suitable to include as part of a network – but strong voice to ensure other areas should still be open to recreational fisherman. (#8, 322, 345, 457)
- Areas such as A, B, D, G, H are enough, allowance needs to be made for recreational opportunity at family level and future generation fishers. (#327)
- Little information to show the total exclusion of recreation fishing is needed to achieve protection. A full cost-benefit analysis of each MPA needs to be carried out. (#2891)
- Support proposed areas A, B (with no extension), D, G, H and T. I oppose all of the other proposed areas. The Forum does not have enough information to identify the positives and negatives of locking up these other areas, or to understand the impacts of these areas on existing users. (#373, 434, 436, 810, 1108).
- The areas A, B, D, G, H, L and T would meet significant areas of MPA Policy. (#428, 429, 430, 431, 586, 587, 588, 589)

- The areas A, B D, G and H avoids the shortcomings of the Forum proposals and minimises impacts on fishing. (#2890)
- Fisheries management a better option. (#219, 382, 457, 1107, 2471, 2890).
- The proposed network (if created) would result in the displacement of fishing in fewer and small areas to the detriment of those users. (#183, 280, 305, 562, 642, 1898, 2508, 2880)
- There should be a rebalancing exercise. (#2467, 2880)
- Disagree with the Forum statement that ‘an adverse economic or social impact is not a reason to exclude a habitat in the MPA network’. The point of public consultation is to obtain views and take all opinions into consideration. Economic and social impacts must be taken into account. (2891)
- The proposals are deliberately tailored towards the commercial sector, especially the trawl fishermen. Proposed sites have been positioned to avoid impact on trawl effort with less effort given to avoiding important recreational areas. (#2891)
- The reserves proposed would remove in excess of 20% of Rock lobster catch in CRA7. This would require a decrease in the TAC with the crown rebalancing by way of a buyout, compensating both ACE fishers and quota share owners. (#2508)
- The Fishing Industry’s submission proposed MPA network does have some adverse effects on commercial fishing. In particular, the PAU 5D fishery is adversely affected by MPA (D), Pleasant Point to Stony Creek. Over the last eight fishing years, an average of 826 kg of catch has been taken from the pāua statistical area in which the MPA is located. Although this is around 1% of the total commercial catch in PAU 5D, pāua fisheries are particularly vulnerable to the impacts of catch displacement and a 1% displacement is likely to slow the rate of rebuild in the fishery. The PAU 5D fishery would therefore need to be ‘rebalanced’ by reducing the TAC and TACC by 1%, compensating PAU 5D quota owners, and implementing any necessary measures to constrain recreational catch by an amount equivalent to the displaced recreational catch. Nevertheless, the impacts of MPA (D) on PAU 5D are considerably less than the impacts of alternative similar MPA sites such as MPA (O), Long Point, which would displace nearly five times more commercial pāua harvest (see analysis in Part Two of this submission). In addition, MPA (A) is likely to have a minor impact on trawling for flatfish and MPA (B) has a minor impact on set netting for rig and school shark. While proposed MPAs (G) and (H) are anticipated to have a moderate impact on commercial fishing, the area supports around half the number of fishing events of Alternative One (MPAs (E) and (F)) and the economic value of the affected commercial harvest is less than half that of Alternative One. (#2467)
- A comparative analysis of the proportion of commercial catch displaced from fisheries in the south-east region under (a) the Forum’s proposed network and (b) the fishing industry’s proposed MPA network has been provided within original submission. Recreational and customary fishers may also be adversely affected by the Type 1 MPAs – i.e. (B) Waitaki Coastal, (D) Pleasant Point to Stony Creek and (H) Papanui Canyon – but we anticipate any impacts to be relatively minor, especially when compared to

alternative MPA sites which cover similar habitat types. We also acknowledge that marine reserves may alienate customary interests and values and this in itself is an adverse effect, irrespective of existing levels of customary use of the site. Undue focus on fishing as opposed to a full range of threats. In order to complement the controls provided by the proposed marine reserves and Fisheries Act regulations, we recommend that the biodiversity protection benefits of the five MPAs should be enhanced by reviewing the consent conditions of all consents located within 200m of the MPA sites (as identified on SeaSketch and in Appendix Three of this submission). The purpose of the review is to identify whether any of the activities have adverse effects on the identified biodiversity values of the sites and, if so, to amend the consent conditions to avoid, remedy or mitigate the identified adverse effect. (#2467)

- It is my opinion that the proposed Marine Protected Area (MPA) would have a significant impact on an area of in-shore fishery which is already adequately and sustainably managed under our quota management system (QMS). While it may be politically desirable at present to be seen to establish MPAs, the question needs to be raised as to whether the long-term management of this resource is best served by MPAs or by continuous improvements to the quota management system. The permanency of MPAs gives them a high level of inflexibility when it comes to required change. The management of this area under our QMS by MPI and the regulatory requirements provides a flexible and effective resource management tool. Therefore, it is my opinion that any MPAs should be selected where it is believed the existing regulatory guidelines do not operate effectively and to areas which have a minimal impact on affected user groups. (#2690)
- Residents and visiting fishers spend over \$172 million on fishing in the South Island. This contribution to the local economy needs to be factored in. (#2891)
- Impacts on shore based fish processing activity. The reduction in throughput of fish would cause redundancies in our business in the vicinity of 30% with the current proposals. This would equate to roughly 10 staff and the flow on effects to their families and the community. It is our submission that should the MPAs be implemented as proposed it would decimate most of the local fishing fleet. (#2691)
- If the MPAs go ahead as proposed, many would be forced out of the industry with no compensation. Although it is difficult to quantify precisely how much is bought into the community economically through fishing, tentatively place the value at \$15-20 million. (#2880)

9.2.4 Additional common themes

^{102.} A number of 'additional' themes that are not necessarily considered as part of the policy guidelines for creating a network of MPAs, that were commonly raised by submitters in their comments regarding creating an MPA network include:

- Existing discharges (e.g. stormwater, wastewater) within proposed MPAs need to be considered. (#436, 661, 1108, 2508, 2882)
- More marine science and or analysis on networks is needed before large areas are consumed by MPA networks. (#1108, 2565, 2683, 2880, 2891)

- Need for there to be proper monitoring programmes in place for a network to be effective. (#239, 382, 2885, 2886)

9.3 Proposed Networks

103. The submission form provided submitters with the opportunity to select sites from the list of proposed sites to identify a network of MPAs. Given the significant number of submitters that responded to the proposal with approximately 2000 providing comments on creating a proposed network a wide range of proposed MPA networks have been provided.
104. The number of submitters that provided a common proposed MPA network ranged from 484 down to 2. An overview of the range of proposed MPA networks can be found in Appendix 2.
105. A proposed MPA network of sites A, B, D, G, H, T, was the most common with 766 submitters identifying these sites as a potential network. A large majority of these submissions were proforma. An additional 24 submitters proposed a similar network however excluded the inclusion of site T.
106. One of the general reasons for this proposed network was:

“Our club (200 members approx) agrees to the above areas being part of a network of MPAs. We do not agree to any other areas being closed off due to the exposed nature of our coast, lack of sheltered fishing areas, safety of small boats, limited number of days fishing due to weather and sea conditions, social impacts (negative) to people who fish in these areas, live in these areas, and play in these areas” (#345)

107. A common theme coming through in support of the most commonly supported network from both recreational and commercial interests was it would have the least impact on a number of users. Reasoning from a number of individual submitters for proposing this (A, B, D, G, H, T) network was also that the area would provide for a diverse range of marine habitats and ecosystems while also protecting whole habitats and ecosystems. This was well summarised by a submitter who stated:

“The areas above offer significant variation in marine habitats without a major impact on customary, local and commercial users” (#130)

108. Other reasons for support of this network included:

“I think that if we look at these smaller areas being managed rather than locking up large chunks of coast then there could be benefits to other areas as well.” (#33)

“Diverse areas of species. Diverse number of sea and shore structures. Tides from north and south meet. Safe harbours for access. Close search and rescue resources in case of mishaps. More moderate weather and sea conditions (except area H). More workable weather and sea conditions for study of closed areas. Areas A, B, D, G have spawning areas of endangered sea life.” (#193)

109. In terms of the size of a potential network of MPAs, in general it was widely expressed that a network should be restricted to (A, B, D, G, H, T) as the Forum does not have enough information to identify the positives and negatives of 'locking up' additional areas.

110. The reasoning for the 25 submitters that chose A, B, D, G, H as an MPA network is well summarised by the following comments:

"These areas will be enough to protect at this time. I don't believe that the SEMPF need all of our coastline." (#220, 221)

"All habitats are protected with as minimal impacts to livelihoods, opportunities, culture and health of our community. This is more than generous. - Fishery management makes more sense than a blanket "No Take" decision." (#457, 1258)

111. The position of the 24 submitters that supported the inclusion of all proposed sites in a potential network of MPAs is summarised well by the following comments:

"It is best for marine ecosystem health to create as much connection between areas as possible. It allows the movement of organisms between areas to promote gene flow, and to escape the effects of global warming in areas at higher risk." (#56)

"The proposals in total allow for less than 6% of the total available area to be protected. This is well short of international best practice, which recommends a minimum of 10%. For this reason, I have selected all the options. I recognise that in some cases they overlap, and the Forum will have to exercise some judgement in choosing which to take, but I am signalling to you that my view is that the overall proposed network is the bare minimum that should be protected." (#153)

"This is great start and offers a diverse range of important habitats." (#381)

"I believe that areas currently proposed are a minimum in both area and distribution of locations required to create a successful marine protected area network." (#625)

112. For the 13 submitters that supported the inclusion of all the sites except G and H within a network of MPAs, no specific reasoning was provided.

113. All other variations of proposed networks were supported by 10 submitters or less.

10 Submissions on Marine Protected Areas

10.1 A - Tuhawaiki to Pareora (Type 2)



114. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site A have been summarised in supplementary reports.

10.1.1 Support for Site A

115. Submitters in support of Site A made the following comments.

Habitat/Biodiversity

- The importance of the site for biodiversity including habitat for elephant fish, shark, penguins and Hector's Dolphins. (#25, 33, 65, 101, 107, 110, 122, 125, 129, 208, 217, 227, 242, 248, 276, 284, 285, 322, 327, 345, 346, 353, 369, 381, 402, 403, 408, 409, 414, 426, 457, 464, 475, 555, 558, 559, 570, 576, 577, 581, 582, 625, 630, 631, 657, 678, 679, 697, 712, 722, 728, 736, 740, 748, 773, 1270, 1271, 1272, 1273, 2479, 2492, 2494, 2502 2509, 2667, 2671, 2672, 2673, 2676, 2677, 2678, 2679, 2681, 2682, 2686, 2692).
- Site is a hot spot for Hector's Dolphins. (#213, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141))
- The need for protection from seabed disturbance. (#21, 25, 466, 598, 1108, 1897, 2497, 2501, 2504, 2672, 2885, 2886)
- To protect habitats and ecosystems. (#138)
- A positive for marine life. (#32, 56, 63, 76, 248, 251, 265, 395, 417)
- Important breeding ground or nursery. (#33, 101, 102, 121, 125, 208, 217, 248, 259, 260, 270, 281, 284, 285, 286, 322, 327, 341, 345, 346, 393, 408, 414, 434, 459, 460, 464, 466, 558, 564, 577, 582, 603, 625, 631, 679, 710, 722, 736, 758, 767, 773, 1108, 2479, 2494, 2509, 2667, 2671, 2673, 2677, 2678, 2679, 2681, 2682)

- More protection needed. (#347, 554, 642, 737)
- Habitat of particular significance for fisheries management. (#2467)
- There is a horrifying decrease in the numbers of most animals on the coast. Fewer shells on the beaches and fewer varieties. Fewer seagulls and starving sea lions last year. I support a total ban on as many areas as possible and then look at what can be sustainably fished and how. (#593)

Recreation

- Allows for recreational fishing. (#251, 411, 422)
- Would not have an adverse effect on recreational users. (#69, 234, 293, 393, 424, 428, 429, 430, 431, 454, 586, 587, 589, 725)
- Will be beneficial for recreational fishing. (#280, 282, 422)
- Don't try to fix something that isn't broken. Fishing is an important recreation that keeps families together don't take that away from us. (#1073)

Commercial

- The existing voluntary ban on commercial trawling already being in place anyway so there is less of an impact on commercial fishing. (#49, 168, 183, 217, 219, 242, 275, 276, 290, 291, 294, 327, 345, 353, 401, 457, 474, 475, 582, 679, 722, 758, 1258, 2472, 2479, 2494, 2501, 2509, 2677, 2678, 2679)
- Support this area based on the agreement of commercial and recreational users of the area. (#352, 411)
- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)
- Not used by commercial fishermen. (#341, 606)
- The proposed MPA is inconsistent with MPA Policy. There is no evidence that the fishing methods in question may have such impacts; and impacts of this nature would be unlikely given the relatively low level of fishing intensity at the site. Furthermore, the proposal is based on irrelevant considerations (fisheries management considerations), and does not protect habitat types that are already protected. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – the objectives of the MPA are implicit rather than explicit, no threats are identified and it is not a least cost approach. (#2467)
- Minor impacts on commercial fishing rights. (#2467)

Tourism

- The importance of tourism. (#74, 403)

Fishing Methods / Limits

- A number of submissions supported banning of all net fishing, commercial long line, dredging, mid water trawling or restricting the number of hooks on fishing lines. (#25, 73, 89, 101, 102, 107, 213, 218, 355, 359, 402, 404, 433, 559, 625, 630, 710, 736, 748, 753, 1897, 1961, 2466, 2472, 2479, 2497, 2504, 2672, 2677, 2678, 2679, 2880, 2885, 2886)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- Reduce recreational bag limits. (#387)

Monitoring

- Support but important to monitor fisheries. (#647)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Other

- More protection required. (#5)
- Compliments adjacent mātaītai reserve. (#49, 101, 102, 150, 183, 208, 248, 322, 355, 409, 466, 603, 710, 730, 758, 776)
- Well suited for a reserve, hard to reach only the commercial boys to keep out. (#172)
- Support Type 2 MPA in this area. (#220, 221, 242, 467)
- Support Type 1 MPA in this area. (#220, 221)
- All information available seems to have a minimal effect on uses of this area. (#247)
- Every piece of protection is important. (#556)
- Support in principle. (#612)
- Would form an important northern component of a South-East Marine protected area network. (#684)
- Would not have an adverse effect on users. (#345, 603)
- I have not fished this area historically, so would not be against this proposal. (#384)
- Better monitoring of discharges to the sea required. (#387)

116. Two common examples of reasons for support for this site are below:

"I like the proposal you have for this area as it includes some recreational fishing and also good marine environment protection." (#251)

"Already a Mātaitai, so seems sensible to have a Type 2 Reserve here. Prohibit all net fishing, commercial long lining, and mid water trawling. This will protect the school shark pupping and elephant fish egg cases." (#102)

10.1.2 Opposition to Site A

117. Submitters opposed to Site A made the following comments.

Recreation

- Impacts on recreational users. (#235)

Commercial

- This is happening at the expense of the commercial fishing industry. (#374, 590, 591)

Supporting evidence

- There was not enough data on the depletion of these areas and that evidence should be provided before restricting access. (#40, 382)

Weather / Safety

- That the natural environment took care of limiting access to the area and therefore the depletion of fisheries and habitats. (#163, 197, 382)

Social

- Restricting access to this area would have social impacts on the community. (#382)
- People have fished here for many years and would like to continue. (#235)
- This is a violation of the Treaty of Waitangi. (#374, 634, 742)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)

Other

- I am totally opposed to a reserve. (#638)

- Good breeding ground for juvenile fish. (#680)

10.1.3 Recommended Changes to Site A

118. Submitters that recommended changes to Site A made the following comments:

Greater Protection

- Change in protection from Type 2 to Type 1. (#595, 630, 678, and 1062)
- Suggest that the shallow reef component of area A be listed as a fully no take marine reserve (Type 1 protection). (#625)
- Monitoring and upgrading to a Type 1 reserve if biodiversity values are not sufficiently protected. (#647)

Extension of the Site

- 1 NM offshore for the protection marine breeding grounds. (#73)
- 12 NM off shore and 4 miles south of the Pareora River mouth for the protection of the Hector's dolphins that are threatened due to trawling and gillnetting. (#625)
- Extend 12 NM offshore to protect the different life-history stages for species. (#2484, 2659, 2671, 2677, 2678, 2679)
- Needs to cover a larger area to be effective including the destructive methods of commercial and setnetting being banned out to 12 NM / or 100m depth contour throughout the entire Forum area. (#2479, 2677, 2678, 2679)
- Extend offshore. (#73, 365, 403, 1062, 2667, 2681, 2682)
- Recommend it is substantially enlarged alongshore and offshore and that restrictions apply to all forms of fishing, commercial and recreation to protect an egg laying area known to be used for Elephant Fish. (#2673)
- Enlarged 10km alongshore and 12 NM offshore. (#2472, 2509, 2671)
- 4 km south and 6 km off shore as well as off shore to 6 km extending north and east to 'wrap-around existing Mātaitai. (#595)
- Extend alongshore and to edge of kelp forest. (#734)
- Extend 1 kilometre offshore and 1 kilometre south. (#770)
- Enlarge alongshore and offshore. (#401, 722, 735, 753, 1897, 2472, 2501,)
- Needs to be adjusted to encompass Caroline Bay and Smithfield beach area / Washdyke Lagoon which carries a Mātaitai reserve status, particularly for the protection of Yellow-eyed penguins but also his allows protection of the beach, seabed and coast to

the fish and habitat living in and on the edge of the existing Mataitai reserve (Washdyke Lagoon). (#2466)

- Enlarge. (#2497, 2504, 2885, 2886)

Less Protection

- Type 2 MPA with Fisheries Act prohibitions on bottom trawling and dredging. (#2508)

Other Changes

- Reduce Sand flounder catch limits to 10 per day. (#2466)
- Ban on drag netting or as an alternative no drag netting half an hour before dusk through to half an hour after sunrise. (#2466)

Fishing Methods

119. The table below shows the fishing methods that submitters thought should be banned within Site A and the submitters who support the ban of those fishing methods:

Fishing methods	Submitters who support banning fishing methods
Dredging	#25, 125, 218, 466, 630, 736, 748, 753, 2508, 2672, 2880
Trawling	#25, 125, 466, 598, 625, 630, 736, 748, 753, 1108, 2508, 2672, 2677, 2678, 2679, 2880
Long line of more than 5 hooks / kontiki	#359, 630, 710, 89, 107, 150, 213, 218, 355, 402, 404, 433, 559, 736, 758, 1897, 2466, 2497, 2504, 2672, 2885, 2886
Commercial long line	#25, 101, 102, 107, 136, 150, 218, 355, 359, 433, 440, 625, 710, 736, 753, 2472,
Net fishing	#25, 101, 102, 107, 136, 150, 218, 355, 359, 404, 443, 440, 559, 625, 710, 728, 736, 753, 2472, 2466, 2672, 2679
Mid water trawling	#25, 101, 102, 107, 136, 150, 218, 355, 359, 443, 440, 710, 736, 753, 2472
Destructive fishing methods	#213, 581, 1897, 2479, 2497, 2501, 2504, 2677, 2678, 2885, 2886
Gill netting	#625
Danish Seining	#630

- We support a complete fishing restriction in this MPA. (#1961)

- Support the protection of species and the reduction in fish take such as Blue Cod to 20/fisher should be considered by the Forum. (#167)
- Concern that mixed trawling (not just trawling for flat fish) which is permitted with low-headline nets is occurring within this trawling restricted area. (#2679, 2677, 2678)

10.1.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

^{120.} Ngāi Tahu, Manawhenua and Tangata Whenua submissions for site A included the following comments:

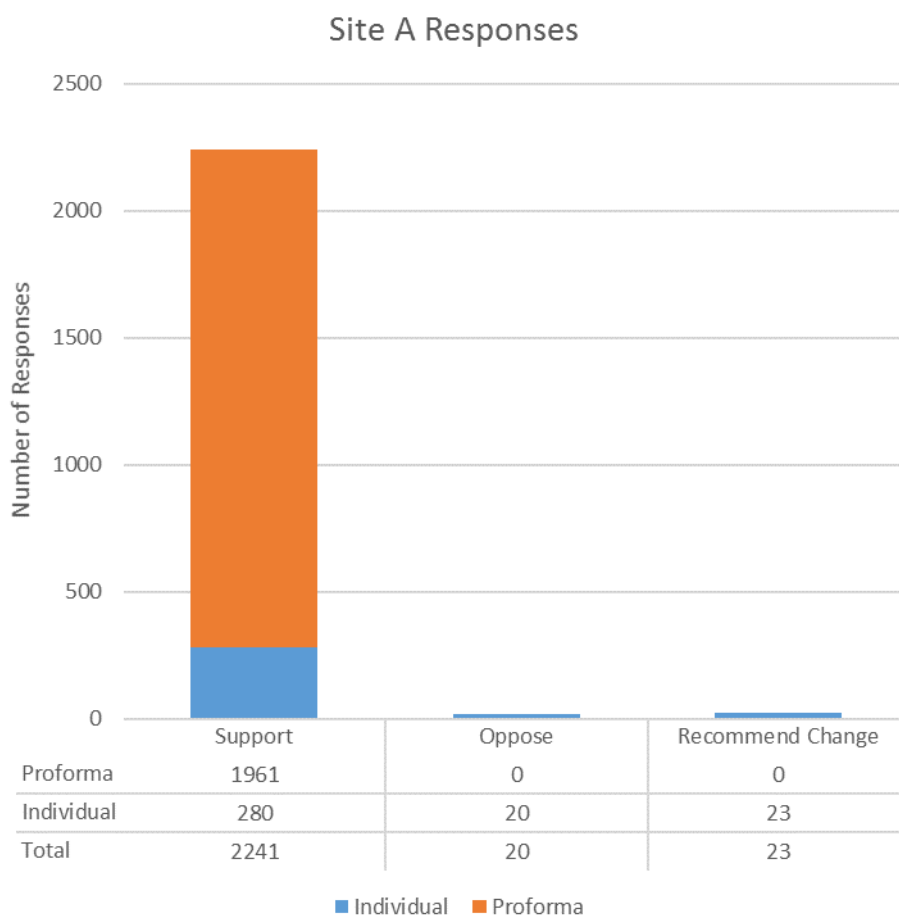
- Support in principle. (#612)
- Support in principle as available information suggests the proposal has limited impact on customary commercial and non-commercial fishing rights and interests. (#2887)
- Complimentary to purposes of adjacent mātaimai. (#776)
- Oppose on basis of loss of customary rights. (#742)
- If the New Marine Protected Areas Act were to be established we would propose a 'Seabed Reserve' as described in the New Marine Protected Areas Act Consultation Document released by the Ministry for the Environment in January 2016. (#2887)

10.1.5 Additional comments

- Submitter has an existing resource consent to discharge contaminants to the Coastal Marine Environment, the discharge is also provided for by way of an AE water quality area in the Canterbury Regional Plan. It is unclear to the submitter to what extent these have been recognised and taken into account (in terms of effects, values and boundaries) in choosing sites. Their request is that the area no longer overlaps the AE Water Quality Area and recognise that the consented discharge does not affect or impact on the values that the proposed MPA is aiming protect. Refer to the original submission which contains supporting information. (#2496)

10.1.6 Submission Numbers

121. The below chart illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.1.7 Technical information and mapping

122. Information was provided by a number of submitters in relation to:

- Cited references. (#2496, 2671)
- Ecological / Habitat information. (#2466)
- Commercial fishing information. (#2467, 2887)
- Resource consent information. (#2496)

123. Submitter maps showing changes for this site are located in Appendix 4.

10.1.8 Responses to focus questions from the consultation document Volume 1

a. Does this area provide adequate protection for the habitats included?

See Support, Oppose and changes sought comments.

**b. How would this proposal affect your current or future use of the area?
How would this proposal affect you?**

See Support, Oppose and changes sought comments.

**c. Do you support this area going forward as a part of the south-east
marine protected areas network? Why? Why not?**

See Support and Oppose comments.

**d. If you do not support it in its current form, are you able to suggest
alternatives to the proposal that would make it more acceptable, such as
changes to its location, size, boundaries and specific rules?**

See changes sought comments.

**e. Do you agree that prohibiting recreational fishing with kontiki lines, or
other lines with greater than five hooks would assist in protecting the
area?**

See fishing methods section in the changes sought comments.

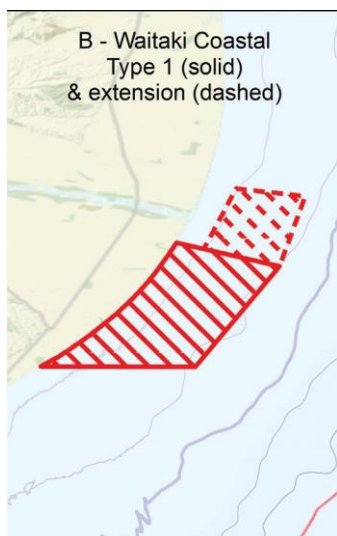
**f. For the fishing methods noted above, how often are they used by you in
this area, and how much of each species is taken by these methods?**

No information was provided on this question.

**g. Do you have any information that would help the Forum decide what
restrictions if any to recommend?**

No information was provided on this question.

10.2 B - Waitaki Coastal (Type 1)



124. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site B have been summarised in supplementary reports.

10.2.1 Support for Site B

125. Submitters in support of Site B made the following comments.

Habitat / Biodiversity

- Protection for Hector's Dolphins and Penguins (including foraging habitats). (#25, 49, 101, 102, 107, 122, 168, 217, 219, 227, 270, 276, 284, 285, 286, 290, 322, 355, 359, 369, 378, 381, 383, 400, 401, 402, 409, 414, 426, 427, 428, 429, 430, 431, 459, 460, 464, 478, 559, 570, 581, 583, 586, 587, 589, 625, 630, 631, 678, 728, 729, 730, 733, 736, 748, 767, 770, 771, 773, 1270, 1271, 1272, 1961, 2489, 2492, 2494, 2497, 2498, 2501, 2502, 2507, 2509, 2567, 2672, 2675, 2677, 2676, 2679, 2686, 2692, 2705)
- Rhodoliths are internationally recognised as being critical habitats for biodiversity and have been documented as being sites for key juvenile stages of many organisms. These habitats remain poorly known in the South Island. They are known to be highly vulnerable to any bottom disturbance (slow growing, fragile - and easily smothered by sediment). (#25, 355, 559, 710, 722, 2494)
- Protection for unique gravel habitat. (#101, 102, 150, 183, 355, 359, 402, 408, 427, 478, 710, 736)
- Protection of biodiversity including seabirds and general marine environment. (#25, 65, 138, 186, 355, 401, 442, 555, 559, 625, 684, 710, 720, 722, 770, 771, 1108, 2672)
- Providing a good linkage with B and C (including for the protection of penguins). (#478, 697, 722, 729, 771)

- Important region for primary productivity, due to the freshwater input from the Waitaki River mouth. (#293, 684, 722, 735, 2509)
- A breeding ground. (#125, 281, 396, 408)
- Ecological benefits. (#291, 294)
- Enhance our marine environment for now and for the future. (#347)
- To protect Otago's unique and important marine habitats and ecosystems. (#395)

Recreation

- It does not impact on recreational Salmon fishing at the Waitaki River mouth. (#21, 73, 168, 188, 206, 242, 287, 310, 341, 346, 353, 457, 475, 625)
- The site is not important for recreational and/or commercial fisherman. (#69, 247, 248, 428, 429, 430, 431, 586, 587, 588, 589, 680)
- Minimal recreational impact. (#172, 208, 293, 345, 349, 367, 417, 424, 603, 747)
- Lower recreational catch limits. (#2512)
- Don't try to fix something that isn't broken. Fishing is an important recreation that keeps families together don't take that away from us. (#1073)

Commercial

- The site is not important for recreational and commercial fisherman. (#69, 167, 428, 429, 430, 431, 586, 587, 588, 589)
- Will be good for eel habitat. (#564, 680)
- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)
- The proposed MPA is inconsistent with MPA Policy. There is no explanation why a marine reserve is required to meet the protection standard. Furthermore the proposal is based on irrelevant considerations (reducing the risk of incidental fisheries captures and benefits to recreational salmon fishing), and does not cover any new unrepresented habitat types. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – the biodiversity protection objectives are not clearly stated, no threats are identified and it is not a least cost approach. (#2467)
- Minor impacts on commercial fishing rights. (#606, 2467)

Tourism

- Tourism benefits. (#49, 74, 150, 188, 679)

Fishing Methods / Limits

- Reduce recreational bag limits. (#387)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Social

- Significant long term benefits for communities. (#646)

Extent

^{126.} The consultation document proposed an extension to Site B to the north (dashed red area on map above). Submitters who supported Site B did not always support the extension of the area.

^{127.} Submitters who clearly identified their support for the extension to Site B made the following comments:

- To protect a wider area for Yellow-eyed penguin, Little blue penguin and/or Hector's dolphin. (#20, 25, 67, 76, 95, 101, 102, 107, 110, 121, 129, 150, 186, 213, 242, 353, 355, 369, 381, 383, 401, 402, 425, 426, 427, 457, 475, 555, 558, 559, 570, 577, 581, 583, 625, 647, 722, 729, 730, 734, 736, 743, 748, 770, 1258, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1894, 1961, 2472, 2479, 2489, 2492, 2494, 2497, 2498, 2501, 2502, 2667, 2672, 2675, 2676, 2677, 2678, 2679, 2681, 2682, 2686, 2692, 2705, 2885, 2886)
- Support the extension with a further extension out to 12 NM to provide better representation of foraging habitats used by blue penguin, Yellow-eyed penguin and Hector's dolphin. This area is an internationally recognised 'Important Bird Area' (IBA). (#1482 (Forest and Bird Proforma x 1084), #1628 (Fish Forever Proforma x 141))
- To protect marine processes related to the Waitaki River Mouth. (#401, 647)
- To extend the marine protection area to protect more of the unique gravel habitat. (#25, 101, 102, 150, 355, 402, 427, 558, 625, 722, 736, 2667, 2681, 2682)
- The extension will have limited impact on recreation and commercial fishing. (#242, 287, 353, 401, 457, 475, 725, 1258, 2501)

- General statement for the protection of biodiversity/habitat/ecosystem. (#25, 30, 32, 56, 101, 102, 107, 186, 287, 355, 425, 426, 427, 554, 556, 557, 558, 559, 625, 684, 722, 729, 736, 770, 774, 1062, 2498, 2667, 2681, 2682)
- Extension creates better designed area. (#375)
- No Reason. (#206, 394, 600, 617, 642, 733, 753, 2482)

128. Submitters who clearly identified their support for Site B but opposed the extension made the following comments:

- Impact on commercial fishing from restricting areas. (#345, 411)
- Negative impact of recreational fishing. (#234, 265, 280, 341, 345, 346)
- Protection of biodiversity/habitat/ecosystem met without extension. (#217, 327, 687)
- Continued recreational fishing won't have adverse effects. (#254)
- Weather provides enough protection. (#265)
- Excluding the extension – Type 1 MPA (marine reserve). (#2508)
- No reason. (#204, 259, 260, 282, 304, 307, 328, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 352, 356, 373, 436, 598, 1099, 2508, 2880)

Other

- More protection required. (#5)
- I believe this will be beneficial to all parties. (#66)
- This is not an area that I have fished. I'm not against commercial activity being restricted in this area. (#384)
- I support the protecting of all our coastline. (#390)
- Support because I agree with recommendations. (#455, 458)
- Support in conjunction with the Type 2 proposal. (#758)
- Better monitoring of discharges to the sea required. (#387)

10.2.2 Opposition to Site B

129. Submitters opposed to Site B made the following comments:

Habitat / Biodiversity

- The problem is soil and water pollution and sewage overflow killing kelp. (#663, 667)
- Not only is the fish population high, their condition remains excellent. (#562)

Supporting Evidence

- Lack of data on depletion and degradation of the environment to justify removing public access. (#40, 382, 562, 634)

Recreation

- Wish to continue to use this area for recreational fishing. (#235, 590, 591, 638, 652)
- No take areas are contrary to the rights of people to fish for food. I am in favour of restrictions on size and amount taken but not on a blanket ban. (#140)

Commercial

- At the expense of the commercial fishing industry. (#374, 590, 591)

Fishing Methods / Limits

- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)

Weather / Safety

- Weather and tides already protect this area. (#163, 197, 382, 590, 591, 663, 667)
- Risk to the safety of recreational fisherman, who will need to go further offshore. (#50, 264, 382, 663, 667)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- The proposal takes away Kāi Tahu customary rights under the Treaty of Waitangi. (#740, 742)

Displacement

- Displacement of fishing activities, creating more intensive fishing in other areas. (#50, 590, 591)

10.2.3 Recommended Changes to Site B

^{130.} Submitters that recommended changes to Site A made the following comments:

Less Protection

- Consider other management tools such as a proposed a change in catch limits for blue cod to 20 per fisher and lower bag limits of kahawai, or general catch limits. (#81, 167, 663, 774)
- Allow recreational fishing. (#206)
- Shore based fishing allowed. (#187)

Extension of the Site

- Extension out to 12 NM for better representation of foraging habitats for blue penguin, Yellow-eyed penguin and Hector's dolphin. (#67, 122, 129, 213, 227, 239, 378, 426, 576, 630, 657, 678, 693, 697, 719, 728, 770, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2497, 2498, 2504, 2659, 2671, 2676, 2677, 2686, 2692, 2885, 2886,)
- Extend north and to 12 NM (#422) for a meaningful protection of key species of seabirds, including Yellow-eyed penguin. ... There are registers showing that this species is part of the bycatch of the fishing operations taking place north of the Waitaki river mouth. (#693)
- The shape within the extension would be difficult to enforce. It needs to be extended into the shoreline, banning fishing off the river mouth, but still allowing recreational beach surf casting. (#2677, 2678, 2679)
- Submitters proposed further extension, but did not specify an area. (#737)
- Extend seaward, include river mouth, extend north. (#2494)
- Extend to 12 NM offshore and to the northern boundary of Waimate, Site C should also extend 12 NM offshore to encompass locations where by catch has been observed. (#95)
- Extend to Shag Point. (#185)
- Extend to include river mouth as it is an important habitat for penguin. (#365)
- Extend boundary south of Waitaki River by a further 1km. (#206) (Refer to Appendix 5 for a map to show the boundary described.)

- Extend north to Waimate to protect Yellow-eyed penguins from set netting bycatch. (#574)
- Extend north for meaningful protection of key species. (#693, 743, 1347, 2509)
- Extend north and 5km offshore. (#2507)
- Extend north to protect only part of a reef area. The area should include the currently omitted zone at Waitaki River. No concessions should be made to support fishing for Whitebait. The native fish species that collectively make up Whitebait are widely acknowledged to be seriously depleted. (#2509, 2673)
- Extend 12 NM offshore and 16 NM north of the Waitaki River to safeguard protected species at this important foraging area. (#729)
- Request for the largest possible area. (#707)
- Too small, the area should match Site C. (#718).
- Extend south to the mouth of the Kakanui River. This would incorporate a substantial amount of important shallow, alongshore reef north of Kakanui and around Cape Wanbrow. This habitat is generally the target for the majority of recreational fishing in the area, and so suffers from depleted stocks. This alongshore habitat supports important macroalgal communities and so has high biodiversity value. (#625)
- Northwards extension of the area B boundary, and suggest that this boundary be further extended in a coastwise directions to the mouth of the Waitaki River and include a recreational fishing zone 200m either side of the mouth. (#625).
- Extension of type 2 area north and south approximately 7 km and extend type 2 area within this offshore a further 2 km and north a further 10 km. This would contribute towards desirable 10-15% of total area in protection reduce pressure by commercial and recreational fishers on type 1 reserve at its boundaries (boundary more extensive and ratio of edge to area reduced). Brings more kelp forest into type 1 protection including more area to north of Waitaki River. (#595)
- The shape with the extension would be very hard to enforce. It needs to be extended into the shoreline, banning all commercial fishing off the river mouth, but still allowing recreational beach casting. (#2677, 2678, 2679)

Reduction of the Site

- Cut back to only one mile from shore. (#372)
- Opposes extension as it is too important for commercial fishing. (#411)
- No extension. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Move vertices B.6-B.5 north to Pukeuri and have it 90 degrees to the coast as it will be easy to see where it is rather than the diagonal. The B1, B2, B3, B4 area is sometimes used by recreational boats. Can it be smaller or removed or changed to Type2. (#251)

- The beaches in the proposed reserve are a popular area for recreational surf casting/contiki fishing and should be considered alongside the salmon and white baiter fisherman and continue to fish from the beach at the many accessible places. This form of fishing has little of no impact towards any marine animals or environments. I believe that the pollution from dairy farming is having a greater negative impact on marine animals and environment than any beach fisherman. I would like to recommend that the reserves start half a NM from the beach to allow surf casting/contiki fishing to be accessible to any fisherman. People and families should be allowed to continue to have the enjoyment of fishing together. (#271)

Other

- A concession for whitebait fishing is inappropriate. The native fish species that collectively make up whitebait are severely depleted. (#2509, 2673)
- At the Waitaki River mouth a submitter proposed there might be options to improve practices or modify fishing gears to minimize mortality of seabirds during operations in the area located between the coast and the proposed MPA. For example, an option is to implement a temporal and/or spatial zoning scheme to improve fisheries management. To do so, there should also be further studies to assess the magnitude and nature of fisheries interaction with wildlife. (#693)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection. (#2467)
- Minor impacts on commercial fishing rights. (#2467)

10.2.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

131. Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site B included the following comments:

- Support but need provision for retrieval of cultural material. (#612, 2887)
- Support a protected area for this type of habitat. (#776)
- Support in principle. Manageable impact on customary commercial and non-commercial fishing rights and interests. Northern boundary designed to exclude the coastline adjacent to the Waihao Māori reserve and the coastline adjacent to the Te Awakomuka Maori Fishing Reserve and Korotuaheke Maori Reserve. Order in council to include provision for the retrieval of stranded or naturally separated parts of marine mammals and kōiwi tangata. (#2887)
- Oppose on basis of loss of customary rights. (#742)
- Oppose on basis of displacement of fishing effort. (#658)

10.2.5 Additional comments

132. Additional comments made by submitters on Site B:

- Submitters were also wanting to clarify process issues in terms of what would happen if one or the other of the options do or do not go ahead. (#774)
- Another comment that was raised regarding the Forum was that there is a lack of recreational fisherman on the Forum. (#663, 667)
- Concern is raised that in Volume 1, it clearly states that set net for rig and school shark is still occurring within this set net bank area, which would be illegal. (#2677, 2678, 2679)

10.2.6 Technical information and mapping

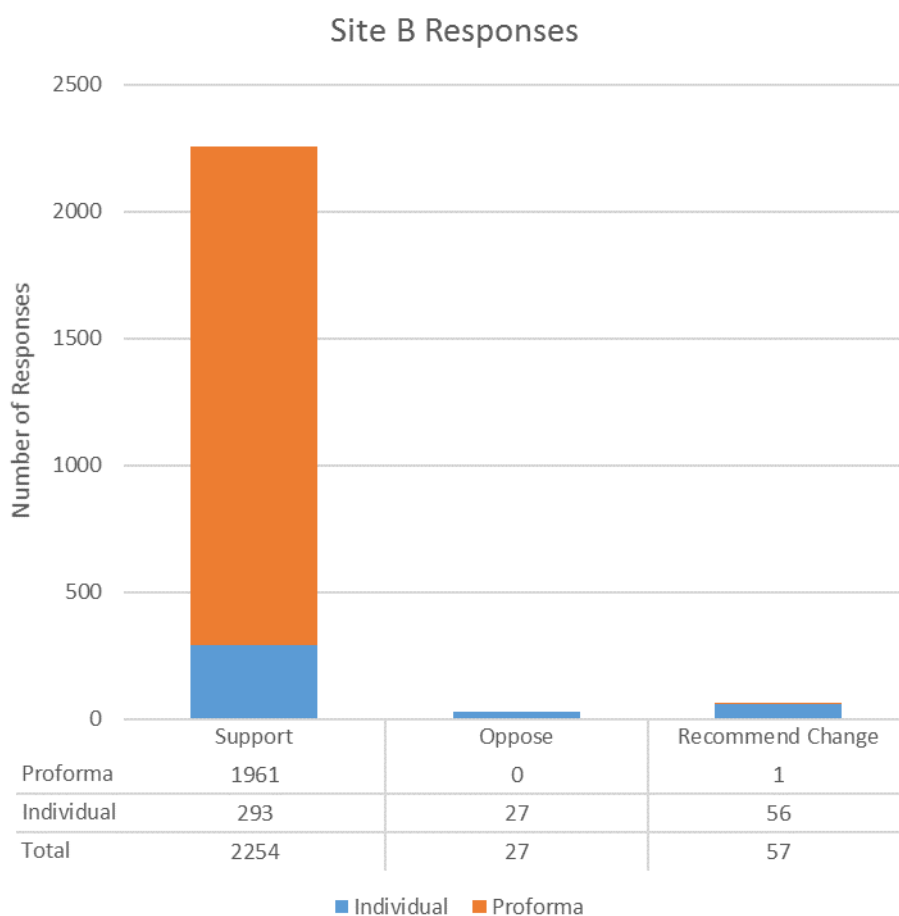
133. Information was provided by a number of submitters in relation to::

- Ecological / habitat information. (#2494)
- Commercial fishing information. (#2467, 2887)
- Cited references. (#736, 1897, 2501, 2671)

134. Refer to Appendix 26 for further information. Submitter maps showing changes for this site are located in Appendix 5.

10.2.7 Submission Numbers

135. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.2.8 Responses to focus questions from the consultation document Volume 1

136. Two submitters responded directly to the questions posed by the Forum in consultation document volume 1. The questions and subsequent responses are below:

**a. Does this area provide adequate protection for the habitats included?
Response:**

Yes (#218)

b. Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?

Yes (#218)

c. Would it be preferable to include the extension to the north of the proposed marine Response: reserve in the MPA network? Why? Why not?

Yes (#218)

- d. How would this proposal affect your current or future use of the area?
How would this proposal affect you?**

Increase my use of (#218)

....Impact on me? Huge! I hate to see the country I was born in and the oceans that surround it suffer continual degradation and loss as humans impact more and more on our environment... (#558)

- e. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?**

N/A (#218)

10.3 C - Waitaki Offshore (Type 2)



137. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site C have been summarised in supplementary reports.

10.3.1 Support for Site C

138. Submitters in support of Site C made the following comments.

Habitat / Biodiversity

- Protection for Hector's dolphins, Penguins and/or seabirds. (#49, 67, 95, 107, 110, 122, 129, 213, 273, 355, 380, 381, 400, 401, 402, 426, 478, 558, 570, 576, 583, 606, 617, 630, 647, 657, 678, 697, 719, 722, 728, 729, 730, 736, 748, 770, 1062, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 1961, 2497, 2472, 2479, 2489, 2492, 2494, 2501, 2502, 2504, 2507, 2509, 2671, 2672, 2673, 2677, 2678, 2679, 2686, 2692, 2484, 2885, 2886)
- Protection for Kelp forest habitat, rhodolith beds, and gravel bed habitat that support marine life. (#76, 125, 355, 464, 478, 559, 574, 625, 642, 710, 722)
- Protection of biodiversity for future generations. (#65, 74, 138, 347, 552, 642)
- Compliments Site B in protecting a larger area of the marine environment. (#150, 201, 355, 359, 425, 464, 478, 558, 574, 577, 581, 606, 697, 720, 736, 758, 770, 2675)
- Important to capture the influence of the Waitaki discharge and associated nutrient flows in an MPA network. (#770, 2484).
- Would still allow high value commercial and recreational harvests whilst maintaining the integrity of the coastal systems and processes. (#684)

- This area (B&C) is essential to a network of marine protection. It showcases the unusual cobble/gravel ecosystem and provides important kelp and rhodolith habitat, which support a diverse flora and fauna, including iconic vertebrates like penguins and dolphins. This place has the whole package and should be a flagship marine protected area. I support both extensions. Together they cover about 350 km², a good big chunk of the coastline that will really have an effect on biodiversity and productivity in the area. (#355)
- Breeding ground. (#281)
- To protect Otago's unique and important marine habitats and ecosystems. (#395)

Recreation

- It does not impact on recreational Salmon fishing at the Waitaki River mouth. (#201, 206, 367, 581, 2489, 2675)
- Improved Salmon fishing. (#49)
- Minimal recreational impact. (#167, 201, 367, 684, 747, 2672)
- Strongly support the Type 2 MPA in this area because of the important fish breeding ground. (#396)

Commercial

- Only support if it is Type 2 as customary commercial interests will be heavily impacted. (#612)
- Would have minimal impact on commercial. (#49, 684, 770)
- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Tourism

- It would be good for tourism. (#49, 74)

Fishing Methods / Limits

- Submitters also supported banning methods of fishing, (e.g. set net bans, dredging, trawling, Danish seining). (#440, 2484, 2501)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- Lower recreational catch limits. (#167, 387, 2512)

Potential for Research

- Provides opportunity for research. (#574)

Extent

- Submitters that supported the main area of Site C plus the small extension/extension in general. (#25, 30, 56, 67, 95, 107, 136, 150, 347, 355, 369, 555, 557, 559, 570, 574 583, 642, 710, 720, 729, 737, 753, 1062, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2489, 2498, 2679, 2671, 2678, 2677)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Other

- More protection required. (#5)
- I support this in addition to option A and B, not as an alternative. Type 1 MPAs will usually have a better outcome. (#121)
- I support the protecting of all our coastline. (#390)
- I support the most extensive marine protection possible. (#554)
- Better monitoring of discharges to the sea required. (#387)
- It compliments Type 1. (#556)
- This Type 2 still allows fishers enough scope. I agree with the restrictions. (#725)

10.3.2 Opposition to Site C

¹³⁹. Submitters opposed to Site C made the following comments.

Recreation

- Disadvantaging recreational fishers by the proposal. (#13, 69, 216 (Tautuku Fishing Club Proforma x 739), 217, 414, 424, 428, 429, 430, 431, 562, 564, 586, 587, 588, 589, 590, 591, 652, 680, 810)
- Not enough recreation representation on the Forum. (#1258)
- I have fished this area and do not feel the current restrictions are in need of change. (#384)

- I don't see how recreational fishing will effect this area. (#217)

Commercial

- Impacts on commercial users. (#352, 411, 564, 680, 810)
- I don't think we need a reserve that big. The fishery needs to be managed and I think commercial fishing needs looked at. (#372)
- Politically motivated and at the expense of the commercial fishing industry. Small regional areas will suffer and die because of this. (#374)
- It could become a safety issue forcing fishermen to work longer hours using more fuel adding costs to the fishing industry. (#687)
- The proposed MPA is inconsistent with MPA Policy. Restrictions on fishing are proposed beyond those which are necessary to provide for the maintenance and recovery of physical features and biogenic structures that support biodiversity. Furthermore the proposal is based on irrelevant considerations (interaction between fisheries and protected species), and the spatial extent is not justified. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – the objectives of the MPA are not clearly stated, no threats are identified and it is not a least cost approach. (#2467)
- Moderate impacts on commercial fishing rights. An important area for set netters targeting school shark and rig and would displace 12% of Danish seine catch within the South East region. (#2467)

Supporting Evidence

- Lack of data on depletion and degradation of the environment to justify removing public access. (#40)
- No scientific evidence. (#409, 634, 742)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Weather / Safety

- Weather and tides already protect this area. (#163, 172, 216 (Tautuku Fishing Club Proforma x 739), 409, 414, 562, 810)
- Travelling further offshore puts fishers at risk. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Social

- Impacts on fishing 'culture'. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- Displaced commercial fishing puts pressure on other areas. (#66, 409, 658)

Extent

- Leave the river mouth out of the proposal gives enough coverage. (#287)
- Site B is enough for this area. (#408)
- No extension, the river mouth needs to be left open for recreational fishers. (#265, 293)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- The proposal takes away Kāi Tahu customary rights under the Treaty of Waitangi. (#742)

Other

- Opposed as it changes the current situation. (#219, 290)
- Type 2 opposed. (#220, 221, 353, 457, 474, 475, 1258)
- Don't like impact. (#1099)
- Pollution from the river from on land would be doing more harm. What is being done to stop this? (#217)
- I oppose this for my family. (#638)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Lack of local [unreadable] so oppose in meantime. (#247)

10.3.3 Recommended Changes to Site C

Submitters that recommended changes to Site C made the following comments:

Greater Protection

- Change to Type 1. (#647, 737, 2492, 2494, 2676)
- More protection. (#5)
- It would be preferable to make the Waitaki offshore MPA a Type 1 no take reserve in order to provide increased protection for the habitats and species within the site and represent the undersea gradient within the Forum region which is not represented in a Type 1 reserve elsewhere. This would also border directly with the Waitaki Coastal B reserve making a larger completely protected area which is preferable in accordance with the Marine Protected Areas Classification, Protection Standard and Implementation Guidelines. (#736)
- The highest possible protection should be put in place for the largest possible area. (#707)
- Submitters also supported banning methods of fishing (e.g. set net bans, dredging, trawling, Danish seining). (#736, 1897, 2484, 2494)
- Blue Cod Fisheries too little too late. Not taking in any spawning ground, I would like to see no take zone October to January over spawning area (Cape Wanbrow to Light House Point). Raise the size limit and lower day take (10 fish pp). (#2512)

Extension of the Site

- Extend 12 NM offshore for because of the importance of the habitat for penguin and/ or dolphins. (#67, 95, 107, 110, 122, 129, 213, 227, 239, 273, 401, 402, 426, 558, 576, 617, 630, 647, 657, 678, 697, 719, 728, 734, 736, 748, 770, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2472, 2479, 2497, 2498, 2501, 2502, 2504, 2509, 2659, 2671, 2672, 2673, 2677, 2678, 2679, 2686, 2692, 2885, 2886)
- Take the estuary boundary out to the full 12km to provide additional protection for the feeding grounds of Hector's dolphins, penguins and other seabirds. (#2498)
- Support with a further extension out to 12 NM to provide better representation of habitats used by Blue penguin, Yellow-eyed penguin and Hector's dolphin. This area is an internationally recognised IBA. (#1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever x 141))
- Extend 12 NM offshore for because this is an important bird area. (#213, 558, 657, 722, 736, 770, 1270, 1271, 1272, 1273, 1897, 2479, 2501, 2502, 2677, 2678, 2679)
- Prohibition of commercial fishing in this area will provide improved protection for penguins, dolphins and other seabirds from fisheries bycatch, in particular setnets, from a very small number of boats operating off Otago. For example, two yellow-eyed penguins were reported bycaught in setnets in 2016 and three in December

2009 to the north and offshore of the proposed area (hence the recommended extension). (#722)

- Extend 12 NM and the southern boundary to the shoreline. (#2479)
- Extend to 12 NM. (#369, 427, 693, 734, 774)
- Extend to 12 NM and to north and south (noting modification sought for Site B) to provide a Type 2 'buffer' around Site B. This MPA should prohibit all bottom and mid water trawling, set netting, marine farming, mineral exploration and extraction, and dredging. (#2494)
- Extend 5km offshore to encompass habitats used by Yellow-eyed and blue penguins, and Hector's dolphins. (#2507)
- Extend further north. (#595, 693, 734, 743, 2484)
- Submitters wanted the area extended but gave no area. (#110, 554, 737)
- Include an MPA (Type 2 buffer) on the southern border of B so that the marine reserve is bounded on all three sides by trawl, dredge closure. This will increase the effectiveness of B at little cost. (#375)
- There could be protection further offshore towards the shelf edge at Waitaki Canyon. (#1062)
- Extend to Shag Point. (#185, 552)
- Support and recommend changes to extend the proposed offshore Type 2 area C boundary further north to the Otaio River and offshore to 12 NM. This would encompass sensitive benthic habitats including more deep gravels and areas of mud. (#722)
- Extend out 12 NM and south to Kakanui. (#625)
- Type 2 area C should extend offshore to 12 nautical miles and also extend to the northern boundary off Waimate to encompass the locations where bycatch has been observed. Both areas (B and C) should link seamlessly to provide more comprehensive coverage and further protect yellow-eyed penguins from bycatch. (#95)
- The southern boundary needs to be extended to the shoreline. This would make the MPA more successful with greater ecosystem benefits. Allowing commercial fishing in this inshore portion will undo good effects of the MPA. (#2677, 2678, 2679)
- Extend 12 NM and 16 NM both north and south of Waitaki Mouth. (#729)

Reduction of the Site

- Start marine reserves half a NM offshore to enable families to fish. (#271)

Other

- Difficult shape, hard to enforce (#2677, 2678, 2679).
- Type 2, no extension. (#265)

10.3.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site C included the following comments:

- Oppose on basis of impacts on fishing practices including loss of income and displacement. (#612, 658, 2887) (noting #612 supported on basis of area remaining Type 2)
- Oppose on basis of loss of customary rights. (#742)
- If the New Marine Protected Areas Act were to be established we would propose a 'Seabed Reserve' as described in the New Marine Protected Areas Act Consultation Document released by the Ministry for the Environment in January 2016. (#2887)

10.3.5 Technical information and mapping.

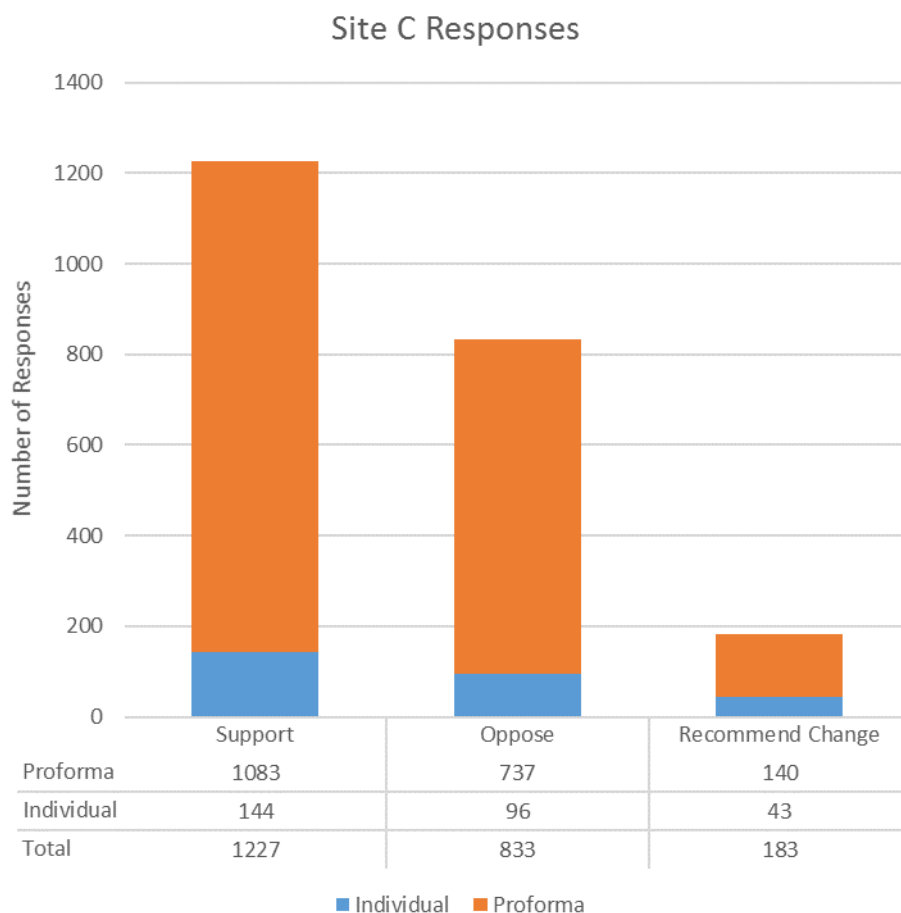
¹⁴⁰. Information was provided by a number of submitters in relation to:

- Commercial fishing information. (#2467, 2887)
- Cited References. (#2671)

¹⁴¹. Submitter maps showing changes for this site are located in Appendix 6.

10.3.6 Submission Numbers

142. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.3.7 Responses to focus questions from the consultation document Volume 1

143. One submitter responded to the questions below.

- a. Does this area provide adequate protection for the habitats included?**
Yes (#218)

See Support and Oppose comments.

- b. Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?**
Yes (#218)

See Support and Oppose comments.

**c. Would it be preferable to include the extension in the MPA network?
Why? Why not?**

Yes (#218)

See Support comments

d. How would this proposal affect how you use the area? How would this proposal affect you?

Would use it more often (#218)

See Support and Oppose comments.

e. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?

N/A (#218)

See Recommended Changes comments.

f. For the fishing methods noted above, how often are they used by you in this area, and how much of each species is taken by these methods?

Rarely as of now (#218)

Only one other submitter mentioned fishing methods. Submitter #49 supported the ban of all trawling.

g. Do you have any information that would help the Forum decide what restrictions, if any, to recommend?

NO (#218)

See Recommended Changes comments.

10.4 D – Pleasant River to Stony Creek (Type 1)



144. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site D have been summarised in supplementary reports.

10.4.1 Support for Site D

145. Submitters in support of Site D made the following comments.

Habitat / Biodiversity

- Seeking more protection for marine ecosystem health and habitats. (#49, 56, 65, 74, 138, 281, 347, 359, 395, 464, 555)
- Presence of bryozoan beds. (#767, 773)
- Inclusion of estuarine habitat and relationship with the adjacent terrestrial environment for ecological and conservation value. (#736)
- Inclusion of subtidal reef habitat which is under-represented in the proposal. (#20, 67, 110, 122, 172, 213, 322, 383, 442, 577, 678, 728, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1894, 1897, 2472, 2497, 2501, 2676, 2479, 2502, 2677, 2678, 2679, 2705)
- Inclusion of deep mud habitat. (#150, 558, 713, 736, 770, 2667, 2681, 2682)
- Macrocystis kelp forests, a key productive habitat and hotspot for biodiversity. (#29, 67, 69, 76, 101, 102, 110, 122, 213, 217, 322, 375, 383, 401, 439, 442, 577, 606 618, 622, 625, 678, 713, 719, 728, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2472, 2478, 2479, 2497, 2502, 2672, 2677, 2678, 2679, 2705, 2484).

- The site is an important area for Yellow-eyed penguins and Otago shags. (#213, 217, 464, 678, 719, 728, 736, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2479, 2484, 2497, 2501, 2502, 2677, 2678, 2679)
- Protection of rock lobster. (#150, 401, 2472, 2509, 1961)
- Fully support the Type 1 option as it has a total ban within its limits. It has taken in the estuaries to the north and south giving the whitebait a better chance to spawn as well. Type 1 allows small boats to reach either north or south without being forced out beyond 10km. Unfortunately with the increase in seal population I think we are creating a greater meal opportunity. (#226).
- This will fulfil the need for an estuary system. (#606)
- Area with important diversity of habitats. (#183, 631)

Recreation

- Fish stocks of blue cod are low in the area. (#454)
- Will have minimal impact on recreational users. (#21, 49, 219, 290)
- Supports but ensure pāua uptake/bottom fishing is possible. (#2486)
- Supports but comments “what possible harm can recreation do.” (#50)
- Supports in principle but concerned about impacts on recreational sailing (unable to anchor buoys). (#676)
- Don't try to fix something that isn't broken. Fishing is an important recreation that keeps families together don't take that away from us. (#1073)

Commercial

- Ban commercial fishing and charter fishing. (#2892)
- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Potential for research

- Educational and scientific purposes. (#559, 622, 2492)

Tourism

- Potential to draw tourists to lesser known areas e.g. Waitaki. (#617)
- More protection needed to ensure tourism. (#74)

Monitoring

- As we have no fully protected areas we cannot produce absolute scientific evidence for benefits of full protection. By creating such as area and monitoring it evidence will be available and we will know what benefits can be expected. (#150)

Fishing Methods / Limits

- Reduce bag limit to 20 east coast region. (#2892)
- Reduce recreational bag limits. (#387, 2512)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Displacement

- Support option 1, but the displacement /impact on the commercial rock lobster fishery is very troublesome/uncertain. (#2486)

Other

- More protection required. (#5)
- Management or co-management by Kāti Huirapa. (#186, 622, 2677, 2678, 2679)
- I love the idea of having a reserve in my area. (#238)
- Covers a good area for natural fish protection. (#362)
- I support because I agree with it. (#455)
- Doesn't affect us and has good public access. (#456)
- I agree with recommendation. (#458)
- Good as is proposed, area needed for network of protected areas. (#594)
- Better monitoring of discharges to the sea required. (#387)
- Minimal impact on users. (#100, 248)

^{146.} Submitters who clearly identified their support for the extension to Site D made the following comments:

- Large range of habitats close together. (#186, 427, 570, 642, 684, 722, 736, 737, 754, 770, 1897, 2472, 2501, 2509, 2667, 2672, 2675, 2681, 2682, 2705)

- More effective as a marine reserve. (#417, 557, 758, 2472, 2509, 2672)
 - A larger area is more supportive of biodiversity and protecting habitat (#20, 49, 107, 110, 121, 150, 369, 381, 417, 427, 478, 554, 556, 557, 558, 559, 570, 574, 577, 617, 622, 647, 684, 707, 709, 713, 725, 736, 744, 747, 748, 774, 1062, 1270, 1271, 1272, 1273, 1894, 1897, 2465, 2472, 2479, 2482, 2492, 2494, 2509, 2667, 2671, 2672, 2677, 2678, 2679, 2681, 2682, 2705)
 - The coastal environment here is very valuable to the locals and to those that use the area for recreational and research purposes. Therefore well worth some form of marine protection. (#758)
147. Submitters who clearly identified their support for Site D but opposed the extension made the following comments:
- Impact on users less with Option 1 than Option 2. (69, 167, 188, 231, 254, 291, 294, 327, 345, 393, 404, 409, 422, 428, 429, 430, 431, 457, 466, 582, 586, 587, 588, 589, 603, 614, 621)
 - Option 1 provides adequate protection. (124, 167, 168, 327, 345, 346, 411, 1108)
 - Safety issue for small boats if they have to go further out as a result of Option 2. (#188, 234, 259, 260, 265, 267, 300, 409, 421, 422)
 - Recreational fishers use the area for Option 2. (#168, 197, 209, 264, 372, 409, 411, 475)
 - Use management techniques rather than a total ban. (#209, 254, 264, 270, 409)
 - Commercial fishermen use the area for Option 2, moving them will transfer the pressure. (#341)
 - Support Option 1 but not the first 1km from shore. (#284)
 - Protection of kelp beds. (#284, 411, 428, 429, 430, 431, 586, 587, 588, 589, 720)
 - For the protection of Yellow-eyed penguins, orca and birds. (#285)
 - Habitat and spawning area protection. (#346, 586, 603)
 - Recovery of ecological systems. (#466)
 - Extension is a high use recreational / commercial area. (#475, 1258)
 - The proposed MPA is inconsistent with MPA Policy. No explanation is provided as to why a marine reserve is necessary to meet the protection standard. Benefits to tourism are an irrelevant consideration. Estuarine habitats are already protected in five mātaihai reserves in the Forum's region – i.e., Waihoa, Waikouaiti, Moeraki, Otakou and Waikawa Harbour. (#2467)

- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – no threats are identified and it is not a least cost option. (#2467)
- Moderate to significant impacts on commercial fishing rights. Refer to submission for data on pāua, Rock lobster, trawl fisheries, Blue cod and eels. (#2467)
- The coastal portion of MPA (D) has moderate impacts on commercial fishing activity and it, if it were to become an MPA, would be acceptable only if ‘rebalancing’ of affected fisheries (particularly pāua and Rock lobster), including a reduction of the TACC and allowances and payment of compensation to quota owners, was to occur. (#2467)
- Cumulative displacement effects. (#2497)
- Support the inclusion of the inshore portion of MPA (D), estuaries excluded, with the caveat that no further pāua-impacting areas are added and that rebalancing is included. (#2481)

10.4.2 Opposition to Site D

- ^{148.} Although there were submitters who indicated their opposition to Site D, many did actually support Option 1 rather than the proposed extension of Option 2. Main reasons for opposing the Site are:

Habitat / Biodiversity

- We oppose this area because it is too small and too far south to impact on protecting the wild life on the Moeraki Peninsula. It is the only area in the top half of the considered zone that is home to the endangered Yellow-eyed penguin, surrounding just 1 nest (now failed) of the 250 that remain. The original proposal up to the Shag River was better, but the protection needs to extend out further, to the edge of the 9km zone. (#616)
- It takes in an estuary which will have negative effect on the eel fishery poorly accessible and poor water visibility would make this not a good viewing area. (#680)
- I strongly oppose Type 1, Option 1 as it does not take into account a number of factors. Firstly, the extensive range of the Hoiho/Yellow-eyed Penguin population in the Bobby's Head area. The penguins can range up to 25km from the shore along the ocean floor in search of food. Like all New Zealand's Hoiho/YEPs, the colony here is very vulnerable and endangered. Both chicks this year died and so helping protect the colony here is more important than ever. I propose that the reserve be extended to a minimum of 10km offshore. Secondly, I understand the compromise that has been arrived at in drawing up the marine reserve boundaries and that there has been strong opposition from recreational fishers around Shag Point. However, I strongly believe, particularly given the sizable population of endangered rapoka/sea lions along the beaches to the south of the Shag, that the Bobby's Head section of the reserve be extended at least to the Shag River Mouth. (#716)

Recreation

- Support Type 2 MPA over Type 1 so that the site remains available for recreational fishing. (#75, 447)
- Impacts on recreational fishing. (#90, 190, 235, 247, 349, 356, 372, 382, 384, 408, 409, 414, 580, 581, 590, 591, 638)
- No take areas are contrary to the rights of people to fish for food. I am in favour of restrictions on size and amount taken but not on a blanket ban. (#140)

Commercial

- Impacts on commercial fishing. (#68, 114, 190, 247, 374)
- Important shortfin eel fishery. This could result in a loss of up to 45% of total allowable catch. (#1957)
- Closure would cause reduction in PAU5d TACC. (#2505)

Supporting Evidence

- Lack of data on depletion and degradation of the environment to justify removing public access. (#40, 634)
- Lack of scientific evidence. (#114, 382)
- Complete absence of any identified risk to estuary. (#2508)
- The purposes and principles of reserves in New Zealand at this stage are not clearly established. The administration and policing has not been established and funded. Methods of stock assessment within reserves has not been established. The impacts of the lack of stock assessment in the reserves on the QMA stocks have not been considered and is unlikely to be able to be done without being contrary the purpose of the reserve. The whole concept is so basically flawed it is the worst I have seen in a lifetime of resource management and I can only conclude it is a political artifice for the coming elections or a ministerial vanity project either way it has the potential for a judicial review. (#114)

Tourism

- Area has poor tourism potential. (#580)
- Increasing access will impact wildlife. (#1962)

Fishing Methods / Limits

- Consider fishery management / reduced catch limits. (#75, 167, 251, 1269)
- Oppose as administration and policing has not been established and funded. (#114)

- Stop net fishing. Potting and handlines only. All commercial should be banned. (#2248)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)

Weather / Safety

- Concern for safety particularly with small recreational boats. (#197, 265, 300, 313, 372, 382, 409, 414, 445, 463, 580, 590, 591, 702)
- Fishing opportunities are self-limited by weather conditions. (#68, 163, 382, , 580, 590, 591, 702)

Displacement

- Would transfer pressure to other areas. (#349)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)

10.4.3 Recommended Changes to Site D and comments on options

¹⁴⁹. Submitters that recommended changes to Site D made the following comments:

Greater Protection

- More protection required. (#5)
- Extend out as far as possible. (#17)
- The smaller option is not supported as it does not adequately represent enough habitats and is too small to be of real value. Of course the larger reserve will mean that some present users will be affected, but it seems that there has already been substantial compromise in proposing this area rather than the Shag Point area. This larger proposal is the only protection proposed for the deep mud habitat. I recognise that this larger proposal does have an impact on the rock lobster industry and blue cod, but it would seem that by providing an adequate area of full protection for these species will eventually benefit the industry as both these species are known to move from one area to another. (#150)

Less Protection

- Option 1 minimises the impact to users. (#101, 102, 231, 234, 280, 345)
- Fishery management makes more sense than no take. (#254)
- Open Stoney Creek to game bird shooting from 1 May to 31 July each year. (#141, 142, 143, 146)
- Support Type 2 only. (#68, 75, 168, 190, 220, 221, 254, 264, 353, 447, 457, 474, 475, 612, 625, 1258, 2248)
- I recommend that a decrease in the catch limit of Blue Cod to be decreased from 30 to 15 per person. And that charter boats fishing in the area should have a quota just like a recreational fisherman. (#98, 366)
- Fishing methods don't damage kelp, weather dislodgement in the main threat. (#1108)
- Ban commercial fishing and charter fishing. Open to recreational fishing. Reduce bag limit to 20. (#715)
- Pleasant River Estuary to be Type 2. (#254, 264, 387, 598)
- I support the type-1 out to 2km but recommend the Pleasant River Estuary be made a Type-2 to allow recreational fishing. This Estuary is a popular local whitebaiting and flounder fishing area. (#387)
- Reduce catch limits rather than no take. (#364, 447, 715)

Extension of the Site

- Seeking a larger area for protection out to 12 NM. (#369, 380, 574, 657, 697, 770, 2484)
- Support extended offshore reserve area. (#753)
- Needs to be larger. (#718)
- Too remote - too small, needs to encompass the Shag Point north face and beach areas, or else just move the whole proposal north. (#394, 402)
- Support, and recommend further extending to include more deep subtidal reef habitat which is underrepresented in the proposal, and increased protection for fish communities associated with kelp forests. (#25, 67, 76, 110, 122, 129, 227, 239, 426, 576, 722, 2482, 2676, 2705) And this area is an internationally recognised International Bird Area for Yellow-eyed penguins and Otago shags. (# 213, 657, 678, 728, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2479, 2497, 2501, 2502, 2677, 2678, 2679, 2686, 2692, 2885, 2886)

- Extend to Shag Point. (#394, 433, 451, 595, 625, 734)
- Extend to Shag River. (#709)
- Extend a Type 2 reserve to 12 NM. (#734)
- Support if extended to better represent reef habitats. Strong preference would be for a marine reserve to be established at Shag Point due to its greater biodiversity values and ease of access for education, science and enjoyment. (#2494)
- Recommend extending this Type 1 reserve southwards to incorporate Cornish Head, Karitane where it might mesh with the taiāpure, and to Warrington. Suggest this change to allow easy public access for swimming, snorkelling and diving in the future abundance of a marine reserve. (#355, 425, 642, 710)
- Extend both north and south, to take in Shag Point and the southern part of Katiki beach in the north, and Waikouaiti Beach and lagoon, Waikouaiti estuary and Karitane Beach in the south. These areas include important habitats for wading birds especially godwits, seabirds including penguins, and marine mammals, and also whitebait. (#2893)
- This area needs much greater extension if science and education are to make full use of a protection status in the area. Also future tourism can only expand and gain more traction with a publicly notified protected area that is inclusive of the Shag Point and the reefs on the North side. recommended changes are inclusive of proposed extension D but extended a full 10km offshore and further extension South past Cornish head to allow a solid connection to East Otago Taiāpure and excellent comparative sites adjacent to each other for monitoring the relative effectiveness of Taiāpure / Type 1 MPA / no protection. (#595)
- A further recommended extension North to include Shag Point and 1 km North would preferably be a Type 1 MPA but could also conceivably be a Type 2 with some defined restrictions on fishing. This would then bring 4 management /protection tools into line for an exciting future of science and education on our local seas sustainability. (MPA Type 2/MPA Type1/EO Taiāpure / and Mātaitai of Otago harbour). Again this proposal adds towards desirable 10-15% protected area, incorporates more kelp forest into protection and increases efficacy of the Type 1 MPA. (#595)
- Extend further along the coast. (#30)
- Kelp forest is a key productive habitat and hotspot for biodiversity. I recommend increasing the alongshore extent of the reserve so that a larger continuous stretch of the habitat is included and surrounding it with a trawl closure zone as at B. This would increase the effectiveness of the marine reserve by lessening edge effects. The offshore extension is largely sand, which is well represented in reserves to the north. (#375)
- This proposed marine reserve includes Bobby's Head, which adjoins the Trust-owned Tavora Reserve. The reserve is managed by the Trust through their habitat and

species conservation programme (e.g. plantings and pest control) to support Yellow-eyed penguin breeding. (#95)

- Recommend it should be a marine reserve i.e. extending 10km offshore rather than a coastal reserve as the former would provide greater protection to marine species in the kelp beds as well as deeper marine habitat which increases the habitat diversity protected by the series of marine protected areas in the South-East. (#25)

Reduction of the Site

- Exclude Pleasant River Estuary to allow safe recreational fishing, particularly for families. (#66, 101, 102, 201, 280, 282, 393, 409, 451, 473, 511, 513, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 564, 648, 725, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 2880)
- I support a reserve out to the 2km line in this area however believe that the southern boundary should start at the northern end of pleasant river inlet. Part of the area currently proposed includes an area used by recreational fisherman to shelter from certain condition while fishing. The 10km line would remove a highly valued recreational fish hang grounds and force smaller boats to travel further up the coast putting them in high risk of been caught in sudden server weather changes. (#66)
- I support Option 1 for this area but would like it to come out to 4km only. I strongly value the Shag Point area for recreational fishing in my small boat. Safety is essential and to have to travel larger distances outside MPA could be dangerous. (#251)
- Supports Option 1 but not the first 1km from the shoreline, kelp beds are good breeding grounds. (#284, 286)
- Exclude offshore extension. (#2508)
- Removal of Bobby's Head to allow land based fishing. (#101, 102, 190, 473, 648)

Other

- Change to ban the use of anchors to protect kelp. (#424)

10.4.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

150. Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site D included the following comments:

- Site D sits within the rohe moana of Kāti Huirapa Ki Puketeraki, managed by tangata-tiaki. Any MPA situated in the area must be managed by Tangata-whenua. (#462)
- Option 1 - Support in principle with rebalancing (commercial pāua, koura). Significant impact on customary commercial and non-commercial fishing rights and interests (Displaced commercial pāua ~0.4% or 356kg and kōura ~13.5%) and wahi tūpuna. (#2887)

- Option 2 - Opposed Significant impact on customary commercial and non-commercial fishing rights and interests. Rebalancing of pāua, lobster and recreational pāua. (#2887)
- Order in council to include provision for the retrieval of stranded or naturally separated parts of marine mammals and kōiwi tangata. (#2887)
- Impacts on customary commercial and non-commercial fishing rights. (#612, 614, 2465)
- Oppose on basis of loss of customary rights. (#742)
- Greater value overall in having the kelp and pāua resource protected but it will cause displacement of collection effort. (#776)

10.4.5 Technical comments and mapping

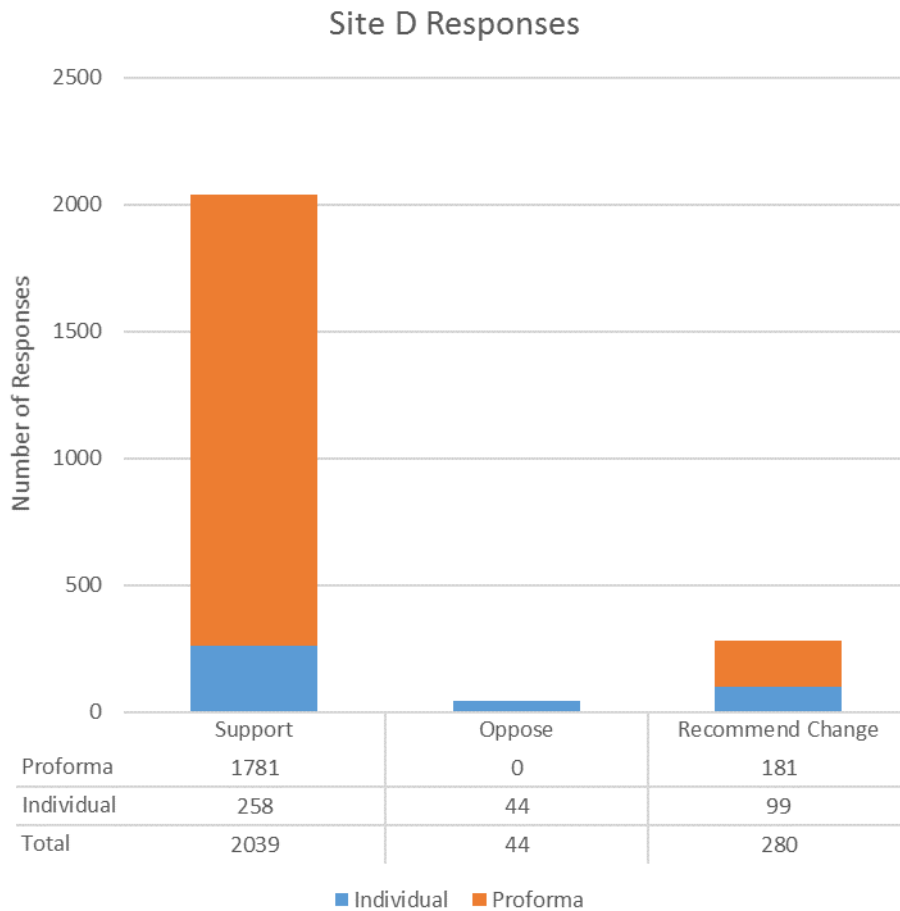
^{151.} Information was provided by a number of submitters in relation to:

- Cited references. (#642, 736, 2494, 2671)
- Ecological / habitat. (#736)
- Commercial fishing. (#1957, 2467, 2887)
- Cultural values. (#462)

Refer to Appendix 26 for further information. Submitter maps showing changes for this site are located in Appendix 7.

10.4.6 Submission Numbers

^{152.} The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.4.7 Responses to focus questions from the consultation document Volume 1

a. Does this area provide adequate protection for the habitats included?

Please see comments above

b. Would the smaller Option 1 or the larger Option 2 be preferred?

Please see comments above.

**c. How would this proposal affect your current or future use of the area?
How would this proposal affect you?**

Please see comments above.

**d. Do you support this area going forward as a part of the south-east
marine protected areas network? Why? Why not?**

Please see refer Network section.

- e. If you do not support it in its current form, can you suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?**

Please see comments above.

- f. For the fishing methods noted above, how often are they used by you in this area, and how much of each species is taken by these methods?**

Please see comments above. Very little information provided regarding fishing numbers.

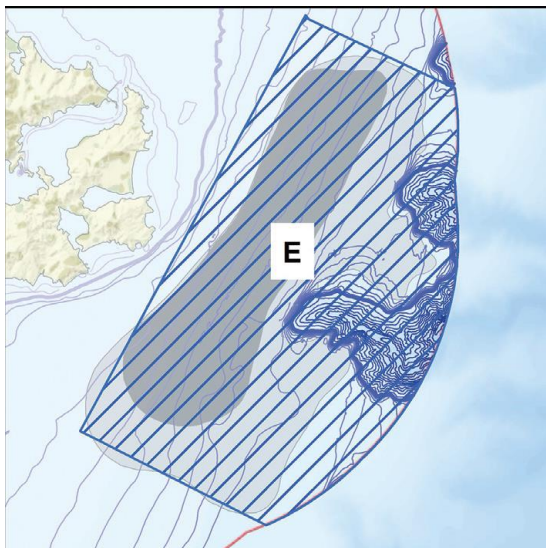
- g. Do you have any information that would help the Forum decide what restrictions if any to recommend?**

Please see comments above.

10.5 E, F, G and H – Otago Shelf and Canyons

153. The analysis of Areas E, F, G and H are presented separately followed by the two Alternative Options.

10.6 E – Bryozoan Bed (Type 2) – Option 2



154. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site E have been summarised in supplementary reports.

10.6.1 Support for Site E

155. Submitters in support of Site E made the following comments.

Habitat / Biodiversity

- To protect important marine habitats and ecosystems. (#43, 65, 138, 381, 395, 554, 1263, 2472)
- Provides the best representation of the range of bryozoan species and associated animal communities. (#84, 122, 129, 186, 213, 378, 401, 426, 427, 442, 570, 625, 657, 678, 697, 710, 719, 722, 728, 735, 736, 738, 760, 774, 1062, 1270, 1271, 1272, 1273, 1628 (Fish Forever Proforma x 141), 1897, 2497, 2501, 2502, 2686, 2692, 2885, 2886)
- An incredibly rich and essential habitat for many species. (#18, 57, 84, 144, 250, 355, 367, 369, 378, 380, 401, 427, 442, 555, 595, 625, 647, 684, 747, 771, 1062, 2479, 2504, 2672, 2677, 2678, 2679)
- Not many reserves provide protection for this type of habitat so I think it is an important aspect of creating a marine reserve network. (#355, 720, 2479, 2677, 2678, 2679)

- An important buffer for the marine reserve at Saunders Canyon. (#375, 401) And compliments Site F. (#401)

Recreation

- Still allows for recreational fishing. (#99, 201, 270, 292, 417, 557, 580, 726, 727, 747)
- This is a large area close to Dunedin and is easily accessible. (#600)
- No commercial fishing will enhance overall fishing for recreational fishers. (#99)

Commercial

- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Tourism

- Will be an asset to tourism / tourism benefits. (#74, 150, 250, 367, 554, 574, 617, 625, 1062, 2489, 2672, 2682)
- We have successfully trialled pelagic bird-watching trips out about 15km to the rich zone of life at the edge of the Otago submarine canyons, and we plan to make those trips at regular intervals. Our company employs about nine full-time equivalent staff and turns over in the vicinity of \$1million annually. (#425)

Fishing Methods / Limits

- Support as it excludes set netting in addition to bottom impact fishing methods (e.g. trawling and dredging). (#198, 351, 375, 464, 557, 583, 594, 747, 1897, 2479, 2672, 2667, 2677, 2678, 2679, 2681, 2682)
- Support a set-net ban in this area. (#20, 381, 425, 577, 583, 736, 747, 760, 1894, 2492, 2672, 2681, 2682, 2705)
- Is essential that this habitat is protected from all netting as well as all trawling, dredging and Danish and purse seining. (#150, 198, 736, 760, 1961)
- Some provision for Queen Scallop fishing should be included but also a substantial area where dredging is not permitted. (#464)
- Good idea to keep the commercial fishing methods from damaging the sea floor. (#581)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- Reduce recreational bag limits. (#387)

Extent

- The bigger the area we can protect from all net fishing and especially bottom trawling the better. (#198, 710)
- E and F cover a greater extent than Site G. (#748)
- E and F cover a greater extent than Site G and H. (#710)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Other

- More protection required. (#5)
- Support site E if this entire area becomes recreational and customary only. (#201)
- Better monitoring of discharges to the sea required. (#387)

10.6.2 Opposition to Site E

¹⁵⁶. Submitters in support of Site E made the following comments.

Recreation

- Recreational fishing will not harm the area. (#46, 172)
- Impacts on recreational users. (#125, 167, 216 (Tautuku Fishing Club Proforma x 739), 247, 259, 260, 422, 424, 553, 606, 810, 2505)
- Oppose a Type 1 protected area. (#220)

Commercial

- There will be a negative impact on the commercial fishery. (#69, 100, 125, 167, 247, 259, 374, 428, 429, 430, 431, 553, 564, 586, 587, 588, 589, 590, 591, 747, 1269, 2511)
- Rebalancing required. (#2511)
- Significant impact on customary commercial fishing rights and interests. Rebalancing set net, mid-water trawl, Queen scallops. (#2511, 2887)
- It removes much of the Queen scallop fishery which removes direct employment and increases pressure elsewhere. (#287)

- The proposed MPA is inconsistent with MPA Policy. Restrictions on fishing are proposed beyond those which are necessary, spatial extent is unjustified and similar habitat is protected elsewhere (Kaikoura). Benefits to tourism and interaction between fishing and protected species are an irrelevant consideration. Option 1 overlays two incompatible MPA types and the commercial finfish catch displaced by Option 1 has more than twice the economic value of the catch displaced by Option 2. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – it has irrelevant objectives, no threats to biodiversity values are identified and is not a least – cost approach. (#2467)
- Impacts on small fishing vessels with limited range. (#2467)
- Significant impacts on commercial fishing rights including an estimated 7.2% of the region’s line fishery takes place in MPAs (E) and (F). Refer to submission for further data including a map of school shark target set net effort. (#2467)

Supporting Evidence

- There is no historical scientific evidence to support any of these reserves working. (#170, 634, 742)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Want data on depletion/degradation before removing public access. (#40)
- There is no evidence of any degradation in the bryozoan beds. (#562)

Weather / Safety

- The site is already protected due weather and sea conditions so restrictions are not required. (#45, 46, 151, 216 (Tautuku Fishing Club Proforma x 739), 368, 409, 454, 572, 580, 702, 757, 810, 1469, 2486)
- It is one of the few areas left that the recreational fishers can safely reach in a smaller boat. (#414, 1469)
- Travelling further offshore puts fishers at risk. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Social

- Impacts on fishing ‘culture’. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- It will displace commercial fishing putting pressure on other areas. (#66, 69, 404, 409, 428, 429, 430, 431, 586, 587, 588, 598, 590, 591, 658, 757 1106)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)

Other:

- Site H and G are better options. (#251, 280, 282, 408)
- Restricts too much fishing. (#680)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available. (#216 (Tautuku Fishing Club Proforma x 739), 810)

10.6.3 Recommended Changes to Site E

¹⁵⁷. Submitters that recommended changes to Site made the following comments:

Greater Protection

- Greater protection required – widest area possible. (#56, 89, 121, 2672)
- Should be a fully protected marine reserve. (#25, 43, 95, 107, 369, 1062)
- Type 1 protection for E, F, G and H. (#647, 729)
- Type 1 for E and F. (#710, 2676)
- Type 1 for E. (#718, 2509, 2673)
- Should include a restriction on potting as it can impact on fragile benthic structures. (#2494)
- While these areas provide some protection for Yellow-eyed penguins, and contain reasonable biodiversity, they sit outside the range of the foraging ranges of many penguins breeding on the Otago Peninsula, and should be extended to the south-west to include the gravel foraging areas. (#2507)
- Blue cod limit should be reduced to 15-20 fish per fisher. (#702)

- We support a Type 1 MPA over Saunders Canyon (F) and Type 2 MPA with fishing restrictions implemented over the remaining bryozoan bed and Papanui Canyon (E). Furthermore we recommend that the Type 1 MPA be extended to the coast to include Hooper's Inlet and link to Harakeke Point (Site I). (#2473)

Less Protection

- Permit recreational and customary fishing. (#172, 2486)
- Could be smaller and still meet objectives of an MPA. (#770)

Extension of the Site

- Should extend to the coast to take in seabird breeding areas and marine mammal haul-outs and breeding areas. Should also extend approximately 5km to the south to take in key Yellow-eyed penguin habitat and provide protection from bycatch and disturbance. (#574)
- An extension of Type 2 area inshore to connect with the coastal breeding sites for penguins to help prevent bycatch risk as they travel to and from breeding areas. (#380, 574, 693, 722, 729, 774, 1263)
- Extend the area - including: to the south-west to cover deep-gravel foraging areas for Yellow-eyed penguins; to the peninsula and estuaries; to connect to the shore; out to at least 12 NM. (#425, 722, 2491)
- Extend 5km south. (#574)
- Support with a south west extension. (#719)
- Extend to include the peninsula and its estuaries to offer protection for increased biodiversity for shorebird species including annually migrating population of godwits. (#2672)
- Extend landward to the Otago Peninsula to protect the full extend to the intertidal through to deeper offshore waters. (#2671)
- Extend to the land at Tairoa Head and the coast at the Tomahawk Beach end. (#2491, 2676)
- Extend to the coast, including Hoopers Inlet and linking Harakeke Point. (#2677, 2678, 2679, 2681, 2682, 2484)
- Extend to 12 NM. (#433)
- Extend the proposed boundaries to adjoin the rocky Cape Saunders coastline. (#2675)
- Add a Mātaimai to link it to the Otago Harbour Mātaimai and extend that. (#642)

- The whole area (E, F, G, H) should be merged into one big MPA as it serves as an important area for source populations of commercially important species. (#365, 625, 729)
- Commit to a meaningful MPA that includes the proposed areas E, F, G, H, I J, and K, ranging from the shore out to 12 NM. (#729)
- Enlarge this area to make a great MPA. (#478)

Other

- Protect one canyon i.e. H. (#1108)
- Areas are invisible by land and therefore relies on agreement from commercial fishermen. Therefore, support commercial fishers recommendations. (#1102)

10.6.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

158. Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site E included the following comments:

- Allows fishing with restrictions. (#386)
- Support in principle but needs rebalancing to minimise impacts on customary commercial fishing. Allow for mid-water trawl. (#612)
- Oppose on basis of effects on customary commercial fishing rights and interests. (#2511, 2887)
- Oppose on basis of displacement of fishing effort. (#658)
- Oppose on basis of loss of customary rights. (#742)

10.6.5 Technical Information and mapping

159. Information was provided by a number of submitters in relation to:

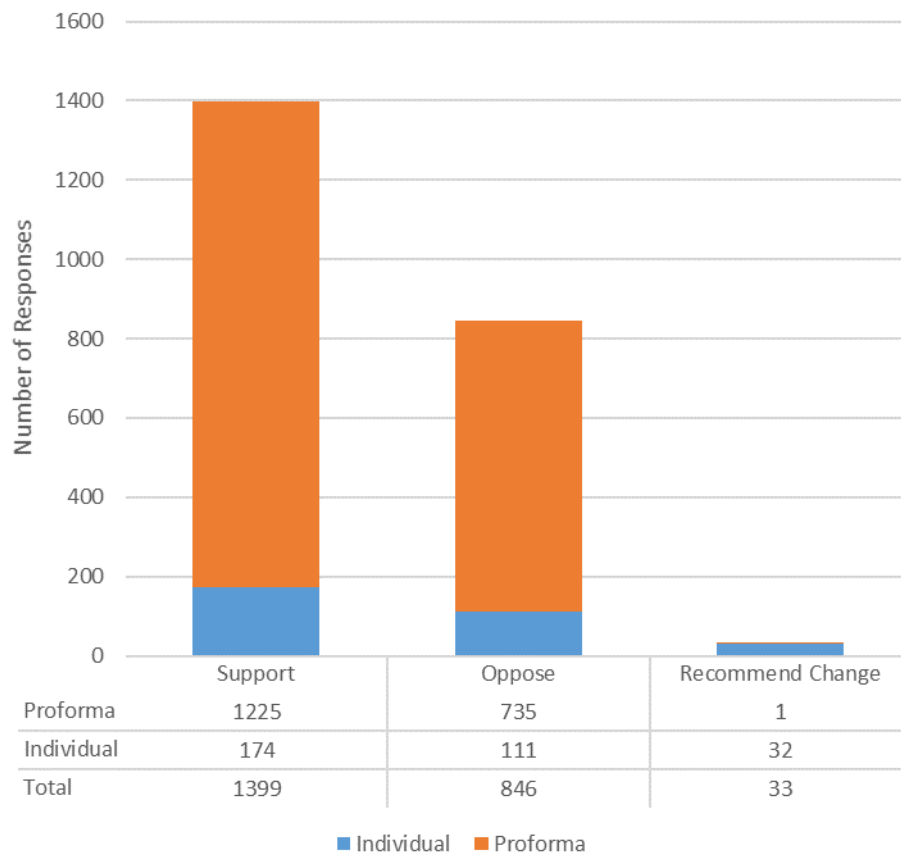
- Cited references. (#95, 186, 1897, 2473, 2501)
- Ecological / Habitat. (#710)
- Commercial fishing information. (#2467, 2887)

160. Submitter maps showing changes for this site are located in Appendix 8.

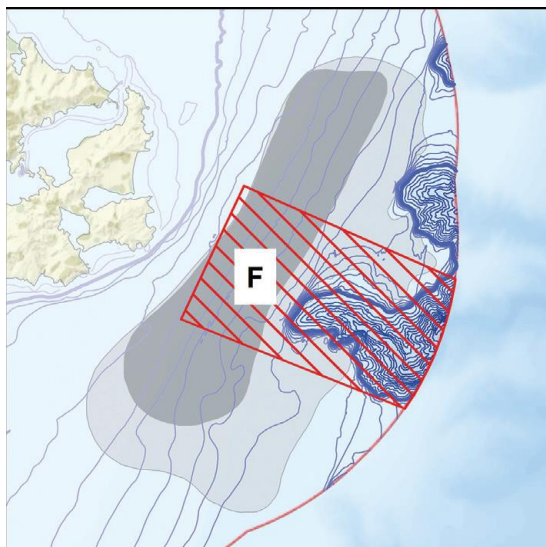
10.6.6 Submission Numbers

161. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.

Site E Responses



10.7 F – Saunders Canyon (Type 1) – Option 1



162. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site F have been summarised in supplementary reports.

10.7.1 Support for Site F

163. Submitters in support of Site F made the following comments.

Habitat / Biodiversity

- Valuable in terms of biodiversity. (#18, 20, 57, 65, 72, 107, 138, 144, 145, 186, 347, 369, 375, 394, 395, 401, 417, 554, 555, 556, 557, 558, 570, 574, 625, 684, 710, 725, 735, 736, 754, 771, 2472, 2479, 2492, 2672)
- Protection of bryozoan beds. (#442, 570, 625, 647, 720)
- Long-term data set being collected on marine mammal sightings in the area which began in 2014. (#145)
- Important sea lion foraging ground. (#657, 2473)
- In July of this year the rare and elusive Shepherds Beaked Whale were seen here. (#557)
- Type 1 MPA offers meaningful protection. (#84, 729)
- Unique opportunity to give MPA status to unique deep water habitats and environment. (#57, 625, 647, 684, 720, 770)
- The region is one of only two places in NZ where canyon habitats are present within the territorial sea. (#2472)

- Saunders Canyon is closer to the coast than Papanui Canyon, and therefore represents a better option for protection. (#401)
- Saunders Canyon option would capture something like three times more of the deep canyon environment than the Papanui option (including the very deepest water in the entire region) and is therefore hugely more attractive from a marine protected area design principles perspective. (#417)
- Saunders Canyon as it is absolutely invaluable habitat that cannot be defined simply by the value the current or future fishing industry places upon it. (#659)
- Saunders Canyon is the largest area of submarine canyon ecosystem to occur in the SEMPF area. This greater area allows a greater complexity of topography and more hydrographic features to be represented. (#2494, 2497, 2501, 2502)
- Proposed Type 1 MPA at Saunders Canyon represents a step towards caring for marine environments just as we care for terrestrial environments. (#72)
- Positive for recreational and commercial fish species. (#417)
- The area has taken a hammering in the past, put this aside to keep a healthy ecosystem in the area. Lots of other options for fishing nearby. (#594)
- Protects more of the ecologically significant bryozoan bed than H. (#2671)
- Larger more important canyon than Papanui Canyon. (#2681, 2682)
- This will give a reserve with deep canyon. (#183)

Commercial

- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Potential for Research

- The value of having this fully protected area surrounded by partial protection 'E' offers excellent opportunities for monitoring and therefore gaining scientific evidence on the benefits, values and any associated negative impacts of full and/or partial protection. (#150, 369)
- Support for scientific/research value, for its intrinsic value as important habitat for top predators (including commercially important fish species, marine mammals, and seabirds). (#144)
- Extending to Hoopers Inlet provides for latitudinal and longitudinal variation and cross continental shelf differences and ecosystems. It is also used by Otago University for ongoing research. (#2885, 2886)
- Would make an excellent area for study. (#84, 95)

Tourism

- Tourism values. (#74, 369, 417, 554, 617, 625, 659, 2489)
- We have successfully trialled pelagic bird-watching trips out about 15km to the rich zone of life at the edge of the Otago submarine canyons, and we plan to make those trips at regular intervals. Our company employs about nine full-time equivalent staff and turns over in the vicinity of \$1million annually. (#425)

Fishing Methods / Limits

- Support strong fishing restrictions (including set nets) because no other area like this in the network. (#355, 359, 425, 478, 771, 2473, 2667, 2681, 2682)
- Support ban on dredging due to it destroying bryozoan bed. (#2667)
- Reduce recreational bag limits. (#387)

Extent

- It contains the larger area and also seems to encompass more of the canyon system and the area protected needs to be as large as possible / support the most extensive protection possible (more of deep marine canyon than Site H). (#121, 122, 186, 198, 213, 355, 367, 401, 420, 427, 557, 559, 678, 726, 727, 728, 729, 748, 779, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141))
- Beneficial linkages with wildlife reserves on Otago Peninsula. (#402)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Other

- More protection required. (#5)
- Benefits likely to far outweigh the costs over the medium-long term. (#684)
- Allow commercial fishing while preserving the canyon as a nursery. (#293)
- The Forum's role is to set up a viable MPA that provide effective protection across a broad range of ecological zones, not to be solely concerned with fisheries interests. (#49)
- Better than H. (#375)

- Better monitoring of discharges to the sea required. (#387)

10.7.2 Opposition to Site F

¹⁶⁴. Submitters opposed to Site F made the following comments.

Recreation

- Recreational fishers are being vastly disadvantaged in these proposals. The extent of fisheries on the south coast that easily and readily accessible are few and far between to the average public. (#13, 68, 216 (Tautuku Fishing Club Proforma x 739), 221, 360, 404, 457, 463, 606, 810)
- This is my most regular recreational fishing area and has been for the last 35 years. This area provides Blue cod, Blue nose, Groper, and other species not found in other shallow water. This is still a safe location for medium sized trailer boats. Closing this area to recreational fishers would deny Dunedin metropolitan fishers access huge social and recreational pursuits. Being unable to catch a couple of family meals would also affect our family budget. (#463)
- Is an important fishery for commercial and recreational. (#69, 125, 201, 428, 429, 430, 431, 564, 586, 587, 588, 598, 590, 591, 680)
- Negative impact on recreational fishing. (#4, 13, 68, 404, 414, 424, 581, 638, 690)
- Is the most accessible deep water recreational fishery close to a major population area – is a critical part of the recreational fishery in the Dunedin area. (#13, 221, 353, 457)
- Recreational fishing will not harm the area. (#90, 172, 217, 409)
- This is where most fish are caught by recreational fisherman. If this is taken away we will see Blue cod numbers drop as they are cannibals. (#4)
- This is a unique hatchery for recreational fishers. (#1258)
- No take areas are contrary to the rights of people to fish for food. I am in favour of restrictions on size and amount taken but not on a blanket ban. (#140)
- The creation of a Type 1 MPA at the Saunders Canyon is strongly opposed. This is an accessible (weather permitting) deep water recreational fisher that is a unique fishery. Support the "forfeiture" of the Papanui Canyon to retain the Saunders Canyon for fishing. (#168, 221, 353, 457, 475, 1258)

Commercial

- I do a lot of commercial fishing in the Saunders Canyon. I spend most of the year out there catching ling and blue cod. For me to lose this ground would mean a massive financial loss and would affect my ability to support my family. If it were to go through we would have to take further action in order to prevent it. (#571)

- This area has too much value as a commercial fishery to be turned into any type of reserve. (#573, 621)
- Effects on commercial fishery. (#247, 386, 393, 571, 680, 687, 2511)
- The proposed MPA is inconsistent with MPA Policy. Restrictions on fishing are proposed beyond those which are necessary, spatial extent is unjustified and similar habitat is protected elsewhere (Kaikoura). Benefits to tourism and interaction between fishing and protected species are an irrelevant consideration. Option One overlays two incompatible MPA types and the commercial finfish catch displaced by Option One has more than twice the economic value of the catch displaced by Option Two. No explanation is provided as to why a marine reserve (In which all fishing is prohibited) is necessary to meet the protection standard when the biodiversity values of the site are primarily benthic. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – no threats to biodiversity values are identified and it is not a least cost option. (#2467)
- Significant impacts on commercial fishing rights including an estimated 7.2% of the region's line fishery takes place in MPAs (E) and (F). Refer to submission for further data including a map of school shark target set net effort. (#2467)

Supporting Evidence

- Lack of data on depletion and degradation of the environment to justify removing public access. (#40, 562, 634)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Fishing Methods / Limits

- Area is well protected by catch limits. (#360)
- Have seen no reduction in fish numbers. (#360)
- Fishery management makes more sense than no take. (#140, 409, 702) And the Blue Cod limit should be reduced to 15-20 fish as this is the most targeted species and the current limit is unacceptable to most recreational fishers. (#702)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)

Weather / Safety

- The site is already protected due weather and sea conditions so restrictions are not required. (#45, 46, 66, 75, 90, 99, 123, 151, 160, 163, 168, 216 (Tautuku Fishing Club Proforma x 739), 221, 270, 292, 360, 393, 409, 414, 454, 457, 474, 562, 572, 580, 581, 687, 702, 810, 741, 1469, 2486)
- Travelling further offshore puts fishers at risk. (#99, 216 (Tautuku Fishing Club Proforma x 739), 810)

Social

- Impacts on fishing 'culture'. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- It will displace commercial fishing putting pressure on other areas. (#151, 409, 658, 1106)

Customary Rights

- This is a direct violation of the Treaty Of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller " basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)

Other

- The other option is better. (#422)
- Impact on fisheries. (#564)
- Already too much closed off / you will close off too much. (#259, 260)

10.7.3 Recommended Changes to Site F

¹⁶⁵. Submitters that recommended changes to Site F made the following comments:

Greater Protection

- Cover as much area as possible is best for marine ecosystem health. (#56)
- E and F, Type 1. (#25)
- Link F to H. (#30, 293, 351, 718) And match in size to Site E. (#718)
- Combine G and H. (#642)

- Link F to I. (#67, 110, 122, 129, 213, 383, 659, 678, 719, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2502, 2676, 2677, 2678, 2679, 2692, 2885, 2886)
- Combine E & F. (#95, 559, 642)
- Should be closed to all commercial fishing in protection of benthic, mid water and pelagic values. (#760)
- E, F, F, G and H as Type 1. (#647)
- Include H and F together and the area between and extend this larger type 1 area to include G as a Type 1 also. (#595)

Less Protection

- Too large. (#100)
- A Type 2 would be a better option as recreational fishing does not disturb the seabed. (#68, 270, 580, 598, 2248)

Extend the Site

- Include Hoopers Inlet and link to Harakeke Point (Site I) (to the shoreline). (#67, 110, 122, 129, 213, 227, 657, 728, 1270, 1271, 1272, 1273, 1897, 2473, 2479, 2492, 2494, 2502, 2667, 2672, 2677, 2678, 2679, 2681, 2682, 2686, 2885, 2886) And such a large salt marsh would otherwise not be represented. (#227)
- Should extend to meet the land and include both inlets. (#2491)
- Extend to coast and link adjacent protected areas. (#239, 693)
- Extend to include Tairoa Canyon as a Type 1 reserve. (#625)
- Extend type 1 protection back towards the coast to link as closely as possible to the bryozoan beds and impressive volcanic cliffed shoreline of Otago Peninsula will provide a full range of habitat to support biodiversity. (#1062)
- Extend protection to the shore to better protect the Sea lion and Yellow-eyed penguin feeding and foraging grounds. (#76, 95)
- Extend to the south west to better represent foraging areas for Yellow-eyed penguins. (#2507)
- Type 2 area be extended at least 5km to the west, to significantly improve protection from bycatch and seabird disturbance in a key foraging area for Yellow-eyed penguins. (#95)
- Support but recommend that it be reconfigured to extend to the coast to include Hooper's Inlet and link to Harakeke Point (Site I). Saunders Canyon is larger, deeper and more complex than the Papanui Canyon, and so provides better more

comprehensive representation for this habitat type. This is also the only proposal to contain representation of a deep water highly productive plateau, with its special bryozoan species. The extension to shore would take in an example of an Otago Peninsula inlet, which have not been represented in the proposed network. Hooper's Inlet is a nationally and locally significant saltmarsh and nursery area for flat fish. The connection to Harakeke point would allow for the inclusion of the Chasm, a high current headland and biologically productive area. Such areas are poorly represented in the proposal. This option provides the best representation of the range of bryozoan species and associated faunal communities. (#1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141) 2479, 2497, 2501, 2504, 2677, 2678, 2679, 2686, 2692, 2885, 2886)

- Inshore to join coast to include areas of shallow intertidal reef, deep reef and shallow gravel habitat, thus providing a coast to deep canyon cross section of habitats. (#722)
- The whole area (E, F, G, H) should be merged into one big MPA. (#365)
- Combine E, F, G, H, I, J and K from the shore out to 12 NM. (#729)
- Extended to the south-west to cover the deep gravel foraging areas for Yellow-eyed penguins. And protection should extend out to the 12 NM limit to capture a wider range of species and ecosystems, especially as penguins normally forage at least that far out to sea. (#425, 722)
- While these areas provide some protection for Yellow- eyed penguins, and contain reasonable biodiversity, they sit outside the range of the foraging ranges of many penguins breeding on the Otago Peninsula, and should be extended to the south-west to include the gravel foraging areas. (#2507)
- Cover as much area as possible. (#56)
- Enlarge area, as it would make a great Marine Protected Area. (#478)
- Extend Type 1 protection. (#2681, 2682)
- Protect both canyons as a Type 1 reserve. (#733, 774)
- Should extend to meet the land and include both inlets. (#2676, 2491)

Reduction of the Site

- Support but consider excluding the Saunders Canyon. (#454)

Other

- H and G are better options. (#167, 251, 280, 282)
- G and H provide too little protection. (#355)
- Reduce catch limits instead. (#167, 1269, 2248)

- Site F should be a non-anchoring recreational fishing area for line fishing only. (#760)
- Some provision for the Queen Scallop fishery should be included but also a substantial area where dredging is not permitted. (#464)
- I look to the Ministry of Fisheries to control the commercial operators in this area and ensure sustainability of their catch. (#702)
- One canyon should be sufficient. (#741, 1108)
- Forfeit Papanui Canyon to retain Saunders Canyon for fishing. (#457, 475, 1258)

166. Those seeking changes to allow recreational fishing recommend:

“Speaking mostly from a recreational point of view. I feel losing Saunders Canyon as a shame. I do however believe recreational fishing limits are far too high and should be cut to a least 1/3rd of the current daily take limits. On these grounds I would suggest a combination of a Type 1 reserve over Papanui Canyon and some form of Type 2 reserve over Saunders Canyon with reduced limits.” (#1269)

10.7.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

167. Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site F included the following comments:

- Oppose on basis of displacement of fishing effort. (#658)
- There must be a balance between what is proposed and our traditions / local people being able to maintain or remain in their livelihood of fishing. (#386)
- Oppose on basis of loss of customary rights. (#742)
- Significant impact on customary commercial fishing rights and interests. Rebalancing set net, mid-water trawl, Queen Scallops. (#2887)
- Significant impact on customary and commercial fishing rights and interests. Rebalancing required. (#2511)

10.7.5 Technical information and mapping

168. Information was provided by a number of submitters in relation to:

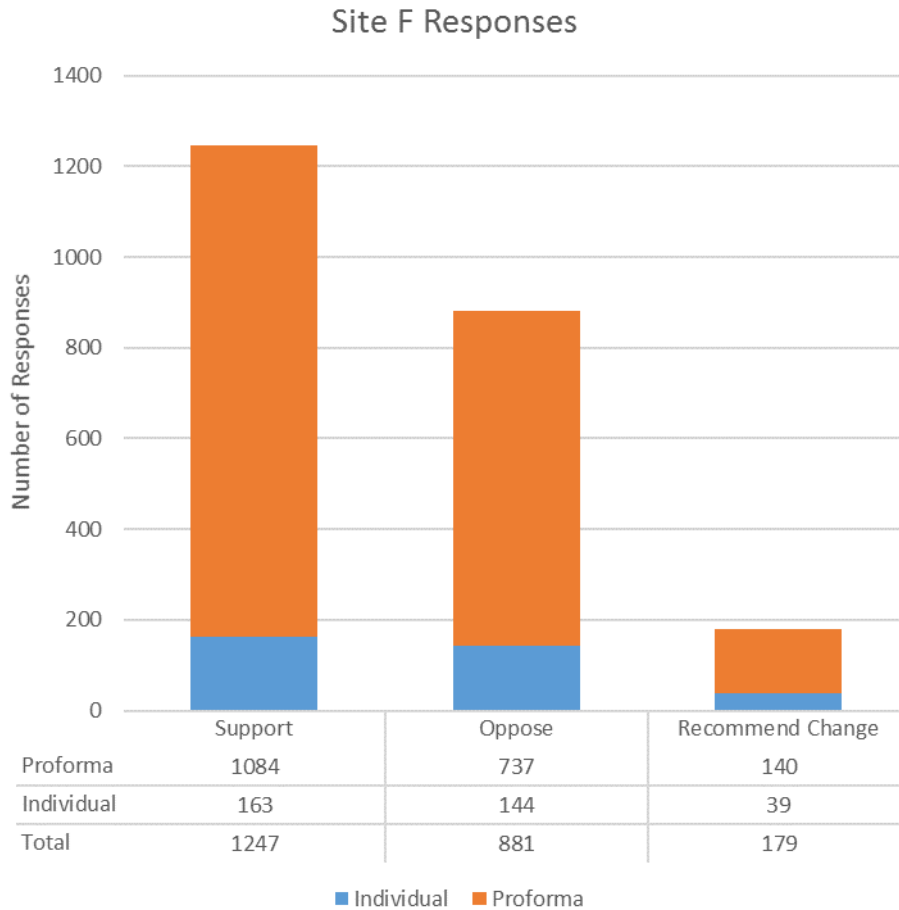
- Cited references. (#95, 145, 427, 657, 1897, 2473, 2494, 2671)
- Ecological / habitat. (#95, 2494)
- Commercial fishing information. (#2467, 2887)

169. Refer to Appendix 26 for further information.

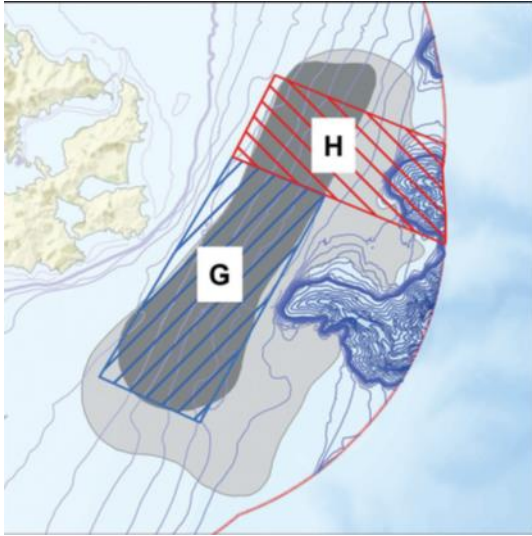
170. Submitter maps showing changes for this site are located in Appendix 9.

10.7.6 Submission Numbers

171. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.8 G – Bryozoan Bed (Type 2) – Option 2



172. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site G have been summarised in supplementary reports.

173.

10.8.1 Support for Site G

174. Submitters in support of Site G made the following comments.

Habitat / Biodiversity

- The canyon is an important 'nursery'. (#1284, 293, 735, 2472)
- Protection for a unique habitat and ecosystems. (#65, 395, 555, 631)
- Bryozoan beds should be protected. (#208, 276, 287, 310, 327, 345, 367, 381, 409, 411, 459, 464, 679, 680, 735, 747, 1269, 2472)
- Protection of bryozoan beds and juvenile fish. (#346)
- Good place for whales. (#259, 260)
- Provides a balance of MPAs with commercial and recreational fisherman but also protection of the bryozoan beds. I believe G and H best represent this. (#208)
- To provide an area for marine species to prosper, while still providing areas that can be fished by leaving other canyons open to fishing. (#125)
- Important to protect the bryozoan beds which are abundant in this area, and to still allow commercial set netting, but prohibit bottom trawling, dredging and Danish seining. (#101, 102, 738, 747, 2880, 2887)
- Type 2 MPA with Fisheries Act prohibitions on bottom trawling, dredging and Danish seining. (#2508)

- This would stop dredging and trawling in this area which would protect the sea bed floor that has sponges, anemones, worms, crabs etc., which need protected. (#447)
- Protection for deep water, gravel, mud and reef. (#408)
- Good breeding ground for flat fish. (#284)
- Provides foraging grounds for Yellow-eyed penguins and NZ Sea lions. (#2472)
- I also agree with a reserve here as I have fished here and understand that giving up Papanui Canyon for marine reserve and closing bryozoan bed to commercial operations will still allow a huge area to fish in the Saunders Canyon and benefit fish life. (#310)

Recreation

- Enables protection from seabed disturbances yet remains available to recreational fisherman who have very little if any effect on the area. (#21)
- Allows fishing with restrictions which commercial and recreational fisherman can use. (#286, 386, 414, 424, 428, 429, 430, 431, 447, 747)
- Least impact on recreational fishers over other options. (#167, 286, 327, 345, 409, 414, 428, 429, 430, 431, 603)
- Recreational fishing will not be affected. (#69, 586, 587, 588 589)
- Support because it is harder to get to and have less effect on recreational fishing. (#391)
- Having no commercial fishing in this area will enhance the overall fishery and improve fishing for all recreational fishers. (#99)
- Support a Type 2 MPA. (#219, 220, 221, 474, 475, 580, 2486)
- Not a great effect on all, but probably a manageable effect on users. (#247)
- Don't try to fix something that isn't broken. Fishing is an important recreation that keeps families together don't take that away from us. (#1073)

Commercial

- Manageable impact on customary commercial fishing rights and interests. (#2887)
- Less impact on commercial. (#100, 247, 293, 345, 409, 603)
- Of the two options to protect the bryozoan bed this would be my preferred option. Once again to leave more allowance for those in the commercial sector that already work in a heavily regulated system. Remembering if you keep taking away fishing grounds for them, it will be harder to catch their quota and therefore quota will eventually be cut. (#1269)

- The proposed MPA is inconsistent with MPA Policy. No explanation is provided as to why a marine reserve is required. Similar habitat may be protected elsewhere (Hikurangi). Benefits to tourism are an irrelevant consideration. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection due to threats to biodiversity already being protected due to voluntary trawl ban and although G and H have less cost to user than alternative 1, however if a voluntary trawl ban already exists no additional biodiversity benefits would arise from type 2 reserve as Danish seining and dredging do not occur in this area. (#2467)
- Moderate impacts on commercial fishing rights. (#2467)
- Alternative Two is inconsistent with the MPA Policy and industry policy on marine biodiversity protection in some relatively minor respects and it has a moderate impact on commercial fishing. However, of the two alternatives it is the lesser-cost approach to achieving the identified biodiversity protection objectives for the bryozoan and canyon habitats. The industry is therefore prepared to give further consideration to the inclusion of MPAs (G) and (H) in the MPA network. (#2467)
- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Potential for Research

- Close to University of Otago Marine Laboratory. (#248, 618, 679)
- Area is of no interest to commercial fishers or recreational fishers, but am sure University Marine Science Department will conduct a lot of research here. (#618)

Tourism

- Increased visibility of marine life will benefit recreation and tourism. (#74, 582, 617, 625, 729, 2672) And likely to exceed economic benefits lost by commercial fishers. (#625)
- More coastline needs protecting to ensure tourism and the general health of NZ coastline as it is very important to myself and future generations. (#74)

Fishing Methods / Limits

- Support a commercial set net ban. (#736)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- I recommend bag limits to be reduced by at least half for recreational fisherman. (#447)
- Restricted harvesting for the protection of biodiversity of this area. (#291, 294)
- Reduce recreational bag limits. (#387)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Other

- More protection required. (#5)
- Prefer over H. (#606)
- Compliments F. (#2472)
- Prefer Site E. (#378)
- Tentatively support in lieu of option E, an inferior solution but better than nothing. (#684)
- Better monitoring of discharges to the sea required. (#387)

10.8.2 Opposition to Site G

¹⁷⁵. Submitters opposed to Site G made the following comments.

Habitat/Biodiversity

- The option does not represent the full range of habitats associated with the bryozoan communities. (#67, 110, 122, 129, 213, 576, 558, 678, 719, 728, 1270, 1271, 1272, 1273, (#1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2494, 2497, 2501, 2502, 2686, 2692, 2885, 2886, 2501, 2502)
- Does not represent the full range of habitats / biodiversity. (#426, 657)
- Option 1 protects a better range of habitat. (#659)
- The area is too small to protect biodiversity. (#43, 49, 121, 138, 401, 433, 570, 583, 612, 730, 733, 760, 770, 774, 2484, 2491, 2676,). And option E is preferable. (#710, 733)

Recreation

- Negative impacts on recreational fishing. (#47, 235, 702, 741, 2505)
- No harm to the area from recreational fishing. (#46, 167)
- Wish to recreationally fish as I have done so for years. (#235)
- My children love to play in rock pools and collect shellfish and crabs. (#50)

Commercial

- Opposed because this is politically motivated and at the expense of the commercial fishing industry. (#374)
- Negative impacts on commercial fishing. (#590, 591)

Supporting Evidence

- Lack of data on depletion and degradation of the environment to justify removing public access. (#40, 382, 562, 634, 742)
- Lack of local knowledge in the consultation documents is evident and lack significant credibility to consider this change. (#382)

Tourism

- Tourism has dropped on Otago Peninsula due to drop in penguin numbers. (#617)

Fishing Methods / Limits

- The option allows set netting which is opposed in this area. (#583, 726, 727, 2494) And allowing for set netting will not achieve the protection standards in MPA policy. (#2494)
- The proposals for limited restrictions on fishing make it unlikely to be effective. (#770, 2491, 2676)
- Consider take limits for fish as they could be reduced i.e. Blue cod = 20/fisher. (#167) Or to 15 to 20 per fisher. (# 702)

Weather / Safety

- The Site is already protected due weather and sea conditions so restrictions are not required. (45, 46, 151, 368, 382, 572, 702, 741)
- Majority of recreational fisherman will be forced further from the shoreline increasing the risk associated with safety, especially with the unpredictable weather we have. (#382)

Displacement

- This would affect commercial fishing who would be displaced from this area possibly creating more intensive fishing in other nearby area. (#151,590, 591, 658) Also impacting the quota management system. (#658)

Customary Rights

- This is a direct violation of the Treaty Of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a " willing buyer willing seller " basis. (#374)

- Taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)

Other

- Support E as it is a larger option. (#401, 556, 736, 747) But would support if E fails. (#556)
- Support if F doesn't go through, but too small. (#612)
- Negative effect on community. (#382)

10.8.3 Recommended Changes to Site G

¹⁷⁶. Submitters that recommended changes to Site made the following comments:

Greater Protection

- Covering as much area as possible is best for marine ecosystem health. (#56)
- Provide full protection by being a Type 1 marine reserve. (#107, 647, 678, 729, 734, 2681, 2682)

Extension of the Site

- Extend the reserve to encompass the whole of the outside of the Otago Peninsula also connecting up with Harakeke Point Reserve. (#734, 2681, 2682)
- Combine G & H and E and F and it would be more effective if a Mātaitai were added to link it to the Otago Harbour and into Hooper's and Papanui inlet. (#642)
- The whole area (E, F, G, H) should be merged into one big MPA. (#365, 359, 625, 647, 737) And be Type 1. (#625, 647)
- Site G is a poor alternative to Option 1 (Site E) as it has limited coverage of the two most important bryozoan beds particularly little or no coverage near the Saunders Canyon. (#18)
- Also that a network of MPAs is required – other than a very small MPA at Kaikōura there are no Type 1 protected areas for canyon systems in New Zealand. (#625)
- Why not take a bold step and commit to a meaningful MPA that includes the proposed areas E, F, G, H, I J, and K, ranging from the shore out to 12 NM. (#729)
- Larger and Type 1. (#2484, 2667, 2681, 2682)
- Expand to match the boundaries of E to adequately cover this critical habitat. It is extremely important that bryozoan beds and other biogenic habitat is protected from bottom trawling and dredging here. (#375)

Other

- While the bryozoan areas need protection, these areas are invisible from the land. The only way protection of these areas will work is with the agreement of commercial fisheries. For this reason I support the recommendations of commercial fisheries and only the recommendations of the commercial sector. (#1102)
- Some provision for the Queen scallop fishing should be included but also a substantial area where dredging is not permitted should be included. This should protect the bryozoans but also submarine spring deposits (chimneys) which have been badly damaged by trawling. (#464)
- Option G (Type 2) is a poor alternative to Option 1 as it has limited coverage of the two most important bryozoan beds particularly little or no coverage near the Saunders Canyon. (#18)

10.8.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

^{177.} Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site G included the following comments:

- Support as it includes fishing with restrictions. (#386)
- Support in principle: If F doesn't go through (#612), Has a manageable impact on customary and commercial fishing rights and interests #2511, 2887).
- If the New Marine Protected Areas Act were to be established we would propose a 'Seabed Reserve' as described in the A New Protected Act Consultation Document 2016. (#2887)
- Oppose on basis of displacement of fishing effort. (#658)
- Oppose on basis of loss of customary rights. (#742)

10.8.5 Technical information and mapping

^{178.} Information was provided by a number of submitters in relation to:

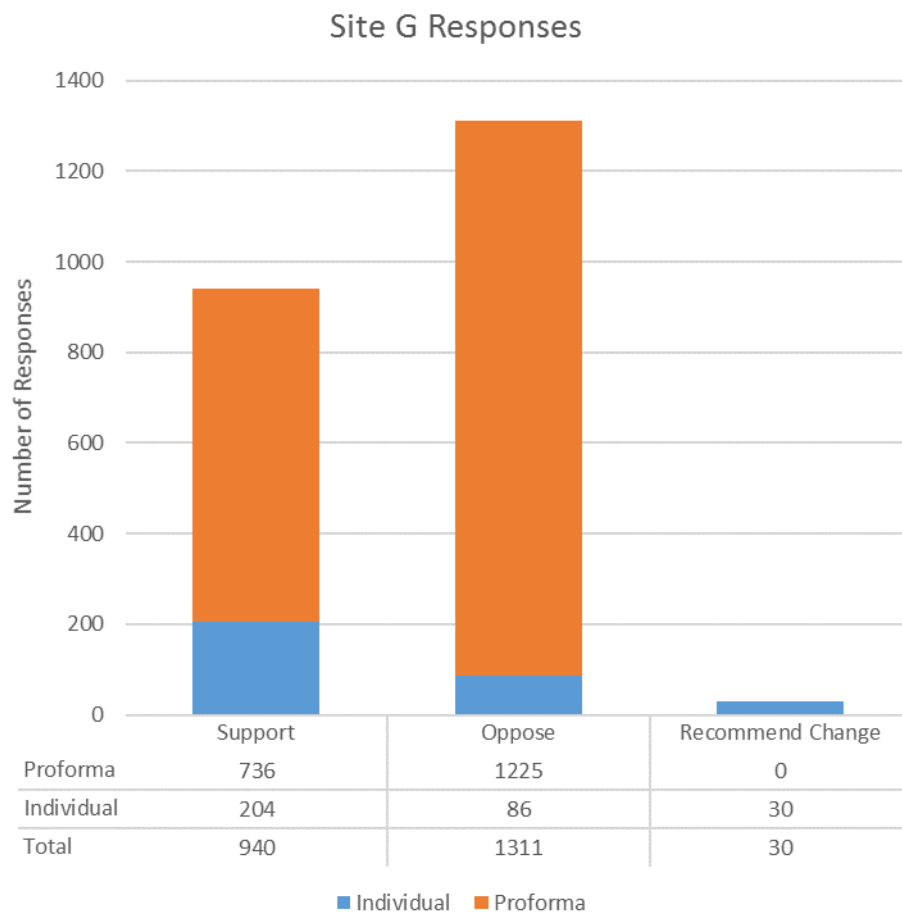
- Commercial fishing information. (#2467, 2887)

^{179.} Refer to Appendix 26 for further information

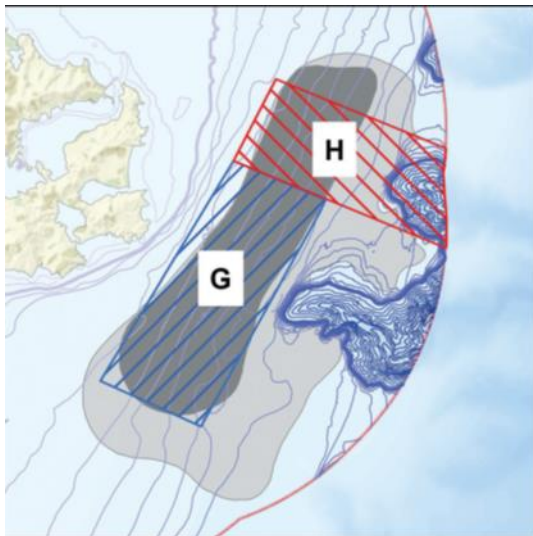
^{180.} Submitter maps showing changes for this site are located in Appendix 10.

10.8.6 Submission Numbers

^{181.} The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.9 H – Papanui Canyon (Type 1) – Option 2



182. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site H have been summarised in supplementary reports.

10.9.1 Support for Site H

183. Submitters in support of Site H made the following comments.

Habitat / Biodiversity

- Support this as the canyons are known to be highly productive areas, and are important for many native marine mammals and birds. (#25, 30, 32, 65, 144, 284, 285, 286, 322, 381, 414, 447, 464, 555, 564, 582, 595, 625, 631, 642, 710, 734, 735, 736, 747, 774, 2472, 2479, 2672, 2677, 2678, 2679)
- Tentatively support in lieu of option E, an inferior solution but better than nothing. (#684)

Recreation

- Minimal impacts on recreational fishing. (#100, 247, 291, 386, 424, 459, 460, 773)
- Site has minimal impact from recreational fishing. (#767)
- Difficult to reach so is a good place for a reserve. (#172)
- To provide an area for marine species to prosper, while still providing areas that can be fished by leaving other canyons open to fishing. (#125)
- Least impact on recreational fishers over other options. (#69, 276, 291, 294, 327, 345, 346, 391, 459, 460, 603, 671, 680, 767, 773) And includes all of the habitats within it. (#680)

- Ling fishing area but prepared to let some ground go, with some fishing still allowed. (#1571, 573)
- Popular area for recreational fishing but areas nearby that are equally abundant. (#21)
- Smaller footprint will likely achieve same result as the much larger Saunders Canyon which will affect more fisherman. (#429, 430, 431, 586, 587, 588, 589)
- Don't try to fix something that isn't broken. Fishing is an important recreation that keeps families together don't take that away from us. (#1073)

Commercial

- Selecting this canyon, with its smaller footprint, will likely achieve the same result as the much larger Saunders Canyon which will negatively affect more fisherman overall. (#69, 429, 430, 431, 586, 587, 588, 589)
- Less impact on commercial. (#100, 208, 247, 291, 294, 310, 327, 345, 460, 603) As they could fish Saunders Canyon. (#310)
- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)
- Some provision for the Queen scallop fishing should be included but also a substantial area where dredging is not permitted should be included. (#464)
- The proposed MPA is inconsistent with MPA Policy. No explanation is provided as to why a marine reserve is required. Similar habitat may be protected elsewhere (Hikurangi). Benefits to tourism are an irrelevant consideration. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection due to threats to biodiversity already being protected due to voluntary trawl ban and although G and H have less cost to user than alternative 1, however if a voluntary trawl ban already exists no additional biodiversity benefits would arise from type 2 reserve as Danish Seining and dredging do not occur in this area. (#2467)
- Moderate impacts on commercial fishing rights. (#2467)
- Alternative Two is inconsistent with the MPA Policy and industry policy on marine biodiversity protection in some relatively minor respects and it has a moderate impact on commercial fishing. However, of the two alternatives it is the lesser-cost approach to achieving the identified biodiversity protection objectives for the bryozoan and canyon habitats. The industry is therefore prepared to give further consideration to the inclusion of MPAs (G) and (H) in the MPA network. (#2467)

Potential for research

- Close to University/ educational and research benefits. (#144, 248, 618, 679, 747)

Tourism

- Support a marine reserve as feel more coast line needs protecting to ensure tourism and the general health of NZ coastline as is very important to myself and future generations. (#74, 107, 582, 679, 693, 2672, 2681, 2682)
- Whilst some recreational and commercial fishing may be displaced by this proposal, there are many opportunities for the development tourism industries at the canyons and plateau should marine protection go ahead. (#625)

Fishing Methods/ Limits

- Reduce recreational bag limits. (#387)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Other

- More protection required. (#5)
- Having G and H as a reserve may help support fisheries in E and F. (#217)
- G and H are a good balance of MPAs with recreational and commercial fishermen. (#208)
- Support F and H. This would probably allow commercial fishing to a larger degree while preserving the canyon as a nursery. (#293)
- Medium effect on all users. Manageable impacts from information I could collect. (#247)
- Support type 1 protection. (#101, 102, 107, 121, 168, 172, 710, 774, 1258, 1269, 2667)
- Of the two canyon this area best suited for type one protection. (#99)
- Causing less spatial displacement. (#409)
- Hard to maintain effective compliance. (#50)
- To have one canyon area protected this is the best option. (#1108)
- Manageable / minimal impact son all users. (#100, 247)
- Want Forum to deliver on 10% as promised, not bow to fisheries interests. I support the bigger option. (#49)
- Better monitoring of discharges to the sea required. (#387)

- Type 1 MPA (marine reserve). (#2508)

10.9.2 Opposition to Site H

¹⁸⁴. Submitters opposed to Site H made the following comments.

Habitat / Biodiversity

- Not enough protection - the proposal protects only a small area of canyon and does not represent the full range of deep water biodiversity. (# 150, 554, 719, 728, 760, 2494, 2504, 2686, 2692, 2885, 2886) And with G does not provide opportunities for research as they have little interconnectivity. (#150)
- This option does not represent the full range of deep water biodiversity. (#110, 122, 129, 213, 426, 657, 678, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2497, 2501, 2502, 2686, 2692, 2885, 2886)
- This area is too small to protect biodiversity. (#43)

Recreation

- No take areas are contrary to the rights of people to fish for food. (#140)
- Negative impact on recreational fishing. (#13, 68, 368, 454, 590, 591, 606, 2505)
- Recreational fishing will not harm area. (#46, 90)
- No take areas are contrary to the rights of people to fish for food. I am in favour of restrictions on size and amount taken but not on a blanket ban. (#140)
- Open to recreational fishers but close to commercial with a quota of 20 fin fish, not 30. (#270)

Commercial

- Politically motivated at the expense of the commercial fishing industry. (#374)
- Impact on commercial fishers. (#580, 590, 591)

Supporting evidence

- Lack of data on depletion and degradation of the environment to justify removing public access. (#40, 382, 562, 580) And has the Forum considered some minor disturbance of the seabed beneficial to ecosystem and biodiversity as it's the case on land? (#562)
- There is no historical scientific evidence to support any of these reserves working. (#634, 742)

- The Forum has no information on the recreational take from this area, has any attempt been made to get this information, how can a recommendation be made. (#580)

Fishing Methods / Limits

- These areas are invisible from the land. The only way protection of these areas will work are with agreement of commercial fishers. (#1102)
- Reduce blue cod limit to 15-20 fish and Ministry of Fisheries to control the commercial operators in this area and ensure sustainability of catch. (#702)
- I am in favour of restrictions on size and amount taken but not on a blanket ban. (#140)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)

Extent

- Not big enough. (#138, 433, 710, 726, 727, 2671)

Weather / Safety

- Not needed - the Site is already protected due weather and sea conditions so restrictions are not required. (#45, 46, 123, 151, 270, 382, 572, 580, 702, 2486)
- Hard to reach for small boat fishermen and very weather dependant. (#172)
- Too dangerous for small craft to go out and fish. (#123)

Social

- Social impacts on families will have a negative effect on the community. (#382)

Displacement

- Closing this area will condense all the effort into the Saunders area thereby threatening to diminish that resource. (#581)

Customary rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)

Other

- Prefer Saunders Canyon to have protection. (#18)
- F preferred. (#239, 401)
- Not on its own. But support if it is a better than nothing at all option. (#556)

10.9.3 Recommended Changes to Site H

¹⁸⁵. Submitters that recommended changes to Site H made the following comments:

Greater Protection

- More protection required. (#625, 693, 729, 2681, 2682)
- Does not protect the most important part of this zone, the Saunders Canyon. (#18, 693, 2491, 2492, 2681, 2682)
- Not enough Type 1 protection. (#595)
- F and H to be protected as a Type 1 reserve. (#378)
- Type 1 for E, F, G and H. (#647)

Less Protection

- Change to a Type 2 protected area. (#467, 474, 580, 2248, 2486)

Extension of the Site

- Link H to F to form a wider area. (#30, 718, 2484) Because the slither left out in the middle will undermine its effectiveness. (#718)
- Link H to F to E to form a greater area of no take Type 1 to give the seal, the penguin and albatross a larger area. (#351)
- Combine G & H. (#642)
- The whole area (E, F, G, H) should be merged into one big MPA. (#365, 737)
- Support E & F together and G & H together as about equally attractive options, but whichever is chosen could be made much more effective if a Mātaitai were added to link it to the Otago Harbour Mātaitai and to extend the Mātaitai into Hoopers and Papanui Inlet. Both the latter have high environmental value, good public access and are close to other wildlife treasures. Customary management should be continued, and sea-scape protection enhanced by abutting to proposal E and F. (#642)
- Extend to the coast. (#378, 693, 729)
- Extend to the shore, also to include Hoopers Inlet and to join with site I at Harekeke Point. (#2677, 2678, 2679, 2681, 2682)

- Protect both canyons and the shelf separating both canyon heads with Type 1 protection. (#733)
- This option does not represent the full range of deep water biodiversity. (#67, 576)
- Match in size to Site E. (#718)
- Needs to include the shelf plateau to be truly effective. Doesn't protect any of the deep reef habitat that the Saunders option does. (#770)

Other

- Combine Alternative 1 (Type-1) and Alternative 2 (Type-1) with E (Type 2) and you'll be on a winner. Change to Type 2. (#737)
- Reduce catch limits instead, i.e. to 20 Blue cod per fisher. (#167)
- Prefer Saunders Canyon as it is larger and supports a more richly diverse and important habitat for marine organisms. (#558, 559, 570)
- Some provision for the Queen scallop fishing should be included but also a substantial area where dredging is not permitted should be included. (#464)
- Reconsider recreational fishing limits. (#1269)
- Recommend that this small patch of canyon head be included in the zone with F to have redundancy in habitat representation in the network. G and H are not a suitable alternative for E and F as edge effects and extent of habitat under protection are not adequate to meet the goals of the Forum. (#375)

10.9.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

¹⁸⁶. Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site H included the following comments:

- Does not affect fishers so much. (#386)
- Oppose on basis of displacement of fishing effort. (#658)
- Oppose on basis of loss of customary rights. (#742)
- Has a manageable impact on customary and commercial fishing rights and interests. (#2511, 2887)
- Support in principle as has a manageable impact on customary commercial fishing rights and interests with 'rebalancing'. Rebalancing of set-net, mid-water trawl and queen scallops. (#2887)
- Support in principle with rebalancing. (#2511)

10.9.5 Technical information and mapping

187. Information was provided by a number of submitters in relation to:

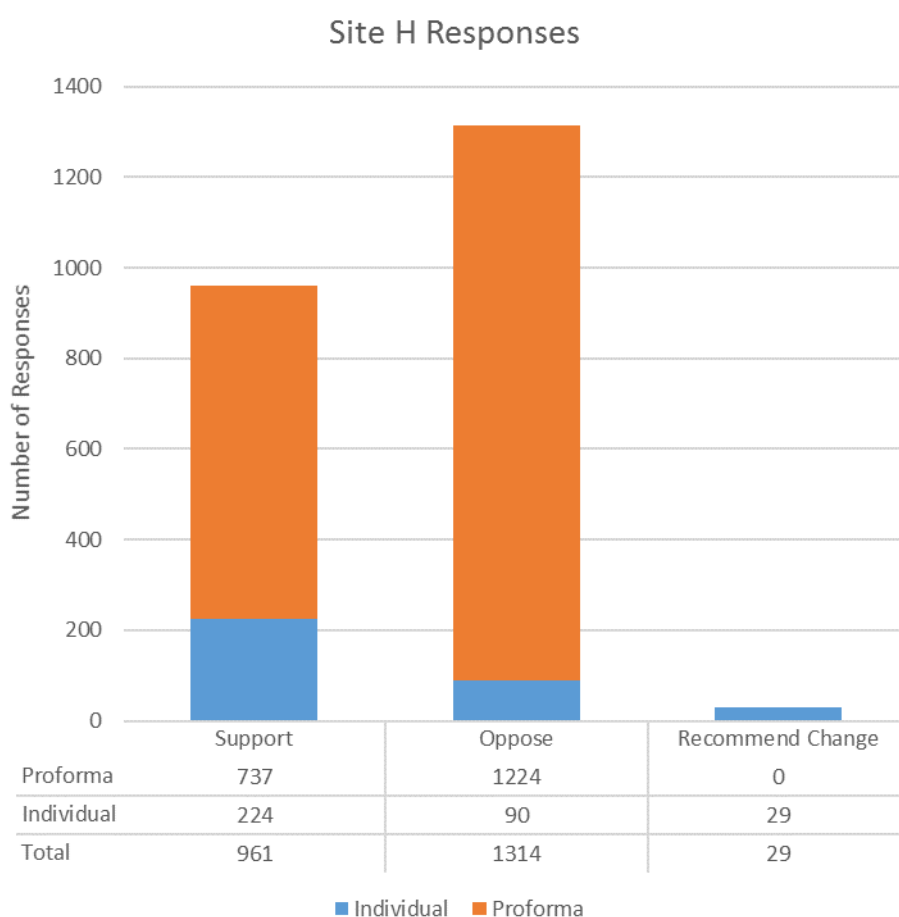
- Cited references. (#735)
- Commercial fishing information. (#2467, 2887)

188. Refer to Appendix 26 for further information.

189. Submitter maps showing changes for this site are located in Appendix 11.

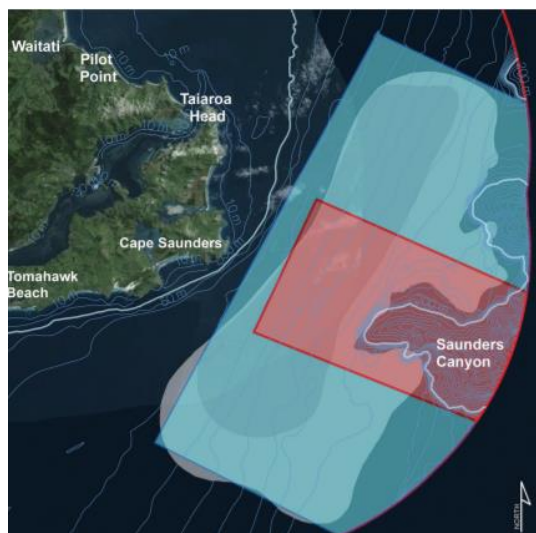
10.9.6 Submission Numbers

190. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.

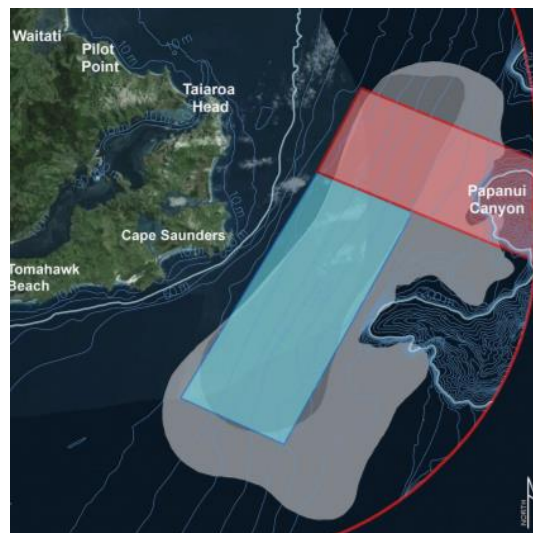


10.10 Alternative Options

191. Two alternative options were also included in the consultation document:



Alternative 1: Includes a marine reserve over Saunders Canyon and the central part of the bryozoan beds (F – Saunders Canyon) and a Type 2 MPA with various fishing restrictions to protect the remaining bryozoan beds, including Papanui Canyon (E – Bryozoan Bed)



Alternative 2: includes a marine reserve over Papanui Canyon (H – Papanui Canyon), combined with fishing restrictions covering the central part of the bryozoan beds (G – Bryozoan Bed).

10.10.1 Alternatives

192. Of those that provided comments on the additional options there is a preference for Alternative 1. The section below provides the reasons for supporting Alternative 1, reasons for supporting Alternative 2 and recommended changes to the proposed alternatives.

10.10.2 Comments in support of Alternative 1

Habitat / Biodiversity

- Is the most representative in terms of habitat, encompassing the high-value Saunders Canyon and an area of plateau, and prohibiting the most damaging fishing methods over the bulk of the bryozoan beds. (#95, 577, 693)
- Support of Alternative Option 1 as I believe it is the best of the options given for the protection of this area, while still allowing certain fishing practices to occur. Both Saunders and Papanui Canyons should be marine reserves, not just one. (#2672)
- Appears to give the maximum protection to the bryozoan beds. Bryozoans are primitive animals that secrete antibacterial compounds to protect themselves and incidentally other organism living on and immediately over these beds. (#378)
- Preferable as it encompasses mid to outer shelf and canyon habitats, and includes larger areas of bryozoan and canyon habitat within a Type 1 MPA. Bryozoan beds are

a particularly important feature of this region - The Otago bryozoan beds are of national, if not international, significance. (#427)

- Support the linking of Type 1 and 2 reserve areas (E and F) to maximise the effects of a protection network and to ensure that reserves are not isolated. (#95)
- Alternative 1, Saunders Canyon as marine mammals and pelagic birds (many of which are endangered) to feed. (#1263)
- Alternative 1. The type 2 MPA (E) is the ideal solution for the entire South-east coast area under consultation as it eliminates setnets and trawls but allows for pots and line fishing. This is much better for the entire inshore environment, protected species and target species, as they are safer, selective methods. There are no issues with high grading, dumping or protected species bycatch by comparison. The Otago Shelf Canyons are an exciting and unique environment, a hotspot for cetaceans, sea lions and seabirds. The area inshore of this is also very important for Hector's dolphins and other protected species. (#2677, 2678, 2679)
- Support option 1 to protect the largest and most significant of all the canyons along this coast. (#2705)
- The type 2 MPA (E) is the ideal solution for the entire South-east coast area under consultation as it eliminates setnets and trawls but allows for pots and line fishing. This is much better for the entire inshore environment, protected species and target species, as they are safer, selective methods. There are no issues with high grading, dumping or protected species bycatch by comparison. The Otago Shelf Canyons are an exciting and unique environment, a hotspot for cetaceans, sea lions and seabirds. The area inshore of this is also very important for Hector's dolphins and other protected species. (#2479)
- G and H are not a suitable alternative for E and F as edge effects and extent of habitat under protection are not adequate to meet the goals of the Forum. (#375)
- Alternative 1 as it provides a better range of habitats and water quality (#2507).

Fishing Methods / Limits

- Excludes set netting in addition to bottom impacting fishing methods (e.g. trawling and dredging). Set netting is a threat to the penguins and marine mammals of the Otago Peninsula that feed within the area covered by option E. (#417)

Extent

- Larger and more comprehensive protection of the two options available. (#355, 378, 420, 554, 556, 559, 659, 693, 720, 729, 730) Which will benefit Dunedin children, tourism and fishing, penguins, albatross and other nesting seabirds. (#554)
- Alternative 1- including a Type 1 MPA over Saunders Canyon and the central parts of the bryozoan beds, simply because this option includes a larger and more diverse area. (#729)

- Alternative 2 provides too little protection and should not be considered as a reasonable alternative. (#710)

Other

- Believe this represents objective and principles of MPA policy more than Alternative 2. (#478)

10.10.3 Comments in support of Alternative 2

Habitat / Biodiversity

- Protects several different habitats e.g. bryozoan beds and canyons would have the least impact on commercial and recreational fishers over other options while protecting a range of other habitats. (#327, 345)
- Alternative 2, protects several different habitats and would have least impact on commercial and recreational fishers. (#327, 345)
- Alternative 2, it protects a large area of important habitat from destructive fishing practices and provides some research opportunities close to the university. (#758)

Recreation and Commercial

- Alternative 2, deep canyons which have little impact on local fishers. (#285)
- Support G and H because of impacts of E and F on recreational and commercial fishers. (#167, 341)
- Having G and H as a reserve may help support the fisheries at E and F (#217)

Other

- H and G are better options. (#251, 280, 282, 451)

10.10.4 Recommended Changes to Alternative Options

¹⁹³. Submitters recommended the following changes to the proposed alternatives.

Greater Protection

- Extend the protection to the coastline to include a very important feeding areas for seabirds, including key marine areas adjacent to breeding areas of the Yellow-eyed penguin, which an emblematic species and a highlight of the ecotourism industry in New Zealand. Support Alternative 1 over 2, since Alternative 1 protects a larger area of the bryozoan beds than Alternative 2, and also includes part of the plateau between the canyons. Both options sacrifice one of the canyons, there might be an intermediate option where you can designate the large MPA of Alternative 1 and still provide a higher level of protection for both canyons, and not leave one of them unprotected. (#693)

- Alternative 1 would have considerably more benefit if it was extended all the way to the eastern shores of the Otago Peninsula. Take a bold step and commit to a meaningful MPA that includes the proposed areas E, F, G, H, I, J, and K, ranging from the shore out to 12 NM. (#729)
- Support option 1 and if it can be further extended north and south so much the better. (#369)
- Recommend Alternative 1 be extended to the shore, include Hoopers Inlet and join up with Site I; Harakeke Point. (#2705)
- Both canyons should be protected and extend to shore. (#693)
- Both Saunders and Papanui Canyons should be marine reserves, not just one. (#2672, 2677, 2678, 2679)
- The size of Alternative 1 is great, however this MPA should be reconfigured to extend in to the coast, including Hooper's Inlet and linking to Harakeke Point. This would cover a wider range of habitat, and improve the effectiveness of the MPA, especially for Sea lions and Hector's dolphins. This would also protect an underrepresented habitat in the proposed network, an example of an Otago Peninsula inlet. Hooper's Inlet is a nationally and locally significant saltmarsh and nursery area for flat fish. The connection to Harakeke point would allow for the inclusion of the Chasm, a high current headland and biologically productive area. Such areas are currently underrepresented in the proposal. (#2672, 2677, 2678, 2679)
- The size of Alternative 1 is great, however this MPA should be reconfigured to extend in to the coast, including Hooper's Inlet and linking to Harakeke Point. This would cover a wider range of habitat, and improve the effectiveness of the MPA, especially for Sea lions and Hector's dolphins. This would also protect an underrepresented habitat in the proposed network, an example of an Otago Peninsula inlet. Hooper's Inlet is a nationally and locally significant. (#2479)
- However, Alternative 1 would have considerably more benefit if it was extended all the way to the eastern shores of the Otago Peninsula. (#729)
- Neither alternative extends far enough south west. (#2507)

10.10.5 Other comments about the Alternative options

- Alternative 1, but would support Alternative 2 if Alternative 1 doesn't go ahead. (#736)
- Alternative 2 is inconsistent with MPA policy. However of the two alternatives it is a lesser cost approach to achieving biodiversity objectives. (#2467)
- Combine Alternative 1 and Alternative 2 with E (Type 2). (#737)
- F is best option, extend to shore to include Hoopers Inlet and join with Site I at Harakeke Point. (#2667)

- Prohibit trawling and set net fishing to the south coast of Otago Peninsula due to importance of marine mammals and include Hoopers Inlet and Harakeke Point. (#2672)
- Support F over H because it is larger and less edge effect, increased range of habitat and biodiversity and an increased plateau for spill over. (#367)
- H and F together and the area in between and extend this larger type 1 area to also include Site G as a type 1 area. Provides a larger area to reduced edge effect, protecting 2 canyon and providing opportunity for research. (#595)
- I suggest an amalgamation of both alternative 1 and 2 to provide more thorough protection of the two important canyon systems and the plateau. I consider the full extent of both Papanui and Saunders canyons should be protected by type 1 MPA, and the entire plateau and adjacent bryozoan known areas be protected in a type 2 MPA that excludes all forms of commercial fishing. Further, I suggest the Forum consider a further extension to include the canyon to the north of the proposed area Taiaroa canyon as a type 1 reserve. I consider this appropriate given the significant unique habitat found at the canyon and at the plateau and the rare species supported by these habitats. (#625)

10.11E, F, G and H – Otago Shelf and Canyons - Responses to Focus Questions

- ¹⁹⁴ Only one submitter responded directly to the question on page 80 of the consultation documents therefore the majority of the comments below have been pulled through from comments made on Sites E – H and the two Alternatives.

10.11.1 Responses to focus questions for options E-H from the consultation document volume 1

h. Which alternative do you prefer? Why?

See Alternative Options section for all comments that were provided Alternative 2, bigger and covers Saunders Canyon. (#218)

i. Are there other combinations of the sites E – H that you prefer? Why?

See Recommended Changes comments. These include:

- Whole area (E, F, G, H) should be merged into one big MPA
- Link F to H and F to I
- Combine E & F
- Combine E, F, G, H, I, J and K from the shore out to 12 NM
- No (#218)

j. For each alternative, how would it affect how you use the area, now or in the future? How would each alternative affect you?

Only one comment provided directly on this - *Little effect on me but could be major on fish numbers.*

Little effect on me, but could be major on fish numbers (#218)

- k. Do you support this area off the Otago Peninsula going forward as a part of the south-east marine protected areas network? Why? Why not?**

See Support and Oppose comments.

Yes (#218)

- l. If you do not support any of the alternatives in their current form, are you able to suggest changes to the proposals that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?**

See Recommended Changes comments.

N/A (#218)

- m. For the fishing methods noted above, how often are they used by you in this area, and how much fish is taken by these methods?**

No information was provided on this.

Nil by me at the moment (#218)

- n. Do you have any information that would help the Forum decide what restrictions to recommend?**

No (#218)

Education

- Having good access means reserve will attract visitors and raise awareness about marine environments. (#15, 121, 478, 1897, 2497, 2484, 2489)

Tourism

- Provides tourism opportunities including visitor viewing of marine mammals and birds, and the promotion of dive sites. (#18, 57, 74, 150, 359, 417, 442, 478, 554, 642, 710, 2484, 2507)
- Disruption to the coastal environment coupled with increased tourist interest has already led to significant decline in the penguin colony at the eastern end of Sandfly Beach. (#57)

Fishing Methods / Limits

- Reduce recreational bag limits. (#387, 745)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)

Weather / Safety

- Weather and surf is a natural protection for the area. (#356)
- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Monitoring

- Easy access to city and ease of monitoring. (#250)

Other

- Great to have a fairly untouched area as a marine reserve. (#594)
- More protection required. (#5)
- Long term benefits for community. (#760)
- Economic benefit to Dunedin. (#18)
- Better monitoring of discharges to the sea required. (#387)

^{197.} The consultation document proposed an extension to Site I to the south (dashed red area on map above). Submitters who supported Site I did not always support the extension of the area. The below outlines submitters who clearly identified their support for the extension and why:

- Viability of bigger area / maximise protection. (#49, 56, 89, 107, 218, 351, 375, 433, 554, 730, 735, 747, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141))
 - Declining fish stocks. (#367, 575, 726, 727)
 - Good for pāua population. (#367, 417, 557, 559, 575, 583, 684, 726, 727, 747)
 - Protection of deeper reef areas. (#138, 150, 186, 367, 401, 557, 558, 575, 625, 735, 760, 1897, 2472, 2501)
 - Biodiversity value. (#20, 25, 138, 186, 351, 401, 417, 427, 554, 557, 558, 559, 570, 575, 577, 583, 625, 668, 691, 728, 735, 736, 770, 1897, 2472, 2484, 2492, 2494, 2501, 2502, 2507, 2667, 2675, 2681, 2682, 2686, 2692)
 - Compliments adjacent seabird sites/supports seabirds. (#186, 355, 367, 417, 554, 555, 557, 575, 647, 668, 710, 736, 747, 2507, 2509, 2667, 2681, 2682)
 - Proximity to Dunedin. (#64, 107, 118, 150, 198, 213, 250, 367, 401, 442, 466, 557, 558, 678, 684, 691, 710, 719, 736, 747, 748, 758, 774, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2472, 2479, 2484, 2497, 2502, 2675, 2686, 2692, 2885, 2886)
 - Tourism opportunities. (#150, 554, 710, 729, 736, 2484, 2507)
 - Science / research opportunities. (#150, 213, 678, 691, 719, 728, 735, 736, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2479, 2494, 2497, 2502, 2885, 2886)
 - Supports penguin population. (#186, 198, 367, 369, 375, 417, 554, 575, 647, 659, 697, 722, 735, 736, 774, 1897, 2472, 2484, 2507, 2509, 2672)
 - Protection of sea lions. (#48, 57, 186, 198, 375, 378, 401, 722, 735, 736, 1897, 2472, 2501, 2509, 2672)
 - General environmental reasons. (#381, 668)
 - Educational. (#213, 466, 559, 678, 719, 728, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2479, 2494, 2497, 2484, 2489, 2502, 2686, 2692, 2885, 2886)
 - No specific reason given. (#30, 67, 76, 122, 426, 753, 1961, 2482, 2491, 2676)
198. The below outlines submitters who clearly identified their support for Site I but opposed the extension option and why:
- Leave Tow Rock for recreation. (#293, 594)

10.12.2 Opposition to Site I

199. Submitters opposed to Site I made the following comments.

Habitat / Biodiversity

- The areas proposed don't have threats to biodiversity other than the level of recreational fishing and its impact on abundance. (#2508)

Recreation

- Impact on recreational fishing. (#13, 37, 44, 58, 59, 69, 90, 100, 117, 167, 197, 216 (Tautuku Fishing Club Proforma x 739), 217, 221, 254, 259, 270, 280, 282, 285, 286, 289, 354, 384, 391, 408, 409, 414, 422, 423, 424, 429, 430, 431, 443, 447, 454, 463, 553, 564, 586, 587, 588, 589, 590, 591, 592, 602, 606, 610, 661, 663, 671, 677, 680, 741, 767, 810, 831, 1104, 1201, 2248)
- Lower catch limits instead/fishery management. (#125, 254, 270, 280, 282, 391, 409, 702)
- No take reserve would end Brighton Fishing Competition. (#289)
- Used for fishing competition. (#1158)
- No take areas are contrary to the rights of people to fish for food. I am in favour of restrictions on size and amount taken but not on a blanket ban. (#140)

Commercial

- Impact on commercial fishing. (#374, 687, 1100, 1104)
- The proposed MPA is inconsistent with MPA Policy. No explanation is provided as to why a marine reserve is required and the spatial extent is unjustified. Considerations such as the recovery and sustainability of pāua populations are an irrelevant consideration. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – the objectives for the MPA are not clearly stated, no threats to marine biodiversity from commercial fishing are identified and it is not a least cost approach. (#2467)
- We consider the rock lobster catch estimates in the consultation document to be very conservative as this is an extremely productive area of the coastline for rock lobsters. The small area around Tow Rock alone produces around 10% of the total catch taken from CRA 7 – i.e., around 10 tonnes of landings under the current TACC. Refer to the submission for further data. (#2467)
- Impacts major paddle crab grounds. (#571, 573)
- I strongly oppose a reserve in this area as Tow Rock is an extremely important area to our crayfishing. (#1100)

Supporting Evidence

- Lack of data on depletion and degradation of the environment to justify removing public access. (#40, 247, 354, 382, 610, 634)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Submitter #2468 raised the following question:

“There are two additional issue that I haven't seen covered in the consultation document. Firstly, is has there been any research that identifies the breeding grounds of the resident fish or has it been confirmed they are transient. If the fish are resident, do the marine reserves protect the breeding areas.? If they are transient would a marine reserve have any effect? Secondly, what size range of fish are the most likely to produce the largest number of offspring. I think the most fertile size range of fish should be identified and factored into the bag limits.” (#2468)

Weather / Safety

- Implications for small craft with regards to safety, and/or weather already restricts access. (#3, 33, 44, 59, 90, 99, 117, 123, 125, 130, 152, 167, 168, 174, 175, 176, 179, 193, 194, 195, 197, 216 (Tautuku Fishing Club Proforma x 739), 219, 220, 221, 255, 270, 276, 284, 285, 286, 287, 288, 289, 290, 313, 346, 352, 353, 372, 382, 391, 404, 409, 414, 443, 447, 454, 459, 460, 463, 474, 475, 581, 582, 590, 591, 592, 606, 641, 663, 671,677, 680, 685, 702, 741, 754, 767, 773, 810, 830, 1258, 2468, 2486, 2493)
- Weather already limits fishing in this area. (#216 (Tautuku Fishing Club Proforma x 739), 810)

This issue is well summed up by the following submitters (#690, 2468):

“I would prefer a Type 2 over this area all the way to Green Island. This area effectively removes the only boat access to the South Coast. Landing fish in a marine reserve is not a good look. Launching at Tomahawk and St Clair if reinstated will remove a lot of people's access to these areas. It will increase the danger and time exposed to the South Coast if steaming from North or South is required. The area has relatively poor access is exposed to the Southern Ocean and its protecting influence. In my opinion it has the best protected fishery on the East Coast of the South Island. Groper are making a great comeback and it has in your words the best in tacked pāua population in New Zealand. The lack of Commercial fishing pressure (now been spotted fishing this area) along with the continued exposure to the south have helped this area sustain this population. These pāua beds are very important and protected by local recreational fisherman losing access to these beds would put greater pressure on better beds to the South.” (#690)

“My submission is this area is already largely protected by the predominant weather and sea conditions which make it too rough to access most of the time. I would fish more regularly in this area but the prevailing conditions make it too risky during the time I can go fishing. Only people with vessels able to be launched from the beach use this area. Larger recreational vessels that can only be launched from either Port Chalmers or Taieri mouth do not use this area because they have to use a substantial amount of fuel to get there and also travel past other fishing grounds.

The only other vessels which access this area are commercial. This fishery would be further protected by the total exclusion of commercial fishing. In general I support the establishment of marine reserves for the conservation of fisheries. However I disagree with this area being a type 1 reserve.” (#2468)

Social

- Impacts on communities. (#382)
- Impacts on fishing ‘culture’. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- Displacement placing pressure on other areas. (#66, 152, 193, 194, 409, 590, 591, 610, 671, 2890)
- Submitter #2493 summarises this issue from a recreational perspective:

If this area is made a type 1 reserve it will significantly increase pressure on other areas, negatively affecting them. This is because there are relatively few other options for the Rec Fishers based in Dunedin that would use this location in area “I”. Certainly, for me it would mean that I fish at Shag Point more often. I believe would be a far worse result overall as this area is genuinely overfished, unlike at Tow Rock. (#2493)
- Displaces pāua gathering. (#7)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- The proposal takes away Kāi Tahu customary rights under the Treaty of Waitangi. (#742)
- Oppose due to my Treaty rights. (#358, 742)

Other

- I vehemently oppose the creation of a Type 1 MPA in this area! There are many factors, including small boat safety, there is a sewerage outflow in this area, and this is one of the key areas we fought for under the "Pāua to the People" campaign. (#168)
- Oppose Type 1 but support Type 2. (#37, 423, 2248), keep commercial out only. (#384)
- Area 'I' should not be included in any network given that its existing state is already substantially altered and its continued use for wastewater disposal means that the marine area cannot adapt or recover in response to human induced disturbance. There continue to be intermittent untreated discharges from this pipe. The pipeline and continuing sand extraction at Tomahawk, means that a substantial length of this coastline could not possibly hope to be returned to a fully natural state and therefore any marine protection seeking to do this would be pointless. (Tautuku Fishing Club Proforma x 735)
- The consideration of the impact of the Dunedin City effluent discharge and/ or nearby sand mining on the marine environment. (#172, 216 (Tautuku Fishing Club Proforma x 739), 353, 391, 409, 475, 754, 810, 1258)
- Due to erosion at St Clair it is very likely there will need to be significant artificial reef formed to prevent major damage. An MPA in this area will most likely hinder any work that will be required. (#1102)
- Don't need both the Saunders and Papanui Canyons. (#741)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Too much to lose. (#260)

10.12.3 Recommended Changes to Site I

²⁰⁰. Submitters that recommended changes to Site I made the following comments:

Greater Protection

- Include as much area as possible for marine ecosystem health, including extension to at least 12 NM. (#95, 378, 574, 693, 722, 729, 733, 734, 2472, 2479, 2673, 2677, 2678, 2679)
- Extend to 6 NM. (#2671)
- Submitter #733 sums up well the need for greater protection:

"The proposed area excludes substantial parts of the species main foraging grounds which are located between 3 and 12 km offshore (Figure 1a).. F These parts are dominated by gravel which provides substrate for sessile fauna (e.g. sponges, corals) which in turn is habitat for crustaceans and fish, i.e. prey penguins target.

Hence, the foraging areas of the Yellow-eyed penguins from the Otago Peninsula point out areas of high biodiversity that proposed MPAs should protect.

Moreover, the proposed site overlaps 100% with the plume of discharged wastewater from the city of Dunedin (figure 1b). The resulting contamination of shellfish effectively protects coastal waters from commercial and recreational harvesting which renders the protective value of the MPA as currently proposed minimal.

Hence, extending the MPA boundaries to 12 NM offshore is warranted as it would cover substantial areas of increased benthic biodiversity as indicated by the Yellow-eyed penguins foraging distribution. This area would not necessarily need to be a Type 1 MPA but could be established as a Type 2 with all benthic fisheries and set netting activities banned within that area. This would also close the gaps between the areas E/F and M/N and bring the proposal closer to an establishment of a network of MPAs.”

Less Protection

- Needs to have regard to existing discharges. (#2882)
- Some consideration does need to be given to the commercial rock lobster fishery as a fair amount of pressure will be displaced - Type 2 protection around Tow Rock could be considered. (#758)
- Support Type 2 over Type 1 for the entire Site. (#128, 201, 356, 600, 657, 661, 746, 754)
- Prohibit all commercial fishing and/or allow recreational fishing with a lowered catch limit. (#118, 695, 1269)
- Allow recreational fishing. (#80, 578, 627, 646, 737).
- Need to allow for recreational fishing at Tow Rock. (#293, 478, 2493)
- I would like to see the boundary shifted to the south side of Seal Point so as fishing is still permitted in the gut at Seal Point (a good place to take young people fishing) as well as Harakeke Point. (#627)
- Prefer fishery management/reduced catch limits and size. (#81, 167, 600, 745, 747, 754, 2468)
- I do not see any merit to include the Tomahawk - White Island area in this reserve. It is too much part of Dunedin City environment. But the area from Harakeke Pt to say 2km off Maori Head would be more acceptable. (#451)
- Lost fishing spot at Harakeke Point and Bay. Shift boundary back to headland nearest sandfly bay. Seal point was once a popular fishing reef until access was denied. If the land ownership changes and access was allowed it would then again be sought after fishing spot. Difficult to change once included in MPA. Recommend removal from MPA along with Tow Rock. (#473)

Extension of the Site

- Proposal is far too small to do any good. (#718)
- Extend the site to 12 NM. (#369, 378)
- Extending and combining the site with Sites J and K. (#355, 754)
- Connect to Site F. (#239, 433, 1270, 1271, 1272 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2479, 2492, 2494, 2497, 2501, 2502, 2671, 2677, 2678, 2679, 2686, 2672, 2705)
- Connect to E. (2671)
- Inclusion of Tow Rock. (#25, 110, 118, 129, 227, 351, 355, 383, 402, 576, 657, 1062, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2885, 2886, 2472, 2479, 2482, 2492, 2494, 2501, 2677, 2678, 2679, 2686, 2692)
- Move north of Tow Rock. (#607)
- Support, and recommend inclusion of Tow Rock. This marine reserve will likely be most effective if the highly productive area of Tow Rock is included. This will be a significant marine reserve for education, research and public enjoyment, being close to a major city, and world class if connected to site F. (#1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141)
- I would like the Forum to consider the south end of Sandfly Bay to Maori Head as a Type 2. If Tow Rock is included, make it Type 2 for recreational fishing (#127)
- The upwelling and mixing of water masses at Cape Saunders allows for a high level of productivity which in turn makes it a biodiversity hotspot and an important feeding ground for marine mammals and seabirds. Therefore I would like to see Cape Saunders included in the MPA. (#136, 365)
- Recommend extension to 6 km off shore and north past Allans Beach to Wharekakuhu and to be inclusive of Hoopers Inlet. This encompasses the Sandymount coastal area and include an area where there is frequent sealion, seal and penguin activity as well as a small area of land reserve on north of Sandymount to the sea edge and a wildlife reserve area on sand flats to the inside of Hoopers Inlet from Allans Beach. This would also allow inclusion of sheltered sandy estuary, sheltered coastal sands (in Hoopers Inlet) which is not well represented in the proposals as given. As a resident of Hoopers inlet and a keen recreational user of local coast seas and inlets I would find a full MPA type 1 reserve status something to be proud of and would link in well with many local tourism operations and the appreciation the local public already has for this area. The extension off shore means that an effective protected area. (#595)

- Extend seawards from Harakeke Point to south of Boulder Beach to protect foraging habitat of Yellow-eyed penguins breeding at Boulder Beach and Sandfly Bay. The Boulder Beach site has in the past supported up to 140 YEP nests. (2507)
- Those seeking an extension are well summed up well by the following:

“Options I, J and K represent an opportunity for a set of spectacular marine protected areas on the doorstep of Dunedin City. These options are unique and therefore worthy of protection for several reasons. In particular: the pāua populations in option I, the accessibility of an offshore island reef system in option K, the retention and preservation of recreational cod fishing and pāua gathering in option J, and the proximity of this set of marine protected areas to Dunedin City and the University of Otago.” (#367)

- Ensure Marine Reserve Act 1971 specific rules and regulations are incorporated at a minimum. (#2501)
- Seeks a Mātaihai reserve north of the area identified as having cultural values. (#642)

10.12.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

^{201.} Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site I included the following comments:

- Oppose on basis of displacement of fishing effort. (#658)
- Oppose on basis of loss of customary rights. (#742)
- Oppose the inclusion of this area as a reserve because of rights under the Treaty. In 40 years of fishing these waters no change in the size and the number of fish in this area seen. The need for a reserve would be better if was placed from Harakeke Point north to the Pudding Stone area of the Cape Saunders. (#358)
- Needs provision to allow for the retrieval of cultural material from stranded marine mammals or their separated parts, and for the retrieval of kōiwi tangata. (#612)
- Support Option 2 to include Tow Rock. Wonderful to have an easily accessible marine reserve so close to Dunedin city with the high diversity of habitats in the area. Happy to give up taking the odd pāua and fishing in this area to protect it for future generations, scientific study and improving ecosystems and biodiversity of species. If the Type 1 MPA doesn't go ahead also supports establishing the whole coastal area from Harakeke Point to Green Island as a Type 2 MPA with restrictions mainly on commercial fishing and recreational bag limits. (#691)
- Has a manageable impact on customary and commercial fishing rights and interests. (#2511)
- Option 1 - Support in principle. Manageable impact on customary commercial fishing rights and interests. Order in council to include provision for the retrieval of stranded or naturally separated parts of marine mammals and kōiwi tangata. (#2887)

- Option 2 – Oppose. More significant impact on customary commercial fishing rights and interests than Option 1. (2887)

10.12.5 Technical information and mapping

202. Information was provided by a number of submitters in relation to:

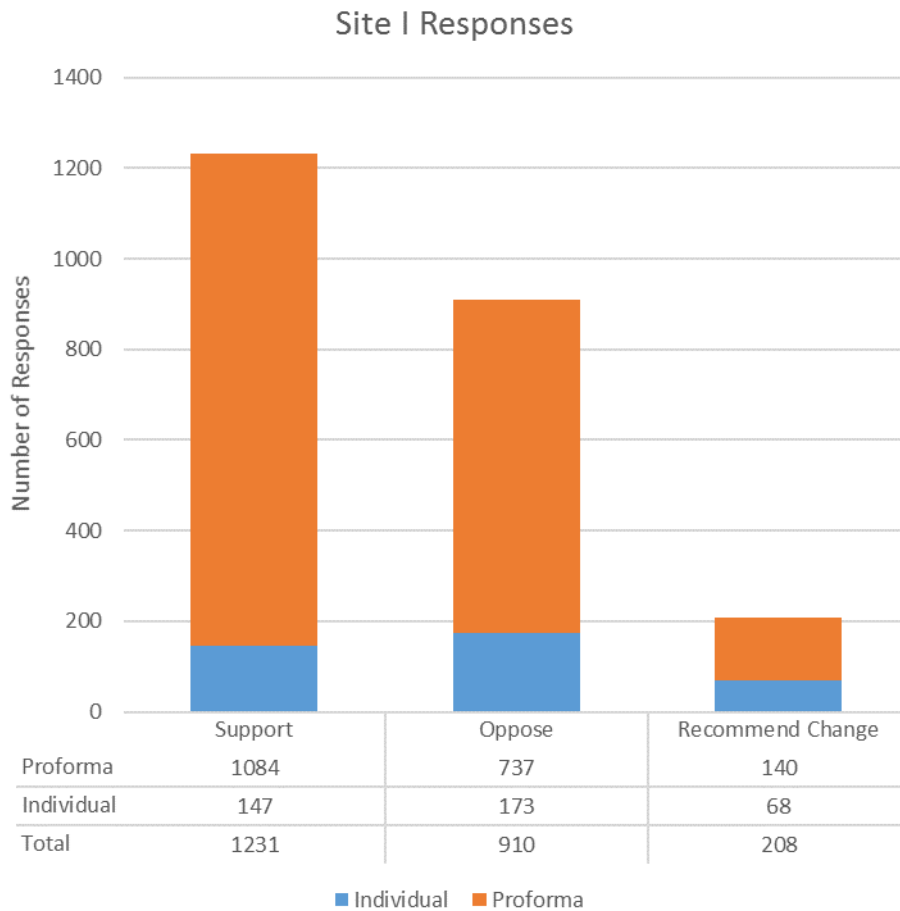
- Cited references. (#735, 2671)
- Ecological / Habitat. (#729, 733, 1897)
- Commercial fishing data. (#2467)
- Recreational fishing information. (#391, 661).
- Resource consent information. (#2882)

203. Refer to Appendix 26 for further information.

204. Submitter maps showing changes for this site are located in Appendix 12.

10.12.6 Submission Numbers

205. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.12.7 Responses to focus questions from the consultation document volume 1

a. Does this area provide adequate protection for the habitats included?

Please see comments above.

**b. How would this proposal affect your current or future use of the area?
How would this proposal affect you?**

Please see comments above.

c. Should Tow Rock be included in the marine reserve? Why? Why not?

“We do not support but do not oppose the Tow Rock extension to Site I. This is because we take recreational fishing charters there, and we recognise that it is a popular recreational and commercial fishing spot. However, if the Forum believes it is a crucial part of the reserve we would willingly amend our fishing activities.” (#425)

“I support this option because of the high diversity of habitat and the importance of protecting the deeper rocky reef areas. Moreover, this is close to Dunedin and I

agree it would be an iconic marine reserve complementing and enhancing the status Dunedin as the 'wildlife capital of the world'. Also, it would provide excellent opportunity for local school groups to appreciate a more real marine environment.” (#558)

“I support the addition of Tow Rock, (option 2) as it then includes the very important habitat - deep reef - which is poorly represented in fully protected areas. The reason it is so highly valued by commercial and recreational fishers (good fishing stocks to harvest) makes it equally valuable for conservation values (good fishing stocks to protect/multiply). The inclusion of Tow Rock provides a valuable asset for possible tourism development (water clarity making glass bottom boat viewing an obvious activity) and also scientific research. The proximity of this marine reserve to the city of Dunedin will have additional benefits to tourism which is a significant part of the Dunedin economy which promotes itself as the ecotourism capital, and also research from the nearby University which has several internationally recognised, specialised marine studies courses. This proposed marine reserve protects a wide variety of habitats, but needs the inclusion of Tow Rock to become a highly diverse valuable reserve.” (#150)

d. Do you support one of the options going forward as a part of the south-east marine protected areas network? Why? Why not?

Please see comments above.

e. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?

Please see comments above.

10.13 J- White Island to Waldronville (Type 2)



206. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site J have been summarised in supplementary reports.

10.13.1 Support for Site J

207. Submitters in support of Site J made the following comments.

Habitat/Biodiversity

- Protection of habitat. (#57, 65, 138, 150, 287, 367, 381, 395, 401, 554, 555, 558, 570, 577, 625, 710, 774, 722, 2667, 2681, 2682)
- While this Type 2 protection does not in itself achieve much in the way of biodiversity protection it may provide a buffer, through fisheries restrictions on the adjacent proposed reserves of Green Island (K) and Harakeke Point (I). (#67, 122, 150, 198, 213, 719, 728, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2497, 2501, 2502, 2504, 2686, 2692, 2885, 2886)
- Links well with I and K. (#121, 401, 570, 575, 722, 771, 2472, 2494, 2667, 2681, 2682, 2885, 2886)
- Valuable as an extension of Site I. (#49, 427, 464, 736, 754)
- Options I, J and K represent an opportunity for a set of spectacular marine protected areas on the doorstep of Dunedin City. These options are unique and therefore worthy of protection for several reasons. In particular, the retention and preservation of recreational cod fishing and pāua gathering in option J, and the proximity of this set of marine protected areas to Dunedin City and the University of Otago. (#367)
- This area will allow increased benefits from the two areas on either side and so an increase in biodiversity along that whole area of the coast. (#150, 570)

- Creates a coastal corridor. (#774)
- Will support Harakeke Point marine reserve. (#76)
- Should be left as a breeding ground. (#281)
- Adjacent to St Clair Fairy Prion colony. (#575)
- Adjoins a number of protected terrestrial areas. (#2667, 2681, 2682)

Recreation

- Excludes all commercial fishing but still allows for recreational fishing and pāua gathering experience for the recreational fishers of Dunedin City. (#107, 367, 417, 556, 557, 583, 725, 747, 760)
- Not easily accessed. (#99)
- Public access best feature. (#642)
- Allows for recreational. (#737, 2489)
- Provides control on fishing impacts. (#1062)

Commercial

- Support controls on commercial fishing. (#387, 559, 684, 691, 695, 725, 753)
- Should exclude all commercial fishing. (#107, 198, 583, 594)
- Minimal commercial impact. (#239, 250)
- Leaves plenty of room for commercial elsewhere. (#100)

Tourism

- Great tourism opportunity close to Dunedin. (#478, 710)
- Support a marine reserve as more coast line needs protecting to ensure tourism and the general health of NZ coastline as is very important to myself and future generations. (#74, 554)

Potential for research

- This site provides an opportunity for research to better understand the impact of differing management on marine biodiversity. It may also increase the resilience of the Green Island and Harakeke sites. (#2494)
- Handy to Otago University for education and research. (#478, 736)

Fishing Methods / Limits

- Importance for recreational fishers and/or acknowledging the potential to reduce recreational bag limits. (#64, 107, 150, 198, 250, 270, 367, 401, 417, 447, 464, 575, 583, 594, 684, 691, 722, 725, 735, 736, 745, 754, 2672, 2469)
- Support creation of no-take zone. (#1961)
- Support proposal apart from reduced recreational take. Have seen no decline in Moki or Greenbone, and a small decline in Blue cod in 35 years. (#201)
- Stop all set netting and trawling within 12 NM. (#2248)
- Reduce recreational bag limits. (#387)

Extent

- Should cover as much area as possible. (#56)

Weather / Safety

- Weather limits number of fishing days. (#64)
- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Displacement

- Support this proposal as believe there will be a detrimental effect on this area from displaced recreational and commercial fishing if Type 1 marine reserves over area I and K go ahead. (#367, 401, 417, 691)

Other

- Has good car access. (#29)
- Great to have a reserve right at Dunedin. (#730)
- Sewage outfall discharges into this area. (#99)
- More protection required. (#5)
- Better monitoring of discharges to the sea required. (#387)

^{208.} The following submitter's comment sums up a very common theme in all the submissions in support:

"I support this proposal as I believe there will be a detrimental effect on this area from displaced recreational and commercial fishing if type 1 marine reserves over area I and K go ahead. Happy with the idea of no commercial fishing and a reduction in

recreational fishing bag limits. Nice that there is still somewhere for recreational fishers to go close to the city but in order to protect areas I think it's reasonable to reduce recreational bag limits.” (#691)

10.13.2 Opposition to Site J

²⁰⁹. Submitters opposed to Site J made the following comments.

Habitat / Biodiversity

- The areas proposed don't have threats to biodiversity other than the level of recreational fishing and its impact on abundance. (#2508)

Recreation

- Impact on recreational fishing. (#13, 193, 194, 216 (Tautuku Fishing Club Proforma x 739), 259, 260, 384, 414, 424, 443, 553, 609, 610, 680, 677, 810, 2505)
- Significant restriction on fishing opportunities with family and friends. (Tautuku Fishing Club Proforma x 735)
- Popular area for local users. (#247, 564)
- Have not noticed a decline in fish number in 35 years (#59) and 40 years. (#358)

Commercial

- Adverse effect on commercial fishery. (#374, 428, 429, 430, 431, 586, 587, 588, 589, 590, 591)
- The proposed MPA is inconsistent with MPA Policy. Restrictions on fishing are proposed beyond those which are necessary to provide for the maintenance and recovery of physical features and biogenic structures that support biodiversity and the proposals for specific controls on recreational fishing step well into the realm of fisheries management rather than marine biodiversity protection. MPA (J) replicates habitats protected in other parts of the proposed network, in particular proposed MPAs (I) and (K). (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – it has a fisheries management objective rather than a marine biodiversity objective, the only identified threat is displaced fishing pressure and threats arising from recreational fishing pressure should be addressed by Fisheries Act tools. (#2467)
- Moderate impacts on commercial fishing rights, particularly for the CRA7 rock lobster fishery. Rock lobster catch estimates in the consultation document considered to be very conservative as this is an extremely productive area of the coastline for rock lobsters and CRA7 stock abundance is increasing. Estimated that the area of MPA (J) produces around 5 to 7 tonnes of rock lobster landings annually. (#2467)

Supporting evidence

- No evidence a reserve will help. (#609, 610, 634, 667, 742, 1108)
- Would like to see data on depletion/degradation of these areas and the surrounding ocean before removing public access. (#40)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Status quo has no proven effects on the surrounding ecosystem. (#354)

Fishing Methods / Limits

- Could reduce take limits. (#167, 443, 641, 685, 695, 702)
- Fisheries management makes more sense than no take. (#372)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)

Weather / Safety

- Implications for small craft with regards to safety, and/or weather already restricts access. (#123, 152, 168, 193, 194, 216 (Tautuku Fishing Club Proforma x 739), 217, 219, 220, 221, 288, 289, 290, 353, 372, 404, 408, 414, 443, 474, 475, 572, 606, 641, 661, 677, 680, 685, 702, 775, 810, 1258)
- Weather already limits fishing in this area. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Social

- Impacts on fishing 'culture'. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- Closing this area puts more pressure on other areas. (#66, 152, 193, 195, 409, 609, 610, 2890)
- Will adversely affect commercial fisherman who will then likely compete with recreational fisherman on other grounds. (#66, 69, 374, 428, 429, 430, 431, 586, 587, 588, 589, 590, 591, 680, 1106)
- Will cause displacement effects on other Quota Management Areas. (#658)
- The impacts on rock lobster fishing are cumulative across adjacent MPAs (I), (J) and (K) and together result in significant level of displacement. (#2467)

Monitoring

- Lack of discussion as to how the reduced bag limits would be enforced and the mechanics around these rules. (#2891)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- Traditional area for maori. (#408)

Other

- The consideration of the impact of the Dunedin City effluent discharge. (#168, 172, 216 (Tautuku Fishing Club Proforma x 739), 353, 409, 661, 667, 693, 810, 1258, 2467, 2882)
- Better as Type 1 due to DCC discharge. (#7)
- Fear marine reserves will not work without appropriate funding and management. (#690)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available. (#216 (Tautuku Fishing Club Proforma x 739), 810)

10.13.3 Recommended Changes to Site J

²¹⁰. Submitters that recommended changes to Site made the following comments:

Greater Protection

- Let the recreational fishers keep the rock but no take around Green Island. (#478)
- Would like to see greatest possible protection. (#30, 2675)
- Make a Type 1 reserve. (#7)
- Make a Type 1 reserve to provide consistent management along this part of the coast, and better protect the diversity of shallow water habitats present. (#647)
- This part should become Type 1 and link I to K. (#355)
- Ban commercial trawling methods. (#2479, 2677, 2678, 2679)
- Exclude commercial fishing. (#25, 440, 581, 661, 2472)

- Reduce the bag limits. Changes recommended include (per person/day): 5 cod, 2 pāua, 2 crayfish / 5 fin fish / 10 blue cod, 5 pāua, 2 Groper / Reduce the limit by half / Blue cod to 20 / Blue cod 10-15 / Groper 3 / pāua 5. (#25, 37, 440, 607, 625, 661, 695, 1269, 1897, 2472)

Less Protection

- White Island area should be available for recreational fishing. (#293, 661)
- Leave recreational limits alone. (#581, 2486)
- Would not be necessary if I & K were not Type 1. (#167)
- Will displace rock lobster industry – group needs looking after. (#2486)

Extension of the Site

- To 12 NM off shore. (#693, 734, 2484)
- Extend 6km offshore and south to Bruce Rocks. (#595)
- Extend to Green Island. (#594, 2484)
- Extend south-west a little further than Brighton in order to allow easy public access for swimming, snorkelling and diving in the future abundance of a marine reserve. (#425)
- Extend 6 NM offshore. (#2671)
- Extend to 5 NM. (#2479, 2672, 2677, 2678, 2679)
- Extend 2 a further miles offshore to protect deep reef habitat. (#625)
- Extend to surround Site I. (#375)
- A good extension of I. (#657)

Reduction of the Site

- Removing areas around Cape Saunders and this area as well as others. The area for commercial fishing is being cut significantly effectively, potentially cutting quota. (#1269)
- Move the reserve from Blackhead to White Island. (#769)

Other

- Suggest from the South Headland at Tunnel Beach to mouth of Kaikorai Stream and include Green Island. (#451)
- Weather already restricts access. (#607)

10.13.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

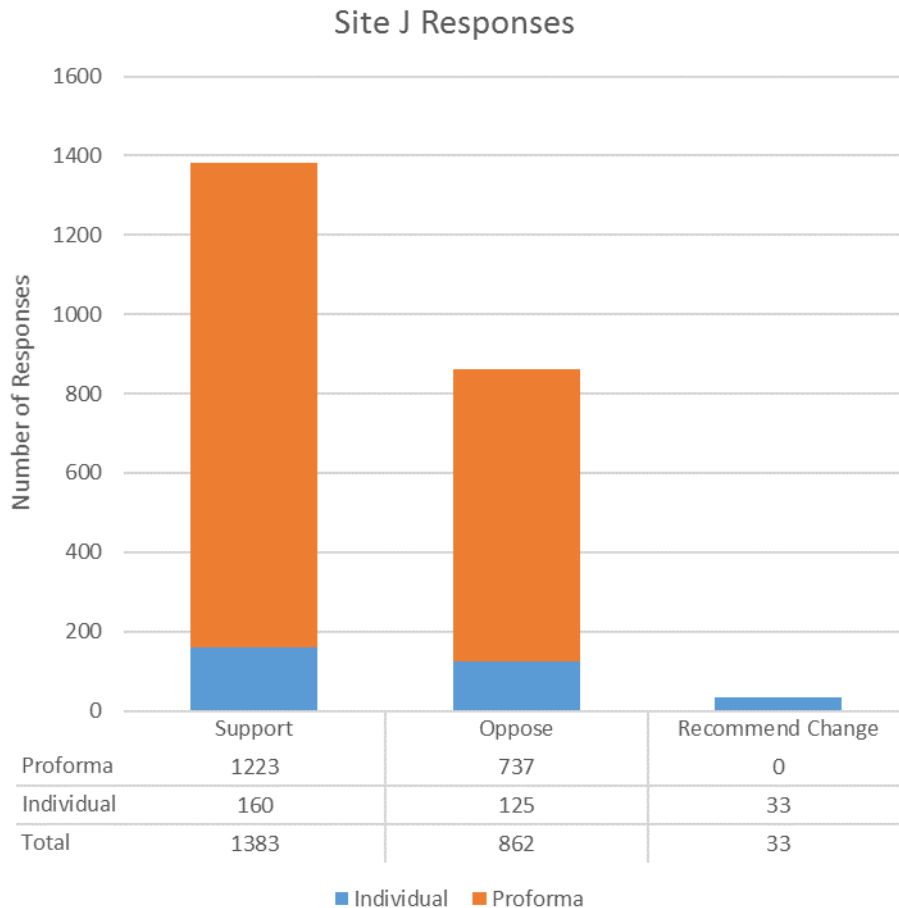
211. Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site J included the following comments:
- Better placed south of Brighton Beach. (#358)
 - There is weak rationale for the establishment of the proposal. 2) It rewards the key opponents to the Brighton Mātaitai application. 3) a community management tool would devalue the 1992 Settlement. Mātaitai are designed to give effect to the obligations stated in the Treaty of Waitangi Fisheries Claims Settlement Act 1992 to develop policies to help recognise use and management practices of Maori in the exercise of fishing rights. If these tools are made available to the wider community these community lead management tools would undermine the capacity for tangata whenua to establish Mātaitai and devalue the redress that Mātaitai are intended to provide. (#612, 2511, 2887)
 - Oppose on basis of displacement of fishing effort. (#658)
 - Oppose on basis of loss of customary rights. (#742)

10.13.5 Technical information and mapping

212. Information was provided by a number of submitters in relation to:
- Commercial fishing information. (#2467)
 - Cited References. (#2671)
213. Submitter maps showing changes for this site are located in Appendix 13.

10.13.6 Submission Numbers

- ^{214.} The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.13.7 Responses to focus questions from the consultation document Volume 1

a. Does this area provide adequate protection for the habitats included?

See Support and Oppose comments.

**b. How would this proposal affect your current or future use of the area?
How would this proposal affect you?**

For some it would increase their usage. Also see comments about effects on commercial operators.

c. Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?

See Support and Oppose comments.

- d. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?**

See Recommended Changes comments.

- e. Do you think this area would experience increased recreational fishing pressure if it is adjacent to two marine reserves? If so, how could the health and biodiversity of the area be protected?**

Submitters consider this the area is obviously going to benefit from the reserves at I and K but there is concern that it will put pressure on other areas.

- f. For the fishing methods noted above, how often are they used by you in this area, and how much of each species is taken by these methods?**

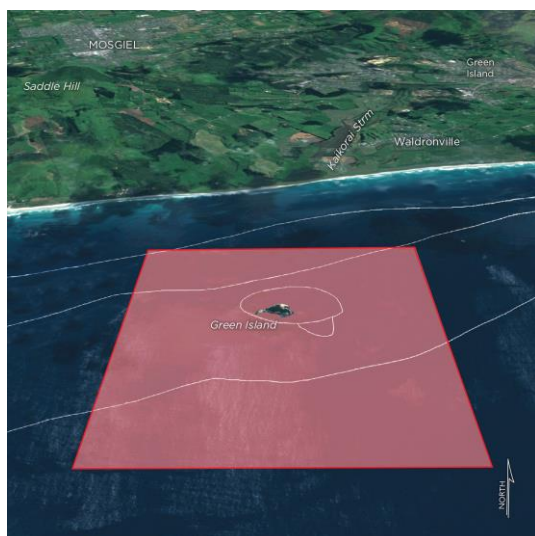
I dive and fish from a kayak

I collect pāua on average six times per year launching an inflatable boat from Tomahawk Beach... From time to time I go spear fishing from the boat without a use of a boat. From time to time I go spear fishing from the beach without the use of a boat. This is usually from Smaills Beach around Bird Island, Lawyers Head or from St Clair around to the cliffs underneath Cargills Castle. Any fish I catch is eaten by my family and me. Sometimes I fish around Gull Rock and Tow Rock however mostly I fish around White Island. Most of the time I rod fish but sometimes spear fish and snorkel around Bird Island and under the cliffs between Smaills Beach and Sandfly Beach. (#661)

- g. Do you have any information that would help the Forum decide what restrictions if any to recommend?**

See comments on suggested bag limit changes in Recommended Changes comments.

10.14 K –Green Island (Type 1)



215. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site K have been summarised in supplementary reports.

10.14.1 Support for Site K

216. Submitters in support of Site K made the following comments

Habitat / Biodiversity

- Habitat and ecosystem protection. (#25, 65, 107, 110, 122, 138, 186, 213, 250, 351, 367, 395, 401, 417, 426, 554, 555, 557, 558, 559, 570, 574, 576, 625, 647, 657, 659, 678, 684, 719, 722, 725, 726, 727, 728, 730, 736, 737, 747, 760, 764, 771, 774, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2484, 2489, 2494, 2497, 2504, 2507, 2671, 2672, 2502, 2686, 2692, 2885, 2886)
- A marine reserve centred on the island has potential to showcase a whole range of southern marine species. (#367, 417, 557, 1062)
- Green Island is already a wildlife reserve. (#250, 367, 378, 381, 394, 417, 557, 575, 577, 2489, 2667, 2681, 2682)
- Important site for Yellow-eyed penguin. (#136, 659, 697, 714, 722, 2472, 2667)
- I support White Island as being part of an extended MPA. I initially opposed area I Harakeke Pt to White Is, but as the bigger picture unfolds I see some value in affording the entire area greater protections via type 1 & type 2 reserves. I have fished this area previously close to the Island and in relative close proximity to it. With nominal results. I am unsure how I will know where these reserves start and end as like most small craft I do not have a chart plotter. I guess technology will help in this regard. Small boats launched at Brighton would lose some safe and accessible fishing

grounds under this proposal. However I believe the upside for future generations in recovery of fishing and ecological values is probably worth the trade-off. (#760)

- Green Island is rat free. (#270, 378, 464)
- Should be left as a breeding ground. (#281)
- Discrete example of reef habitat. (#375, 47, 625, 722, 1062, 1897, 2484)
- Great site for the reasons stated in the Marine Reserves Act 1971 s3(1). (#556)
- For protection and recovery of kelp beds. (#559)
- Covering as much area as possible is good for ecosystem health. (#56, 121, 347, 369, 554)

Recreation

- Value as a dive spot. (#12, 49, 64, 70, 198, 270, 478, 557, 583, 747, 1062, 2489, 2672)
- If there has to be a no take marine reserve near to Dunedin, this should probably be it, although it will adversely affect a lot of small boat recreational fishers. (#201)
- We have fished these waters for generations. Mother nature decides how often you get to go out and it's not very often. (#669, 677)

Commercial

- Would support a reduction in commercial fishing. (#55)
- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)
- Manageable impacts on commercial fishing. (#2511)

Potential for research

- Green Island would have potential for scientific research / study. (#12, 150, 186, 213, 239, 401, 417, 478, 556, 564, 625, 657, 680, 719, 771, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2494, 2497, 2501, 2502, 2504, 2672, 2686, 2692, 2678, 2679, 2885, 2886)

Tourism

- Tourism benefits and potential. (#74, 125, 150, 186, 417, 478, 554, 558, 680)

Fishing Methods / Limits

- Reduce recreational bag limits. (#387)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Other

- Proximity to Dunedin. (#239, 375)
- Inaccessible. (#394)
- More protection required. (#5)
- Accessible. (#417, 443, 557, 684, 691, 730, 2494, 2507)
- Helps create an MPA network. (#425, 559, 758)
- Minimal impact on existing users. (#680)
- Links with J. (#2671)
- Better monitoring of discharges to the sea required. (#387)

10.14.2 Opposition to Site K

²¹⁷. Submitters opposed to Site K made the following comments.

Habitat / Biodiversity

- The areas proposed don't have threats to biodiversity other than the level of recreational fishing and its impact on abundance. (#2508)

Recreation

- Will affect recreational fishing and diving – is a good safe area. (#13, 33, 37, 69, 75, 100, 160, 176, 193, 194, 216 (Tautuku Fishing Club Proforma x 739), 217, 219, 220, 221, 287, 288, 289, 290, 292, 293, 313, 322, 352, 353, 354, 358, 361, 384, 399, 408, 409, 414, 424, 428, 429, 430, 431, 435, 444, 447, 467, 473, 474, 553, 572, 586, 587, 588, 589, 590, 591, 606, 620, 663, 667, 677, 702, 769, 775, 810, 830, 1108, 2505)
- Could have a ban on commercial and recreational fishing but leave for spearfishing / freediving. (#361)
- I feel that recreational fishers are being vastly disadvantaged in these proposals. The extent of fisheries on the south coast that easily, readily and accessible are few and far between to the average public. (#13, 685, 1258)
- No take areas are contrary to the rights of people to fish for food. I am in favour of restrictions on size and amount taken but not on a blanket ban. (#140)

- Very accessible. (#172, 434, 447)

Commercial

- Type 2 status would be sufficient if the criteria included a restriction on commercial fishing in the area. (#37, 120, 293, 444, 663, 667)
- Impacts on commercial fishing. (#374, 1108)
- The proposed MPA is inconsistent with MPA Policy. No explanation is provided as to why a marine reserve is required. Tourism opportunities, accessibility and the desire to create an “iconic place” are irrelevant under the MPA policy unless comparing equivalent sites of minimum impact. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – the objectives are not clearly stated, no threats to marine biodiversity from commercial fishing are identified and it is not a least cost approach. (#2467)
- Proposed MPA (K) alone is anticipated to have a minor impact on the exercise of commercial fishing rights, although impacts could be moderate for the CRA7 rock lobster fishery. We consider the rock lobster catch estimates in the consultation document to be very conservative as this is an extremely productive area of the coastline for rock lobsters. The estimated displacement of 0.2% of the rock lobster fishery is improbable in the context of recent and current stock abundance. We estimate that the area of MPA (K) produces around 3 tonnes of rock lobster landings annually under current management settings. (#2467)

Supporting Evidence

- Lack of supporting scientific evidence / data. (#40, 609, 610, 620, 634, 742, 2890)
- No proven effect of existing recreational and commercial fishing. (#354)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Tourism

- Suggesting this area as a possible tourism area is a bit far stretched. Cannot see how someone could operate tours to the island when boats would need to be beach launched or face a long trip from Taieri Mouth, both which would deter and tourism options. (#361)

Fishing Methods / Limits

- Lower catch limits instead. (#293, 384, 444, 474, 663, 667, 685, 702)
- Support fishery management as an alternative. (#168, 384, 457, 475, 1258, 2890)

- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)

Weather / Safety

- Sea conditions regulate this area. (#216 (Tautuku Fishing Club Proforma x 739), 641, 685, 810)
- Very popular with small boats and can be safely reached from Brighton. (#168, 288, 289, 572, 1108, 1258)
- Closing this area will put smaller vessel at risk by pushing them further out to sea or along the coast / safety concerns. (#66, 123, 152, 160, 175, 176, 216 (Tautuku Fishing Club Proforma x 739), 217, 290, 292, 322, 352, 353, 399, 404, 409, 414, 434, 435, 444, 467, 473, 474, 590, 591, 606, 631, 663, 667, 702, 775, 769, 810, 830, 1258)
- Is a good safe place to take beginner divers/spear fisher men, this is a selective type of fishing and causes minimal damage, it is self-regulating with weather. (#435)
- Close to surf club meaning help is at hand for those in need. (#313)

Social

- Impacts on fishing 'culture'. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- Will put pressure on other areas. (#152, 287, 572, 590, 591, 609, 610, 658, 764, 2890)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- The proposal takes away Kāi Tahu customary rights under the Treaty of Waitangi. (#742)
- Long history with local iwi. (#358)

Other

- No easy access. (#29)
- Sewage outflows in area. (#353, 2882)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available. (#216 (Tautuku Fishing Club Proforma x 739), 810)

10.14.3 Recommended Changes to Site K

²¹⁸. Submitters that recommended changes to Site K made the following comments:

Extension of the Site

- Enlarge the area. (#30, 355, 401, 642, 770, 2472, 2673, 2675, 2677, 2678, 2679)
- Extend to 5 NM. (#2479)
- Too small. (#718)
- Seek extension to reduce bycatch risk to seabirds in the area. (#95, 380, 574, 722)
- Extend west and south at least 2 miles to incorporate deep reef habitat. (#625)
- Extend from South Headland at Tunnel Beach to mouth of Kaikorai Stream including Green Island. (#451)
- Link to a larger Type 2 MPA - Extend J to surround K. (#594, 375)
- Enlarge to south. (#440)
- Extend westward and offshore. (#722, 735, 1897, 2472, 2501)
- Extend to 12 NM. (#734, 2484)
- Extend area J to this area and to Brighton. (#594)
- Link to the land and include Kaikorai Estuary. (#355, 365, 642, 774)
- Extend to the coast. (#420, 2479, 2484, 2673, 2675, 2677)
- It's great that I, J and K are adjacent to each other, however they all need to be extended offshore to at least 5 NM. And beyond that, designated as type 2 MPAs out to 12 NM/ 100m depth contour. (#2479, 2677, 2678, 2679)

Other

- Make Type 2. (#37, 127, 754)
- Reduce the bag limits. (#55, 99, 167, 399, 754, 764, 1269)
- Ban commercial and recreational fishing. (#594)
- Let the recreational fishers keep the rock but no take around Green Island which will cause grief to recreational fishers and divers. (#478)
- It is vital to preserve this much-loved recreational resource for the local community in Brighton and Ocean View and as such we cannot support a complete ban on all fishing in the area of Green Island. (#55)

- We average 3 meals a week of kaimoana sourced from this site. (#167)

10.14.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site K included the following comments:

- A prime spearfishing area with a long history with local iwi and the Otago Underwater Club. There are very few areas that I can offer as an option instead. (#358)
- Oppose on basis of displacement of fishing effort. (#658)
- Oppose on basis of loss of customary rights. (#742)
- Support this proposal to be a Type 1 MPA. Would improve the area for diving and its close and accessible to the city. (#691)
- Support (in principle). (#2887)
- Has a manageable impact on customary and commercial fishing rights and interests. (#2511, 2887)

10.14.5 Technical information and mapping

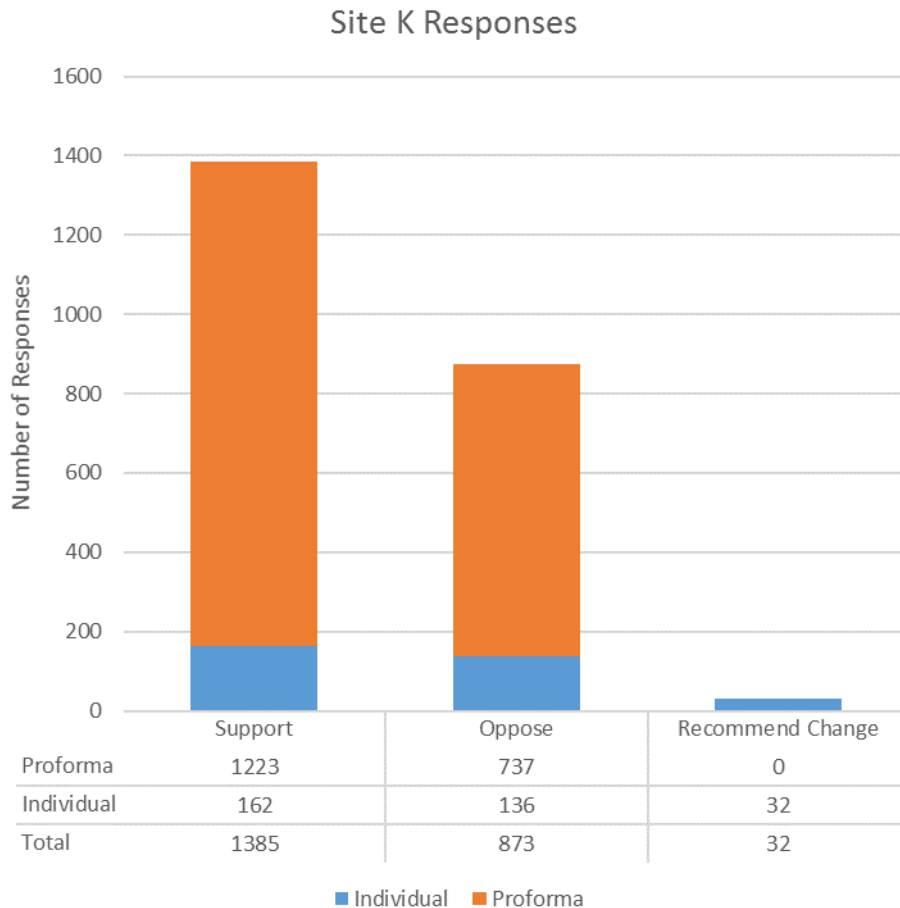
219. Information was provided by submitters in relation to:

- Cited references. (#1897)
- Commercial Fishing. (#2467)

220. Submitter maps showing changes for this site are located in Appendix 14.

10.14.6 Submission Numbers

221. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.14.7 Responses to focus questions from the consultation document Volume 1

a. Does this area provide adequate protection for the habitats included?

See Support and Oppose comments.

**b. How would this proposal affect your current or future use of the area?
How would this proposal affect you?**

See comments in the above sections.

I often spear fish here, another accessible spot for locals which is only accessible on perfect conditions and is self protecting in its environment. (#13)

c. Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?

See comments in the above sections.

- d. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?**

See Recommended Changes comments.

10.15 L – Akatore Estuary (Type 2)



222. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site L have been summarised in supplementary reports.

10.15.1 Support for Site L

223. Submitters in support of Site L made the following comments.

Habitat / Biodiversity

- Estuaries must be included and this is an estuary with good biodiversity values. (#158, 381, 426, 464, 625, 647, 714, 720, 730, 1897, 2667, 2675, 2681, 2682)
- Is an area already recognised as having value. (#145, 186, 770, 1897, 2501)
- The protection of habitat surrounding the estuary means it is less likely to be impacted than other estuaries, and offers a good opportunity to link terrestrial and marine management. (#401, 722, 736, 735, 2472, 24942501)
- Estuary protection is vital for water quality. (#25)
- Estuaries are significant nursery areas for flat fish, and habitat for shore and sea birds. (#110, 122, 129, 213, 239, 281, 367, 433, 555, 570, 576, 657, 678, 719, 728, 770, 774, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2484, 2497, 2479, 2501, 2502, 2671, 2678, 2679, 2686, 2692, 2885, 2886)
- Has a significant saltmarsh. (#558, 577, 722, 1897, 2472)
- Highly important for estuary protection. (#556)
- Estuaries are underrepresented in MPAs nationwide. (#684)

- Covering as much area as possible is important for ecosystem health. (#56, 554)
- Proposal to protect offshore coastal habitat means benefits more likely to accrue. (#1897, 2472, 2501)
- Full support for all estuaries. (#355, 559)
- Would be good to keep this great and looking healthy. (#581)
- Ecosystem protection. (#65, 138, 150, 395)
- Only proposal to protect estuarine sand flats. (#150)
- Has very high marine life important for bird feeding. (#25)
- Would contribute well to a network of estuarine MPAs. (#427)
- Estuary habitat fragile. (#76)

Recreation

- Does not significantly affect recreational fishing and would add value to the network requirement for an estuary environment. (#69, 183, 424, 428, 429, 430, 431, 586, 587, 588, 589, 725, 760)
- Support the recommendation for this area. It would have little influence present use of this area - presently mostly involves taking grand children to find crabs and shellfish in the Akatore Creek tidal zone downstream of the road bridge. (#324)

Commercial

- Does not have a great impact on commercial eel fishery. (#564, 680)
- Important to limit commercial scale extraction. (#375)
- Support restrictions on commercial harvest. (#387, 753)
- Commercial take of eels should be banned. (#2479, 2677, 2678, 2679)

Potential for research

- Great site to assess impacts of runoff without having to take into account fishing impacts (if made no take). (#1062)

Education

- Easy to visit and enjoy and also use for educational purposes. (#558)

Tourism

- More protection needed to ensure tourism. (#74)

Fishing Methods / Limits

- Strongly support fishing restrictions proposed. (#107)
- Support no netting. (#761, 2672)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- Reduce recreational bag limits. (#387)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Other

- More protection required. (#5)
- Makes sense. (#100)
- No problem with the proposal. (#444)
- Easy access. (#29, 49, 270, 577)
- Doesn't consider sedimentation. (#581, 2887)
- Support as a 'dependant' area of M – Akatore Coastal. (#442, 737)
- Support L, M & N as a grouping. (# 559, 642)
- Better monitoring of discharges to the sea required. (#387)

10.15.2 Opposition to Site L

²²⁴. Submitters opposed to Site L made the following comments.

Habitat / Biodiversity

- Supports low biodiversity – cockle pipi beds small, flounder population small. (#10)

Recreation

- Local recreational fisherman will be adversely affected. Including whitebait and flounder spearing in area. (#13, 139, 168, 172, 219, 288, 289, 290, 353, 384, 409, 414, 457, 572, 590, 591, 606, 1258, 2478, 2477)

- Too restrictive - is valued, life style, and recreation fishing for families particularly as it is easily accessed. (#10, 13, 216 (Tautuku Fishing Club Proforma x 739), 217, 280, 474, 553, 685, 711, 810)
- Is an important food gathering site. (#553, 606, 2505)
- Easily accessed. (#408)
- Not required – attracts very little public interaction. (#352)
- I have fished these locations every year and have noticed no decline in numbers. (#215)

Commercial

- The proposed MPA is inconsistent with MPA Policy. Restrictions on commercial fishing are proposed beyond those which are necessary to provide for the maintenance and recovery of physical features and biogenic structures that support biodiversity. By allowing recreational line fishing to continue while prohibiting commercial line fishing, the proposal reallocates fisheries access between fishing sectors in a manner that cannot be justified for marine biodiversity protection purposes. Estuarine habitats are already protected in five mātaihai reserves in the Forum's region – i.e., Waihoa, Waikouaiti, Moeraki, Otakou and Waikawa Harbour. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – it has a fisheries management objective; no threats are identified and is not a least cost approach. (#2467)
- Negligible impacts on commercial fishing rights except commercial eel fishing. (#2467)
- Important shortfin eel fishery. This could result in a loss of up to 12% of total allowable catch. (#1957)
- Politically motivated at expense of commercial fishing industry. (#374)
- Impacts on commercial fishery. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Would be concerned if commercial fishing financially disadvantaged considerably. (#478)

Supporting evidence

- Lack of scientific evidence / I would like to see more data. (#40, 409, 467, 609, 610, 711, 1108)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)

- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Complete absence of any identified risk to estuary. (#2508)

Fishing Methods / Limits

- Current fishing restrictions are sufficient to protect the area. (#711)

Weather / Safety

- Safety concerns. (#123, 414)
- Safe place, not open to swell. (#33)
- Travelling further offshore puts fishers at risk. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Social

- Impacts on fishing 'culture'. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- Will put pressure on other areas. (#287, 409, 609, 610, 2890)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- The proposal takes away Kāi Tahu customary rights under the Treaty of Waitangi. (#742)

Other

- Ensuring water quality is not compromised by effluent or soil runoff would provide enhancement. (#287)
- Leave this area alone please. (#455)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available. (#216 (Tautuku Fishing Club Proforma x 739), 810)

10.15.3 Recommended Changes to Site L

²²⁵ Submitters that recommended changes to Site L made the following comments:

Greater Protection

- Total ban of commercial fishing. (#753)
- Exclude recreational line fishing and spear fishing. (#625)
- Further consideration needed regarding reserve status. Regenerating forest and a large coastal wetland adjoin this estuary enhancing the integrity of this option. (#2494)
- Should be Type 1 as estuarine environments under significant pressure from surrounding land use and need protection to continue to be nursery area for marine life. (#440)
- For science and education purposes recommend that at least part of this system is given Type 1 protection - preferably the whole system should be protected for realistic study and impacts and comparison with unprotected systems. (#1062)
- Would like better protection for whitebait. (#30)
- Should be Type 1 (#2676), for natural biodiversity values. (#2675)

Less Protection

- Dropping the fish limits would be more beneficial than turning this area into a reserve. (#167)
- Other sites better suited. (#167)
- Should be open to public and closed to any commercial along coast and estuary. (#313)

Extension of the Site

- Connect the Akatore estuary, Akatore coastal and the Akatore Offshore sites. (#43, 359, 625, 710, 2472)
- Connect to the sea. (#227)

Other

- Site should cover from North side of Akatore Creek to North side of Watsons Beach - and a straight line other boundary to simplify. (#451)

10.15.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

²²⁶. Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site L included the following comments:

- Oppose on basis of loss of customary rights. (#742)

- Support in principle. (#2887)
- Support - customary use and gathering of kaimoana is unhindered by the proposed management tool. (#2511)

10.15.5 Additional comments

227. The following additional comment was noted:

Clear communication to recreational fishers and their families about what this means for them and their ongoing enjoyment of their recreational activity is key as it is apparent that the public does not understand items such as their ability to flounder in estuaries with a spear (just no nets), and the ability to pass through restricted fishing zones in a boat with fishing gear is not impeded - they just can't fish there. The wider public needs to clearly understand that their rights have not been eliminated under this proposal, just changed - for the long-term improvement. (#158)

10.15.6 Technical information and mapping

228. Information was provided by a number of submitters in relation to:

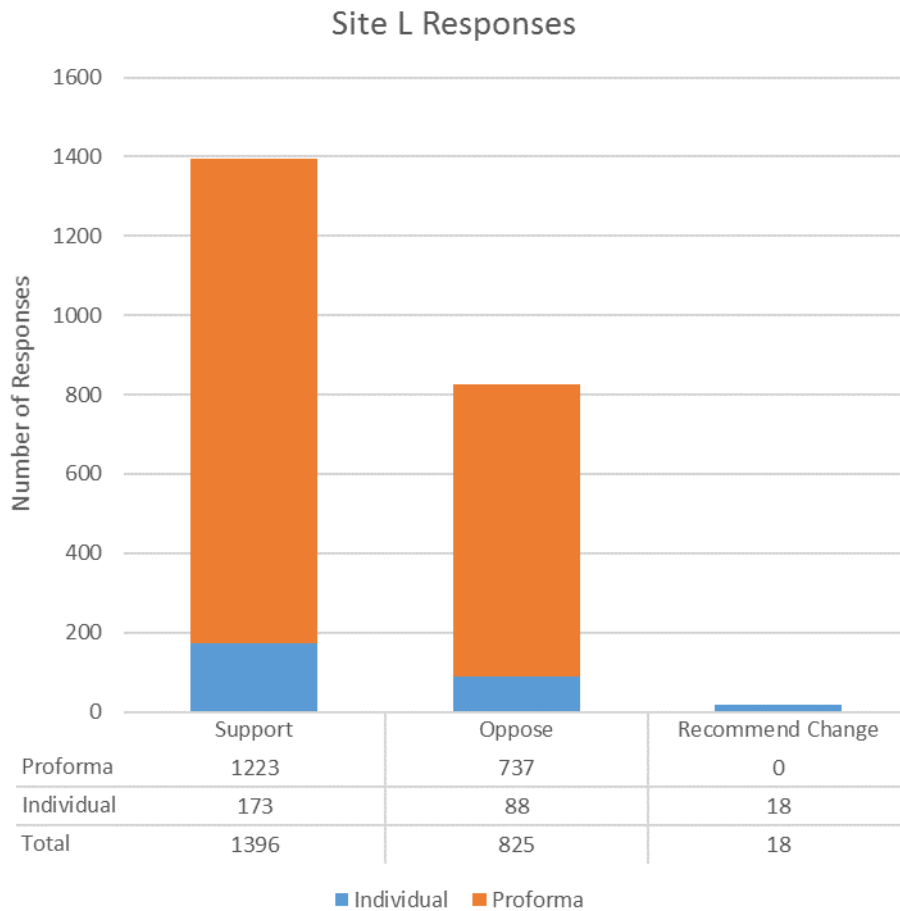
- Cited references. (#1897, 2667, 2671, 2681, 2682)
- Commercial fishing information. (#1957, 2467)
- Ecological / habitat. (#555)
- Other. (#186)

229. Please refer to Appendix 26.

230. Submitter maps showing changes for this site are located in Appendix 15.

10.15.7 Submission Numbers

231. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.15.8 Responses to focus questions from the consultation document Volume 1

a. Does this area provide adequate protection for the habitats included?

See Support and Oppose comments.

b. How would this proposal affect your current or future use of the area?

For a small number of submitters it would increase use of the area.

How would this proposal affect you?

See Support and Oppose comments.

Huge impact in a positive way - gives me hope we can redress (to a limited extent) the wrongs being inflicted on our marine environment. It gives me hope my future generations will get to experience an unmodified environment abounding with life. (#588)

c. Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?

See Support and Oppose comments.

- d. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?**

See Recommended Changes section.

- e. For the fishing methods noted above, how often are they used by you in this area, and how much of each species is taken by these methods?**

No information was provided on this.

- f. Do you have any information that would help the Forum decide what restrictions if any to recommend?**

See Support and Oppose comments.

10.16 M – Akatore Coastal (Type 1)



232. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site M have been summarised in supplementary reports.

10.16.1 Support for Site M

233. Submitters in support of Site M made the following comments.

Habitat / Biodiversity

- Protect Otago’s unique and important marine habitats and ecosystems. (#395, 570)
- Provides worthy protection of a representative section of the coastline. (#1063)
- Greater protection of ocean environments is required. (#30, 49, 56, 65, 74, 138, 347, 725)
- Provides some important examples of exposed rock reef habitat. (#67, 150, 375, 401, 577, 625, 647, 684, 735, 736, 774, 2472)
- Need to provide a network of healthy marine environments. (#555)
- Fantastic to see recognition of the importance of estuarine habitats. (#107)
- Provides protection for target communities. (#239)

Recreation

- I support this proposal as the conservation values are greater than private rights on this proposal. There is still plenty of coast available to forage on and sea to fish in. Clear communication to recreational fishers and their families about what this means for them and their ongoing enjoyment of their recreational activity is key as it is

apparent that the public does not understand items such as their ability to flounder in estuaries with a spear (just no nets), and the ability to pass through restricted fishing zones in a boat with fishing gear is not impeded - they just can't fish there. The wider public needs to clearly understand that their rights have not been eliminated under this proposal, just changed - for the long term improvement. (#158)

Commercial

- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Potential for research

- Potential value for research/scientific study on coastal processes, and species protection. (#186, 559, 730).

Tourism

- Has tourism potential. (#29, 74)

Fishing Methods /Limits

- I support the concept of increased protection at Quoin Point however I think this is a poor solution to the issues the proposal is trying to solve. The current fishing regulations allow 30 fin fish and 10 pāua per person etc. In addition to this take there is strong anecdotal evidence of illegal fishing in this proposed area. The legal limits combined with the illegal take mean the stocks of commercially valuable species have been severely depleted over the years. (#605).
- Reduction in limits. (#605)
- Reduce recreational bag limits. (#387)

Connectivity

- It would provide a vital network with the other marine reserves, which would allow all to complement each other and contribute to the overall health of the marine environment in the region. (#186, 401, 558, 559, 594)
- A reserve at this location would provide an important connection between sites I and O which also protect coastal reef habitat. (#401, 2501)
- Support the L, M & N proposals as a grouping with important transitions and inclusion of key habitats. (#43, 559, 684, 710, 736)
- Important for connectivity with other proposed areas / for the network principles of MPA planning. (#25, 186, 401, 722, 735, 736 2672)
- A good complement to the estuary proposal - a great way to link the estuary protection with the surrounding coastline. (#43, 121, 442, 581, 735, 1063, 2667)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Other

- More protection required. (#5)
- It's a great bit of wild rocky coast and we should look after it - the government promised 10% and you guys are supposed to make that happen. (#49)
- The reserve will be as difficult to enforce as the current fishing regulations are and is unlikely to be honoured by those who ignore the current legislation. Where I now live there is an excellent reserve which is closely monitored (with cameras and in person) by DOC yet still has issues with people taking pāua at night. (#605)
- I'm not against this area being changed from it's current status, however must say, that the quota management system must be failing if it needs to be changed. (#384).
- We query how the passing through rights will be policed? (#1961)

10.16.2 Opposition to Site M

²³⁴. Submitters opposed to Site M made the following comments.

Recreation

- This is an important pāua gathering area / closing pāua areas will put pressure on the only remaining area. (#7, 10, 69, 100, 183, 290, 428, 429, 430, 431, 444, 448, 465, 553, 586, 587, 589, 590, 591, 663, 680, 1258, 2478, 2505, 2510)
- Area used by generations of recreational fishers and family. (#70, 298, 324, 385, 444, 651)
- The activity of gathering and fishing for seafood is an important cultural and traditional recreation enjoyed by our family and friends in a safe, proximate environment. (#42, 44, 174 615, 615)
- Important customary area /kaimoana gathering area for local villagers. (#140, 168, 353, 408, 615, 634)
- I fully support some level of protection for the area (though different to the no-take proposed) as I am well aware of the specialness of this coast. What I have not seen in any of your documents is a discussion about the impacts on local rural communities. The discussion relating to 'recreational' fishing is almost always framed in terms of people coming to these places on holidays or as a 'favourite' fishing spot. Coastal rural residents utilise the sea as a primary source of sustenance to feed their families on a regular basis. Growing up in Akatore we regularly went to the beach and dropped

lines for a feed or grabbed a couple of pāua for dinner. While our usage does not fit the cultural definition of customary, it is so in the wider sense of the word, and the establishment of a no take reserve in this area would have a significant negative impact on our family's traditions and customs. (#615)

- There is a lack of recreational fisherman on the Forum (#663, 667).
- Regularly used for club activities. (#353, 1258)
- Will adversely affect recreational fisherman. (#13, 31, 37, 42, 44, 69, 70, 89, 100, 132, 139, 183, 191, 216 (Tautuku Fishing Club Proforma x 739), 217, 280, 298, 327, 345, 354, 409, 414, 424, 428, 429, 430, 431, 434, 448, 473, 564, 586, 587, 588, 589, 590, 591, 606, 619, 623, 663, 667, 680, 1258, 1269, 1469, 2478, 2477, 2510)
- Recreational fishers are not believed to be having an impact on fisheries that requires blanket bans. (#434, 761)
- Bought up in this area on a farm and I would now love my own children to have recreational use in this area. For our family it is vitally important to our feeling of turangawaewae. It is where our family shares a common connectivity through generations and branches of the family tree. It is where we learned our love and respect for the ocean, where we watched the changes in the fishery and adapted our methods to protect the resource. We are now teaching a 5th generation about the importance of the ocean and giving them a sense of belonging. (#132)
- Impacts on residents (Crib owners) and holiday makers. (#232, 345, 553, 563 603)

Commercial

- Adverse impacts on commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 298, 374, 352, 564, 687, 810, 2505, 2481)
- No good for commercial fishing trying to get their annual catch entitlement as economically as possible forcing some fishers out of business. (#327)
- Would be concerned if commercial fishers from the likes of Taieri Mouth were to be financially disadvantaged considerably. Some compromise should be explored to maintained commercial fishers from this area a reasonable income. (#478, 2486)
- Proposed MPA (M) is anticipated to have a moderate impact on the exercise of commercial fishing rights, as follows:
 - Rock lobster: An estimated 2-3 tonnes of rock lobster is landed from the Akatore reef systems in a season;
 - Blue cod: Information provided by fishers indicates that MPA (M) is located in an area with medium to high intensity of cod potting;
 - Trawl fisheries: Trawling for flatfish and other species occurs within MPA (M). The impact of MPAs (M) Akatore Coastal and (N) Akatore Offshore will be cumulative as

fishers target similar species in both areas, including flatfish, gurnard, red cod and elephant fish. (#2467)

- The area is particularly important for the small coastal vessels that operate out of nearby Taieri Mouth, including the trawl and rock lobster fleets. These fishers would be particularly affected by the MPA because the removal of fishing grounds forces vessels to range further up and down the coast to make up for lost catch. (#2467)
- The stated objectives of proposed MPA (M) are not consistent with the purposes for which marine reserves may be established under the Marine Reserves Act. There is no suggestion that the area contains features that are “of such distinctive quality, or so typical, or beautiful or unique that their continued preservation is in the national interest” (MRA s5). MPA (M) is inconsistent with both the MPA Policy and industry policy on marine biodiversity protection in several critical respects. There is no justification for establishing a Type 1 MPA purely to replicate and connect other proposed MPAs. There are no threats to the biodiversity values of the site that could be better managed if the site were to be established as a marine reserve. The area, together with MPA (N), is critical for the small fishing vessels based out of Taieri Mouth. The industry therefore opposes the establishment of proposed MPA (M). (#2467, 2481)
- You tell the New Zealand public fake information by saying there’s shallow reefs up to 800 metres out along this stretch when its only dip grey sand straight of the rocks and shore line and you say its schist rock along here but its only blue rock weathered by thousands of years sea’s and sun. Boats have trawled right into the rocks here for years. (#2510)
- The proposed MPA is inconsistent with MPA Policy. No explanation is provided as to why a marine reserve (in which all fishing is prohibited) is necessary to meet the protection standard. The site simply replicates habitat protected in other proposals and the ability of the public to access rock pools is an irrelevant consideration in MPA site selection. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – the objective is not to protect biodiversity, no threats from commercial fishing are identified and it is not a least cost approach. (#2467)
- The suggested opportunities for scientific study are not compelling. The potential to provide educational experiences is not an indication of the scientific value of the site for Marine Reserves Act purposes. (#2467)

Weather / Safety

- Weather already restricts access for fishing and thus provides natural protection. (#31, 33, 232, 305, 345, 409, 434, 465, 603, 663, 667, 685, 2477)
- Is one of the few areas that can be safely fished with easy access. (#42, 44, 191, 232, 280, 282, 313, 322, 408, 414, 603, 631, 663, 667, 711, 1469, 2467, 2478)

- Safety for fishermen is the reason oppose sites M, O and K. These all contain important anchorages where fishermen need to be able to shelter from extreme weather. When forced to abandon fishing and seek shelter fishermen need somewhere safe to process their last catch. If fishermen were denied these areas they would be forced to travel further and lives could be lost. (#322)
- Would limit areas accessible by small boats, pushing boats further out and creating a safety issue. (#123, 216 (Tautuku Fishing Club Proforma x 739), 345, 408, 687, 810)

Social

- Impacts on fishing 'culture'. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Fishing Limits / Methods

- A total no-take zone is not required to satisfy the objectives of the Forum. (#132)
- Fishery Management/Reducing daily catch limits over a blanket ban. (#140, 167, 191, 214, 409, 615, 619, 641, 651, 663, 667, 685, 761, 1269, 2510)
- No threat because it is such an isolated area and hardly anyone uses this area already - it is not over used and not over fished and only a small number of people would use this area over the summer. (#623)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- Do not believe that they are areas that are subject to being over fished due to their location and surrounding accessibility. Fish some of these areas each year and have noticed no decline in fish numbers. (#215, 298, 385, 663, 667)

Supporting Evidence

- Lack of evidence in the way of data to support restrictions/ or a reserve will be beneficial. (#40, 191, 324, 409, 609, 610, 615, 634, 663, 667, 711, 742, 1108)
- The current status quo of commercial and recreational fishing in this area has no proven adverse effect on the surrounding ecosystem. (#354)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- I submitted in the original consultation process, there are a very small number of affected parties for the Akatore Coastal MPA, the proposed area borders private land held by less than half a dozen families and yet no one from the Forum has contacted myself or any member of my family over our historic use of the sea and the fishery. The process is flawed if no notice is provided to submitters that the final consultation document has been released. We have only recently been made aware of the

documents and the time frame for responding. There is now insufficient time to provide an analytical and researched submission on the creation of a Type 1 MPA for Akatore, therefore I have submitted on the same lines as my initial "consultation". We'd appreciate an opportunity to gather our family and actually speak to the Forum, given we are one of the few impacted landowners in this proposal. (#132).

Displacement

- Displaces commercial or recreational fishing putting pressure on other areas. (#66, 298, 305, 324, 385, 409, 606, 609, 610, 680, 687, 2890)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634, 742)

Other

- No restrictions. (#219)
- Too difficult for compliance. (#409, 615)
- Existing water quality issues the problem. (#409, 663, 667, 2508)
- Better monitoring of discharges to the sea required. (#387)
- Impacts on rural property owners adjoining coastal areas. (#615, 619, 2510)
- Do not see any point to this proposal. (#346)
- Leave this beach alone please. (#455)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available. (#216 (Tautuku Fishing Club Proforma x 739), 810)

10.16.3 Recommended Changes to Site M

²³⁵. Submitters that recommended changes to Site M made the following comments:

Greater Protection

- More protection required. (#2677, 2678, 2679)
- The proposed reserve fails to include sufficient buffering and connectivity between the rocky reefs and sand ecosystems, and offshore habitats. As presented it does not meet the protected area guidelines as it has a high boundary to area ratio, and complex boundaries. (#2494)

- The Forum decided not to extend this area to the proposed N – Akatore Offshore MPA due to the trawl fishery and recreational values. The MPA Policy is about representing the full range of habitats with the SEMPf region, and when there are several alternatives the Policy directs that the area chosen be the one that has least impact on existing users and Treaty Settlement Obligations. The Fishing Intensity maps indicate that this area is less intensively trawled or fished by set net than similar areas further south. (#2494)

Less Protection

- Make Type 2 to allow some taking as opposed to no take given the recreational use. (#37, 89, 133, 214, 270, 313, 324, 598, 615, 761, 2486)
- I believe it should be a Type2 with major cuts in the daily bag limits, and where we can still teach children how to fish, to learn what lives in the rock pools and to respect the sea. I can see why you have chosen this area, (paragraphs 394 to 399) as I have spent most of my life living and working there, but I cannot see that making it Type 1 will make it much better. The human influence, especially on the middle section, is not that great due to a lack of access as there are only 4 landholders, 1 north of Akatore Creek and 3 south, and it is quite a long walk in a wet suit from the north or south ends. I believe the commercial ocean take of fish over many years has depleted the food source for seals and sea lions and they have been forced to feed inshore. (#214)
- Make no commercial. (#313, 361, 761, 2677, 2678, 2679)
- Lower the bag limit instead. (#133, 167)
- Lack of biodiversity to justify Type 1. (#615)

Extension of the Site

- Link L, M and N - we need them all linked. (#43, 427, 559, 642, 2671)
- Should be in conjunction with L for maximum protection. (#737, 2492, 2705, 2675)
- Connect N & M – provides additional habitat and recognises that habitat connectivity is vital for the success of the MPA. (#67, 110, 122, 227, 355, 375, 625, 736)
- Be extended to include site N Akatore Offshore to ensure that the offshore deep reef habitat is protected in a marine reserve. (#129, 213, 401, 426, 433, 558, 576, 625, 657, 678, 719, 722, 728, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2484, 2494, 2497, 2667, 2676, 2681, 2682, 2885, 2886, 2501, 2502, 2504, 2672, 2677, 2678, 2679, 2680, 2681, 2682, 2686, 2692)
- Recommend extension north and south 3 km each and off shore 6 km. This long thin reserve is next to useless, edge effect means virtually 0% is effectively protected. Small and a long distance from other proposed areas any chance of being considered as part

of a network means a necessary increase in size particularly off shore and southward. (#595)

- Although the proposed reserve contains a reasonable length of coastline, the fact that it only extends 1km offshore means its area is very small (6.3km²), and its effectiveness will potentially be compromised by significant edge effects. We recommend the reserve should at least be extended offshore to the 50m isobath so it abuts site N, thus providing protection from the coast to the territorial limit. (#2472)
- Supports extending the boundaries of N and P in to the shoreline, keeping M and O as designated no take areas, but allowing for type 2 MPAs, everywhere else. This inshore areas off Akatore extending northwards to Brighton, and southwards to Kaka Point are hotspots for Hector's dolphins and areas of former dolphin abundance. Why these coastal areas have not been proposed as MPAs is surprising. These areas all need to be protected from setnets and trawling out to 12 NM/ or the 100m depth contour, from Blackhead to Nugget Point. All other commercial fishing methods should be permitted, along with customary and recreational fishing (provided no setnetting is used). Banning all commercial trawling and setnetting would transform these proposed MPAs into awesomeness. It would eliminate protected species bycatch and enhance the fisheries for commercial, recreational, and customary, simply by employing more selective, sustainable commercial fishing methods. (#2479, 2677, 2678, 2679)
- Extend further offshore. (#753, 770, 2509, 2673)
- Too small, needs to be bigger. (#718)

Reduction of the Site

- Move the boundary to the south side of Akatore Creek. (#280, 282)
- The length of coast line on this proposal is too long, the location of this coast line limits fish takes so really is self-protected. I could see a benefit in banning commercial take from the area. if a reserve is required in this area I would suggest it is halved in size. (#361)

Less Protection

- I would like to see a change to this proposal whereby either (i) customary sustainable practices are implemented to manage the area, allowing for some level of take by local landowners, or (ii) the reserve is designated as a Type 2 reserve whereby local landowners have an exception allowing some take or some types of 'recreational use' are allowed. This would bring the reserve in line with other proposals in the area, will allow you to set specified limitations on usage, protect the coast and continue to provide local landowners with an option to sustainably use the wonderful resource that is our ocean. (#615)

Other

- I also think the MPA should be extended southward to include at least Bull Creek, but perhaps if this is the case, restricted recreational fishing should be permitted, within the extension. (#2672)
- Straighten the boundaries / straighten to make a rectangle. (#76, 213, 383, 657, 719, 728, 770, 1270, 1271, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2497, 2501, 2502, 2675, 2686, 2692, 2885, 2886)
- I would suggest from North side of Akatore Creek to North side of Watsons Beach - and a straight line other boundary to simplify. (#451)
- Should the Forum still wish to consider this reserve to protect the inshore reed due to the inaccuracy of its exposed shallow reef Fig 44 pg. 118 volume 1 it might wish to adjust its boundary. (#352)
- I support this site, though it would be enhanced if it included some deep reef area. (#381)
- I propose this area be considered as a type 1 reserve for a decade, and then fishing be allowed at very very low limits. Think of it as "a good old days" reserve, so people can once again marvel at how good the fishing was in the good old days - showcasing how sustainable fishing can be achieved as part our shared future. (#605)

10.16.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

^{236.} Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site M included the following comments:

- Totally opposed as ancestors have gathered shellfish and fish from this area for 100s of years. There has been no decline of stocks in this area. Any reserve in the Akatore coastal area would result in intense pressure at Moturata Island and the surrounding waters. #385)
- Oppose on basis of displacement of fishing effort. (#658)
- Oppose on basis of loss of customary rights. (#742)
- Oppose - the proposal will divert gathering pressure to Moturata Island which has been recovering whilst access has been restricted in recent years. Watsons Beach is a particularly important gathering site for the local Whānau and we would reconsider opposition if this site was not included. (#2511, 2887).

10.16.5 Technical information and mapping

^{237.} Information was provided by a number of submitters in relation to:

- Cited references. (#2501, 2671)
- Ecological / habitat. (#324)

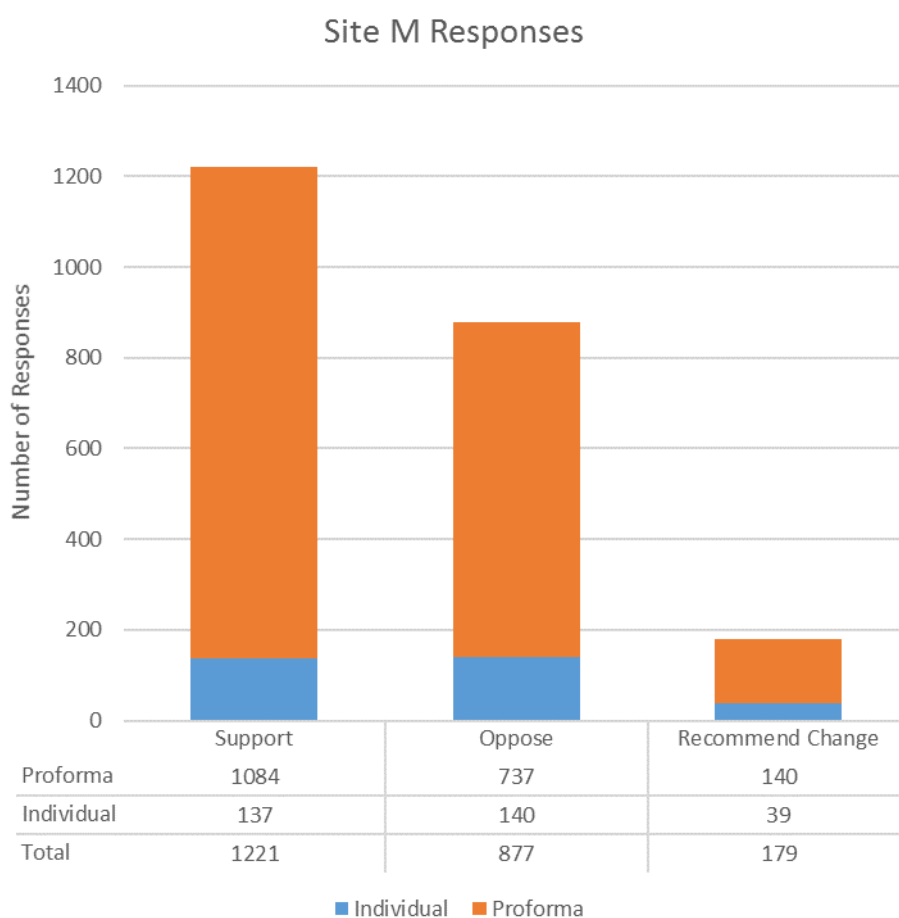
- Commercial fishing information. (#2467)

238. Refer to Appendix 26 for more information.

239. Submitter maps showing changes for this site are located in Appendix 16.

10.16.6 Submission Numbers

240. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.16.7 Responses to focus questions from the consultation document Volume 1

g. Does this area provide adequate protection for the habitats included?

See Support and Oppose comments.

h. How would this proposal affect your current or future use of the area?

Single comment provided - my usage would increase enormously.

How would this proposal affect you?

See Support and Oppose comments.

Huge impact in a positive way - gives me hope we can redress (to a limited extent) the wrongs being inflicted on our marine environment. It gives me hope my future generations will get to experience an unmodified environment abounding with life

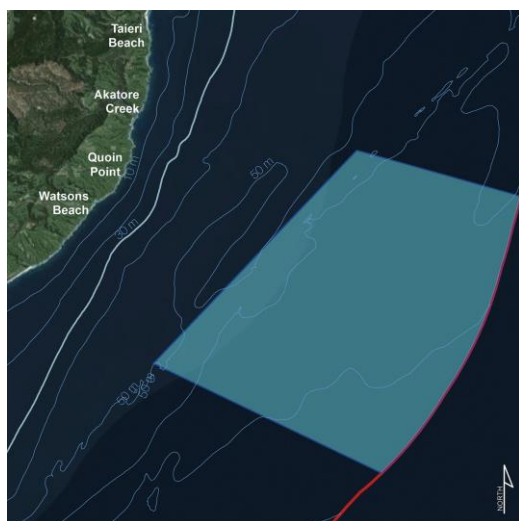
i. Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?

See Support and Oppose comments.

j. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?

See Recommended Changes.

10.17 N – Akatore Offshore (Type 2)



241. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site N have been summarised in supplementary reports.

10.17.1 Support for Site N

242. Submitters in support of Site N made the following comments.

Habitat / Biodiversity

- The restriction of commercial fishing methods in this area would protect sensitive seafloor habitat such as bryozoan beds, and remove the risk of bycatch of seabirds. (#361, 401, 714, 722, 735, 736, 2472, 2675)
- This is an important deep reef area containing a variety of habitat including deep gravels and sands, so protection should be put in place for survival of the reef and the animals inhabiting it. (#25, 121, 150, 186, 239, 401, 427, 558, 570, 577, 625, 684, 710, 720, 722, 736, 737, 758, 770, 771, 1897, 2472)
- Important area for biodiversity and some restriction of commercial fishing will allow for maintenance and recovery of the biodiversity of the area. (#714, 760, 1063)
- Protect habitats and ecosystems for future generations. (#65, 138, 158, 555, 558)
- Need to provide a network of healthy marine environments for protection of a range of species, namely Yellow-eyed penguin and Northern Royal Albatross. (#555, 625, 736, 770, 771, 774, 1897)
- Breeding purposes / enhances the fishery. (#29, 99, 191)
- General health of marine environment. (# 56, 74, 76, 107, 218, 395, 442, 554, 730, 1961)

Recreation

- Clear communication to recreational fishers and their families about what this means for them and their ongoing enjoyment of their recreational activity is key as it is apparent that the public does not understand items such as their ability to flounder in estuaries with a spear (just no nets), and the ability to pass through restricted fishing zones in a boat with fishing gear is not impeded - they just can't fish there. The wider public needs to clearly understand that their rights have not been eliminated under this proposal, just changed - for the long term improvement. (#158)
- Associated benefits on edges of reserves for fisherman / enhance recreational fishing in the long term. (#49, 99, 100, 435)
- Commercial fishing has been affecting recreational fishing. (#70)

Commercial

- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Tourism

- More protection needed to ensure tourism. (#74)

Fishing Methods / Limits

- Support bans on bottom impacting fishing methods. (#725, 753, 760)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- Reduce recreational bag limits. (#387)

Connectivity

- I support both together-coastal and offshore to make one marine reserve, but Harakeke-White Island and Green Island have higher priority if all marine reserves cannot be supported. (#556)
- Needed to make the network work. (#594)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Other

- Leaves a large area of fishing available for recreational and commercial in between two protected areas. (#581)

- More protection required. (#5)
- Agree with the concept. (#1961)
- Support this as a dependent area of M-Akatore Coastal (Type 1). (#442)
- Better monitoring of discharges to the sea required. (#387)

10.17.2 Opposition to Site N

²⁴³. Submitters opposed to Site N made the following comments.

Habitat / Biodiversity

- I do not support this site as proposed as the protection provided is not adequate and it does not include the coastline and inshore area. (#2667, 2681, 2682)
- The habitats contained in this MPA are not represented in reserves as described above. (#2494)

Recreation

- Negative impacts on recreational fishing. (#10, 13, 69, 160, 216 (Tautuku Fishing Club Proforma x 739), 354, 377, 384, 414, 424, 434, 553, 609, 610, 680, 687, 810, 2477).
- Keep open for future generations. (#2478).
- Recreational fishing not impacting fish stocks. (#215, 254, 434, 2478)

Commercial

- Impacts on commercial fishing. (#374, 564, 687)
- Impacts existing quota owners. (#680)
- Oppose any restrictions on this area - the current status quo of commercial and recreational fishing in this area has no proven adverse effect on the surrounding ecosystem. (#254)
- Oppose because this is politically motivated and at the expense of the commercial fishing industry. Small regional areas will suffer and die because of this. You are trying to push out the commercial fishers who have property rights that are getting eroded each day with this sort of "stealing". This is a direct violation of the Treaty Of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis (#374)
- Strongly oppose, as the area is of high importance to commercial fleet of Port Chalmers and Taieri Mouth. Will have significant impact on the business and livelihoods of commercial users here. (#322, 353, 408, 2511, 2486)
- The proposed MPA is inconsistent with MPA Policy. Restrictions on fishing are proposed beyond those which are necessary to provide for the maintenance and

recovery of physical features and biogenic structures that support biodiversity. Fisheries interactions with protected species are not a relevant consideration for MPA site selection; and the relatively large size of the MPA is not justified with respect to MPA Policy principles, particularly as the site is described as providing replicate protection of other deep water reef habitats. (#2467)

- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – it is not clear why such a large area is needed to meet the objective, no threats to marine biodiversity from commercial fishing are identified and it is not a least cost approach. (#2467)
- Moderate impacts on commercial fishing rights. An estimated 2 to 3 tonnes of rock lobster catch is estimated to be taken annually in the deep reef habitat. The impact of MPAs (M) Akatore Coastal and (N) Akatore Offshore will be cumulative as several species are targeted in both areas, including Rock lobster, Flatfish, Gurnard, Red cod and Elephant fish. (#2467)

Supporting Evidence

- No good evidence for any closure. (#40, 353, 354, 409, 562, 609, 610, 634, 711, 742, 1108, 2467)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Inadequate information provided on impacts on recreational and commercial fishing. (#216(Tautuku Fishing Club Proforma x 739), 810)

Fishing Methods / Limits

- Fishery management makes more sense than no take for this area/reduction in catch rates. (#31, 69, 167, 174, 384)

Weather / Safety

- Weather provides natural restrictions already. (#160, 216 (Tautuku Fishing Club Proforma x 739), 409, 434, 572, 810, 1469, 2477)
- Very large safety risk, being that Long Point is known major shelter from North East weather, and is often used. (#680)
- This area is too great and will cause boaties to travel too far (beyond their comfort zone) and get into difficulty such as weather, mechanical reliabilities and the time factor can lead to risky bar crossings as the weather can change. Most boaties have not noticed any change in catch rates. Limits boat catch to 15 fish per person and this is more than enough. Perhaps the catch rate should be altered. (#31)
- Current fishing rules are sufficient to provide protection and public access for food harvesting, safe and close access is required for personal safety due to dangerous coastline. (#711)

- Safety concerns /Travelling further offshore puts fishers at risk. (#123, 216 (Tautuku Fishing Club Proforma x 739), 414, 562, 631, 687, 810, 1469)

Social

- Economic impacts on communities. (#322)
- Impacts on fishing 'culture'. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- Displaced commercial and or recreational fishing putting pressure on other areas. (#66, 69, 183, 217, 409, 428, 429, 430, 431, 448, 553, 586, 587, 588, 589, 590, 591, 606, 609, 610, 658, 680, 687, 2890)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634, 742)

Other

- MPA (N) is inconsistent with both the MPA Policy and industry policy on marine biodiversity protection in several critical respects. The area, together with MPA (N), is critical for the small fishing vessels based out of Taieri Mouth. Given the absence of fishing-related risks to marine biodiversity, the marine biodiversity protection benefits of establishing the site as a Type 2 MPA are negligible. The industry therefore opposes the establishment of proposed MPA (N). (#2467)
- Irrelevant considerations: Fisheries interactions with protected species are not a relevant consideration for MPA site selection; and unjustified spatial extent: The relatively large size of the MPA is not justified with respect to MPA Policy principles, particularly as the site is described as providing replicate protection of other deep water reef habitats. The same habitat types could be protected in a much smaller MPA and the site adds nothing to the proposed network in terms of protection of unrepresented habitat types. (#2467)
- Oppose any restrictions. (#168, 219, 220, 221, 290, 1258)
- Not necessary. (#352)
- Leave this alone please. (#455)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available. (#216 (Tautuku Fishing Club Proforma x 739), 810)

- We need action to protect this area from river borne contaminants. (#2508)

10.17.3 Recommended Changes to Site N

²⁴⁴ Submitters that recommended changes to Site N made the following comments:

Greater Protection

- Should be no take. (#761)
- Change to Type 1. (#129, 647, 761, 1897)

Less Protection

- Reduce take limits instead. (#167)

Extension of the Site

- Enlarge the area. (#30, 2667)
- Extend to the shore. (#2484)
- I would prefer to see the protection extended from the shore to the outer limit of the Forum's boundary, but I can support the compromise decision to allow commercial and recreational fishing to continue without extra restriction in the area between 'M' and 'N' as the Long Point proposal 'O' offers this more effectively. However, it must be noted that if proposal 'O' does not go forward then 'L', 'M', 'N' proposals will need to be reconsidered in order to create an area in the network where there is protection from shore to the outer limits of the Forum's boundary. (#150)
- Support and extend to 12 NM. (#576, 2509, 2673)
- Requests that Sites L, M and N are all linked. (#43, 381, 559, 625, 642, 684, 710)
- Extend to M. (#227, 239, 355, 365, 375, 401, 433, 625, 678, 735, 774, 1268, 1270, 1271, 1272, 1273, 2472, 2667, 2672, 2678, 2681, 2682, 2692)
- Support but as a marine reserve linked to Site M. (#67, 110, 122, 213, 365, 426, 657, 719, 722, 728, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2497, 2501, 2676, 2686, 2692, 2885, 2886)
- I think that this MPA should be extended southward to account for this and to make the area large enough to support neighbouring fisheries. (#2672)
- Makes more ecological sense to join up the Type 2 reserve with the Type 1 reserve. (#734)
- Extend the boundaries of N and P in to the shoreline, keeping M and O as designated no take areas, but allowing for type 2 MPAs, everywhere else. This inshore areas off Akatore extending northwards to Brighton, and southwards to Kaka Point are hotspots for Hector's dolphins and areas of former dolphin abundance. Why these

coastal areas have not been proposed as MPAs is surprising. These areas all need to be protected from setnets and trawling out to 12 NM/ or the 100m depth contour, from Blackhead to Nugget Point. All other commercial fishing methods should be permitted, along with customary and recreational fishing (provided no setnetting is used). Having a gap in protection between inshore and offshore Akatore proposed MPAs doesn't make sense, neither do the gaps in between Long Point offshore and inshore (O and P). (#2479, 2677, 2678, 2679)

Other

- I would view this as a 10-20 year plan as a test area so as to monitor the recovery of the area, to be used as an example. (#293)
- Open to public and closed to commercial can only be fished by smaller boats 10 days of the year. (#313)
- Support, with the recommendation that it be extended offshore to 12 NM offshore, and that complex polygon shapes be avoided. The preferred option would be two landmarks on shore and an offshore 12 NM boundary. (#2509)
- Should Area M be put forward to the Ministers as is (or not at all), I suggest the inshore boundary of Area N be aligned with the current set net prohibition. (#2671)

10.17.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

- Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site N included the following comments:
- Oppose on basis of displacement of fishing effort. (#658)
- Oppose on basis of loss of customary rights. (#742)
- Concerned for commercial fishers, and the impact it may have on Taieri Mouth commercial fisheries. Our understanding is that only 3 commercial fishers currently operate at Taieri Mouth compared to 24 a few years ago. This Type 2 MPA has potential to put additional pressure on the remaining commercial fishers who are all small boat fishers and whose boats do not bottom trawl. Taieri Mouth began as a fishing village and the local fisheries are significant part of the town's character. Whānau want to retain this connection. (#2511, 2887)

10.17.5 Technical information and mapping

²⁴⁵. Information was provided by a number of submitters in relation to:

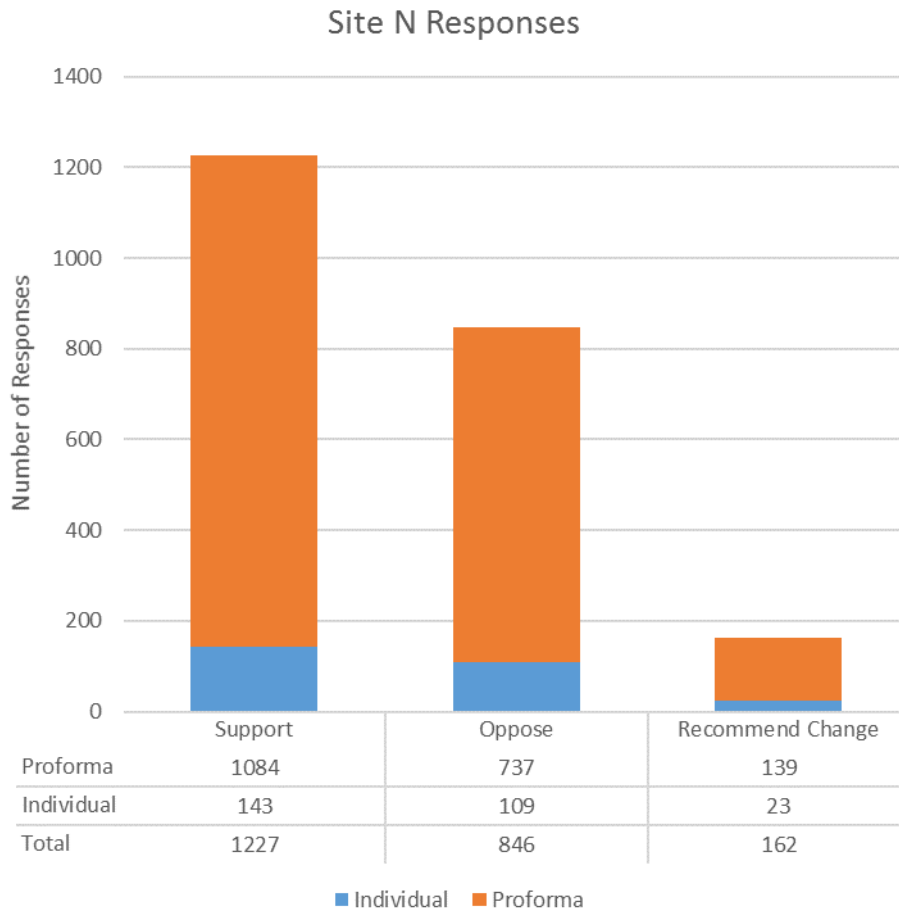
- Ecological /Habitat. (#1897)
- Commercial fishing information. (#680, 2467, 2481)

²⁴⁶. Please refer to Appendix 26 for further information.

²⁴⁷. Submitter maps showing changes for this site are located in Appendix 17.

10.17.6 Submission Numbers

248. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.17.7 Responses to focus questions from the consultation document Volume 1

k. Does this area provide adequate protection for the habitats included?

See Support and Oppose comments.

l. Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?

See Support and Oppose comments.

**How would this proposal affect how you use the area?
How would this proposal affect you?**

See Support and Oppose comments.

- m. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?**

See Recommended Changes comments.

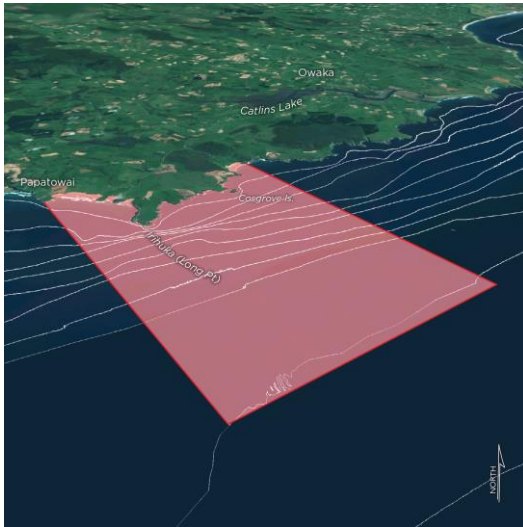
- n. For the fishing methods noted above, how often are they used by you in this area, and how much of each species is taken by these methods?**

No comments provided.

- o. Do you have any information that would help the Forum decide what restrictions if any to recommend?**

In addition to the Support, Oppose and Recommended Changes, see the Additional Comments section below.

10.19 O – Long Point (Type 1)



249. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site O have been summarised in supplementary reports.

10.19.1 Support for Site O

250. Submitters in support of Site O made the following comments.

Habitat / Biodiversity

- More protection required for marine ecosystem health and for a range of protected seabirds and marine mammals. (#18, 30, 56, 65, 72, 74, 107, 118, 138, 198, 218, 347, 367, 369, 375, 378, 464, 554, 555, 558, 574, 625, 710, 727, 730, 736, 2672, 2673, 2479)
- High biodiversity values including a continuum of habitats from coastal / shallow waters through to deep reef, and coastal headland. (#186, 359, 369, 375, 380, 394, 395, 401, 402, 427, 559, 577, 625, 647, 720, 722, 729, 735, 737, 770, 1062, 1897, 2472, 2494, 2501, 2675)
- This site offers the best opportunity in the SEMPf region to fully protect an estuary and beach ecosystem that is nearly surrounded by native bush and conservation land so best meeting a design guideline of considering adjacent land uses. Areas adjacent to protected intact terrestrial ecosystems are likely to have greater biological integrity. (#2494)
- There are no other similarly sized reserves proposed for the Catlins region / this site is considered important for the Catlins as an outstanding region. (#145, 367, 417, 556, 557, 577, 583, 625, 684, 722, 736, 747, 758, 1897, 2472, 2509, 2667, 2673, 2681, 2682)
- An internationally recognised Important Bird Area. (#213, 678, 719, 728, 729, 734, 736, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish

Forever Proforma x 141), 2497, 2501, 2502, 2504, 2667, 2672, 2681, 2682, 2686, 2692, 2885, 2886)

- Significant for Yellow-eyed penguins. (#95, 107, 110, 145, 186, 239, 380, 570, 574, 628, 659, 714, 729, 734, 1897, 2507, 2672, 2472, 2681, 2682, 2885, 2886)

Recreation

- Clear communication to recreational fishers and their families about what this means for them and their ongoing enjoyment of their recreational activity is key as it is apparent that the public does not understand items such as their ability to flounder in estuaries with a spear (just no nets), and the ability to pass through restricted fishing zones in a boat with fishing gear is not impeded - they just can't fish there. The wider public needs to clearly understand that their rights have not been eliminated under this proposal, just changed - for the long-term improvement. (#158)
- Associated benefits for recreational fishers. (#198, 240, 754)
- Recognise there will be impacts on recreational fisheries at Long Point. (#402)
- Area is already difficult to access. (#179)
- More acceptable to those living in the area. (#25)

Commercial

- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Potential for Research

- Scientific / research value. (#95, 359, 369, 378, 442, 722, 735, 2509, 2673)
- Any future scientific activity for these areas should involve the local community directly. (#2463)

Tourism

- The area will provide tourist benefits. (#74, 118, 145, 270, 359, 369, 378, 401, 558, 722, 735, 2501.

Fishing Methods / Limits

- Reduce recreational bag limits. (#387)

Extent

- A good alternative / compromise to Nuggets. (#25, 145, 186, 375, 378, 478)
- Disappointment that Nuggets is not included. (#49, 433, 440, 647)
- Gap between Sites O and P does not make sense. (#2479, 2677, 2678, 2679)

- Even if the extension at Harakeke was approved it does not meet the minimum size recommended for effective protection of that environment. Even now the Long Point area is only 65.6km² which is less than the recommended 100km². (#239)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Social

- The government should provide support for businesses impacted by these proposals. (#2463)

Other

- Support but will be difficult to police (#419, 2479, 2677, 2678)
- More protection required. (#5)
- The only proposal with access by road as far as I can tell? (#394)
- Better monitoring of discharges to the sea required. (#387)

10.19.2 Opposition for Site O

²⁵¹. Submitters opposed to Site O made the following comments.

Habitat / Biodiversity

- Land based protection would be more effective. (124)
- Another aspect I am against also with this Reserve proposal is it appears to be for the benefit of the Long Point penguin colony. A question I have previously asked is, why the penguins at Long Point? What protection is being offered to the penguins at Jacks Bay, and the Nuggets, the site of a previous Marine proposal. The viewing platform at the Nuggets lighthouse has been upgraded recently along with improvements to the penguin hide and car parking. The road to Nugget Point is at present being upgraded and tar sealed at a cost of several million dollars. Will ratepayers being imposed with the expense of upgrading the access road to Long Point to make it safe for increased traffic if a reserve is created? (#682)
- If a marine reserve was to go in the barracuda and shark numbers in the area would be higher posing more of a threat to the penguins. (#724)

Recreation

- The proposal disadvantages recreational fishers and families including those who have fished here over a number of years / generations, particularly as it is a safe and

accessible site. (#13, 34, 35, 41, 61, 69, 88, 89, 104, 105, 106, 111, 112, 113, 130, 154, 175, 176, 179, 180, 189, 191, 193, 194, 196, 199, 201, 208, 211, 216 (Tautuku Fishing Club Proforma x 739), 217, 224, 232, 236, 243, 245, 246, 249, 257, 258, 259, 275, 278, 279, 293, 306, 308, 310, 311, 316, 317, 318, 319, 320, 326, 327, 343, 344, 345, 346, 349, 352, 354, 377, 384, 388, 389, 397, 398, 405, 406, 409, 410, 413, 415, 418, 424, 428, 429, 430, 431, 439, 435, 446, 452, 465, 473, 553, 561, 563, 564, 565, 581, 586, 587, 588, 589, 601, 602, 603, 604, 606, 609, 610, 629, 635, 637, 650, 652, 656, 660, 662, 665, 666, 670, 672, 673, 677, 679, 653, 674, 680, 682, 688, 699, 700, 704, 706, 711, 724, 755, 760, 767, 768, 773, 810, 1108, 1256, 1265, 1259, 1260, 1261, 1474, 1477)

- A popular pāua and diving area. (#86, 91, 104, 105, 130, 135, 149, 154, 166, 194, 217, 224, 235, 258, 311, 315, 343, 344, 361, 377, 388, 389, 405, 410, 413, 561, 563, 601, 602, 648, 653, 654, 660, 666, 670, 672, 673, 679, 682, 704, 1108)
- Important to local fisherman. (#10, 69, 86, 243, 278, 345, 352, 586, 587, 588, 589, 590, 591, 603, 680, 682)
- It is a sheltered area for small boats. (#343, 345, 349, 603, 606, 660)
- We take children to this spot / it's safe for kids. (#103, 130, 269, 275, 650, 672)
- Impacts on families who do not own boats. (#201, 1477)
- Impacts on recreational use and taking future generations here. (#154, 224, 279, 310, 319, 654, 666, 677, 773, 1265, 1474)
- I enjoy fishing at Long Point and Purakanui Bay. (#318)
- If recommended changes take place we will have to travel a lot further to enjoy our recreation. (#320, 581, 654)
- Reasons relating to access. (#405, 582, 679)
- Little pressure on fish stock from recreational users. (#116, 167, 215, 235, 354, 389, 604, 660, 688)

Commercial

- Impacts on commercial fishing for blue cod, crayfish and pāua, and / or places pressures on other areas and associated costs. (#86, 135, 305, 465, 469, 561, 564, 601, 602, 611, 653, 1108, 2481, 2505)
- This will have a negative effect on our ability to continue to catch our quota as a percentage of our catch area has been removed putting pressure on other areas in PAU5D. This will have varied affects such as threatening of stock numbers as the quota is the same but catch area has diminished caused by displacement. Our costs will increase due to having to travel further to fish. Safety issues as trying to catch quota in less naturally protected fishing environments. (#135)
- A voluntary agreement already exists to exclude commercial fishing / diving for some areas. (#672 680, 682)

- Impacts on commercial fishing. (#10, 374, 762, 1100, 1104)
- Good area for flatfish. (#762)
- Impact should be limited to commercial fishermen. (#34, 35, 180, 323, 361)
- Long Point is the boundary between the CRA7 and CRA8 lobster quota management areas. It is an area that has been fished for several generations by locally based commercial rock lobster fishing families. In recent years, the intensity of the fishing has varied. This is due to the fact the CRA8 fisherman rely on the migration of the rock lobster south from the CRA7 fishery for most their catch. the CRA7 fishery has undergone significant variations in abundance and the reduction in quantities of migrating lobsters has resulted in a reduction of fishing effort around Long Point. Never the less this area remains a highly important area to the CRA8 industry and is the most productive rock lobster fishing ground in The Catlins. Typically, fisherman have caught about 30% of their catch entitlement in the Long Point area. (#469)
- As a commercial fisherman, I trawl for flatfish in the proposed area and I would estimate that some years up to 20% of our annual catch would come from this area. To close this area to trawling will put greater pressure on other areas. We are already limited to where we can target flatfish due to unsuitable bottom type. With the type of trawl nets, we use to target flatfish we can only trawl on smooth sandy bottom with no obstructions like reefs, rocks, kelp beds, coral, stones etc. Long Point and Cosgrove island are also important anchorages, if we cannot utilise these safe anchorages to process and discharge fish waste we will be forced to travel great distances in adverse weather conditions to other places to anchor. Placing more stress on skippers and crew, this is a serious safety concern potentially putting lives at risk. I believe the economic cost of a reserve in this area will be significant to myself and other operators, with no consideration to the displaced fishing effort, and the very real safety concerns due to effectively losing the ability to anchor and process fish. (#611)
- The proposed MPA is inconsistent with MPA Policy. No explanation is given as to why a marine reserve is necessary and boosting the Catlins tourism industry is not a relevant consideration for selection of sites unless selecting between sites of low impact. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection - the objectives are not clearly stated, no threats to marine biodiversity from commercial fishing are identified and it is not a least cost approach. (#2467)
- Significant impacts on commercial fishing rights including for pāua, rock lobster, and trawl fisheries (especially for flatfish). Refer to submission for detailed statistics particularly for pāua but also Rock lobster and Flatfish, including maps. (#2467)
- Already lost considerable paddle crab grounds to Mātaitai Reserves. (#571, 573)

Supporting Evidence

- No evidence that fish stocks are under threat by recreational fishing and general lack of scientific evidence, including an absence of local mānāwhenua science and

environmental management principles and practices in the mapping of the MPAs. (#40, 62, 191, 211, 278, 408, 609, 610, 674, 742, 1477)

- No threats to biodiversity are identified because no assessment has been carried out. Instead there is the immediate assumption that fishing is a threat and therefore must be prohibited. To the contrary, the recognition that certain protected species live in the area is testimony that fishing and these species have existed together without any adverse impact for many years. Restrictions on trawling and set netting are already in place. There is no evidence that further levels of protection are required. (#469)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Tourism

- Growth in marine tourism will impact on the Catlins natural environment and the Kiwi way of life. (#126)
- Tourism should play no role in determining the future of a fishery that will greatly affect the local people who use it as a resource of enjoyment and providing a customary take for their families. It is the advent of tourism that is putting pressure on the habitats of the nesting colonies, wildlife etc. Stop promoting tourism for the sake of a handful of greedies capitalising on it. (#410)

Fishing Methods / Limits

- More effective fishery management through reduced catch limits. (#85, 124, 140, 167, 180, 191, 208, 211, 236, 237, 240, 248, 310, 323, 326, 409, 410, 413, 428, 429, 430, 431, 561, 586, 587, 588, 589, 590, 591, 601, 637, 656, 672, 674)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- Fisheries management would be better. (#124, 409, 428, 1258)
- No take areas are contrary to the rights of people to fish for food. I am in favour of restrictions on size and amount taken but not on a blanket ban. (#140)
- Long Point is an example of a community that has taken responsibility for the marine environment and worked diligently to protect and enhance the areas biodiversity. They have negotiated voluntary closures and undertaken enhancement work over several decades. They have supported the work of the Penguin groups and in return the forum proposes to take away their right to access the area for a recreational take. Instead we should be proposing regulatory structures that enable the community to take responsibility for the management of the coast in multisector management. (#2508)

Extent

- Decrease the size of the boundaries. (#2486)

Weather / Safety

- Weather conditions self-limit the number of days suitable for recreational fishing. (#61, 62, 77, 85, 104, 116, 124, 130, 131, 149, 155, 174, 175, 180, 189, 193, 194, 195, 196, 199, 216 (Tautuku Fishing Club Proforma x 739), 217, 232, 235, 258, 285, 286, 293, 305, 306, 308, 311, 320, 323, 327, 344, 345, 352, 361, 389, 397, 398, 405, 408, 409, 413, 418, 435, 459, 460, 603, 637, 653, 666, 672, 674, 675, 677, 810)
- It is a sheltered area and is a safety issue if we cannot fish here. (#130, 131, 154, 176, 189, 191, 193, 194, 195, 199, 208, 217, 232, 278, 279, 284, 305, 311, 316, 322, 326, 345, 397, 408, 414, 415, 446, 459, 460, 465, 561, 563, 581, 601, 603, 604, 631, 637, 653, 656, 660, 664, 672, 680, 682, 699, 711, 755, 762, 766, 1100, 1104, 1474)
- Safety for fishermen is the reason I (sic) oppose sites M, O and K. These all contain important anchorages where fishermen need to be able to shelter from extreme weather. When forced to abandon fishing and seek shelter fishermen need somewhere safe to process their last catch. If fishermen were denied these areas they would be forced to travel further and lives could be lost. (#322)
- Safety concerns /Travelling further offshore puts fishers at risk. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Safe entry point for local fishermen would be lost. (#88, 130, 276, 315, 601, 637, 672)

Social

- Social impacts on people who live and play in this area affecting way of life. (#126, 189, 201, 345, 680)
- Community should decide. (#760)
- Impacts on the values of the properties if owners cannot go fishing, crayfishing and pāua diving. (#344)
- Educating people is a better option. (#674)
- Impacts on fishing 'culture'. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- Displaces fishermen to other areas putting pressure on them. (#66, 131, 205, 211, 305, 343, 345, 405, 410, 428, 561, 602, 603, 609, 610, 658, 662, 680, 699, 706, 762, 1474)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- The proposal takes away Kāi Tahu customary rights under the Treaty of Waitangi. (#740, 742)

Other

- To protect an eco-system, first priority should be given to cleaning the water ways that flow into the sea. To create a reserve and in your information you talk about 'tourism opportunities'. The Penguins and birds are safer without the threat of freedom campers. Lower area quota levels. The major problem is the water not the user. (#1471)
- Strongly oppose any restrictions. (#168, 219, 220, 221, 253, 1258)
- Oppose as there are other areas that could be reserves. (#579)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Already protected by weather. Make a Type 2. (#205, 208)

10.19.3 Recommended Changes to Site O

²⁵². Submitters that recommended changes to Site Q made the following comments:

Greater Protection

- I would want to see both Long Point Type 1 and Long Point Type 2 approved together to give maximum chance for fish and birds to flourish. (#18)

Less Protection

- Change to Type 2 MPA. (#37, 89, 201, 205, 286, 326, 612, 643, 683, 696)
- Reduce recreational catch numbers. (#167)
- Understand this area to have a commercial quota of 200 tonnes. The quota for Blue Cod should be reduced for the management area, and commercial take should be banned from the proposed Long Point reserve. Take home catch numbers for recreational fishermen should be reduced to help conserve stocks, and the proposed Long Point area should be left open for recreational fishermen only. (#323)

Extension of the Site

- Extend southward to encompass down to at least Tautuku Bay & Waipati Beach. (#2672)
- Extend to 12 NM. (#67, 76, 95, 122, 213, 369, 381, 678, 697, 719, 728, 770, 774, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2479, 2484, 2497, 2501, 2502, 2504, 2671, 2676, 2677, 2678, 2679, 2681, 2682, 2686, 2692, 2705)
- Support, with a further extension to 12 NM to better represent Yellow-eyed penguin foraging habitats. This area is an internationally recognised inshore and offshore IBA. (#67, 122, 129, 369, 381, 426, 433, 558, 576, 678, 697, 719, 728, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2492, 2494, 2501, 2667, 2676, 2681, 2682, 2686, 2692, 2705, 2671, 2885, 2886)
- Yellow-eyed penguins are known to forage out to 30 km offshore. The proposed Long Point reserve is only 65.6 km², whereas the global MPA study found that a minimum size of 100km² is necessary for conservation success. (#129)
- This area should be extended to better represent yellow eyed penguin foraging grounds. (#110)
- Area should be extended to at least 25 km offshore to better represent the realistic range within which Yellow Eyed Penguins are known to forage. (#659)
- Ask the kaitiaki to extend the existing Kaka Point Mātaitai to wrap it around the Nuggets themselves. (#642)
- I suggest that Area O be extended. I consider an appropriate extension to the area would encompass the coastal margin as far as Jacks Bay in the North, retaining the same offshore extent as a boundary. I believe this extension provides the necessary protection for the important habitat found within Area O. The protection proposed in Area O will not influence my recreational fishing opportunities at all. (#625)
- Include the Tahakopa Estuary. (#355, 401, 574, 710, 722, 728, 734, 735, 1897, 2472, 2492, 2494, 2501, 2509, 2667, 2681, 2682, 2705)
- Extend further up and down the coast. (#365, 753)
- Take the proposed MPA from Lone Point (o) to the Nuggets, there is a road to this area so it would be able to be policed. Make Long Point O into a Type 2 MPA. This would be a fear way for a fishers. Make this proposed MPA smaller in size (#205)
- Ideally the Type 1 area should be extended towards Nugget point so it can match the offshore Long Point proposal. As explained in the document, there are reasons for not including the Nuggets but at least the inshore area should include the Cannibal Bay. (#693)

10.19.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

²⁵³. Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site O included the following comments:

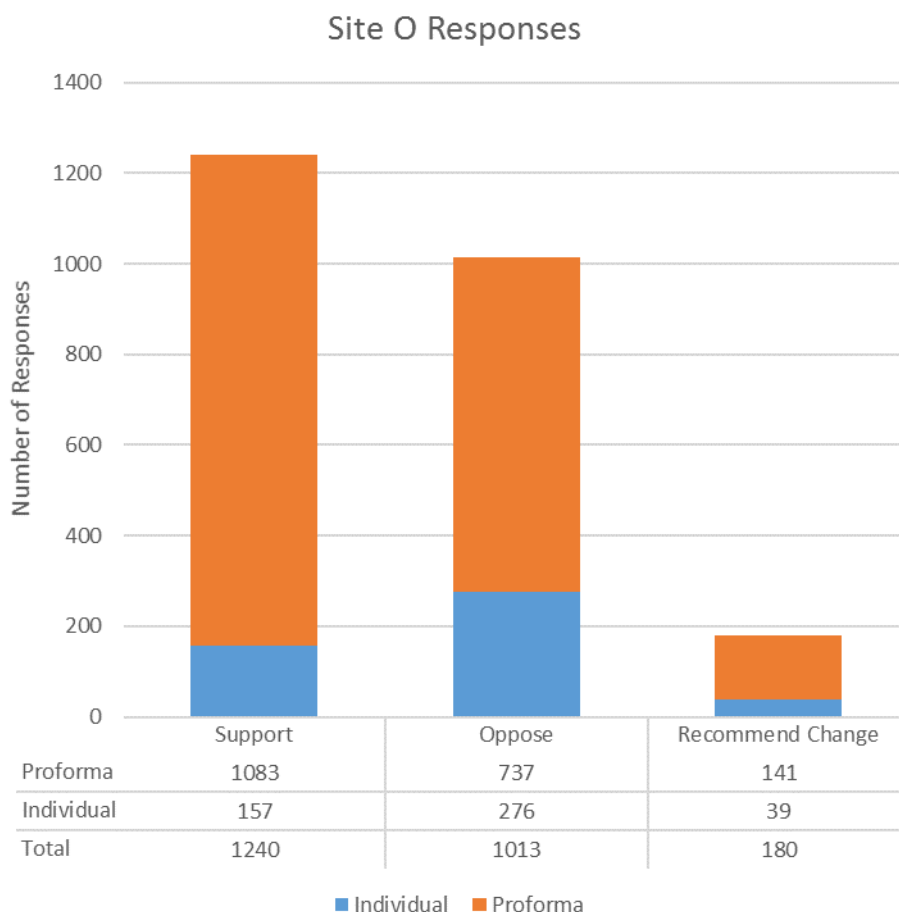
- Significant impacts on customary fishing interests and rights. Would support as a Type 2. (#612)
- Oppose on basis of displacement of fishing effort. (#658)
- Oppose on basis of loss of customary rights. (#742)
- Do not support this MPA as a type 1 reserve. Use this area for collecting kaimoana. It is also one of the main areas locals use for recreational fishing and this proposal has upset many people in the district. Prefer smaller type 1 MPA at the Nuggets instead of Long Point. If that were not possible would not be opposed to a type 2 MPA at Long Point that would still allow recreational fishing and diving with reduced catch limits. (#683)
- For generations these places have been used by tangata whenua to collect food, that all peoples of the region have benefited from in times of need, to mark special occasion, and to survive. Subsistence living is an expression of tino rangatiratanga. An acknowledgement of local mana whenua science and environmental management principles and practices is absent in the mapping out the future of MPA on the southern coast. Mana whenua have the science and systems in place to manage MPAs. Myself and my Whānau support an agreed area that has been truly co-constructed with tangata whenua - from the decision to map out a proposed area to the management of the MPA. (#723)
- This site was used traditionally as hapūka fishing grounds. This site was managed and maintained and fished by our tupuna and we still use these grounds today. These grounds are fished to provide kaimoana for marae and for manuhiri on special occasions such as hui, wananga and tangi. Whānau gather pāua, whānau fish for rawaru (Blue cod) and Trumpeter. This site is accessible to Whānau and is a cherished area for tangata whenua. The specified proposal is a direct breach of the Treaty and Treaty partnership. We oppose the specified proposal pertaining to this site. We suggest this area is deemed as a taiāpure and/or mātaītai. Ngāi Tahu management tools will be utilised to help preserve, protect and sustain this area. (#751)
- All of the proposals go against the Waitangi agreement for food gathering. (#778)
- I am opposed to restricting local commercial fishermen from making an honest living from this area. Restricting large trawlers from fishing these waters and those around it would be more beneficial. (#1473)
- Oppose - Significant impact on customary commercial and non-commercial fishing rights and interests. (Displaced commercial pāua ~5.6% or 5 tonne and pātiki trawl ~6.1%). (#2887)

10.19.5 Technical information and mapping

- ²⁵⁴. Information was provided by a number of submitters in relation to:
- Cited references. (#95, 208, 375, 1897, 2494, 2671)
 - Commercial fishing information. (#469, 611, 2467, 2494, 2887)
 - Ecological / habitat. (#402, 736, 1897)
- ²⁵⁵. Refer to Appendix 26 for further information.
- ²⁵⁶. Submitter maps showing changes for this site are located in Appendix 18.

10.19.6 Submission Numbers

^{257.} The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.19.7 Responses to focus questions from the consultation document Volume 1

- a. **Does this area provide adequate protection for the habitats included?**
Please see comments above.
- b. **How would this proposal affect your current or future use of the area?
How would this proposal affect you?**
Please see comments above.
- c. **Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?**
Please see comments above.
- d. **If you do not support it in its current form, can you suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?**

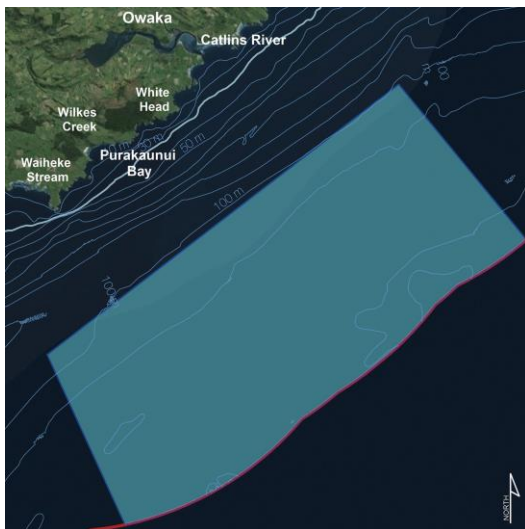
Please see comments above.

e. Do you have any comments to make regarding this proposal?

Please see comments above.

I know the coast very well. We have a very high compliance rate of fishing regs here and the weather looks after the sealife on its own. The pressure that would be applied to a few other reefs would be too much. This Forum has missed the boat in identifying the logical location of Campbells Reef to northside of Nuggets for a reserve. The government has dropped the ball on this I've been to Goat Island and seen the benefits of a marine reserve but this choice of location is wrong. Hands off Long Point. (#706)

10.20 P –Long Point Offshore (Type 2)



258. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site P have been summarised in supplementary reports.

10.20.1 Support for Site P

259. Submitters in support of Site P made the following comments.

Habitat / Biodiversity

- Protection of the habitats for penguin and seabirds. (#95, 186, 284, 285, 286, 355, 367, 369, 381, 395, 401, 417, 419, 464, 554, 555, 557, 559, 570, 574, 583, 628, 659, 660, 672, 680, 693, 696, 722, 734, 735, 736, 747, 1897, 2672, 2472, 2675)
- An opportunity to protect mid-shelf sedimentary (and perhaps biogenic) habitats. (#427)
- Good biodiversity. (#186, 426, 559, 736)
- Habitat protection. (#65)
- The Catlins are a natural and diverse habitat which needs to be protected from commercial and private interests to improve the fisheries and diversity for ongoing sustainability. (#2)
- Damage by deep water trawlers impacts inshore fishery. (#564)
- Protection for future generations. (#74, 138, 555)
- Estuaries are significant nursery areas for flat fish, and habitat for shore and sea birds. (#1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141))

Recreation

- These areas are less frequented by recreational fisherman so is a good area for a Marine Protection area. (#191, 367, 684)
- Recreational fishers should be happy with this too. (#198)
- No negative impact on recreational fishing. (#417, 747)
- minimal impact on human activities and benefits to wildlife and coastal marine area generally. (#684)

Commercial

- Support a complete ban on commercial fishing in this area, right round our coast within 12 miles. (#62)
- Restrictions be expanded to include all activities likely to impact on the sea floor – including mineral and gas exploration, mining and marine farming, and that any MPA must link with the 4 NM set net restricted area. (#2494)
- Would likely promote the establishment of a more productive commercial fishing grounds in adjacent areas through increased recruitment and spill over effects. (#625)
- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Tourism

- More protection needed to ensure tourism. (#74, 94)

Fishing Methods / Limits

- Align with the current set net prohibition / prohibit set nets. (#67, 95, 110, 122 150, 213, 367, 388 401, 417, 461, 556, 557, 574, 583, 657, 678, 697, 719, 728, 771, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141)2497, 2472, 2502, 2504, 2509, 2885, 2886) And trawling and dredging. (#771)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- Concern about the impact of trawling. (#660, 2686, 2692)
- Support no trawling. (#700)
- Support bans on bottom impacting methods. (#753, 1897, 2501)
- Bottom trawling wouldn't be allowed everywhere if the damage was visible for everyone to see. (#198)

- We support this MPI and urge the Forum to support the restrictions on bottom impacting methods, additional restrictions on all netting, mid-water trawling and purse seining. This includes prohibiting recreational dredging and set netting. (#107, 150, 736)
- Clear communication to recreational fishers and their families about what this means for them and their ongoing enjoyment of their recreational activity is key as it is apparent that the public does not understand items such as their ability to flounder in estuaries with a spear (just no nets), and the ability to pass through restricted fishing zones in a boat with fishing gear is not impeded - they just can't fish there. The wider public needs to clearly understand that their rights have not been eliminated under this proposal, just changed - for the long term improvement. (#158)
- Reduce recreational bag limits. (#387)

Potential for Research

- Any future scientific activity for these areas should involve the local community directly. (#2463)

Social

- The government should provide support for businesses impacted by these proposals. (#2463)
- Least impact on users. (#167, 581)
- O and P minimise potential impacts to customary, commercial and recreational fishing intent. (#186)
- Fishery displacement is small, but having it as a marine reserve would have significant gain for marine biodiversity. (#402, 725)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Connectivity

- This site compliments site O. (#736)
- Areas O and P (in their proposed extended form) would also improve the resilience of the species, by protecting the most southern large breeding area on the mainland, which protects the potential for redistribution of birds into more southern waters as a response to climate-change induced ocean warming. (#95)
- Would like to see both Long Point Type 1 and Type 2 approved together to give maximum chance for fish and birds to flourish. (#18)

Other

- More protection required. (#5)
- Better monitoring of discharges to the sea required. (#387)

10.20.2 Opposition to Site P

^{260.} Submitters opposed to Site P made the following comments.

Habitat / Biodiversity

- Seals, sealions and shags are flourishing at the expense of other species. For example a submitter mentioned spearing Greenbone around the west side of Tautuku Peninsula 30 years ago and there is no Greenbone, but there is a great seal colony instead. (#465)
- No shortage of marine life. (#87)
- I have fished this area and have noticed no decline in fish stocks. (#215)
- Don't see how this proposal will conserve the resource. (#10)

Recreation

- Recreational fishers are being vastly disadvantaged by the proposals. (#13, 86, 88, 91, 111-113, 149, 199, 216 (Tautuku Fishing Club Proforma x 739), 245, 246, 249, 354, 424, 652, 674, 677, 679, 688, 700, 701, 711, 810, 1265)
- Safe and accessible area to recreationally dive and fish. (#88, 91)
- Recreational fishers have a low impact. (#679, 688, 701) And it is not overfished. (#688)
- It makes the assumption that recreational fishing has more of an impact than commercial fishing which suggests that this proposal is not really about preserving marine life, but rather appeasing commercial interests to the detriment of the recreational fisherman. (#674)
- Impact on local fisherman. (#1473)

Commercial

- Impact the livelihood of commercial fishermen. (#248, 354, 374, 408)
- Politically motivated at expense of fishing industry. (#374)
- Due to the commercial sector being kind and voluntary leaving no take pāua zones along the coast I feel it's only fair that their livelihood remains the same. (#706)
- Effects on commercial fishery. (#478)

- Will commercial fishermen be compensated for loss of fishing grounds. (#682)
- The proposed MPA is inconsistent with MPA Policy. Restrictions on fishing are proposed beyond those which are necessary to provide for the maintenance and recovery of physical features and biogenic structures that support biodiversity. Fisheries interactions with protected species are not a relevant consideration for MPA site selection. No explanation is provided as to why a relatively large MPA is necessary to meet the protection standard. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection, because the objectives are not clearly stated, no threats identified and not least cost as it excludes fishing methods for no clear biodiversity protection benefit. It also impacts on commercial fishing rights and have a moderate impact on the rights of commercial fishers. (#2467)
- Moderate – significant impacts on commercial fishing rights. The area is particularly important for the set net fishery targeting school shark and rig. It also produces regionally-significant catches of trawl-caught species including silver warehou (nearly 20% of the region's SWA catch is taken from trawls starting in MPA (P)), squid, and Queen scallops (43% of the region's catch over the past eight years). (#2467)
- Important area for trawlers. (#1108)
- Would put to much pressure on offshore commercial fishery as fishing is largely dependent on tides in this area and subject to sudden extreme weather events. (#124)

Supporting Evidence

- Submitters would like to see data on depletion and degradation of these areas and the surrounding ocean before removing public access. (#40, 711)
- No evidence to suggest penguin numbers were declining or if fishing was impacting them. Seals are a problem to the penguin population. (#135)
- Lacks proper evidence. (#562, 609, 610, 1108)
- No scientific measuring or monitoring has been done. (#711)
- The current status quo of commercial and recreational fishing in this area has no proven adverse effect on the surrounding ecosystem. I want to be able to fish in this area. (#354)
- There is no information that commercial fishing is currently affecting birdlife of the area. (#208)
- Is there any evidence to suggest any benefits gained from a reserve? (#408, 409, 609, 610, 634, 742)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)

- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Fishing Methods / Limits

- Current fishing rules are sufficient protection. (#711)
- Fisheries management makes more sense than no take. (#69, 249, 408, 428, 429, 430, 431, 586, 587, 588, 589, 590, 591, 711)
- Would agree to a larger size limit and less fish per person. (#236)

Extent

- Too large. (#130, 343, 549, 767, 773)
- In favour of the local community devising upon MPA areas not “non-locals”. (#760)
- Gaps between O and P don't make sense. (#2479, 2677, 2678, 2679)

Weather / Safety

- It is a safe and accessible area to recreationally dive and fish. (#13, 88, 91, 199, 377, 679, 711, 751, 1265)
- It will force recreational fisherman out to dangerous waters. (#199, 216 (Tautuku Fishing Club Proforma x 739), 249, 253, 377, 562, 701, 810, 1265)
- Great area to fish but limited by southerly conditions. (#77)
- Intermittent weather and conditions restrict recreational fishermen. (#149, 155, 174, 180, 216 (Tautuku Fishing Club Proforma x 739), 344, 409, 572, 582, 677, 679, 711, 773, 810, 1268)

Social

- Impacts on fishing ‘culture’. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- Displaced commercial and recreational fishing puts pressure on other areas. (#66, 69, 130, 166, 217, 276, 409, 428, 429, 430, 431, 581, 586, 587, 588, 598, 590, 591, 606, 609, 610, 658)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)

- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- The proposal takes away Kāi Tahu customary rights under the Treaty of Waitangi. (#742)

Other

- Could be used as a test area. (#293)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available. (#216 (Tautuku Fishing Club Proforma x 739), 810)

10.20.3 Recommended Changes to Site P

261. Submitters that recommended changes to Site made the following comments:

Greater Protection

- Cover as much area as possible. (#56)
- Recommend that it be aligned with the current set net prohibition and prohibit all destructive methods that impact the seafloor. (#1897, 2686, 2692)
- Protect blue cod spawning grounds. This may benefit Yellow eyed penguins. (#208)
- Type 1 reserve. (#647, 2676)
- Make part of it Type 1 to measure the success of partial protection. (#1062)

Less Protection

- Too large. (#248, 276, 343, 549, 460, 767, 773)
- Continue to allow recreational fishermen but reduce catch of blue cod for example to 20/fisher. (#167)

Extension of the Site

- Extending Type 1 protection west (to connect with the reserve at the Tahakopa Estuary and join the western extent of offshore Area P). Would provide much better protection for a larger proportion of the penguin foraging region and a wide range of habitats and productive areas. (#95)
- Extended to Tahakopa Estuary (Site Q). (#76, 355, 722)
- Extend to include all feeding areas for Yellow-eyed penguins. (#239)
- Out towards the edge of the continental shelf. Having this zone included with the inshore Marine Reserve would go a long way to helping YEPs survival. (#402)

- Extend site O to include P to make it all type 1. Area needs to be large enough to make a difference. (#402, 642)
- I recommend that this trawl exclusion be brought in to surround the marine reserve at Long Point. This would greatly increase the effectiveness of both zones. (#375)
- Extend to the coastline where Area P exceeds the extent of Area O. (#625, 2672)
- Move further south. (#29, 478)
- Ideally the Type 1 area should be extended towards Nugget Point so it can match the offshore Long Point proposal. (#693)
- Extend to 12 NM. (#369)
- Extend to 25 km off shore. (#659)
- Extend to Site O. (#730, 2494, 2484)
- Together with site O, it provides protection from the coast to the territorial limit. This would enhance foraging opportunities for Yellow-eyed penguins and protect them from bycatch. (#1897, 2472)
- Approve both O and P together to give an increased area for fish and birds to flourish. (#18, 558, 625, 729)
- O and P are not alternatives, ecologically link them. (#642, 735, 2501)
- Suggest it buffers options Q and O. (#383)
- Inshore should include Cannibal Bay. (#693)

Other

- Too far offshore that it is pointless. (#553)
- Helps to protect O. (#770)
- Would give this area up to still use O. (#258)
- Inferior to O but would complement it. (#556)
- O and partially P provide a chance of the Yellow-eyed penguin to survive. (#150)
- Why choose this area over The Nuggets? (#478)
- More protection. (#5, 30)

10.20.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

^{262.} Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site P included the following comments:

- Oppose on basis of displacement of fishing effort. (#658)
- For generations these places have been used by tangata whenua to collect food, that all peoples of the region have benefited from in times of need, to mark special occasion, and to survive. Subsistence living is an expression of tino rangatiratanga. An acknowledgement of local mana whenua science and environmental management principles and practices is absent in the mapping out the future of MPA on the southern coast. Mana whenua have the science and systems in place to manage MPAs. Myself and my Whānau support an agreed area that has been truly co-constructed with tangata whenua - from the decision to map out a proposed area to the management of the MPA. (#723)
- Oppose on basis of loss of customary rights. (#742)
- The whakapapa association of Ngāi Tahu whanui with this area has already been formally recognised by the crown through a statutory Acknowledgement for Rakiura / Te Ara a Kewa [Rakiura/ Foveaux Strait Coastal Marine Area] within the Ngāi Tahu Claims Settlement Act 1998. (#751)
- Murihiku Ngāi Tahu Whānau have used the Coast from Waipapa Point to Tokata to gather kai moana and mahinga kai for many generations well before the Treaty of Waitangi was signed. This site was used traditionally as fishing grounds. This site was managed and maintained and fished by our tupuna and we still use these grounds today. These grounds are fished to provide kai moana for marae and for manuhiri on special occasions such as hui, Wananga and tangi. Whānau gather pāua, whānau fish for rawaru (Blue cod) and Trumpeter. This site is accessible to whānau and is a cherished area for tangata whenua. The specified proposal is a direct breach of the Treaty and Treaty partnership. We oppose the specified proposal pertaining to this site. (#751)
- I am opposed to restricting local commercial fishermen from making an honest living from this area. Restricting large trawlers from fishing these waters and those around it would be more beneficial. (#1473)
- Oppose - significant impact on customary commercial and non-commercial fishing rights and interests (Displaced commercial school shark set net ~5%). (#2887)

10.20.5 Technical information and mapping

263. Information was provided by a number of submitters in relation to:

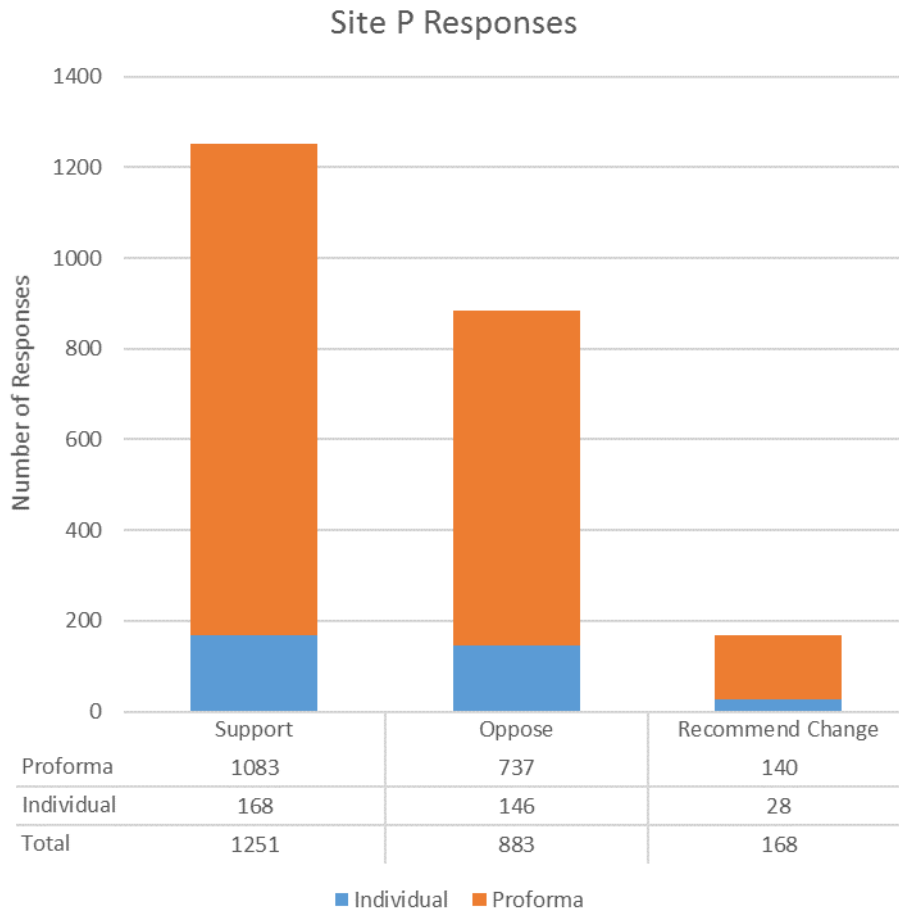
- Cited references. (#95, 402)
- Ecological / Habitat. (#402, 1897)
- Commercial Fishing information. (#1897, 2467, 2887)

264. Refer to Appendix 26 for further information.

265. Submitter maps showing changes for this site are located in Appendix 19.

10.20.6 Submission Numbers

266. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.20.7 Responses to focus questions from the consultation document Volume 1

a. Does this area provide adequate protection for the habitats included?

(i) Yes (#218)

Please refer to comments above.

b. Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?

(i) Yes (#218) I always support areas for protection/ regeneration of species.

Please refer to comments above.

c. How would this proposal affect how you use the area? How would this proposal affect you?

Little (#218)

Please refer to comments above.

- d. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?**

Please refer to comments above.

- e. For the fishing methods noted above, how often are they used by you in this area, and how much of each species is taken by these methods?**

Please refer to comments above.

- f. Do you have any information that would help the Forum decide what restrictions if any to recommend?**

Please refer to comments above.

10.21 Q –Tahakopa Estuary (Type 1)



267. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site Q have been summarised in supplementary reports.

10.21.1 Support for Site Q

268. Submitters in support of Site Q made the following comments.

Biodiversity / Habitat

- Important habitat. (#2, 30, 65, 67, 107, 121, 122, 138, 186, 213, 239, 367, 375, 378, 395, 401, 478, 555, 556, 559, 576, 577, 657, 678, 684, 725, 730, 736, 758, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2497, 2502, 2667)
- Support as it provides protection of an important estuary environment that are really vital for biodiversity. (#381)
- Lack of estuary protection in New Zealand. (#642)
- It would be nice for the salt marsh to regenerate. Nice place to watch birds and it would be nice for whitebait to have safety to breed. (#270)
- Includes salt marsh important for wading birds. (#25, 121, 401)
- Estuaries are vitally important areas to protect as they provide breeding sites and habitat for several important fish species. (#367, 378, 419)
- Rich habitat for bottom fish and sea run brown trout, area needs to be preserved. (#2)
- Important source of nutrients for the sea. (#355, 359)

- Protects an area of wetland of special significance for wading birds, white bait breeding habitat and is flanked by other protected areas. (#186, 401, 736, 1897)
- Ensures health of coastline for future generations. (#74, 138, 347, 555)
- Got to get some estuaries covered don't you? Deliver on the Minister's commitments. Nice clean bush above too. (#49)

Recreation

- By including only half of the estuary, it allows for existing recreational use to continue. As the western side of the proposal is fully bordered with protected land (DOC and QE11 covenanted land) it provides a connection with the land that is highly valuable. (#150, 736)
- Excellent place for kaimoana. (#355)

Commercial

- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Potential for Research

- Any future scientific activity for these areas should involve the local community directly. (#2463)

Tourism

- Positive for tourism. (#74, 135, 419)

Fishing Methods / Limits

- Reduce recreational bag limits. (#387)

Extent

- Will have the least impact on other users compared to alternative sites. (#577)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Social

- The government should provide support for businesses impacted by these proposals. (#2463)
- Less adverse effects on users. (#186)

- I support this proposal as the conservation values are greater than private rights on this proposal. There is still plenty of coast available to forage on and sea to fish in. (#158)

Other

- More protection required. (#5)
- Better monitoring of discharges to the sea required. (#387)

10.21.2 Opposition to Site Q

²⁶⁹. Submitters opposed to Site Q made the following comments.

Habitat / Biodiversity

- Water quality the issue grey water from Papatowai township runs into this area and sewage is a problem in this area. (#441, 1471)
- Need to be monitoring water quality. (#674)
- Has never been affected by humans. So why should it change. Love to take kids crabbing. (#286)

Recreation

- A place enjoyed by many families for enjoyment and shellfish gathering. (#41, 77, 166, 174, 217, 248, 285, 389, 408) And why should they change their lifestyles. (#408)
- Effects on recreational use. (#13, 41, 69, 88, 91, 111, 112, 113, 180, 199, 217, 243, 249, 257, , 316, 317, 318, 343, 344, 354, 389, 396, 408, 409, 410, 414, 416, 424, 428, 430, 431, 561, 564, 590, 591, 637, 652, 700, 705, 711, 742, 766, 810, 1108, 1259, 1471)
- Used by many for flounder and trout fishing, recreational fishers adversely affected. (#85, 344, 396, 410, 416, 441, 601, 670, 688, 1260, 1473)
- Great place for children to learn to fish, study and play. (#130, 174, 217, 249, 315, 410, 416, 441, 565, 601, 766)
- Concerned about impacts on existing whitebait stand due to overcrowding. (#316)
- Favourite duck shooting area. (#343)
- Takes away food gathering ability. (#344)
- This is another holiday area that has great fishing. Locals will be hardest affected. (#563)
- I have fished here for many years - leave it as it is. (#58)

- I feel that recreational fishers are being vastly disadvantaged in these proposals. The extent of fisheries on the south coast that easily, readily and accessible are few and far between to joe public. (#13)

Commercial

- Impacts on the commercial fishing industry. (#243, 354, 374, 564, 680, 810)
- The proposed MPA is inconsistent with MPA Policy. No explanation has been provided why a marine reserve is necessary. Estuarine habitats are already protected in five mātaimitai reserves in the Forum's region – i.e., Waihoa, Waikouaiti, Moeraki, Otakou and Waikawa Harbour. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection –no threats are identified and it is not a least cost approach. (#2467)
- Negligible impact on commercial fishing rights apart from commercial eel fisheries, for which the impact is likely to be more significant (especially the cumulative impacts of existing mātaimitai reserves and other estuarine MPAs within the proposed network). (#2467)
- Important shortfin eel fishery. This could result in a loss of up to 5-10% of total allowable catch. (#1957)

Supporting Information

- Not enough data / science on fish stock in these areas to decide before removing access. (#40)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Complete absence of any identified risk to estuary. (#2508)

Tourism

- Access to site is not suitable for tourist traffic. (253)

Fishing Methods / Limits

- Managed fisheries would be a better option. (#191, 217, 253, 409, 429, 723)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- No take areas are contrary to the rights of people to fish for food. I am in favour of restrictions on size and amount taken but not on a blanket ban. (#140)

Social

- Impacts on fishing 'culture'. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Have a social and economic effect on livelihoods of crib owners in the area. (#410, 1268)

Extent

- Not currently affected as is a remote place so why change it. (#315)

Weather / Safety

- Safe and accessible area for fishing and diving. (#86, 88, 91, 130, 199, 217, 315, 389, 414, 711, 766, 1268)
- Travelling further offshore puts fishers at risk. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Weather provides natural restrictions already. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- Displacement of commercial fishers here likely to put pressure on other areas. (#66, 409, 429, 430, 431)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- The proposal takes away Kāi Tahu customary rights under the Treaty of Waitangi. (#742)

Other

- Should wait until MPA legislation enacted and more appropriate mechanisms are available (#216 (Tautuku Fishing Club Proforma x 739), 810)

10.21.3 Recommended Changes to Site Q

²⁷⁰. Submitters that recommended changes to Site Q made the following comments:

Less Protection

- Not aware of commercial fishing in this area, would support Type 2. (#62)

- Would like to support Type 1 but opposed to restricting trout fishing (common). (#72, 147, 233, 683)
- Reduction to fish takes or increase fish size limit. (#167)
- Would prefer Type 2 protection. (#62, 628, 683, 696)

Extension of Site

- Too small, needs to include river channel to protect whitebait and native fish. (# 774, 2672)
- Estuaries and inlets are very poorly considered across the region, but have significant ecological importance. Include entire estuary. (#558, 625, 720, 735, 2472, 2492, 2673)
- A number of submitters recommend extending to include Long Point Option O. (#129, 420, 678, 722, 728, 734, 1270, 1271, 1272, 1273, 1897, 2885, 2886, 2479, 2492, 2494, 2501, 2502, 2504, 2677, 2678, 2679, 2686, 2692, 2504)
- Support, and recommend that it extends to join with Long Point (Option O). This is the only representation of an estuary in the southern area and needs to represent all the habitats associated with the mouth of the estuary. (#1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141))
- Only representation of an estuary in the southern area and needs to represent all of the habitats associated with the mouth of the estuary. (#67, 122, 213, 678, 728, 1270-1273, 2497, 2502, 2504, 2686, 2692)
- Need more estuaries in MPA network. (#642)

Other

- Clear communication to recreational fishers and their families about what this means for them and their ongoing enjoyment of their recreational activity is key as it is apparent that the public does not understand items such as their ability to flounder in estuaries with a spear (just no nets), and the ability to pass through restricted fishing zones in a boat with fishing gear is not impeded - they just can't fish there. The wider public needs to clearly understand that their rights have not been eliminated under this proposal, just changed - for the long term improvement. (#158)

10.21.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

^{271.} Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site Q included the following comments:

- Impacts on customary fishing rights and interests. (#612)
- Oppose on basis of loss of customary rights. (#742)
- Does not support this type 1 MPA as it will stop family from using this area. Used it for trout fishing and spear fishing. It is also used in the same way by many others including locals and holiday makers. It is also very close to Papatowai and very

accessible especially for the younger and older family members and others who cannot get to other places. Would support this area in a type 2 MPA with the same restrictions as the Tautuku Estuary MPA. Would also support an expansion of the area if it were under these conditions. This expansion would be both sides of the river for the extent of the reserve plus the bottom of the part of the MacLennan River for the bridge to the junction with the Tahakopa River. (#683)

- For generations these places have been used by tangata whenua to collect food, that all peoples of the region have benefited from in times of need, to mark special occasion, and to survive. Subsistence living is an expression of tino rangatiratanga. An acknowledgement of local mana whenua science and environmental management principles and practices is absent in the mapping out the future of MPA on the southern coast. Mana whenua have the science and systems in place to manage MPAs. Myself and my Whānau support an agreed area that has been truly co-constructed with tangata whenua - from the decision to map out a proposed area to the management of the MPA. (#723)
- This estuary is a traditional kai gathering area for Inanga (whitebait), Patiki (spearing flounders), Kokopu (Native Trout). There are Archaeological sites (specifically Ko Iwi) of great significance to our people and NZ as a country. Some of the oldest taonga have been found in the Catlins Area - Whānau use this area to educate and bring our rangatahi, mokopuna, tamariki back to the whenua, moana and awa to teach traditional mahinga kai practices. Again, the specified proposal is a direct breach of Treaty rights and Treaty partnership. We suggest this area is deemed as a Taiāpure and/or Mātaitai. Ngāi Tahu management tools will be utilised to help preserve, protect and sustain this area. (#751)
- It appears some people want this reserve to impress tourists. This area is often fished for flounder and should remain so. (#1473)
- Significant impact on customary non-commercial fishing rights and interests (including wānanga). (#2887)

10.21.5 Additional comments

²⁷². Additional comments provided are:

“I have a generally negative stance on the estuaries and harbours proposed for inclusion. While recognition of their natural habitat values is commendable, they are already protected by being DoC land or adjacent to DoC land and subject to hunting and fishing regulations. Changing the status of the Tahakopa Estuary does not provide any additional protection for biodiversity and merely creates another bit of bureaucracy to handle.”
(#584)

“Clear communication to recreational fishers and their families about what this means for them and their ongoing enjoyment of their recreational activity is key as it is apparent that the public does not understand items such as their ability to flounder in estuaries with a spear (just no nets) and the ability to pass through restricted fishing zones in a boat with fishing gear is not impeded – they just can’t fish there. The wider public need to clearly

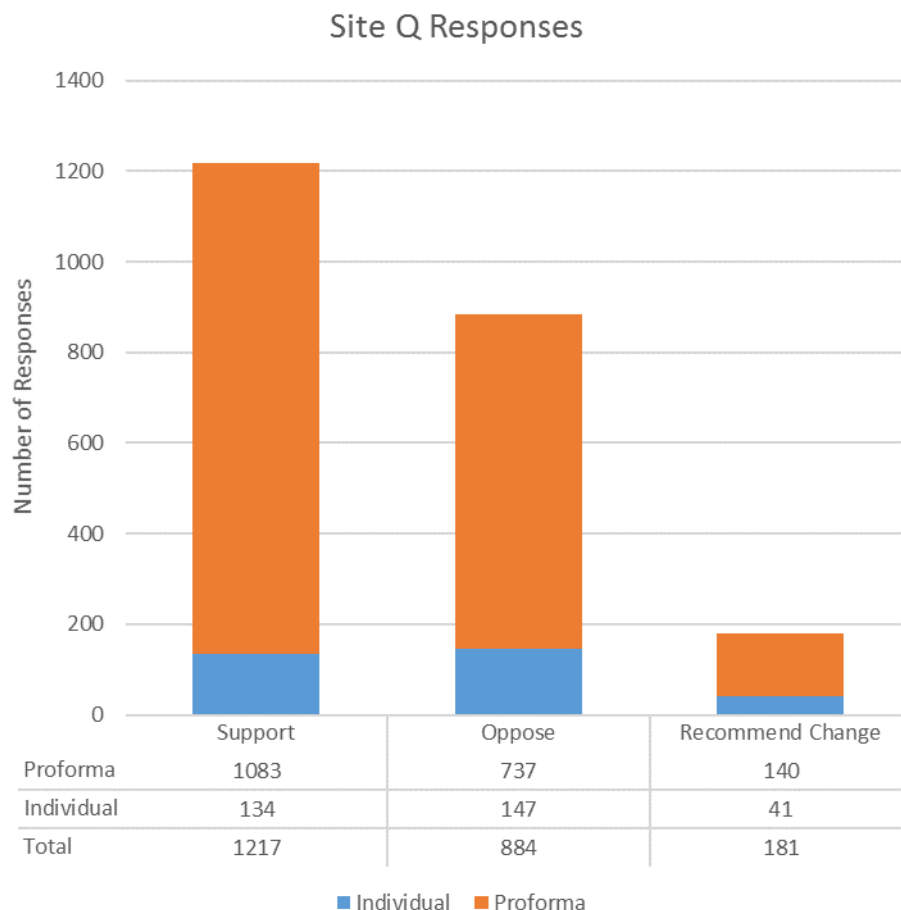
understand that their rights have not been eliminated under this proposal, just improved for the long term.” (#158)

10.21.6 Technical information and mapping

- ^{273.} Information was provided by a number of submitters in relation to:
- Cited References. (#735, 1897, 2501, 2667, 2671, 2681, 2682)
 - Commercial Fishing Information. (#1957, 2467)
- ^{274.} Refer to Appendix 26 for further information.
- ^{275.} Submitter maps showing changes for this site are located in Appendix 20.

10.21.7 Submission Numbers

276. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.21.8 Responses to focus questions from the consultation document Volume 1

a. Does this area provide adequate protection for the habitats included?

Please refer to comments above.

**b. How would this proposal affect your current or future use of the area?
How would this proposal affect you?**

Please refer to comments above.

**c. Do you support this area going forward as a part of the south-east
marine protected areas network? Why? Why not?**

Please refer to comments above.

- d. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?**

Please refer to comments above.

10.22 R – Tautuku Estuary (Type 2)



277. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site R have been summarised in supplementary reports.

10.22.1 Support for Site R

278. Submitters in support of Site R made the following comments:

Habitat / Biodiversity

- Significant nursery for flat fish/fish. (#25, 121, 122, 186, 213, 367, 381, 570, 575, 625, 657, 678, 720, 722, 728, 729, 730, 735, 736, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2472, 2497, 2502, 2667, 2681, 2682, 2686, 2692)
- Habitat for shore and sea birds. (#121, 122, 186, 381, 401, 555, 570, 575, 625, 657, 678, 696, 720, 722, 728, 729, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 1897, 2472, 2497, 2502, 2667, 2681, 2682, 2686, 2692)
- Should be left as a breeding ground. (#281, 367, 730)
- Protects habitats and ecosystems. (#65, 138)
- Unmodified nature. (#129, 145, 150, 186, 355, 401, 419, 427, 442, 559, 577, 584, 625, 696, 710, 720, 722, 729, 736, 1897, 2472, 2494, 2667, 2672, 2681, 2682)
- Unique habitats and important place for scientific study. (#150)
- Need to provide a network of healthy marine environments. (#555)
- Covering as much area as possible for marine ecosystem health. (#56, 121, 554)

- Protects wetlands. (#25)
- Have noticed a decrease in flatfish. (#683)
- Likely important habitat for threatened fish species. (#625)
- Changing the status of Tautuku Estuary does not provide additional protection for biodiversity. (#584)
- Protect unique habitats and ecosystems. (#395)
- Important to provide protection for estuaries. (#375, 378, 556, 684)
- Has an intact catchment. (#427, 577)
- Good estuary for wildlife. (#426)

Recreation

- Clear communication to recreational fishers and their families about what this means for them required. Plenty of other coast available. (#158)
- Still plenty of room to gather shellfish and line fishing still permitted. (#561)
- Look forward to continuing to visit the area and assist with predator control through fishing for trout. (#72)
- Support in principle as long as it does not impact ability to fish. (#130)
- Important for recreational fishing. (#766)
- Valued by users of Tautuku Outdoor Education Centre. (#2667, 2681, 2682)
- Tautuku Estuary has for years provided an opportunity to gather food. (#62)

Commercial

- Currently experiencing negative impacts from commercial eeling and overfishing. (233)
- Concerns regarding the continuation of commercial eeling. Populations of eels in the Puerua River have dropped. (#558)
- Will be protected from commercial activities. (#129)
- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Potential for Research

- Any future scientific activity for these areas should involve the local community directly. (#2463)

- Great to study. (#150)

Tourism

- More protection needed to ensure tourism. (#74)
- Popular for tourists and deserves protection. (#725)

Fishing Methods / Limits

- Should disallow set nets. (#147, 683)
- Like the idea traditional catching methods still allowed. (#49)
- Limiting harvesting to low impact more manual methods. (#684)
- Support all restrictions including no whitebaiting. (#107, 642, 736, 1897, 2501)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- Spear fishing and recreational line fishing should not be permitted. (#729)
- Reduce recreational bag limits. (#387)

Extent

- Suggest no take west of last crib. (#766)
- Covers whole estuary (as opposed to Site Q). (#239)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Social

- The government should provide support for businesses impacted by these proposals. (#2463)
- Important for future generations. (#74)
- Have a social and economic effect on livelihoods of crib owners in the area. (#410, 1268)

Monitoring

- Better to be monitoring and enhancing water quality. (#674)

Customary Rights

- Recognise Kāi Tahu SILNA land and Maori freehold land. (#186)
- Support use of estuary for Kāi Tahu cultural purposes. (#729)

Other

- Has access via boardwalk. (#29, 145, 419, 2667)
- More protection required. (#5)
- Support Type 1 status. (#30, 433)
- This is the best of the estuaries. (#49, 464)
- Type 2 is adequate. (#478)
- May provide a crucial network of estuarine protected areas. (#625)
- Better monitoring of discharges to the sea required. (#387)

10.22.2 Opposition to Site R

²⁷⁹. Submitters opposed to Site R made the following comments.

Habitat / Biodiversity

- Seals eat more fish than people catch. (#344)

Recreation

- Do not agree with whitebait restriction. (#41, 253, 386, 415)
- Recreational fishing and use adversely impacted. (#41, 69, 86, 87, 88, 91, 111, 112, 113, 135, 166, 174, 180, 199, 216 (Tautuku Fishing Club Proforma x 739), 245, 246, 248, 249, 253, 257, 317, 318, 343, 344, 354, 397, 415, 424, 428-431, 442, 564, 565, 586, 587, 589, 590, 591, 609, 610, 629, 648, 650, 652, 662, 666, 670, 680, 694, 706, 711, 810, 1108, 1201, 1260, 1473)
- Have seen no effect on fish numbers. (#215)
- Limit size catch and keep commercial out. (#180, 243)
- Loss of the right to fish for future generations. (#61, 666)
- Site not widely used by the public and fishery not under pressure. (#166, 215, 397, 711)
- Remoteness/ lack of access provides protection. (#77)
- Access limited by tide. (#344)

- Valuable for food gathering. (#86, 88, 91, 553)
- Popular well utilised place. (#10)
- Cockle gathering impacted. (#286, 343)

Commercial

- At the expense of commercial fishing industry. (#374, 564)
- Better to ensure commercial activities minimised. (#674)
- Not commercial here at all. (#415)
- Financial implications for eel quota. (#135, 564)
- Current commercial fishing has no impact on surrounding ecosystem. (#354)
- Important shortfin eel fishery. This could result in a loss of up to 20% of total allowable catch. (#1957)
- Keep commercial out. (#180)
- The proposed MPA is inconsistent with MPA Policy. Restrictions on commercial fishing are proposed beyond those which are necessary to provide for the maintenance and recovery of physical features and biogenic structures that support biodiversity. By allowing recreational line fishing to continue while prohibiting commercial line fishing, the proposal has the effect of reallocating fisheries access between fishing sectors in a manner that cannot be justified for marine biodiversity protection purposes. (#2467)
- Tourism and public access benefits are not relevant considerations for site MPA selection, unless comparing sites of minimal impact (which is not the case for eel fisheries in the various proposed estuarine MPAs) and estuarine habitats are already protected in five mātaihai reserves in the Forum's region – i.e., Waihoa, Waikouaiti, Moeraki, Otakou and Waikawa Harbour. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection –no threats are identified and it is not a least cost approach. (#2467)
- Negligible impact on commercial fishing rights apart from commercial eel fisheries, for which the impact is likely to be more significant (especially the cumulative impacts of existing mātaihai reserves and other estuarine MPAs within the proposed network). (#2467)

Supporting Evidence

- No science proving benefits of reserves in the south. (#409)
- No clear reason for any closure. (#1108, 1201)

-
- No scientific measuring / monitoring has been done. (#711)
 - Lacks evidence / would like to see more data. (#40, 609, 610, 634, 742)
 - No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
 - Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)
 - Complete absence of any identified risk to estuary. (#2508)

Weather / Safety

- Weather dictates when fish can be caught. (#180, 397)
- Safe and accessible. (#88, 91, 199, 285, 397, 650, 711, 1268)
- Safe place to learn. (#284, 397)
- Will force recreational fishers out into dangerous waters / weather can change quickly. (#199, 216 (Tautuku Fishing Club Proforma x 739), 414, 810)
- Weather already limits fishing in this area. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Social

- Way of life for crib owners for generations. (#61, 135, 245, 246, 408, 415, 648, 650, 680, 1260, 1268)
- Impacts on fishing 'culture'. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Monitoring

- Better to be monitoring water quality. (#674)

Displacement

- Pressure on other areas. (#66, 409, 609, 610)

Fishing Methods / Limits

- Fisheries management could be a better tool for this area. (#217)
- Suggest limiting catch. (#253)
- Prohibiting dredging, commercial line fishing and hand gathering of shellfish and whitebaiting. (#243)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- The proposal takes away Kāi Tahu customary rights under the Treaty of Waitangi. (#742)
- Impacts on iwi. (#1473)

Other

- Cannot see any reason for this to be a reserve. (#258, 637, 700)
- Leave it as it is. (#58)
- Strongly oppose any restrictions. (#168, 219, 1258)
- Already protected. (#682)
- Let the community decide. (#760)
- Has good clean water flowing into it. (#1471)
- Locals and iwi capable of dealing with any abuse of privilege. (#1473)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available. (#216 (Tautuku Fishing Club Proforma x 739), 810)

10.22.3 Recommended Changes to Site R

^{280.} Submitters that recommended changes to Site R made the following comments:

Greater Protection

- Should be Type 1. (#359, 440, 1062, 2667, 2676, 2675, 2681, 2682, 2675)
- Reduce take limits for recreational fish. (#167, 233)
- Exclude whitebaiting. (#642)
- Ban net fishing. (#233)
- Ban eeling in entire catchment. (#233)

Extension of the Site

- Extend to open coast and Tautuku Beach. (#2667, 2681, 2682)
- Make whole estuary marine reserve and link to Long Point P and O. (#2504, 2885, 2886)
- Fails to meet MPA guidelines and fails to represent full systems and habitats. Needs to include whole estuary. (#2494)
- Extend to sea. (#359)
- Extend to beach. (#2484)
- Encompass whole estuary. (#401)
- Extend out to sea by 1km. (#394)
- Area should include to the river mouth. (#402, 722, 738, 753, 1961, 2472, 2501, 2509, 2673, 2681, 2682, 1897, 2671)
- Support with extension to Long Point (Site O). (#719, 1897, 2501)
- Extend to 12 NM, 100 metres depth and joined up to cover greater area. (#2479, 2677, 2678, 2679)

Other

- Other sites would have more environmental benefit. (#167)
- Reduce catch limits. (#167)
- Why take away ability to gather seafood. (#248)

10.22.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

^{281.} Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site R included the following comments:

- Do not agree with restriction on white baiting in this area. Recommend that white baiting should be a permissible seasonal activity. (#386)
- This area is adjacent to SILNA land. If a reserve were to be placed here, it would better serve tangata whenua if it were to be managed using customary tools such as Mātaitai or Taiāpure. (#612)
- Support this MPA because it does not affect the way in which we use this area which is trout fishing, spearing of flat fish and eels and gathering shellfish. Have noticed a decrease in flatfish in this area; most likely due to over fishing particularly in summer months. A ban on all nets in this area would be a good thing. (#683)

- For generations these places have been used by tangata whenua to collect food, that all peoples of the region have benefited from in times of need, to mark special occasion, and to survive. Subsistence living is an expression of tino rangatiratanga. An acknowledgement of local mana whenua science and environmental management principles and practices is absent in the mapping out the future of MPA on the southern coast. Mana whenua have the science and systems in place to manage MPAs. Myself and my Whānau support an agreed area that has been truly co-constructed with tangata whenua - from the decision to map out a proposed area to the management of the MPA. (#723)
- Oppose on basis of loss of customary rights. (#742)
- Ngāi Tahu Whanui hold mana whenua and mana moana (customary authority) over the coast from Waipapa Point to Tokata (Kaka Point). The whakapapa association of Ngāi Tahu whanui with this area has already been formally recognised by the Crown through a Statutory Acknowledgement for Rakiura / Te Ara a Kewa (Rakiura/ Foveaux Strait Coastal Marine Area) within the Ngāi Tahu Claims Settlement Act 1998. Murihiku Ngāi Tahu Whānau have used the Coast from Waipapa Point to Tokata to gather Kai Moana and mahinga kai for many generations well before the Treaty of Waitangi was signed. Many historical middens along this stretch of coastline and estuaries contain Urupa and bone, shells charcoal tool making stone , and as such bear testament to the earlier use of the coast as a mahinga kai and resource gathering area for Southern Maori. We alternate our gathering areas of the fishing grounds due to different tides weather and species. From a Whānau perspective it would be a complete injustice to close these traditional areas of gathering kai moana and mahinga kai. We want our mokopuna Tamariki and Rangatahi to gather and learn about traditional food gathering practices. It would be sad to have to show pictures and tell stories of how their ancestors gathered from these places. Many of our Whānau lie in these places. Names have been placed on the environment to remind us of who we are and where we came from. Many of our Whānau have land shares in the S.I.L.N.A Maori Lands 1905 that originally amounted to 3,000 acres of coastal land. These lands were given in compensation of land taken by the crown. Our Whānau were given the lands to sustainably manage and feed our Whānau, Hapū and Iwi! Paru (mud) is available in this area and is a rare resource used for the traditional dying of harakeke. This area is a cleansing and healing place of Matua today and Tupuna of the past. This proposal is a direct breach of Treaty rights and Treaty Partnership. (#751)
- This are is frequently used by my family and has been for three generations, local iwi have a vested interest in this area with our land nearby. No restrictions are required, the locals and iwi are quite capable of dealing with any abuse of privilege. (#1473)
- Opposed - Adjacent to SILNA land. SILNA land was set aside for landless Ngāi Tahu that was an attempt to recognise that these whānau had limited means of sustenance. Any MPA would further restrict the land owners access to the coastal resources and therefore be in contradiction to the original intention of the SILNA Act 1906. (#2887)

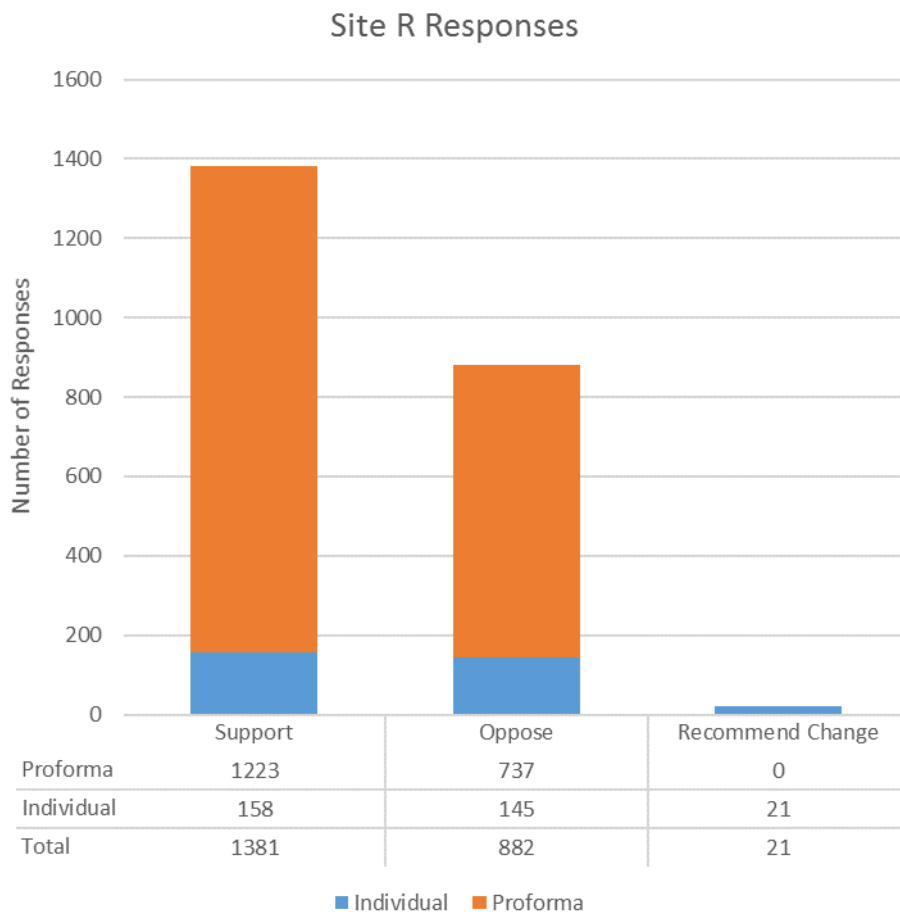
10.22.5 Technical information and mapping

²⁸². Information was provided by a number of submitters in relation to:

- Cited References. (#1897, 2667, 2681, 2682)
 - Commercial Fishing Information. (#1957, 2467)
283. Refer to Appendix 26 for further information.
284. Submitter maps showing changes for this site are located in Appendix 21.

10.22.6 Submission Numbers

285. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.22.7 Responses to focus questions from the consultation document Volume 1

- a. Does this area provide adequate protection for the habitats included?**
Please refer to comments above.
- b. How would this proposal affect your current or future use of the area?**
How would this proposal affect you?

Please refer to comments above.

- c. Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?**

Please refer to comments above.

- d. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?**

Please refer to comments above.

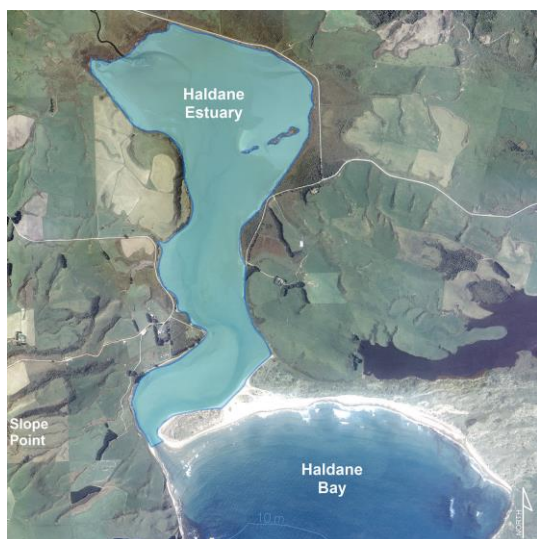
- e. For the fishing methods noted above, how often are they used by you in this area, and how much of each species is taken by these methods?**

Please refer to comments above.

- f. Do you have any information that would help the Forum decide what restrictions if any to recommend?**

Please refer to comments above.

10.23 S –Haldane Estuary (Type 2)



286. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site S have been summarised in supplementary reports.

10.23.1 Support for Site S

287. Submitters that supported Site S provided the following reasons for support:

Habitat / Biodiversity

- Estuarine habitats are important nursing grounds for wader and shore birds, and native fish, specifically flat fish and white bait. (#25, 49, 121, 186, 239, 270, 367, 395, 401, 426, 433, 555, 558, 559, 570, 577, 625, 657, 678, 696, 722, 730, 735, 736, 774, 1897, 2472, 2501, 2502, 2667, 2671)
- The foraging range of the Northern Royal Albatross is extensive, Northern Royal Albatross and other species of Albatross forage through all these areas and we need to ensure that we continue to provide a network of healthy marine environments. The Little Penguin is distributed throughout the South-East Marine area and as for the Albatross, we need to ensure that areas of the marine environment area protected to ensure future generations of marine species have sufficient healthy habitats to support future generations. (#555)
- Important estuary habitat. (#110, 122, 129, 150, 213, 376, 427, 442, 556, 576, 577, 657, 697, 719, 728, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2497, 2667, 2681, 2682, 2686, 2692, 2885, 2886)
- More estuary areas need to be protected. (#56, 736, 1062) and limit the expansion of commercial scale extraction in these culturally important sites. (#375)
- Important source of nutrients to sea and provide source of kaimoana. (#355)

- Existing conservation measures that will be enhanced by further protection. (#25, 381, 478, 559, 736), including its important role as a whitebait nursery. (#381)
- MPA underrepresented nationwide. (#684)
- Support the most extensive marine protection possible – many areas, large areas and diverse ecosystem types. (#554)
- Protect Otago’s unique and important marine habitats and ecosystems. (#65, 395)
- Healthy ecosystems for future generations. (#74, 138, 558)
- The area surrounding the proposed MPA is heavily modified so would benefit from a broader management plan. (#401, 722, 1897, 2472)
- The proposed protection measures make a good compromise between the ecosystem of the estuary, and the interests of the local community. (#2672)

Recreation

- Limiting harvesting to low impact methods but still allows recreational fishing. (#684, 725)
- I am a recreational user of this site and my experiences would be enhanced were part of the estuary protected as a MPA. (#736)
- Clear communication to recreational fishers and their families about what this means for them. (#158)
- Support as long as there remains existing boat ramp access. (#1102)

Commercial

- No commercial activity here so no impact. (#1473)
- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)

Potential for Research

- Any future scientific activity for these areas should involve the local community directly. (#2463)
- Scientific and educational value. (#376)

Tourism

- High tourism values. (#74, 150)

Fishing Methods / Limits

- Support bans on bottom disturbing fishing methods. (#753, 1897, 2501)

- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- Reduce recreational bag limits. (#387)

Weather / Safety

- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Social

- The government should provide support for businesses impacted by these proposals. (#2463)

Other

- More protection required. (#5)
- Like estuary. (#29)
- I support these estuary proposals. (#451)
- I would like to see Haldane Estuary remain as it is to date. (#749)
- Support all four estuary MPAs. (#378)
- Better monitoring of discharges to the sea required. (#387)

10.23.2 Opposition for Site S

²⁸⁸. Submitters opposed to Site S made the following comments.

Habitat / Biodiversity

- Poor state, undergoing increased sedimentation from the catchment. (#145)
- Bivalve species limited here. (#145)
- The facilitation of pingao restoration (an activity that takes place above MHWS) is an irrelevant consideration for establishing an MPA. (#2467)
- Every two years D.O.C. department come and spray around the edges of the estuary for gorse etc. They do it just before whitebaiting season, which is killing the habitat where the whitebait use as breeding grounds. It takes about 2 years for the bait to return to this area. You state that bird life is endangered. Bird life appears to have increased over the years and fishing does not endanger it. (#2668)

Recreation

- Perfect spot for families to camp and fish and children to play. (#38, 39, 200, 408, 563, 2668). And Fortrose Estuary is polluted, so the next safe place for families to enjoy some activities is miles away. (2668)
- The proposal disadvantages recreational fishers and families who have fished here over a number of years / generations, particularly as it is a safe and accessible site. (#58, 71, 77, 199, 216 (Tautuku Fishing Club Proforma x 739), 217, 691, 694, 700, 705, 723, 810)
- Has a very high value for bathers and small children safest swimming area. (#124, 200)
- Restricts hand gathering of shellfish and whitebaiting. (#173, 200, 243, 408,
- Would adversely affect fishermen. (#69, 354, 371, 424, 428, 429, 430, 431, 561, 564, 586, 587, 588, 589, 590, 591, 691), and Akatore Estuary would be a better selection (#428, 429, 430, 431, 586, 587, 588, 589)
- Local food gathering spot. (#145, 174, 553, 690, 691 723)
- The following submitters summarised the opposed position well from a recreational perspective:

“When I moved to Southland 3 years ago. Camping and enjoying the outdoors was a major for me and my family to continue to do. I searched for so long for the best place where we can camp, enjoy the beauty of our ocean and wildlife whilst still protecting it. Finally after looking around I finally found the perfect spot, Haldane Estuary! It is the perfect spot to camp, enjoy our beautiful ocean and look after our environment. Let’s stop changing what we have and start protecting it without stopping camping and fishing etc. I oppose the changes to the estuary. I think it is a wonderful area to enjoy life in the outdoors. Let’s make it a great spot for our families to grow and have fun.” (#38)

“We are regular users in as much as we swim, boat, our children play, we flounder, whitebait, fish, gather cockles, duck shoot and set eel nets in it. We have read through the submission and have several reason why we don’t support it, plus unanswered questions about some of the reasoning and drivers behind this. The first would be what this reserve is actually trying to achieve, other than placing a load of unnecessary restrictions on local people traditionally doing what we have been doing for years with no lasting adverse effects on the environment.” (#691)

Commercial

- Displaced commercial fishing will pressure other areas. (#66)
- Effects on commercial fishery. (#135, 354, 374, 561, 564, 680, 2505)
- This is politically motivated and at the expense of the commercial fishing industry. Small regional areas will suffer and die because of this. You are trying to push out the commercial fishers who have property rights that are getting eroded each day with

this sort of "stealing". This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)

- Important shortfin eel fishery. Will impact existing quota and result in losses of catch. (#135, 1957)
- The proposed MPA is inconsistent with MPA Policy. Restrictions on commercial fishing are proposed beyond those which are necessary to provide for the maintenance and recovery of physical features and biogenic structures that support biodiversity. By allowing recreational line fishing to continue while prohibiting commercial line fishing, the proposal has the effect of reallocating fisheries access between fishing sectors in a manner that cannot be justified for marine biodiversity protection purposes. Estuarine habitats are already protected in five mātaihai reserves in the Forum's region – i.e., Waihoa, Waikouaiti, Moeraki, Otakou and Waikawa Harbour. Together these five mātaihai reserves represent nine different estuarine habitat types, as discussed in Part One of our submission. The consultation document proposes MPAs in six estuaries around the region – Pleasant River, Stony Creek, Akatore, Tahakopa, Tautuku and Haldane – none of which represent habitats not already in mātaihai reserves. (#2467)
- The proposed MPA is inconsistent with industry policy on marine biodiversity protection. The objective of the MPA appears to be to protect an estuary of significance for bird habitat. The protection of bird habitats is not relevant to the selection of representative areas of marine biodiversity; No specific threats have been identified. Aside from some eel fishing, there is no commercial fishing in the estuary and no bottom-perturbing fishing methods are used. Danish seining is prohibited by regulation. The edges of the estuary are grazed, but no management measures are proposed for this potential threat to biodiversity values. (#2467)
- Negligible impact on commercial fishing rights apart from commercial eel fisheries, for which the impact is likely to be more significant (especially the cumulative impacts of existing mātaihai reserves and other estuarine MPAs within the proposed network). (#2467)

Supporting Evidence

- Insufficient data to suggest an existing issue with the ecosystem. (#40, 215)
- Lacks proper evidence. (#354, 409, 561, 634, 742)
- No evidence exclusion of recreational fishing necessary. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Inadequate information provided on impacts on recreational and commercial fishing. (#216 (Tautuku Fishing Club Proforma x 739), 810)
- Complete absence of any identified risk to estuary. (#2508)

Tourism

- I don't believe we should be locking up these areas for tourism as we work and play in the Catlins, they don't. We shouldn't have to change our way of life for tourists who contribute nothing to me. (#465, 691)

Fishing Methods / Limits

- Fisheries management or reduced catch limits could be a better tool for this area. (#253)
- Proposed MPA (S) could be implemented using Fisheries Act regulations only if fishing was having an adverse effect on the aquatic environment or marine biodiversity. The majority of fishing methods that would be prohibited under the proposal – i.e., dredging, commercial set net fishing, commercial line fishing, and mechanical harvesting – do not occur at the site, and neither is it anticipated that these methods would be utilised in the future. There is therefore no Fisheries Act-related justification for prohibiting the use of the methods. (#2467)
- Floundering in the Haldane Estuary has changed due to large amount of shifting sand. It is very soft and difficult to drag a net. Also there is only a small area that can be dragged. (#2668)

Weather / Safety

- Sheltered area, closures will put fishers into dangerous areas. (#199, 200, 216 (Tautuku Fishing Club Proforma x 739), 810, 1268, 2668)
- Safe place to drag a flounder net. (#465, 563) And one of the few unpolluted estuaries we can catch flounder in. (#465)
- White baiting/fishing already dictated by weather/river conditions. (#1268, 2668)
- Weather already limits fishing in this area. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Social

- Will negatively impact local property values and or crib owner's way of life. (#173, 200, 217, 371, 1268, 2668)
- Let the local community decide. (#760)
- Impacts on fishing 'culture'. (#216 (Tautuku Fishing Club Proforma x 739), 810)

Displacement

- Displaced fishing will put pressure on other areas. (#166, 409)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- The proposal takes away Kāi Tahu customary rights under the Treaty of Waitangi. (#742)

Other

- Oppose any restrictions. (#168, 219, 1258)
- Not needed – too difficult to administer/police. (#1268)
- Should wait until MPA legislation enacted and more appropriate mechanisms are available. (#216 (Tautuku Fishing Club Proforma x 739), 810)

10.23.3 Recommended Changes to Site S

²⁸⁹. Submitters that recommended changes to Site S made the following comments:

Greater Protection

- Prefer Type 1. (#, 440, 625, 642, 1062, 2675, 2676 2681, 2682, 2667, 2681, 2682)
Another type 1 estuarine MPA along the Catlins coast will allow for better connections between similarly protected areas along the coast. These connections may be crucial to the success of the management (#625). Failing a Type 1, Mataitai would be preferred (#642).
- Support some of the estuary as Type 1. (#30)
- Review the take limits. (#167, 371)
- We support the proposal and would like to support all the restrictions proposed including the no take of whitebait. We would like to see commercial eeling completely banned as well. (#107)

Less Protection

- Alternate sites would be better for the environment with less effect on existing users. (#167)
- Allow whitebaiting and floundering. (#371)
- I have a generally negative stance on the estuaries and harbours proposed for inclusion. While recognition of their natural values is commendable, they are already

protected by being DoC land or adjacent to DoC land and subject to fishing and hunting regulations, setnet bans etc. Changing the status of the Haldane Harbour does not provide any additional protection for biodiversity and merely creates another bit of bureaucracy to handle. The exception is whitebait. There is a small amount of whitebaiting which would be hard to police. (#584)

- Better bird counts at Waikawa. Recommend Waikawa Harbour over Haldane Mātaitai. (#584). Waikawa, in contrast has Sealions and Hector's dolphins, surfers and swimmers, nesting Yellow-eyed penguins, a large migrant wading bird population, Maori and Whaling station sites and a diverse range of habitats. Although the same question applies - 'What does this protect that isn't protected already?' (OK, no more whitebaiting) and although Waikawa has iwi recognition that Haldane lacks, it would be a better token Southland representative example. I recommend Waikawa Harbour over Haldane. (#584).
- One alternative proposal we would be happier with is create the reserve from the narrow section separating the upper and lower estuaries. That way the section that is more heavily used now would still be available for traditional use and the breeding grounds above would be left protected which would be a win win for everyone. We do agree however that commercial harvesting or mining of any sort has no place in the Haldane Estuary. (#691)

Extension of Site

- Extend offshore. (#394, 737, 2677, 2678, 2679)
- Extend to encompass the whole mouth of the estuary. (#2484)
- I support the proposed MPAs, however the type 2 MPAs should be extended much further offshore (12 NM/ 100m depth), and joined up to cover a greater area, where commercial set netting and trawling are banned in such important Hector's dolphin habitat. It's unbelievable the areas off Porpoise Bay and Haldane estuary haven't been considered as type 2 MPAs. (#2479, 2677, 2678, 2679)
- Extension offshore and north and south as a Type 1 MPA. This will provide protective 'backing' to the recreational fishing in estuary itself, will provide a link in any further network of MPAs to south and west and will be of sufficient size that edge effect still means and effective protected area will exist. This additional area brings total protected area closer towards a needed 10-15% of total area under consideration. (#595)
- I also recommend the creation of a marine reserve between The Brothers Point and The Sisters, in the Catlins area. This reserve should be from the coast offshore to 12 NM to give representation of deep subtidal gravel habitats within the area of highest current speed inside the Forum's boundaries. This habitat type is not represented in the proposed MPA network. A reserve here would also represent Yellow-eyed penguin foraging habitats associated with Forest & Bird's Te Rere Yellow-eyed penguin reserve. (#1628 (Fish Forever Proforma x 141))

- Ideally the proposed reserve should be extended to lie adjacent to the Haldane Conservation Area and the rock headland to the east as far as Curio Bay and the entrance to Waikawa Harbour. This would greatly extend the diversity of marine habitats and shore types represented. (#2667, 2681, 2682)

Other

- At least one. If only one then R is best. (#464)
- Either S or R should be MPA Type 1. (#433)
- I am particularly interested in the approach of limiting harvesting to low impact more manual methods. I believe this is a good compromise between the lock it up in a glass case approach and the maximum harvest of a limited number of commercial species with no regard to systematic and ecological impacts. (#684)

10.23.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

^{290.} Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site S included the following comments:

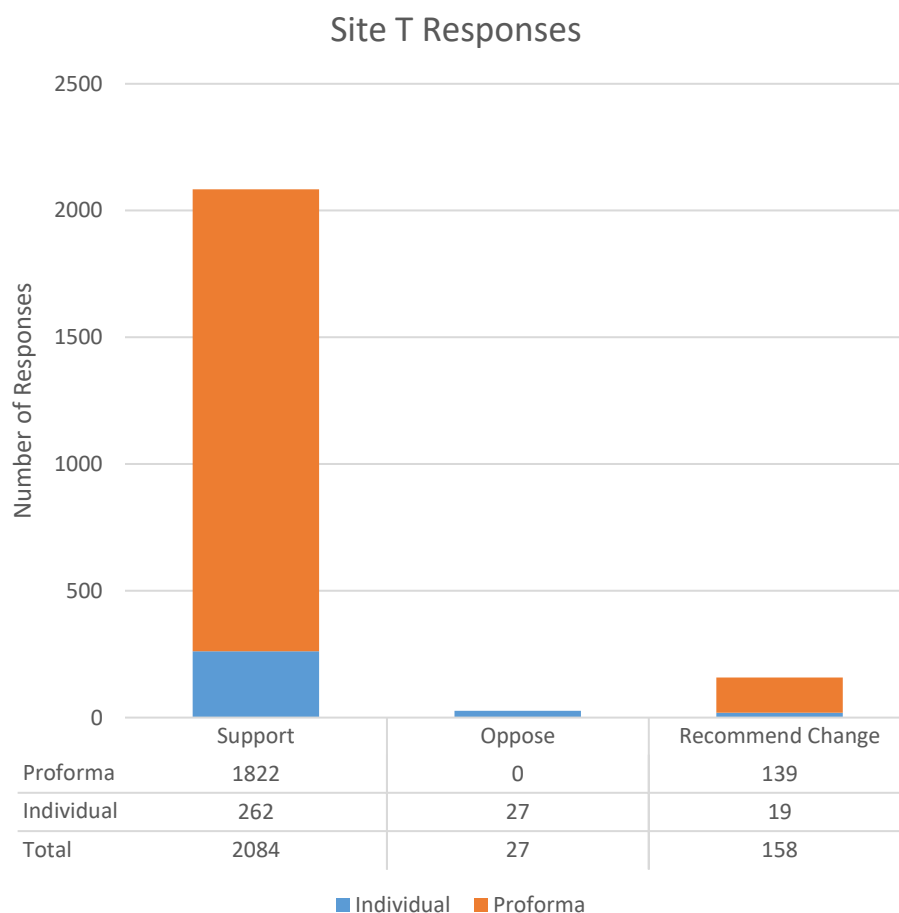
- Weak rationale. (#612, 2887)
- For generations these places have been used by tangata whenua to collect food, that all peoples of the region have benefited from in times of need, to mark special occasion, and to survive. Subsistence living is an expression of tino rangatiratanga. An acknowledgement of local mana whenua science and environmental management principles and practices is absent in the mapping out the future of MPA on the southern coast. Mana whenua have the science and systems in place to manage MPAs. Myself and my Whānau support an agreed area that has been truly co-constructed with tangata whenua - from the decision to map out a proposed area to the management of the MPA. (#723)
- Oppose on basis of loss of customary rights. (#742)
- We want to ensure current and future generations of Ngāi Tahu in particular Tautuku (Waipohatu) Haldane and Awarua are able to continue to exercise their customary rights and rangatiratanga over this area as stated in article two of the Treaty of Waitangi. There are sites of significance in this estuary, Archaeological sites specifically Koiwi. There are Middens, Patiki (flounder), Inanga fishery (whitebait) in this estuary that is gathered by local Whānau and tangata whenua. This is a prime area to educate young rangatahi on learning Traditional Mahinga Kai gathering methods. We recommend a Mātaitai and/or Taiāpure is enforced to sustain and preserve taonga species. We propose Ngāi Tahu management tools be utilised. This proposal is a direct breach of the Treaty rights and Treaty Partnership. (#751)
- There is little or no commercial activity here, the restrictions you are suggesting will make no impact apart from appeasing a few govt shiny bums, you are just going to make people cheat. (#1473)

10.23.5 Technical information and mapping

291. Information was provided by a number of submitters in relation to:
- Cited References. (#145, 376, 1897, 2667, 2671, 2681, 2682)
 - Ecological Habitat. (#186, 370, 584)
 - Commercial Fishing Information. (#1957, 2467)
292. Refer to Appendix 26 for further information.
293. Submitter maps showing changes for this site are located in Appendix 22.

10.23.6 Submission Numbers

294. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.23.7 Responses to focus questions from the consultation document Volume 1

How would this proposal affect your current or future use of the area? How would this proposal affect you?

Submitter #370 specifically responded to this question.

The immediate effects of the reserve status would not be noticeable but in the future, the status could be significant. The following explains this reasoning.

The Board needs to be mindful of the views of Ngāi Tahu, particularly local iwi and we respect these views and believe they should be given significant weight. However, we have not been able to articulate those views through this submission as the Ngāi Tahu representatives on the Board have not been able to contribute to this submission. We therefore expect that Ngāi Tahu representatives will make separate submissions to this process and you will take their views into account.

We note that the effects of reserve status where some fishing is allowed may not be measurable as its catchment is affected by drainage, bush clearance and siltation which is not influenced by the status. All the bird species and seals on Haldane Beach are protected, fishing and shellfish gathering is minimal, the surrounding land is road reserve or conservation land and there are no commercial activities there. There are farms in the catchment with associated buildings and infrastructure and a small number of cribs/buildings adjacent to the shoreline, south of Weirs Beach.

Commercial eeling interests would still be able to fish in the Waikopikopiko Stream as it is outside of the reserve, as would whitebaiters. Set netters would be disadvantaged, but it is not known how much of this occurs. Other estuaries such as Maitai and half of the Waikawa Estuary, amongst several others in Southland would still be open for this type of fishing. Spear fishing would be allowed. Flounders are likely to be abundant and a prohibition of set netting could be an advantage to this species while harvesting using spears could still occur.

The estuary does not appear to be suitable for commercial line fishing or dredging. Prohibiting the harvesting of shellfish with implements including spades could affect some people. It is likely that due to a relatively pristine environment shellfish in the estuary could be abundant and important. Hand gathering however would still be possible.

Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?

Submitter #370 specifically responded to this question.

The Board does endorse the concept of marine reserves and marine protected areas in estuaries because declaring an area a 'marine reserve and marine protected areas' is an affirmation of its conservation value. Generally, the Board feels that

NZ has an inadequate number and area of marine reserves or protected areas. A declaration of a reserve should not be simply a response to a perceived threat. As a general principle prioritizing shallow water areas for protection is important because of the role of shallow water areas in aquatic ecology as nursery areas for marine species e.g. flounder. And also as a habitat for short finned eels, mullet, stargazers, migratory freshwater fish such as bullies, galaxiids, torrent fish and eels. Kanakana are also likely to be present. Eel and kanakana have significant cultural value as mahika kai

We also note that if a marine protected area, type 2 is created it sets precedent to actively restore the area, where needed, and maintain it at a level of high conservation value. Activities may arise in the future that could threaten the natural values of these areas so the Board feels that providing protection before any threats are identified is prudent, especially as estuaries can be degraded or modified. The goal for New Zealand should be to create a network of diverse Marine Reserves and we think that this would be a good addition to the network.

If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size, boundaries and specific rules?

Submitter #370 specifically responded to this question.

We do support the proposed protected status which allows some continued harvest of species in the estuary. However, it limits the use to what is likely to be sustainable and not likely to degrade the area into the future. We think this is appropriate. Preventing any harvest is not necessary in this case, as far as we can tell, although we do admit that we do not have information to support this view, which is based on general principles relating to exploitation of wild populations of animals and plants.

For the fishing methods noted above, how often are they used by you in this area, and how much of each species is taken by these methods?

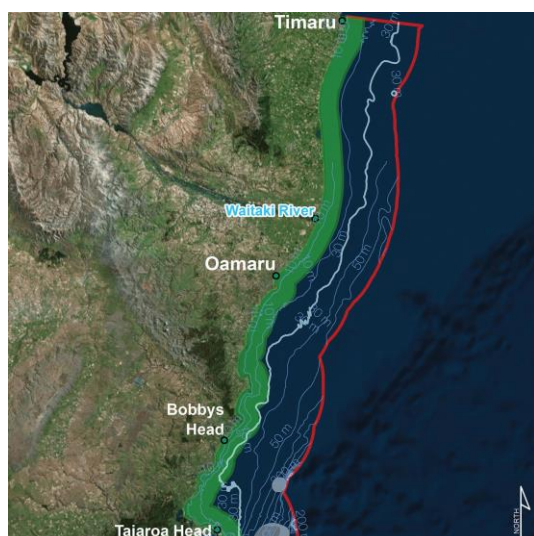
Submitter #370 specifically responded to this question.

The Board does not fish in in this area (although individual members may do in their private capacity). Two Board members are involved in wildlife observations as mentioned in the Appendix which describes this area and identifies the natural features that we are aware of.

Do you have any information that would help the Forum decide what restrictions if any to recommend?

Please refer to comments above.

10.24 T – Kelp Forest (Type other)



295. Please note as identified in Sections 5.2.7 and 5.2.8 Scientific Information and Commercially Sensitive Information relating to Site A have been summarised in supplementary reports.
296. Unlike the other Areas, the Kelp Forest proposal is not for a Type 1 or Type 2 MPA given uncertainty over the mechanism(s) that could be used under current legislation to provide protection.

10.24.1 Support for Site T

297. Submitters in support of Site T made the following comments.

Habitat / Biodiversity

- Kelp forests provide habitat for numerous fish and invertebrate species and support overall biodiversity values. (#25, 30, 57, 95, 107, 121, 122, 136, 188, 201, 213, 265, 284, 285, 286, 345, 355, 359, 367, 369, 378, 380, 381, 401, 408, 414, 417, 555, 556, 557, 559, 564, 570, 574, 576, 577, 603, 622, 678, 680, 684, 696, 710, 719, 722, 730, 735, 736, 747, 758, 770, 771, 774, 1062, 1108, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2497, 2504, 2672, 2675, 2885, 2886, 2473, 2479, 2484, 2489, 2494, 2498, 2501, 2502, 2509, 2667, 2673, 2677, 2678, 2679, 2681, 2682, 2686, 2692, 2671)
- Important for breeding. (#21, 32, 234, 254, 259, 327, 345, 414, 426, 433, 434, 700, 1108)
- To ensure survival of habitats and ecosystems. (#56, 65, 138, 395)
- If it was on land would have been protected long ago. (#49)
- Sensible from ecological first principles. (#642)

- This habitat needs to be better represented within marine reserves in the proposal. (#110, 122, 678, 722, 728, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1628 (Fish Forever Proforma x 141), 2502, 2686, 2692, 2885, 2886)
- Kelp forests in decline / in decline globally. (#558, 735, 2675, 2681, 2682)
- Unique habitat. (#76, 135, 248)
- Destruction of kelp beds has far reaching ecological consequences so should protect them. (#129)
- Should be better recognised. (#427)
- Proposal would assist in protection of extended kelp area. (#150)
- Those submissions mentioning habitat / biodiversity are summed up by this comment:

“I consider this important to reserve. As forests exist on land to create environments for the protection of life, so the kelp forests supply the same for the marine reserves of life. It goes without saying that a protection should be placed on the kelp forest for creating bio-diverse stocks for future generations.” (#442)

Recreation

- Good area for snorkelling and harvesting fish. (#2489)
- Recreational fishing not impacted. (#424)
- Would like to see beach harvest of cast kelp continue (no cutting). (#327)
- Lower recreational catch limits. (#2512)
- Clear communication to recreational fishers and their families about what this means for them. (#158)
- Support in principle but want to ensure temporary buoys can be anchored for yacht races. (#676)
- Don't try to fix something that isn't broken. Fishing is an important recreation that keeps families together don't take that away from us. (#1073)

Commercial

- Would restrict or prohibit commercial harvest of kelp / commercial harvest of kelp should be prohibited. (#69, 107, 129, 130, 198, 270, 369, 427, 428, 429, 430, 431, 439, 580, 586, 587, 588, 589, 590, 591, 622, 720, 722, 725, 735, 753, 754, 771, 2484, 2497, 2501, 2504, 2672, 2673, 2677, 2678, 2679, 2885, 2886)
- Commercial fishing should be excluded. (#12)

-
- Put greater restrictions on commercial operations, which disturb the seafloor and deplete fish stocks. (#387)
 - Commercial takes not affected. (#478)

Potential for Research

- If these areas were studied in depth we might learn more about kelp forests in other areas. (#33)
- More research required. (#625, 2677, 2678, 2679)

Tourism

- More protection needed to ensure tourism. (#74, 554, 622)

Fishing Methods / Limits

- Recreational bag limits should be reduced. (#12, 265, 387)
- Only relates to cutting of kelp. (#251)
- No harm done if harvested from shore / beaches. (#316)
- Support a managed fishery with a reduced recreational quota. A closed season should be considered. (#82)
- Should not be mechanically harvested. (#1102)

Weather / Safety

- More safety for small boats. (#50)
- I would submit (as one who has owned and operated a 7m boat for a number of years in the past) that keeping an eye on the weather is key to good boatmanship, and, if the marine forecast looks less than favourable, one should not be putting to sea in the first place. (#65)

Customary Rights

- Would have a manageable impact on customary fishing rights and interests. (#2454)

Other

- Is an innovative idea. (#2494)
- Important for greenhouse gas mitigation. (#433)
- Should be marine reserve. (#1961)
- Could be protected by other means. (local laws). (#595)

- No effect on current users. (#580)
- Cultural values. (#576)
- Support as an additional tool. (#145)
- Support as a Type 2 reserve. (#89, 375)
- More protection required. (#5, 554)
- Would not affect too many people. (#217)
- Important for erosion protection. (#285)
- Needs inclusion to satisfy network principle. (#239)
- Protect at all costs. (#396)
- Important to protect kelp forests. (#341, 583, 647)
- Protect for future generations. (#347)
- Better monitoring of discharges to the sea required. (#387)

10.24.2 Opposition to Site T

²⁹⁸. Submitters opposed to Site T made the following comments.

Recreation

- Great area to teach children snorkelling and a good area for spearfishing. (#553)
- Impacts on recreational fishing. (#174, 199)

Commercial

- This is politically motivated and at the expense of the KBB3G Quota holders. KBB3G was brought into the QMS and the quota was set at very low levels to allow the development of this stock. This is one of the fastest growing seaweeds and can grow up to 50 metres per year so very sustainable. When fully developed this industry could be worth hundreds of millions of dollars to the New Zealand economy which will create a large number of jobs. (#374)
- Very productive commercial pāua habitat. (#2505)
- Oppose as coastline is used by rock fishermen and pāua fishermen not kelp harvesters. (#174)
- The proposed MPA is inconsistent with MPA Policy. The proposal does not meet the protection standard and is therefore not an MPA under the MPA Policy and a representative example of kelp habitat is protected in proposed MPA (D), comprising

over 36% of the identified area of *Macrocystis* beds in the region. Protecting additional kelp habitat cannot be justified under the MPA Policy. Aside from a general intent to restrict the ability to commercially harvest kelp, the specific controls that would apply in order to protect the kelp habitat have not been identified, hindering any assessment of the proposal's value for biodiversity protection or impacts on other uses and values. (#2467)

- The proposed MPA is inconsistent with industry policy on marine biodiversity protection – the protection of the entire spatial extent of the kelp habitat is not justified and kelp harvesting is identified as a threat but there is no current harvesting of kelp in the area and it is not a least cost approach. (#2467)
- Significant impacts on exercise of commercial harvest rights for kelp. (#2467)

Supporting Evidence

- Would like to see data on depletion/degradation of these areas and the surrounding ocean before removing public access. This includes evidence that marine reserves work. (#40, 382, 634, 742)

Weather / Safety

- Will force fishermen out into dangerous waters. (#199, 382)

Social

- Social impacts on families / community. (#382)

Customary Rights

- This is a direct violation of the Treaty of Waitangi which should be stopped on all fronts. If these go ahead compensation should be paid to all quota holders on a "willing buyer willing seller" basis. (#374)
- I oppose all of these reserves from Waipapa to Timaru on the grounds that it is taking away Kāi Tahu customary rights which have been settled under the Treaty of Waitangi. (#634)
- The proposal takes away Kāi Tahu customary rights under the Treaty of Waitangi. (#742)

Other

- Not within the scope intended for this Forum. (#66)
- Strongly oppose any restrictions in this area. (#168, 220, 221, 1258)
- No restrictions. (#219)
- Diverts attention from political responsibilities for environmental monitoring. (#382)

10.24.3 Recommended Changes to Site T

²⁹⁹. Submitters opposed to Site T made the following comments.

Greater Protection

- Could look at reducing take limits for fish. (#167)
- Upgrade to a marine reserve. (#702, 1897)
- Full restrictions on commercial kelp harvest. (#737, 1897, 2472, 2486)
- New category of protected area is required. (#1894)
- This habitat should be better represented. (#1894, 2676)
- Support Type 2 for this area. (#600)

Less Protection

- Harvesting of invasive kelp species e.g. *Undaria* could still be allowed. (#737)

Other

- The boundary of the Kelp Forests is incorrectly drawn. It is shown as extending south of the entrance of Otago Harbour whereas there are no kelp forests south of the Kelp Forest at Heyward Point. The location of kelp forests is set out in the attached statement. The boundaries of the Kelp Forests should be in accordance with the locations attached. (#716)
- I suggest that the same provision for the protection of kelp forest habitat be implemented, not only in the area delineated by area T, but throughout the entire south eastern area from Timaru to Slope Point. These provisions should include the mentioned restrictions on the direct harvest of freestanding kelp forests as well as the restriction of all commercial or recreational fishing practises that may damage kelp forest. This should include all forms of trawling, set-netting, and dredging. These restrictions should be applied to existing kelp forests throughout the Forums jurisdiction. Further, I suggest the commissioning of scientific research to establish the probable locations of historical kelp forests. Fisheries restrictions should be established at these locations also. One of the most substantial threats to kelp forest communities along the Forums area is the impact of sedimentation from terrestrial runoff. Whilst I realise controlling the level of sedimentation to the coastal environment is beyond the scope of the Forum, I suggest the Forum develops working relationships with agencies such as regional councils and federated farmers to begin to address this issue. (#625)
- Minimal change could be implemented by mutual agreement. (#22)
- Should be open to public only. (#313)

- Could create new habitat to support regeneration e.g. dropping rocks, concrete structures. (#421)

10.24.4 Ngāi Tahu, Manawhenua and Tangata Whenua Submissions

300. Ngāi Tahu, Manawhenua and Tangata Whenua submissions for Site T included the following comments:

- Support in principle (with boundary changes). Manageable impact on customary commercial fishing rights and interests with boundary changes (area reduced to include the nationally and internationally significant kelp forests from Warrington to Kakanui to include the East Otago Taiāpure area). (#612, 2887)
- Oppose on basis of loss of customary rights. (#742)
- Manageable impact on customary commercial fishing rights and interests. Macrocystis is a habitat of particular significance for customary fisheries and fisheries management generally. (#2887)
- Closure area is to include East Otago Taiāpure area. (#2465)
- If the New Marine Protected Areas Act were to be established we would propose a 'Seabed Reserve' as described in the New Marine Protected Areas Act Consultation Document released by the Ministry for the Environment in January 2016. (#2887)

10.24.5 Additional comments

301. Other comments provided are:

- Submission (#2485) only covered Area T. The submitter opposes the area being given protection. The submitter questions why the only scientific paper referenced by the Forum was Geange and presents other research, the High Court case against the Ministry of Fisheries that resulted in Giant kelp being brought into the QMS system and there is potential for using Giant kelp.

10.24.6 Technical Information and Mapping

302. Information was provided by a number of submitters in relation to:

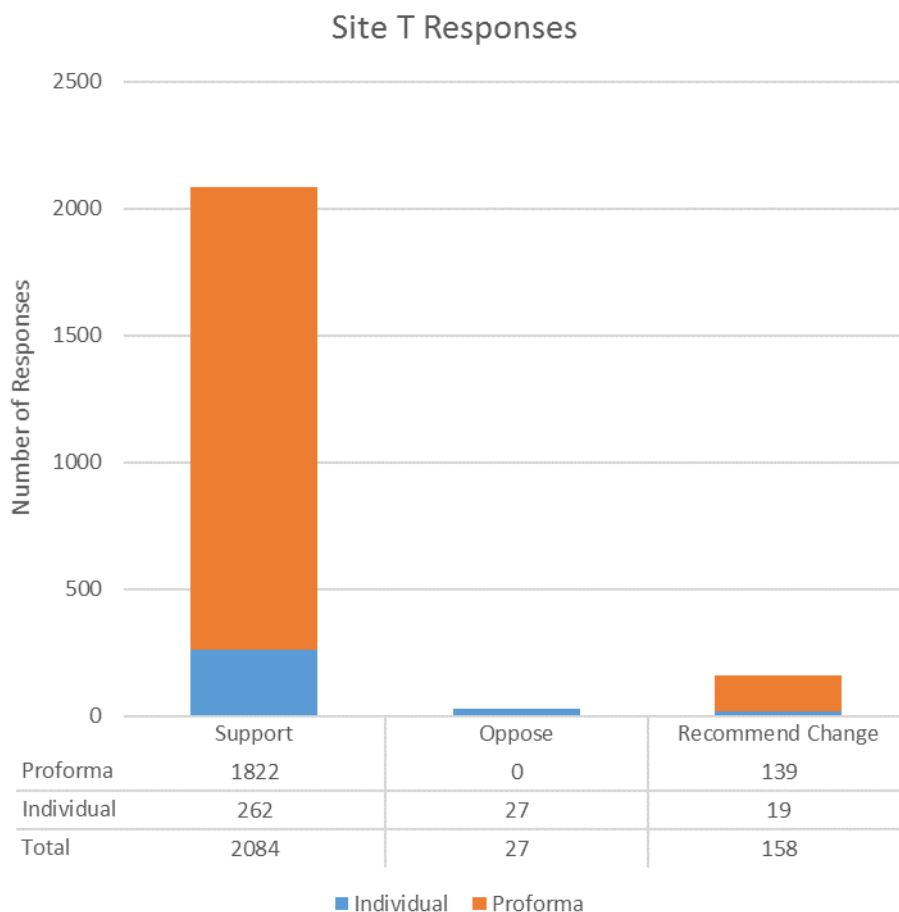
- Cited References. (#622, 716, 1897, 2454, 2501, 2671)
- Commercial Fishing Information. (#374, 2467, 2485)

303. Refer to Appendix 26 for further information.

304. Submitter maps showing changes for this site are located in Appendix 23.

10.24.7 Submission Numbers

305. The chart below illustrates the position of submitters in relation to the site, and the number of individual and proforma submissions.



10.24.8 Responses to focus questions from the consultation document Volume 1

a. What sort of protection over kelp forest habitat do you think is appropriate?

Few submitters provided comment on the type of protection that should be provided. Those that did comment (other than no protection) stated that the protection should be:

- Type 2
- Exclude commercial harvesting
- *I believe that there should be a ban on cutting all attached habitat-forming kelp species (e.g. Durvillaea, Ecklonia, Macrocystis, Marginariella and Lessonia). Failing this, at a minimum, I believe that there should be a ban on the commercial harvest of Macrocystis pyrifera. (#622)*

**b. How would this proposal affect your current or future use of the area?
How would this proposal affect you?**

The only comments on how the proposal would affect use/people was from those with a commercial interest.

c. Do you support this area going forward as a part of the south-east marine protected areas network? Why? Why not?

See Support and Oppose comments.

d. If you do not support it in its current form, are you able to suggest alternatives to the proposal that would make it more acceptable, such as changes to its location, size and boundaries?

See Recommended Changes comments.

11 Submissions seeking Additional or Alternative Marine Protected Areas

306. A number of additional sites were suggested by submitters. These sites are listed in the table below with the suggested type of MPA and the reason or evidence why this area should be included as an MPA.
307. The most commonly suggested sites for marine protection were Shag Point, The Nuggets, Nugget Point and The Brothers Point and The Sisters in the Catlins. Reasons included the ease of access, the importance for marine biodiversity and the habitat at these locations.
308. There were also some general comments about what was lacking in the proposed MPAs. These comments are below the table. They have been ordered north to south in line with how the consultation document was set out, noting some of the proposals were general (e.g. more estuaries) or referred to sites that are not easily identifiable in terms of place names (e.g. Hay Paddock).

Area	Type of MPA	Reason/Evidence	Submitter
A Marine Mammal Sanctuary from Timaru to Waipapa Point, out to 12 NM offshore, including harbours.		It is needed more ecosystem-focused protection for higher level predators like dolphins, whales and seabirds as well as fish and shellfish. The Marine Mammal Sanctuary will provide much needed connectivity for marine mammal and seabird populations. Fishing methods that kill marine Mammal (gillnets and trawling) and exploration for oil and gas using air guns (seismic surveys) should be banned.	(#678, 2678)
Northern offshore area, between Kakanui and Oamaru	Type 2	<i>"...where there are unusual concentrations of sea tulips and tubeworms, and foraging areas for Hector's dolphins and little blue penguins."</i> <i>"A large Type 2 MPA with no set netting would protect these values"</i>	(#20, 577, 1894)
Cape Wanbrow		<i>"I would like to see the area off Cape Wanbrow included as a reserve as this is an important tourist area with the little blue penguins and Yellow-eyes."</i>	(#426)
Moeraki Point To Katiki Point		Over fishing in this area. Katiki Point is the only mainland breeding site for broad-billed prions and white faced storm petrels. They also have large Yellow-eyed penguin, common diving petrel and sooty shearwater colonies. Otago	(#719, 661)

Area	Type of MPA	Reason/Evidence	Submitter
Katiki Beach		protection should include iconic sites for public recreation, such as the Nuggets and Katiki Beach.	(#647)
Katiki Point	Type 1 (#477)	<p>Important for marine biodiversity, specifically for Yellow-eyed penguins but also the overall marine ecosystems that they represent and should be included as Type 1 marine reserves.</p> <p>Yellow-eyed penguin habitat.</p> <p>There does not seem to be an alignment with land based activities, in particular, with areas of penguin habitat restoration.</p>	(#477, 2131, 2844)
Shag Point		Ease of accessibility and diverse habitats for a variety of fish, crayfish, as well as seabirds. It would complement the Pleasant River to Stony Creek (Type 1) proposal and also be much more accessible to the general public.	(#433, 394, 1894, 2487)
Shag Point and the Nuggets		<p>There is no rational ecological/scientific reason why these important areas are excluded from this consultation document.</p> <p>Areas of outstanding beauty and areas with great conditions for a diversity of marine life. They are also some of the few areas where our endangered Yellow-eyed penguins can be seen.</p> <p>These areas are a couple of the most easily accessible areas in the region with diverse habitats for species that recreational divers and snorkelers and rock poolers like to see.</p> <p>The Forum has declined to include either Nugget point or Shag Point in the protected areas. I hope that this decision may be reconsidered in future years. With the closure to various types of fishing in nearby areas, fishers are likely to put even greater pressure on these two areas.</p>	(#20, 65, 157, 180, 205, 213, 351, 383, 552, 608, 642, 657, 728, 736, 1062, 1628 (Fish Forever Proforma x 141), 1897, 2482, 2492, 2510, 2504, 2510, 2676, 2844, 2885, 2658)
Shag Point Beach to North Coast		None of the proposals provide for safe visits where people can park the car and go and see protected marine life.	#394
Shag Point to Waianakarua River		Disappointed that an area between Shag Point and Waianakarua River has not been proposed for protection. Having grown up in Moeraki and fished there both commercially and recreationally, I have witnessed first hand the insidious decline in the abundance of key species like Blue cod and pāua.	#2729

Area	Type of MPA	Reason/Evidence	Submitter
		Moreover, the fishery in this area is immensely valuable to endangered species (e.g. Yellow-eyed penguins), Maori, and commercial and recreational fishers. Thus, it seems critically important to create an MPA in this area as a tool to restore and enhance the surrounding fishery.	
Karitane		Easily accessed. Had public support in the past. Overfishing in this area.	(#394, 433, 657, 661, 1642, 2487, 2658)
Mapoutahi		Want easily accessed MPAs	(#394, 433)
Orokauni Ecosanctuary included with Warrington and Purakanui covered.		As at the moment, the Kaimoana these areas are under huge pressure and are on the verge of collapse	(#1776)
North west side of Otago harbour from in front of the old Pilots houses to the north of the Blueskin estuary, taken in the mole, Aramoana surf break and the old pa headland.	Type 2	These sites provide excellent shallow water diving and snorkelling, are protected to the south and provide excellent visibility for most wind directions except from the Eastern quarter when the south coast opens up. This area would not affect fishing as very little fishing is carried out apart from some spear fishing, shellfish gathering and rock fishing. Some commercial fishing is carried out but this could continue under a type 2 area with restrictions. This area has some wonderful diving at an entry level; it is also very safe unless a large swell are in play. Shellfish harvesting could still take place at a reduced level along the coast.	(#690)
Heywood Point to Blueskin Bay		See grass habitat that is not represented in other sites. Nursery and rearing ground for flat fish and sprat has been found to have more larvae present than in the midshelf waters off Otago Peninsula.	(#2494)
Hay Paddock		The proposed network does not represent the unique biogenic habitats and associated biodiversity inshore of the Hay Paddock, where abundant sponges, coralline algae and bryozoans provide habitat for blue cod, leather jacket, orange	(#2494)

Area	Type of MPA	Reason/Evidence	Submitter
		wrasse, southern pigfish, brittle stars and sea cucumbers.	
The Aramoana spit should be turned onto a reserve.		It already is a voluntary one so why not make it actual. This spot is easily accessible and has great fish life and interesting terrain to swim around within, including shipwrecks.	(#157)
The Mole		<p>Unofficial reserve, why not formalise it.</p> <p>We understand that formal protection is not likely at either site. However, we suggest that even informal status with voluntary observance might be implemented somehow.</p> <p>Divers at the Mole used to have a voluntary no-take understanding, and we hear this may be revived – it would be great if SEMPAF can encourage this.</p>	(#425, 433, 2487)
Taiaroa Head		Understand that formal protection is not likely at either site. However, we suggest that even informal status with voluntary observance might be implemented somehow.	(#150, 425)
Taiaroa Head to Cape Saunders		<p>For the area around Taiaroa Head and down to Cape Saunders, we suggest that Otakou rununga, DoC, and SEMPAF discuss means of protection – e.g. if iwi can take a lead role, or ways of conveying to the public just how special the area is, how it has been fished heavily because it's so accessible, and how it would be good if at least some of it can be a voluntary no-take or a specially limited take</p> <p>Captures a significant portion of habitat for our unique wildlife would provide another valuable link in the network as well as going some way to protect the future of wildlife on the Peninsula. Habitats of the Hector's dolphin should also be given as much effective protection as possible.</p> <p>This is to allow the wildlife in the area to regenerate and breed with plentiful supply of fish stock.</p>	(#425, 721, 2857)
Wellers Rock		Another good accessible area for the general public. A marine reserve needs to be able to be enjoyed by all, not just blocking off some areas because we need to create some reserves.	(#157)

Area	Type of MPA	Reason/Evidence	Submitter
Consider some of the unmodified rocky shoreline in Otago Harbour		The mission of the NZMSC is to foster understanding and appreciation of New Zealand's unique marine environment and responsibility towards its conservation through community engagement and education. To do this we spend a lot of our time exploring local seashores with schools and the wider community and the local shores never fail to amaze and intrigue visitors young and old. I was intrigued that public access or education was never once mentioned as a reason why a site was proposed..... I suggest the Forum consider some the areas of unmodified rocky shoreline in Otago Harbour as additional sites to including in their proposal.	(#759)
Papanui Inlet		Culturally important site.	(#351)
Cape Saunders		None given	(#1667)
Green Island to Taieri Island		Taieri Island should have a 500m no take protected status applied. (#324)	(#2510)
Bull Creek to Clutha River		I feel like the Akatore Coastal site has not been looked at properly and one of the main reasons it is there is because it doesn't have larger communities against it like Bull Creek for example. Bull Creek has much the same intertidal reef as Akatore and with more reefs offshore. Why has it not been an option?	(#2510)
Clutha River		Is the biggest river, long volume in the country and important in terms of ecosystems.	(#1062)
Catlins Area		The whole Catlins area is underrepresented - the small protected area at Long Point could be hugely strengthened.	(#2844)
Between Catlins and Nugget Point	Type 2	Location of NZ sealions on land has been shown to be an accurate proxy of their foraging at sea. This location is one of the most important mainland NZ sea lion breeding areas outside of Otago Peninsula. Refer to original submission from submitter.	(#2473)
Nuggets	Type 2 MPA (#419) Type 1 that	We are really disappointed to see the beautiful and iconic Nuggets not included in this proposal A major disappointment for conservationists was the discovery that not only is no marine reserve proposed for the Nuggets; it won't even get Type 2	(#49, 95, 107, 129, 150, 159, 186, 212, 248, 258, 349, 355,

Area	Type of MPA	Reason/Evidence	Submitter
	extends .. from the shoreline to way around the Nuggets. And from the shoreline way around and within the Otago Peninsula. ” (#608)	<p>protection. ... astounded to observe a fishing boat pulling up a net within a few hundred metres of where some of the world’s rarest penguins were coming ashore.</p> <p>I have not commented on customary use and mana whenua values as this is not my place. But I am sure that there are ways to work together to ensure that the marine environment remains healthy and sustainable.</p> <p>It is easily accessible.</p> <p>A major tourist attraction.</p> <p>All these sites are important for marine biodiversity, specifically for Yellow-eyed penguins but also the overall marine ecosystems that they represent and should be included as Type 1 marine reserves.</p> <p>Seems to me that several of your proposed areas for MPAs have scientific and factual statements which equally apply to The Nuggets.</p> <p>Nugget Point should have a 500m no take protected status applied.</p>	378, 419, 433, 477, 478, 608, 647, 657, 661, 682, 696, 698, 719, 728, 1062, 1471, 1482 (Forest and Bird Proforma x 1084), 1894, 2497, 2507, 2667, 2681, 2682)
Campbells Reef to Nuggets		Look at the idea of Campbells Reef to Nuggets as that is a gemstone that makes total sense and is so logical. Full public access good road, most shelter along the coast from prevailing swells and winds reef sand vegetation etc. I’ve measured the fish that are caught here and they are often just legal so not a major impact on rec. The benefits to local economy would be huge.	(#706)
Cannibal Bay to south side of Campbells Reef which includes Nugget Point and Roaring Bay		It has existing eco-tourism, roading and infrastructure (toilets, car parks). And would be a good boost for the local economy at Kaka Point.	(#446)
Te Rere in the Catlins	Type 1	Important for marine biodiversity, specifically for Yellow-eyed penguins but also the overall marine ecosystems that they represent and should be included as Type 1 marine reserves.	(#477, 736, 678, 1894, 2844)

Area	Type of MPA	Reason/Evidence	Submitter
		<p>Is a nationally important breeding site for endangered Yellow-eyed penguins and an offshore marine reserve would provide protection for the local birds within their foraging grounds.</p> <p>There does not seem to be an alignment with land based activities, in particular, with areas of penguin habitat restoration.</p> <p>The proposals do not represent any deep gravel habitats, or deep reef habitat within a high current area.</p>	
Porpoise Bay, Waikawa		High density area for Hector's dolphin and protection could link nicely with the Catlins Coast Marine Mammal Sanctuary.	(#1897)
Curio Bay		<p>Curio Bay is the home of both the Yellow-eyed penguin and Hector's Dolphin. A reserve here needs to extend at least 12 NM offshore to protect the foraging range of the Yellow-eyed penguin. It appears that there is evidence that the disease causing the decline of Yellow-eyed penguin numbers can be attributed to poor diet, which is most probably caused by over fishing.</p> <p>Contains a range of marine habitats and so will assist to overcome the lack of diversity proposed for protection in the Catlins.</p> <p>Regionally important for marine wildlife and for tourism.</p>	(#150, 159, 1662, 2667, 2681, 2682)
Between The Brothers and The Sisters in the Catlins areas		<p>To give representation of deep subtidal gravel habitats within the area of highest current speed inside the Forum's boundaries. This habitat type is not represented in the proposed MPA network. A reserve here would also represent Yellow-eyed penguin foraging habitats associated with Forest & Bird's Te Rere Yellow-eyed penguin reserve.</p> <p>This reserve should be from the coast offshore to 12 NM to give representation of deep, sub-tidal gravel habitats within the area of highest current speed inside the Forum's boundaries. This habitat type is not represented in the proposed MPA network. A reserve here would also represent Yellow-eyed penguin foraging habitats associated with Forest & Bird's Te Rere Yellow-eyed penguin reserve.</p>	<p>(#728, 1482 (Forest and Bird Proforma x 1084))</p> <p>From the coast to 12 NM (# 678, 719, 728 752, 1270, 1271, 1272, 1273, 1482 (Forest and Bird Proforma x 1084), 1681, 1897, 2281,</p>

Area	Type of MPA	Reason/Evidence	Submitter
			2494, 2667, 2681, 2682, 2686, 2692)
Increase the areas of fully protected areas		<p>The proposed critical mass is significantly less than that recognised by international scientific consensus. Ideally what is proposed is stage 1 of a number of future stages.</p> <p>Best evidence suggests that all MPAs should be greater than 100 km². Edgar et al. (Nature, 2014) conducted a meta-analysis of 87 of the world's MPAs and found that the conservation benefits increased exponentially with the accumulation of five key features: no take, well enforced, old (greater than 10 yrs), large (greater than 100 km²) and isolated by deep water or sand. With this in mind many of the proposed MPAs are sadly too small and therefore require considerable extensions if they' really to meet their true potential as a tool for maintaining and enhancing the productivity of the surrounding marine environment.</p> <p>We are disappointed that some of the areas are so small and the overall area protected falls significantly below the scientific consensus of 30 % of the ocean needing to be being protected. It is a shame that proposed new law changes within MPI haven't come into effect, yet especially that of recreational fishing parks and seabed reserves which would extend the scope of this Forum.</p>	(#107, 213, 433, 608, 721, 738, 753, 2729)
More estuaries		They are poorly represented in these proposals and should be fully protected as they are important breeding grounds for a variety of fish and feeding areas for shore birds.	(#20)
Estuaries that are DoC reserves		To enable commercial eel fishing to continue.	(#1957)
A fishing reserve extending a full 3 km around entire coastline		Excluding all powered vessels from fishing within the reserve.	(#764)

Area	Type of MPA	Reason/Evidence	Submitter
Waipapa Point Waipapa beach and eastern headlands Black Point		<p>This site containing a range of shore and marine habitats and so will assist to overcome the lack of diversity proposed for protection in the Catlins.</p> <p>This site includes the site of the wreck of the Tararua</p> <p>The site supports a population of sealion.</p> <p>This site will assist to overcome lack of protection options proposed on the open coast in the Catlins.</p>	(#2667, 2681, 2682)
Ruapuke Island		Blue cod stocks depleted.	(#349)
Oreti Beach		Fish stock depletion.	(#2506)
Stewart Island		Blue cod stocks depleted.	(#349)
<p>On Shores that are suitable for snorkelling and connected with larger reserves.</p> <p>For example,</p> <p>Kakanui, Moeraki, Karitane, Warrington, Mapoutahi and Brighton</p>	Type 1	<p>We support the strong recommendation that a number of areas be designated as Type 1 reserves on shores that are suitable for snorkelling – preferably connected with larger reserves. Marine biologist and underwater filmmaker Andrew Penniket has pointed out that the proposed marine reserves do not have any place where the reserve is accessible to the general public without a boat. This would mean “immersive” marine education for kids would not be feasible. The SE coasts kelp beds are an incredible biological resource that more people could be encouraged to experience, especially if they could snorkel or dive to see huge blue cod, moki, trumpeter, etc. and abundant large crayfish. On the East Otago coast we suggest Kakanui, Moeraki, Karitane, Warrington, Mapoutahi and Brighton are worth considering, and have made some notes to that effect on Sites D and J. Part of the appeal of Goat Island Marine Reserve north of Auckland is the ability to wade, swim, snorkel and scuba-dive amongst schools of big fish – making the value of such reserves immediately obvious to even casual visitors.</p>	(#425)

309. Submitters also provided comments about what was lacking in the proposed sites for marine protection, these comments are separated under the following topic headings:

Habitat

310. Some of our inlets, estuaries and harbour ecosystems remain unprotected and would be worthy & accessible examples of southern habitat types. No extensive eelgrass beds are included, for example. (#1062)
311. Submitter (#2494) provides a lengthy discussion regarding adequacy of the protections of habitat types. They also provide in the Appendix to their submission a gap analysis of habitats available and percentage of representation. Please refer to original submission for supporting documentation.

Access

312. None of the proposals provide for safe visits where people can park the car and go and see protected marine life, for example, Shag Point beach and north coast, Karitane, Mapoutahi and the Nuggets. (#394)
313. A number of submitters mentioned considering additional locations which would be more easily accessed by public.

Location of sites

314. Submitter (#585) submitted that there were gaps in MPAs between Shag Point and Otago Peninsula and are not going to adequately protect marine ecology for future generations.
315. Disappointed that no Type 1 MPA extends out to 12 NM. This is the kind of protection that is required to ensure we can really restore and enhance the ecological systems, habitats and species within the region. (#736)
316. Submitter (#197) provided comment on a site that was not identified for marine protection but was pleased Shag Point was left for fishing.

Night Sky Protection

317. Significant concerns about the impact of fishing by squid boats along the south-east coast: squid are an important source of food for penguins, sea lions and other marine mammals; the method of harvesting using intense LED lighting has a negative impact upon pristine night sky of the south-east Coast. Restricting fishing to beyond the 12 NM limit would improve the view of the night sky during squid fishing season. Night sky tourism is a significantly growing industry in the region, which may be threatened by increased light pollution close to shore. (#2484)

12 Next Steps

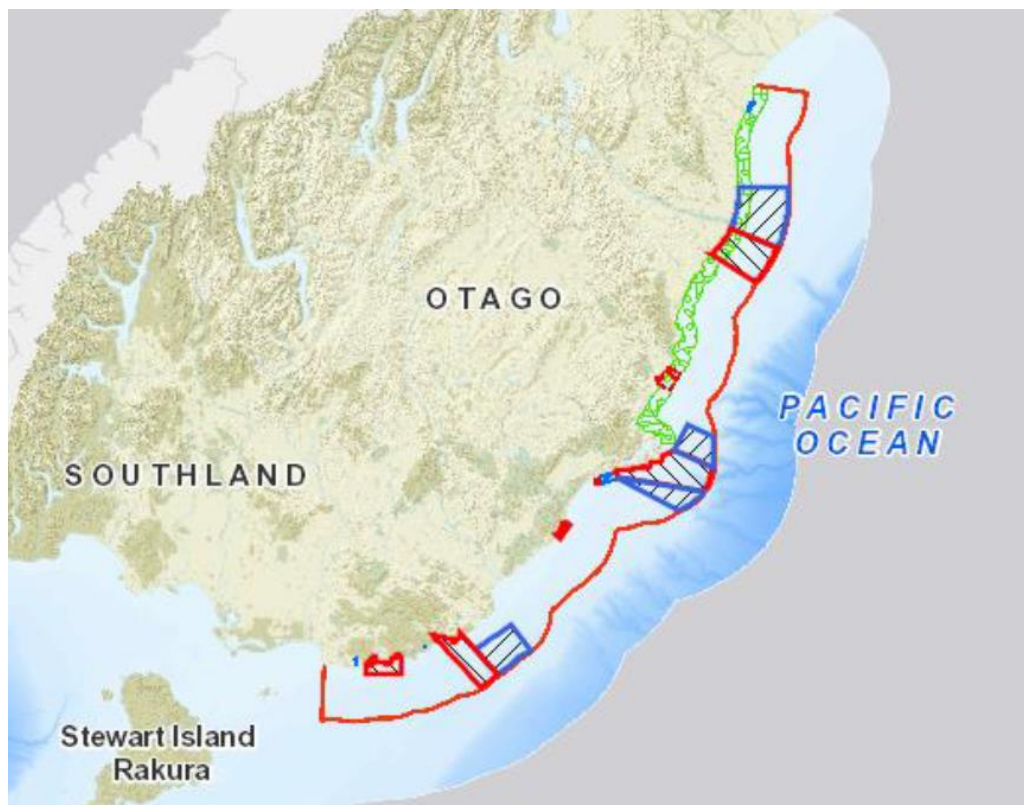
This summary of submissions report will be provided to the South-East Marine Protection Forum to enable the Forum to make final recommendations to the Minister of Conservation and Minister for Primary Industries. The Ministers then decide whether to accept the final recommendations. If accepted the relevant statutory process will then

follow the relevant statutory process for example the Marine Reserves Act 1971, The Fisheries Act 1996 or any other relevant legislation.

Appendix 1: Network Matrix





Count	Creating a Network Options	Site A	Site B	Site C	Site D	Site E	Site F	Site G	Site H	Site I	Site J	Site K	Site L	Site M	Site N	Site O	Site P	Site Q	Site R	Site S	Site T
1888																					
768	A,B,D,G,H,T																				
25	A,B,D,G,H																				
24	A,B,C,D,E,F,G,H,I,J,K,L,M,N,O,P,Q,R,S,T																				
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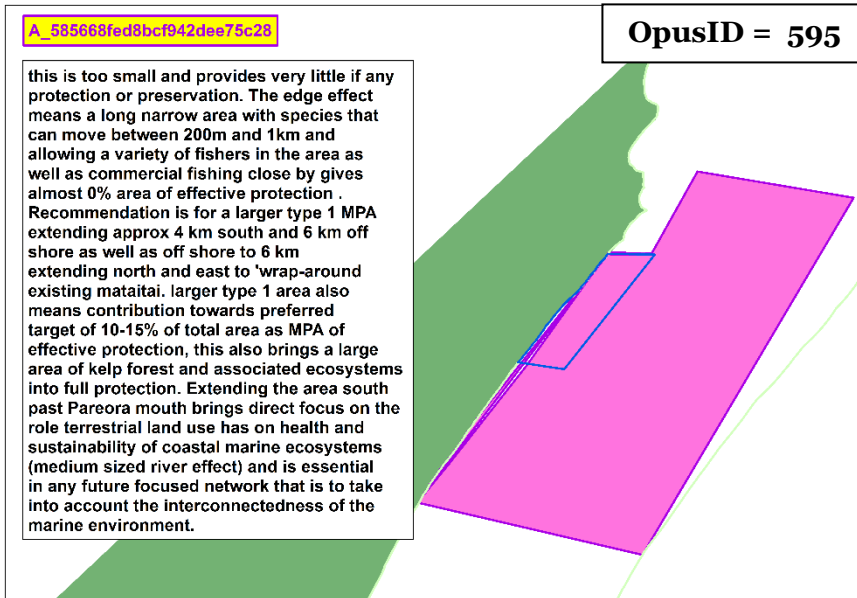
Appendix 2: Submitter maps showing recommended networks

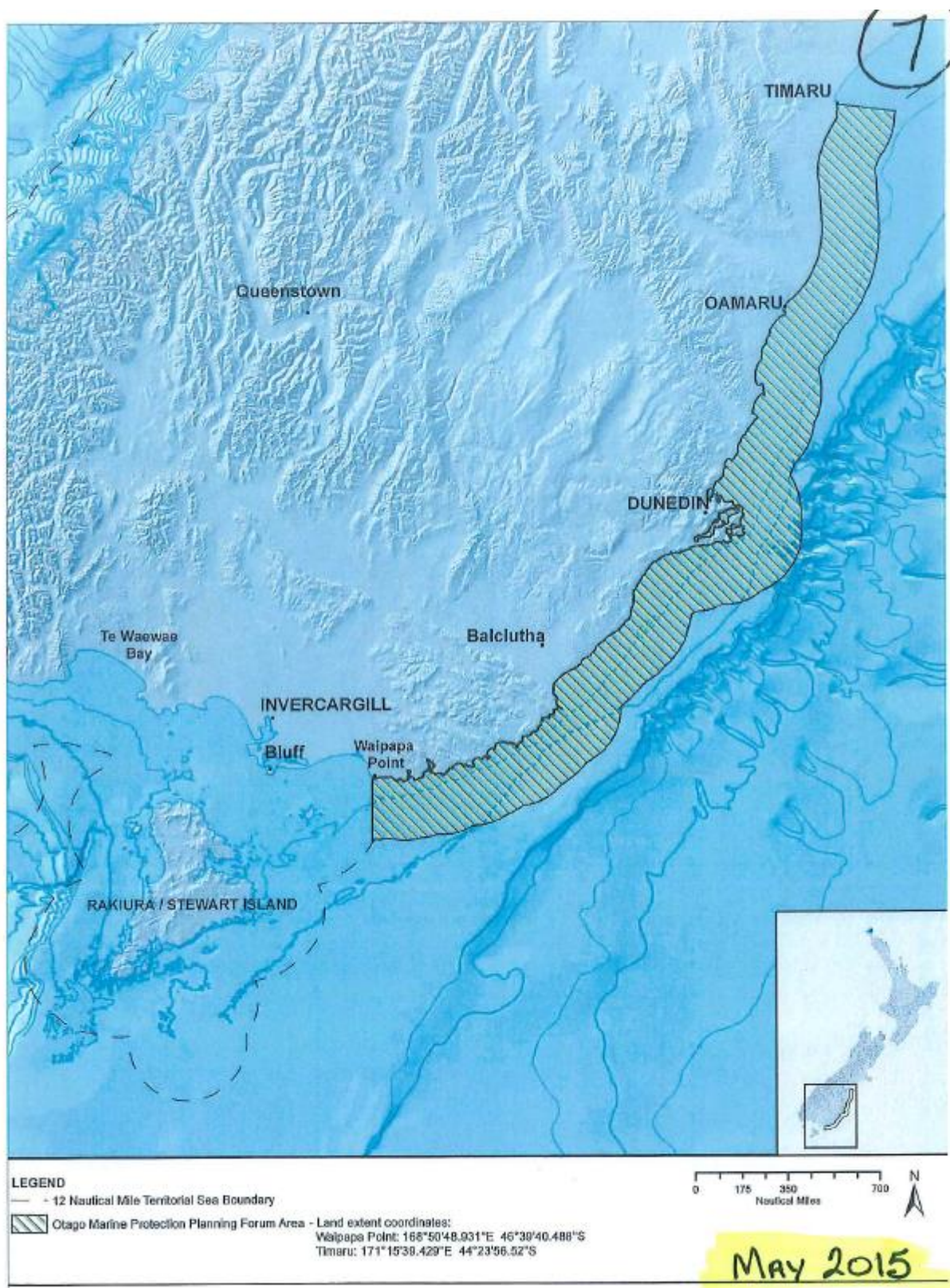


(#1897)

Appendix 3: Submitter maps for Site A - Tuhawaiki to Pareora (Type 2)

Type 1:  Type 2:  Hashed Lines = change to Type 1 removal  type 2 





(#2466)

Proposed Otago Marine Protection Planning Forum Area

(9)

A. TUHAWAIKI TO PAREORA (TYPE 2)



Figure 4: Proposed Type 2 MPA.

Dec 2016

Description

98. This proposed marine protected area is in the north of the Forum's region, near Timaru. It is south of, and abuts, the Tuhawaiki Mātaitai Reserve. It extends 4.4 km (2.4 nm) along shore, and offshore to 1.1 km (0.59 nm), and encompasses approximately 4.4 km².

This MPA would include fisheries restrictions that would prohibit:

- all bottom trawling
- all dredging

99. The fisheries restrictions would not restrict potting or recreational fishing with the possible exception of recreational fishing with lines (including kontiki) of more than five hooks. Danish seining is already prohibited in this area.

Recreational fishing

117. Most recreational fishing would be able to continue under the proposed management of the area. The Forum is however considering asking the Minister for Primary Industries to prohibit the use of lines with more than five hooks, and is requesting public feedback on this suggestion.

(#2466)

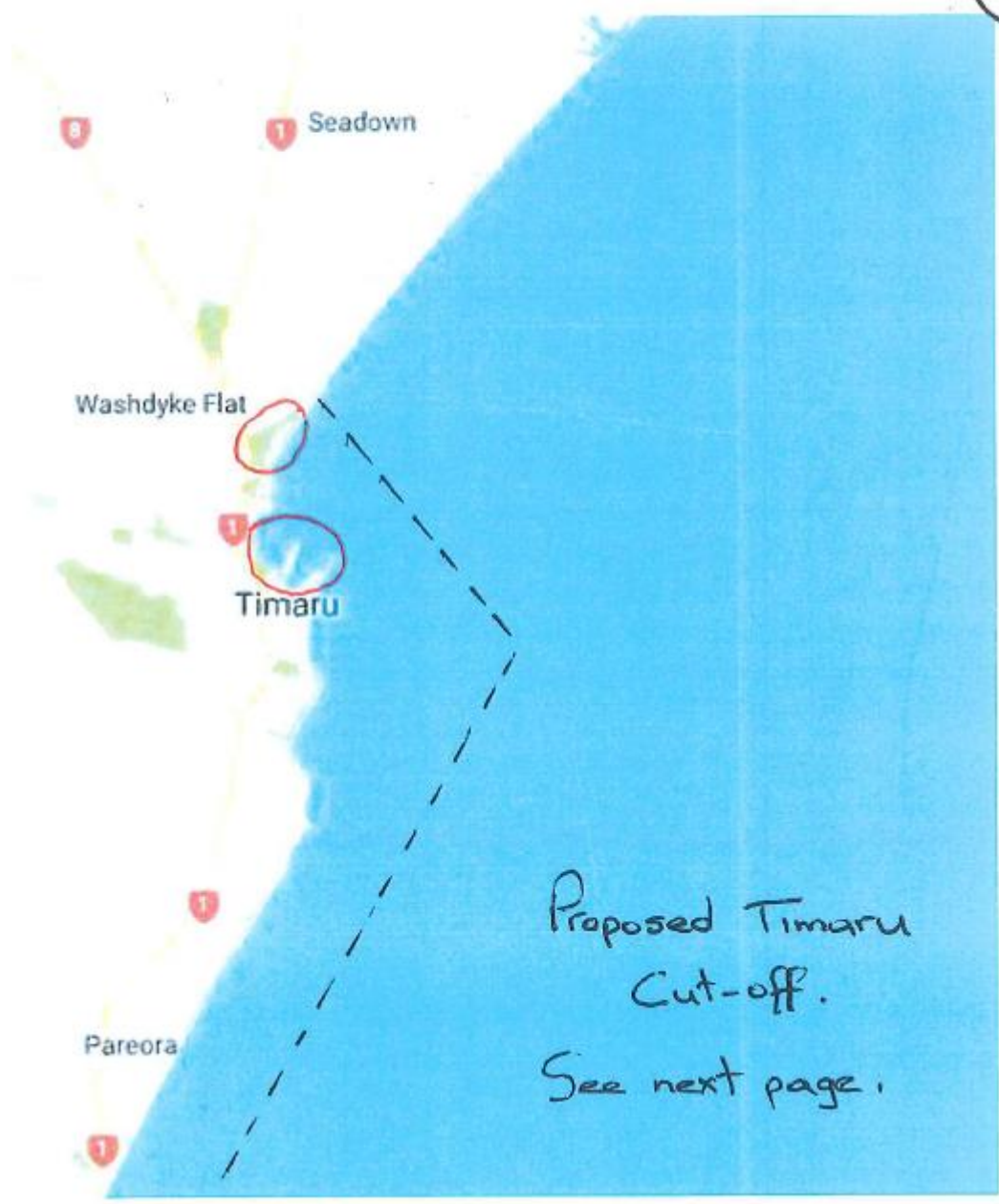
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Figure 7: Proposed MPA boundaries – Tuhawaiki to Pareora.

(#2466)

11

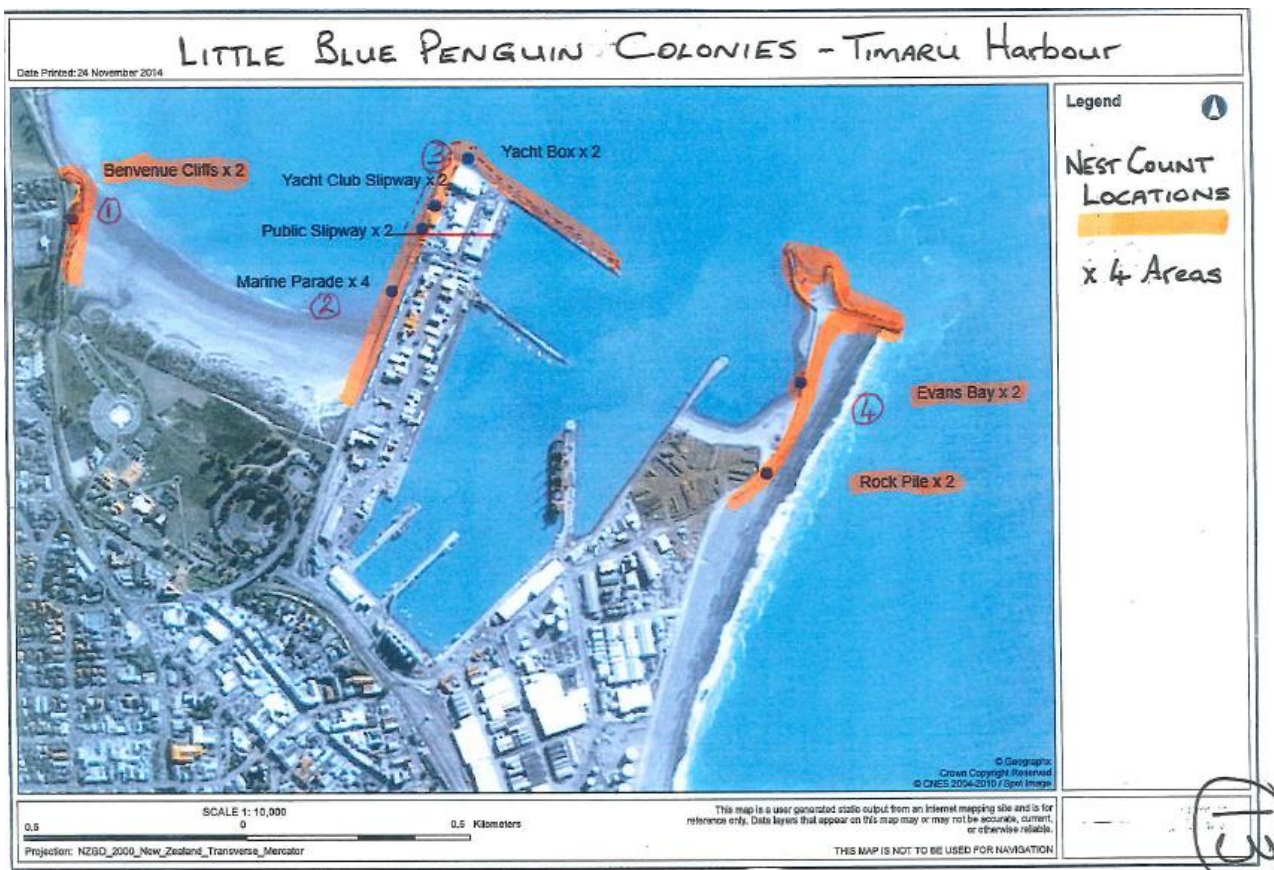


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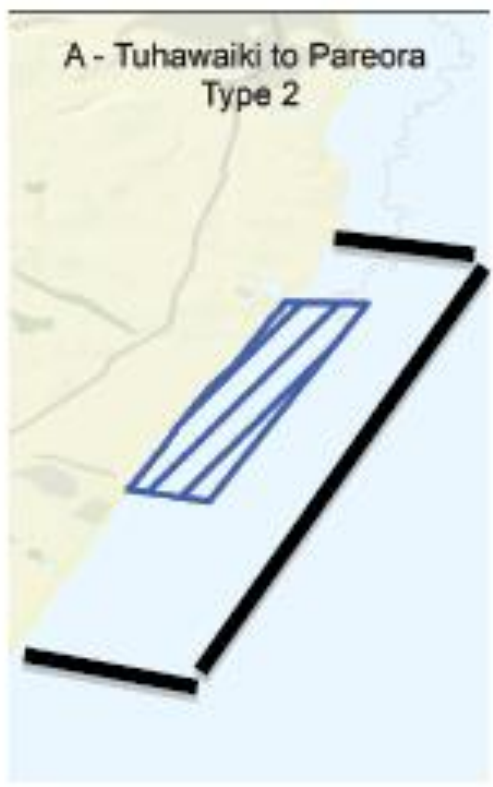
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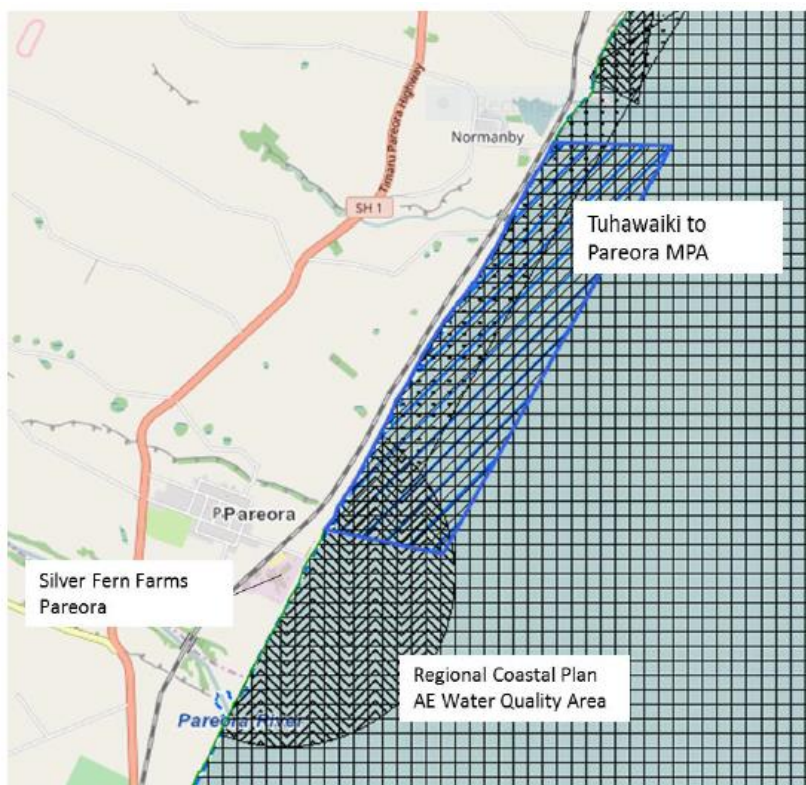
(#2466)



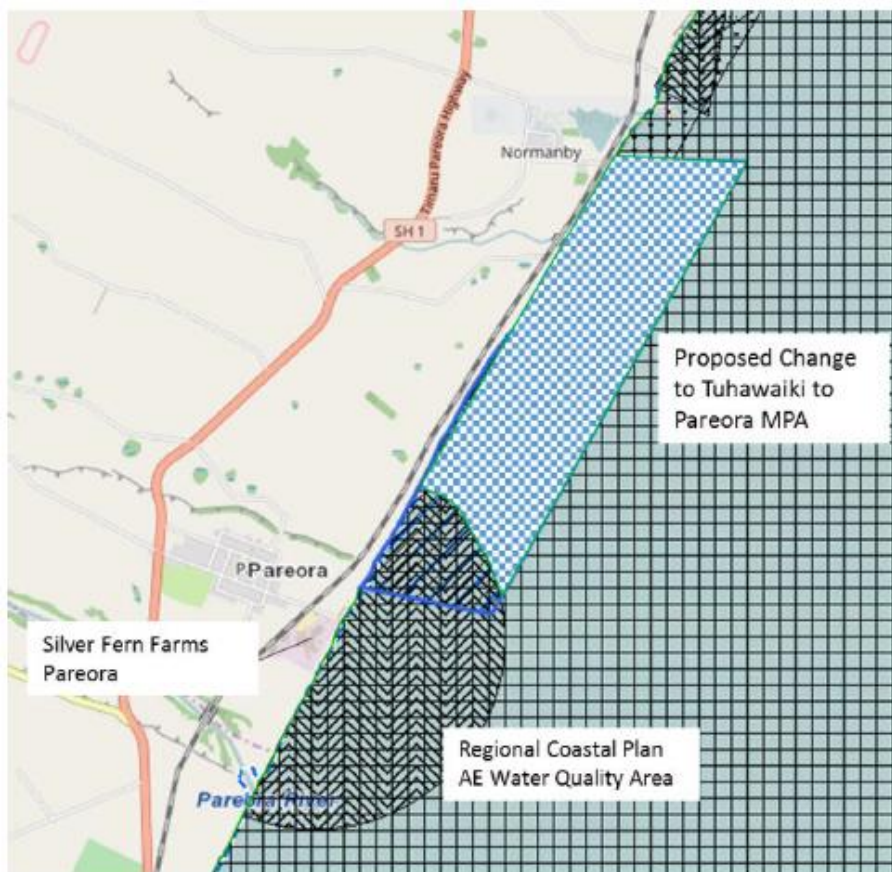
(#2466)



(#2672)







(#2496)



(#2496)

Appendix 4: Submitter maps for Site B - Waitaki Coastal (Type 1)

Type 1:  Type 2:  Hashed Lines = change to Type 1 removal  type 2 



(#172)



(#204) - Exclude dotted area



(#206) - I generally support this proposal (and its extension north) but I recommend extending the boundary south of Waitaki River mouth, further south by about a kilometre. I say this because although more surf casting for salmon occurs close to the river mouth some years when the river runs out to sea pointing to the south (only rarely) the fish can be caught some distance south of the mouth even opposite the car park at end of the kaik Road on Taylors property. Also the position of the river mouth can change considerable from year to year – by as much as 4 kms do not limit surf casting for salmon north of the Waitaki mouth so I do not anticipate any problem on north side. On page 13 on the site map have indicated my suggestion of amended boundary.



(#254)



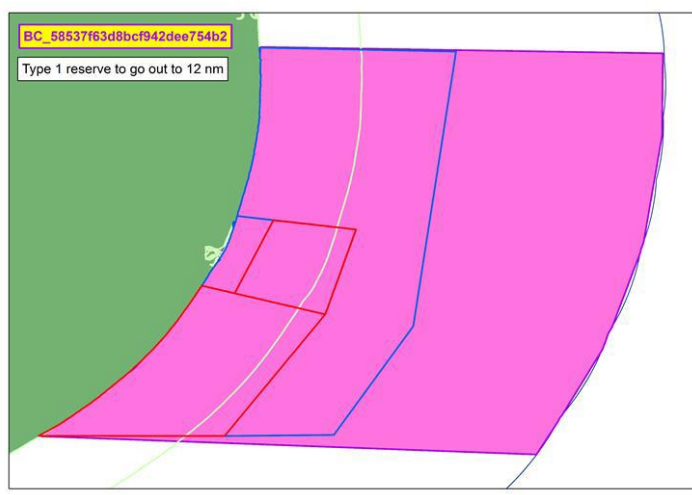
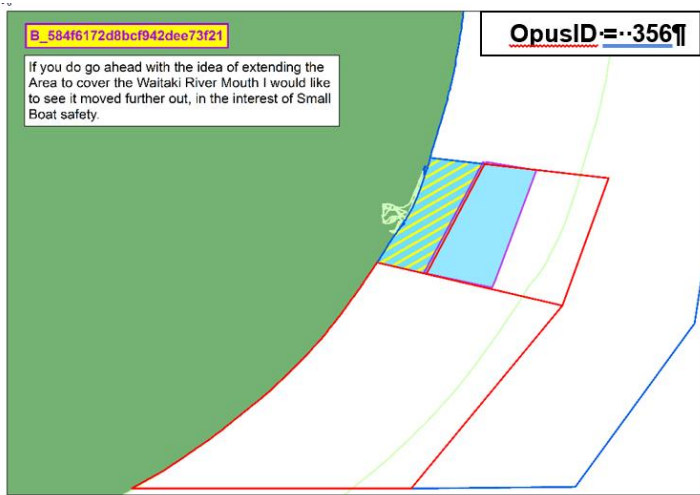
(#271) - I would like to recommend that the reserves start 1/2 nautical mile from the beach to allow surf casting/contiki fishing to be accessible to any fisherman. People and families should be allowed to continue to have the enjoyment of fishing together.



(#327) - I believe area B without the extension would protect kelp habitats and young fish species. It would have any major impact on existing users.



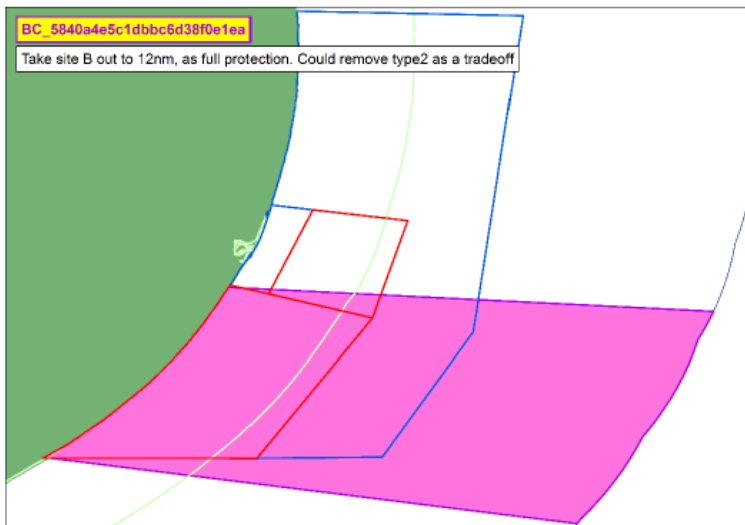
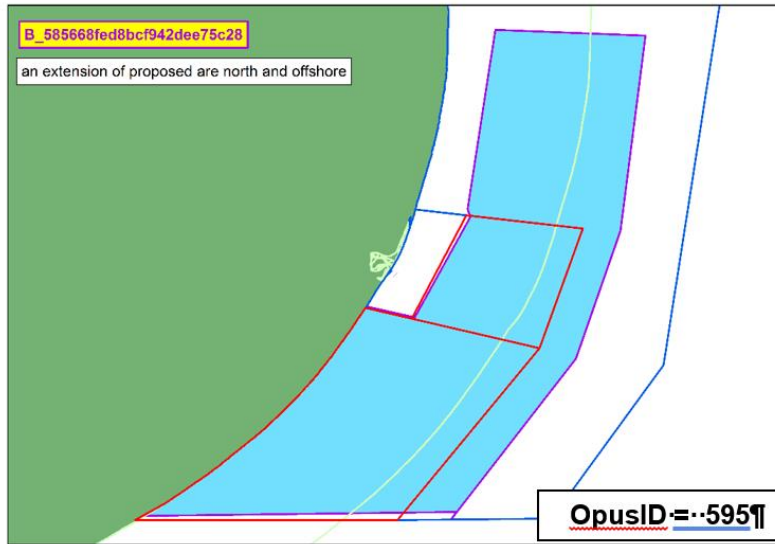
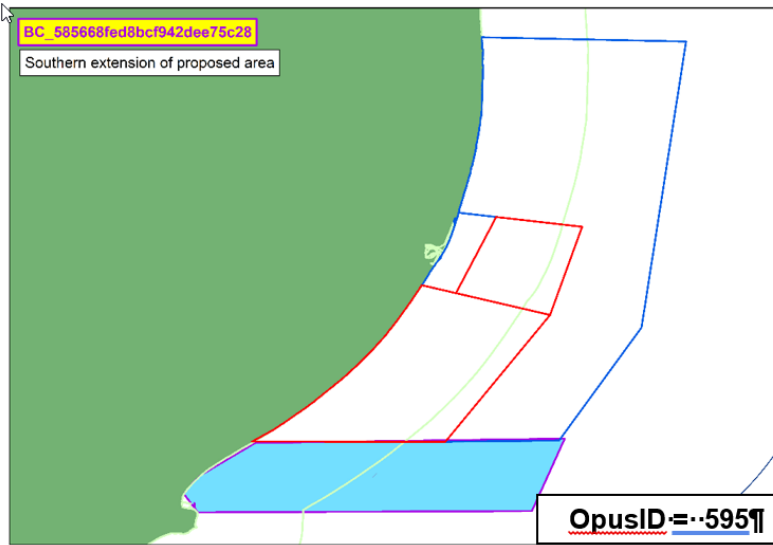
(#345) - Support site 'B' without extension. Would not have significant impacts on existing users.



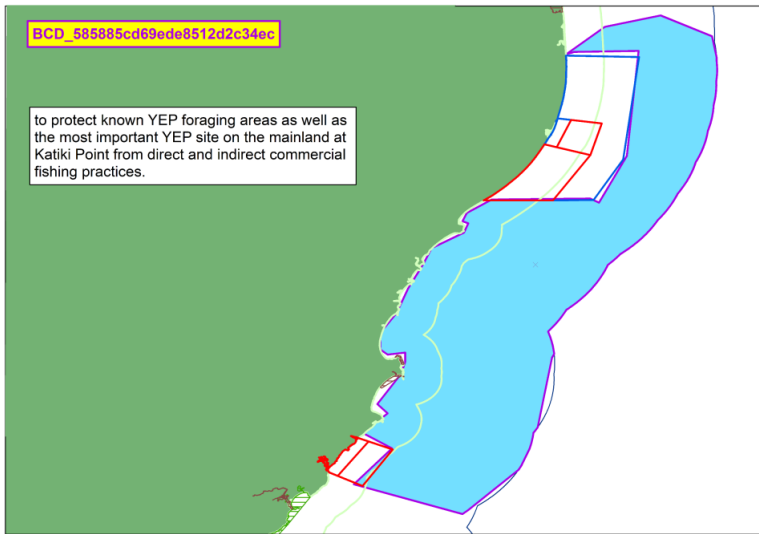
(#426)



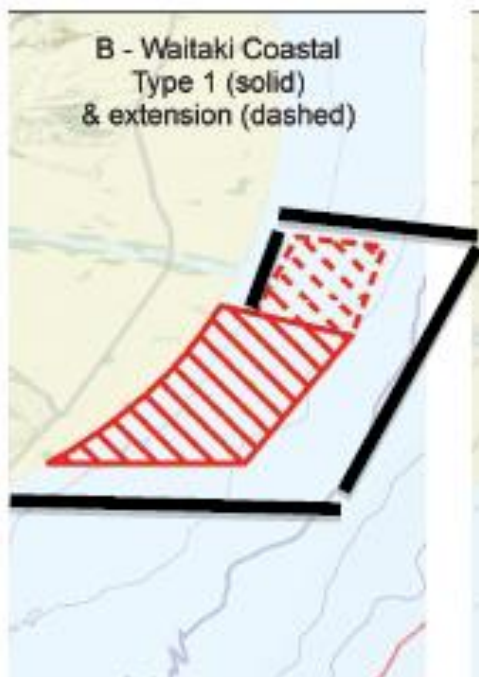
(#460)



(#770)

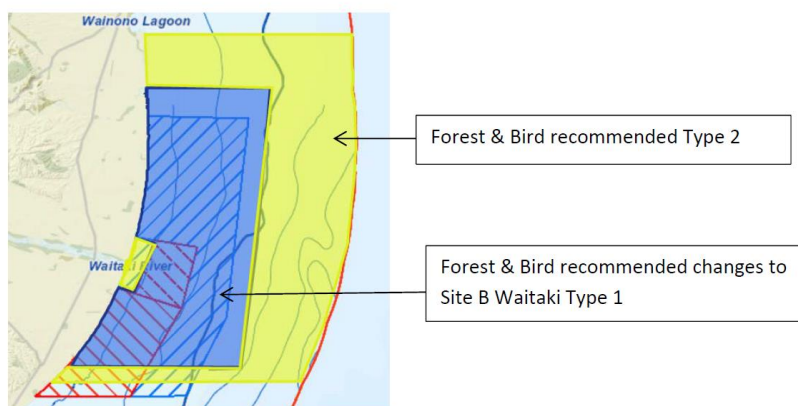


(#734)







(#2672)

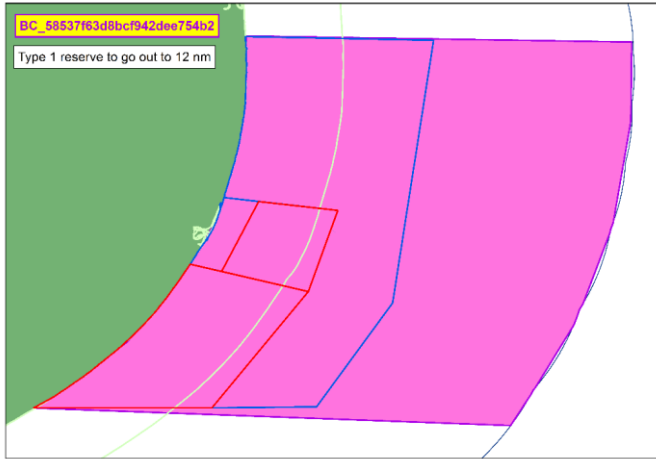
Recommended changes to Site B Waitaki Coastal Type 1 – (blue) and C Waitaki Offshore Type 2



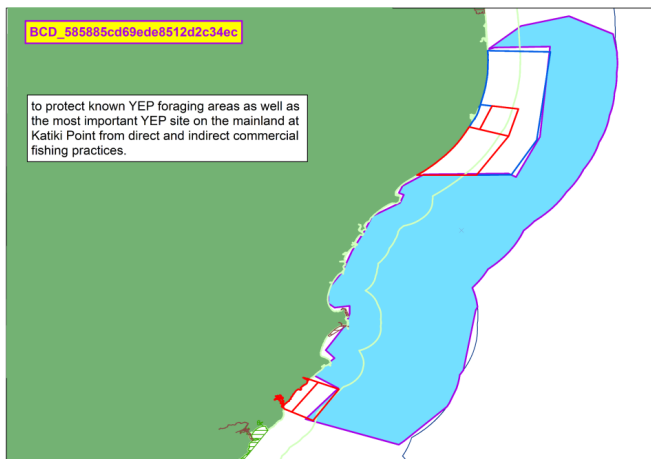
(#2494)

Appendix 5: Submitter maps for Site C - Waitaki Offshore (Type 2)

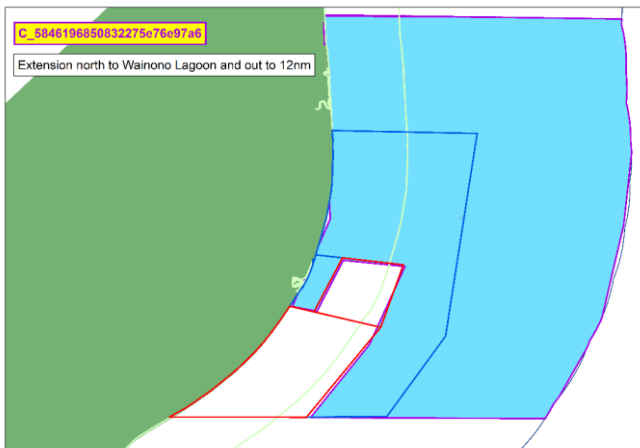
Type 1:  Type 2:  Hashed Lines = change to Type 1 removal  type 2 



(#426)



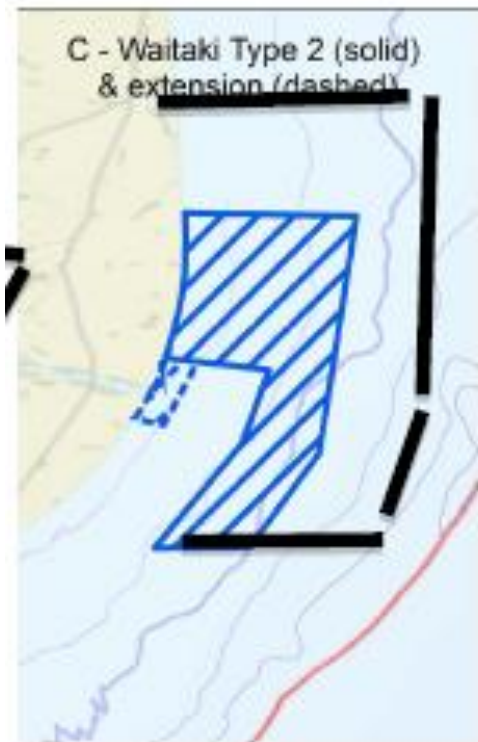
(#734)



(#95)







(#647)



(#2672)

Appendix 6: Submitter maps for Site D – Pleasant River to Stony Creek (Type 1)

Type 1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal

D - Pleasant River to
Stony Creek Type 1



(#190)

D - Pleasant River to
Stony Creek Type 1



(#264) - I support the proposed area reserve option 1. My family has traditionally use this area for recreational fishing and recommend that the pleasant river estuary be made a type 2 as this is the only local area to fish for flounder and is popular white baiting river for locals. I agree with reserves as a general statement but don't believe in no-take reserve. I believe they should up the size limit and lower the catch per person per day.



(#271)



(#287)



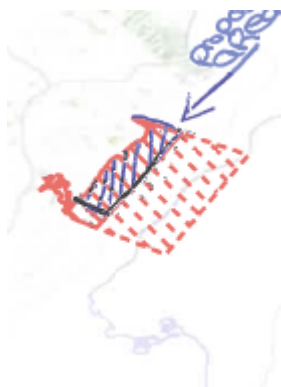
(#294)- Inside marked area only as this area is not used commercially or recreationally



(#327) - A area 1km off coast would protect habitats. Option 1 minimises the potential impact to existing users.



(#345) - Only the area 1km from the coast, not the piece added on to it. Would protect several habitats. Option 1 minimises the potential impact to existing users



(#171) - I support Pleasant River to Stony Creek option I, but feel the boundary should be from the north of the Pleasant River excluding the Pleasant estuary. Because small boats shelter and fish inside the large weed bank off the Pleasant River as it is safer, also the estuary provides safe land based fishing especially for younger families. It has good access to the estuary and coast which makes it a sheltered and safe Recreational spot for young people and children. I also feel this area has found more than most in the name of conservation. Having the east Otago Taiapure and no option 1 amended area D.



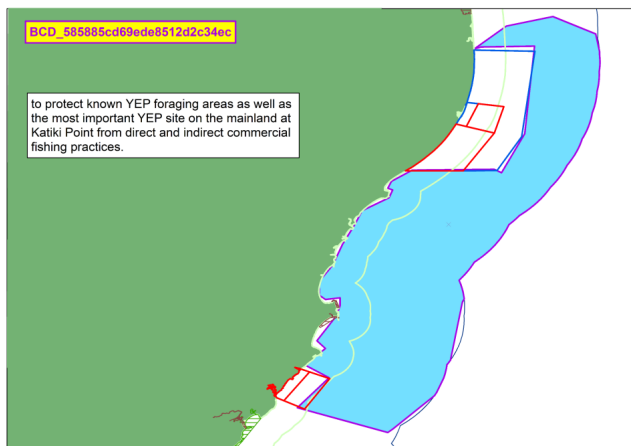
(#201) - Would like to see the Pleasant River Estuary removed from this proposed reserve



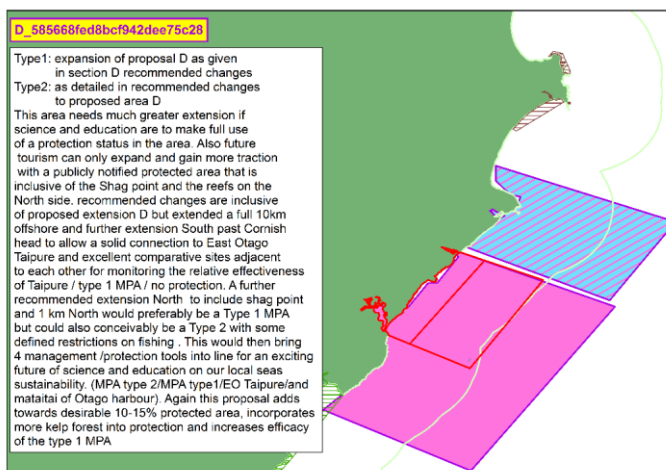
(#254) - I support the reserve out to one mile line and would like the Pleasant River to be a Type 2 for recreational users. Fishery management makes more sense than no take.



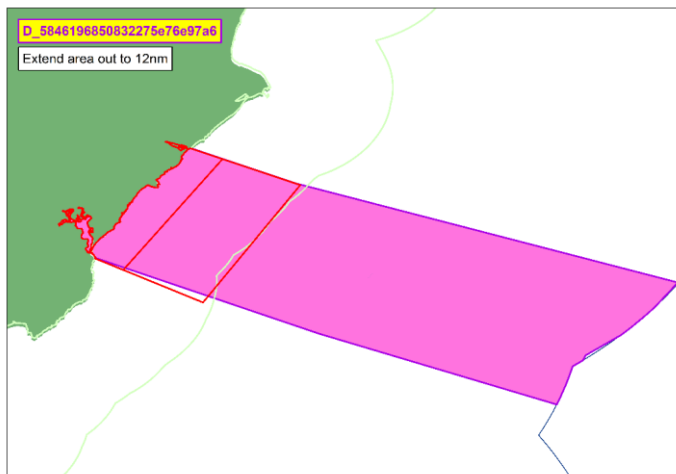
(#300) - Only out to 1 nautical mile as it is too far to go out further in small boats that use this area



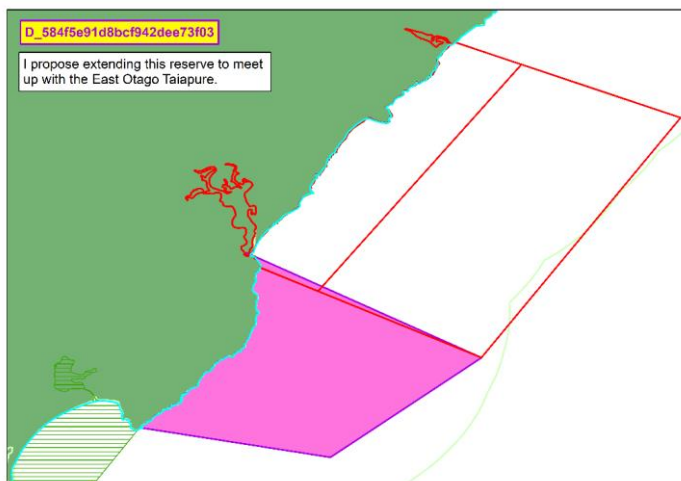
(#734)



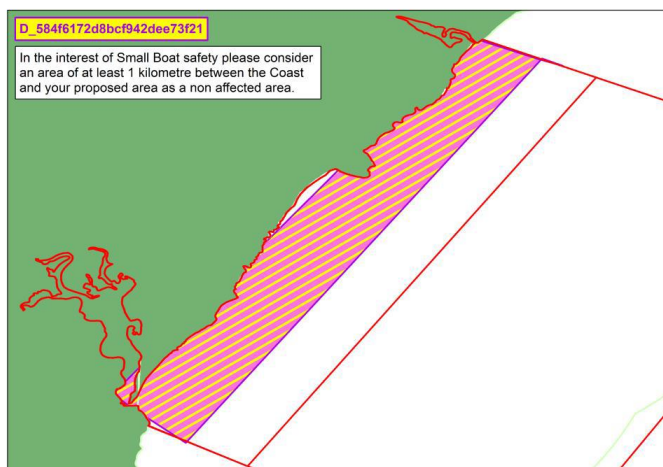
(#595)



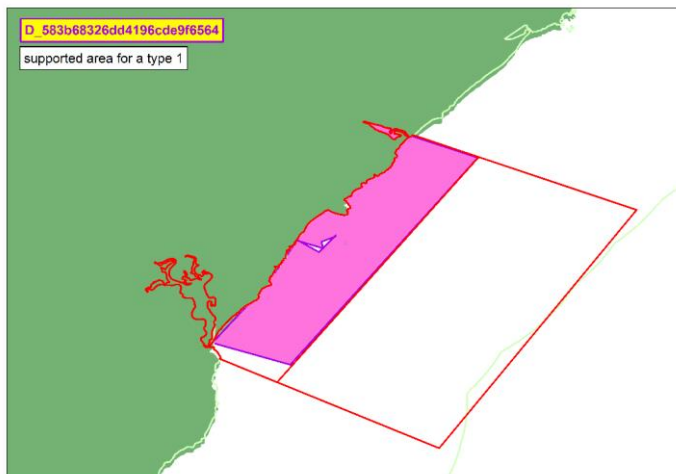
(#95)



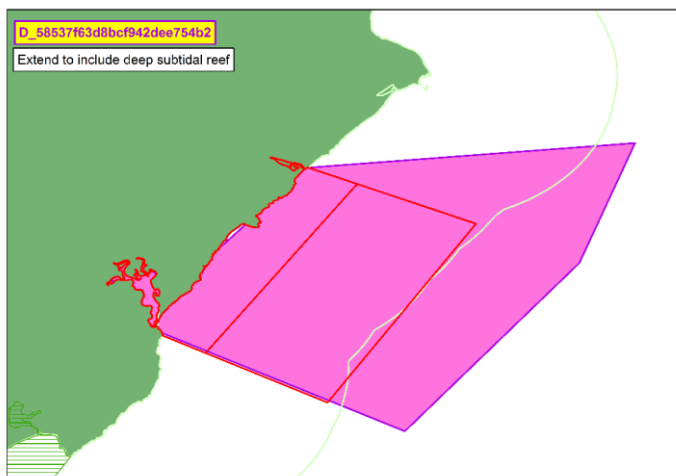
(#355)



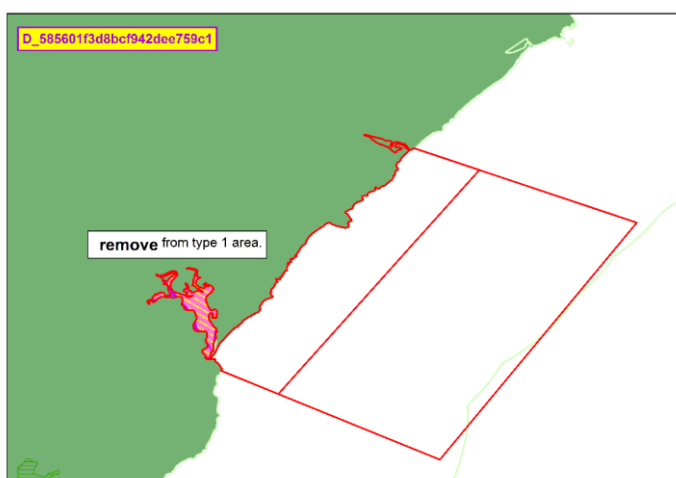
(#356)



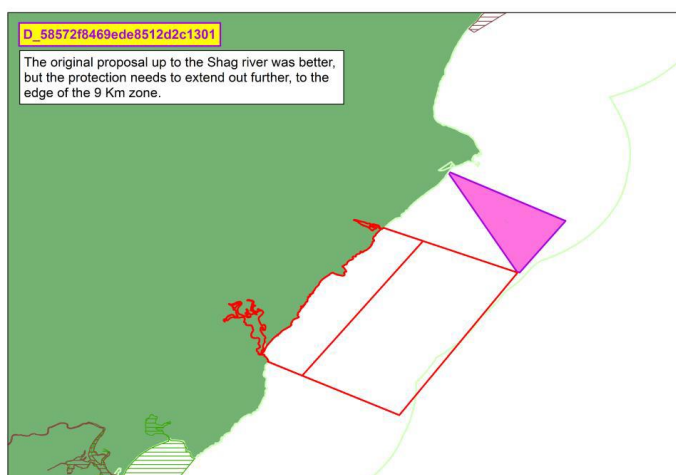
(#66)



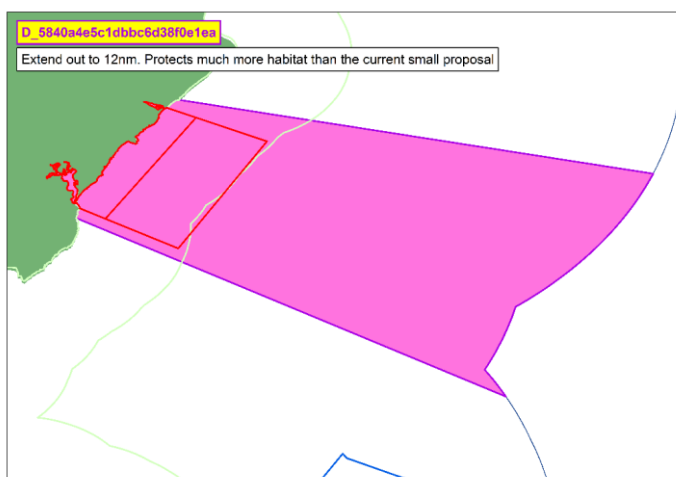
(#426)



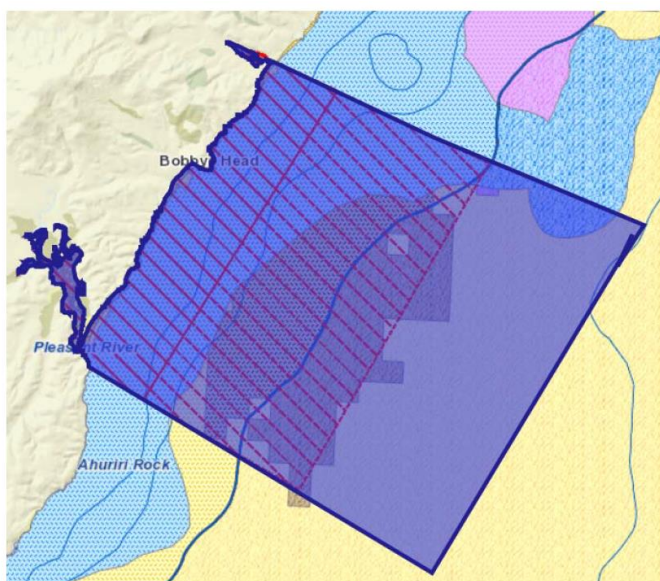
(#564)



(#616)







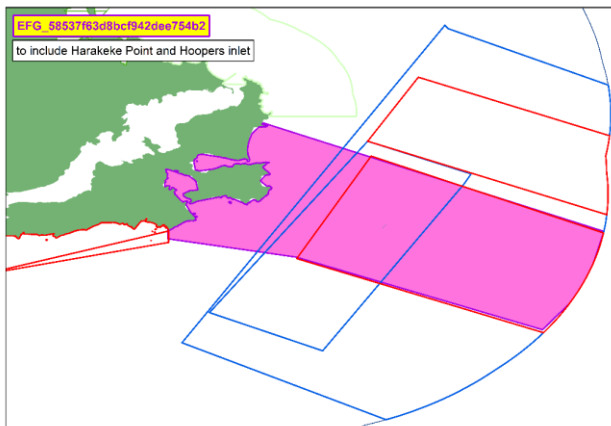
(#770)



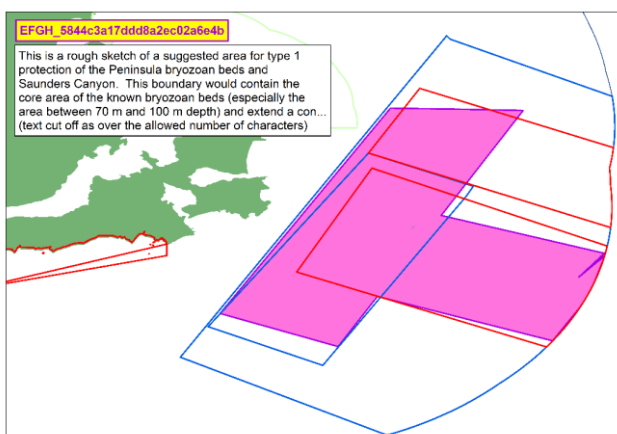
(#2494) Recommended Extension

Appendix 7: Submitter maps for Site E – Bryozoan bed

Type 1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal



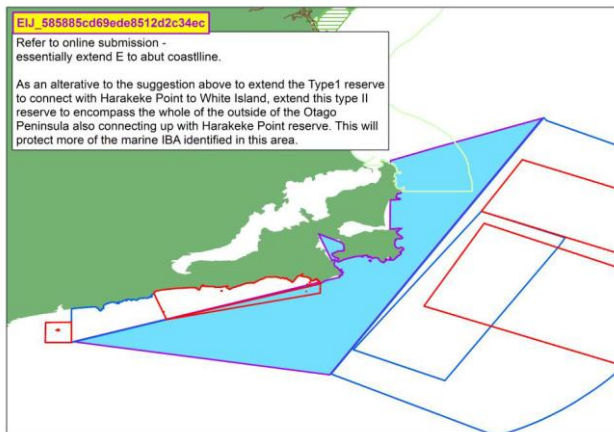
(#426)



(#84)



(#95)



(#734)







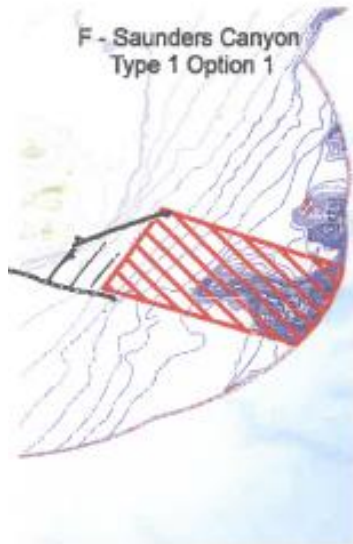
(#1263 – should be extended to cover the coast along Otago Peninsula the way to Taiaroa Head)



(#2672)

Appendix 8: Submitter maps for Site F-Saunders Canyon

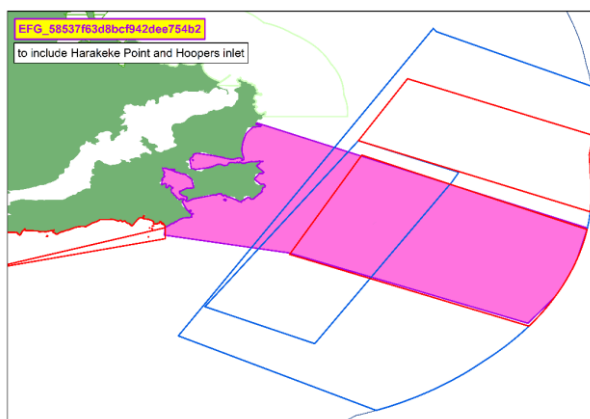
Type 1:  Type 2:  Hashed Lines = change to Type 1 removal  type 2 



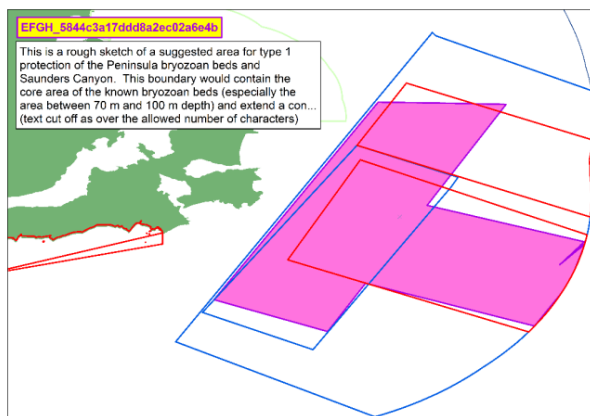
(#239 – provides more protection)



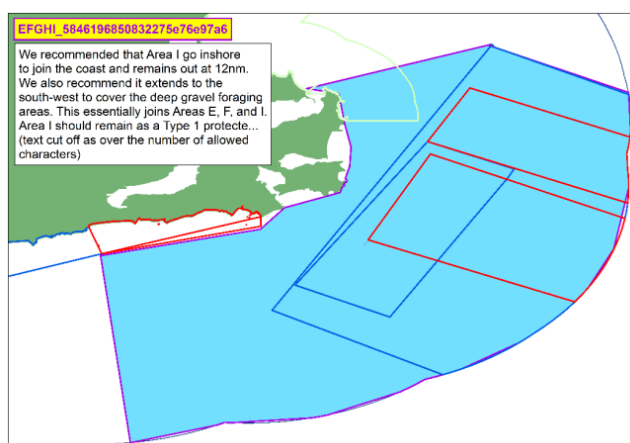
(#351) - Visiting both Saunders & Papanui Canyons on a monarch pelagic [sic] tour earlier this year, we saw so many albatross – 6 species in total. I support site F with the no take/minimum disturbance policy, but recommend that this area be extended to the shore to include Hoopers Inlet and that it joins with site I. I also recommend site F be joined with site H, including two canyons. This will provide a greater protection for the various wildlife foraging.



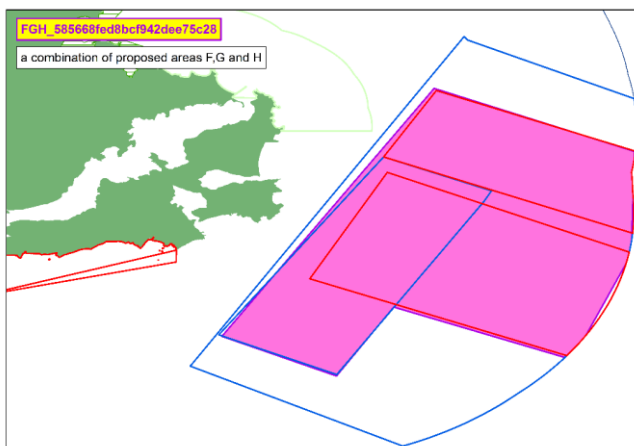
(#426)



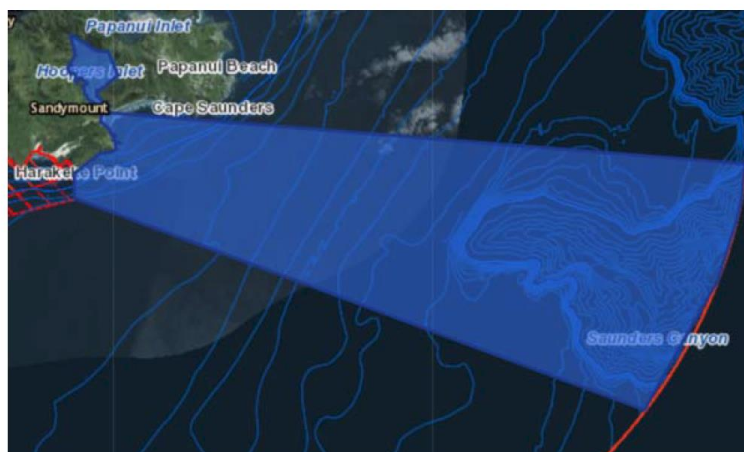
(#84)



(#95)







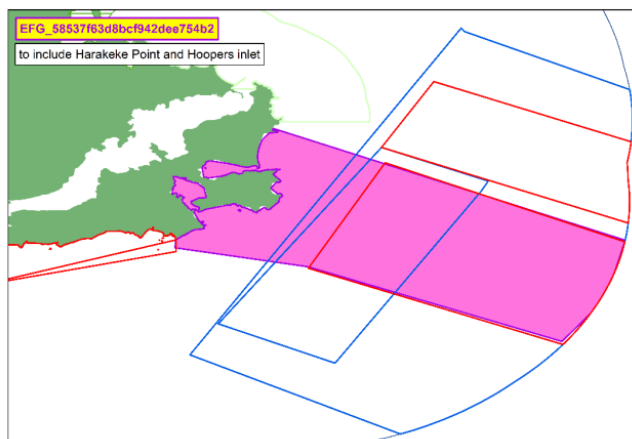
(#595)



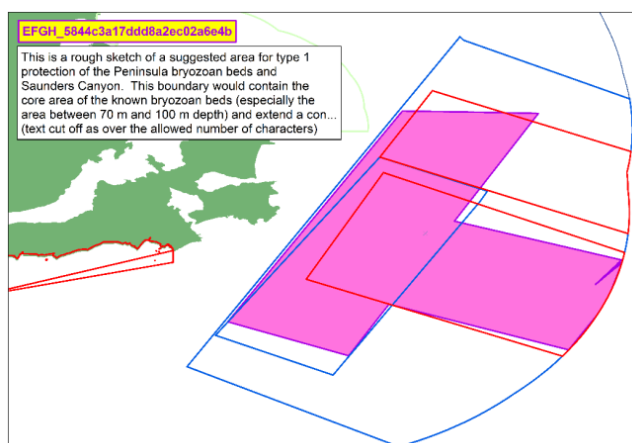
(#2494) Recommended Extension

Appendix 9: Submitter maps for Site G- Bryozoan Bed

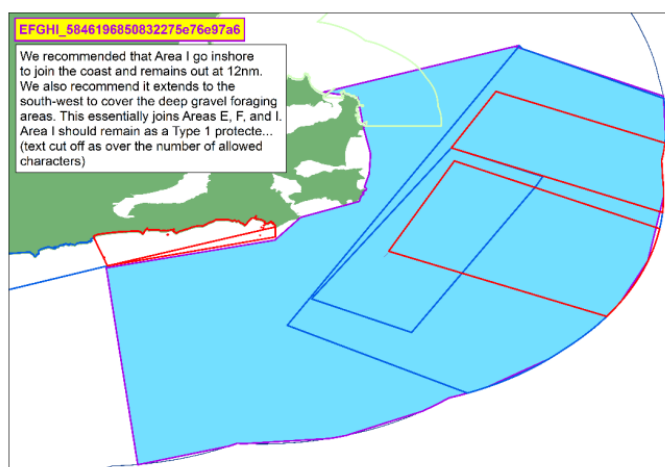
Type 1:  Type 2:  Hashed Lines = change to Type 1 removal  type 2 



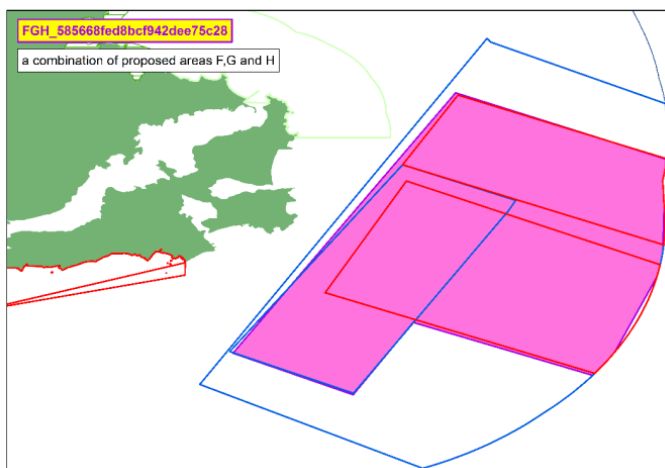
(#426)



(#84)







(#95)



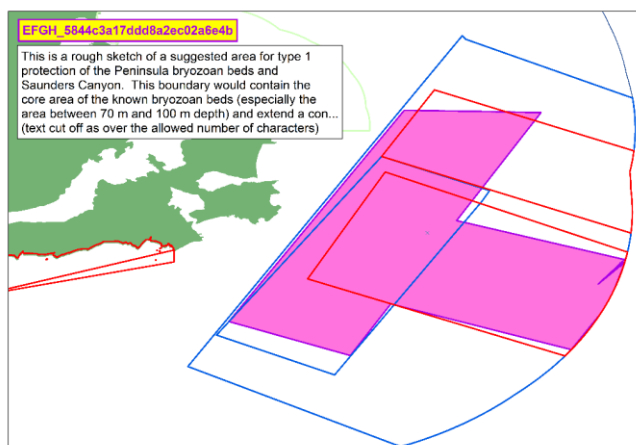
(#595)

Appendix 10: Submitter maps for Site H-Papanui Canyon

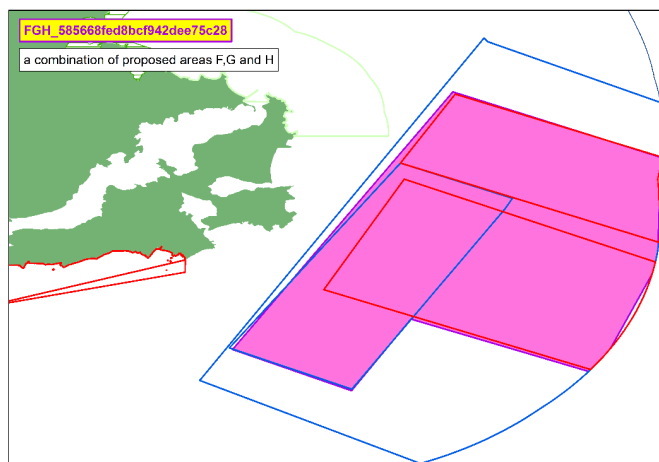
Type 1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal



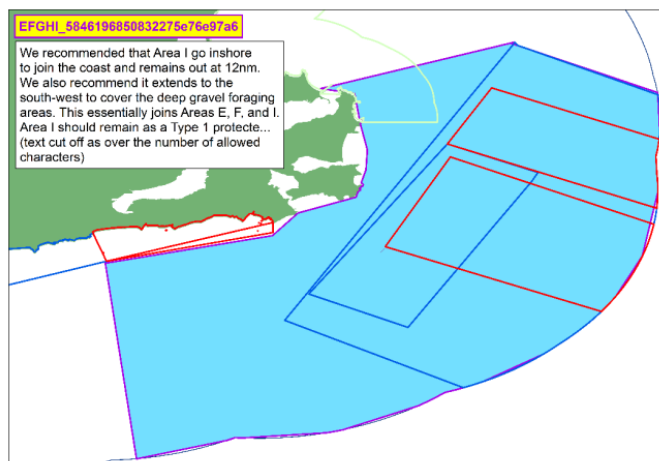
(#351) - I support both site H and site F. Recommend they be joined within the wider area of site E, alternative 1. This will provide a greater area of no take type 1 to give the seal, the penguin and albatross a larger foraging area.



(#84)







(#595)



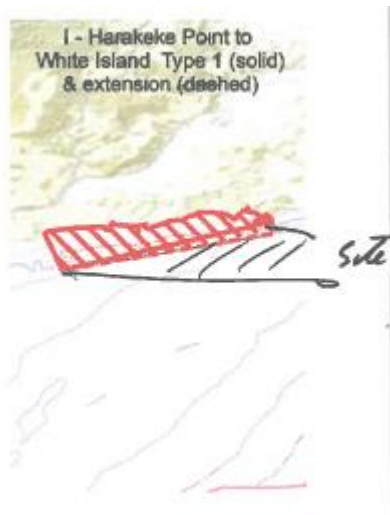
(#95)

Appendix 11: Submitter maps for Site I- Harakeke Point to White Island (Type 1)

Type1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal



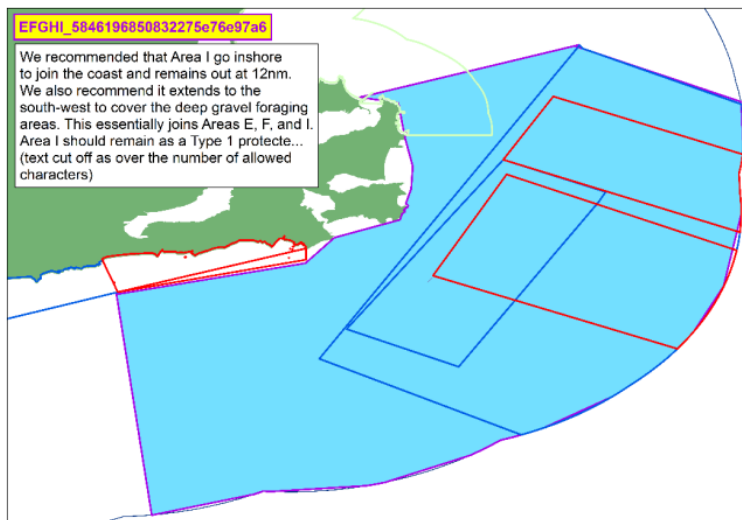
(#201) - I support Option 1 in this case but would like to see Seal Point as Type 2 reserve. The area near to Dunedin does not have many accessible rock fishing places as it is. Or exclude Seal Point from proposal altogether.



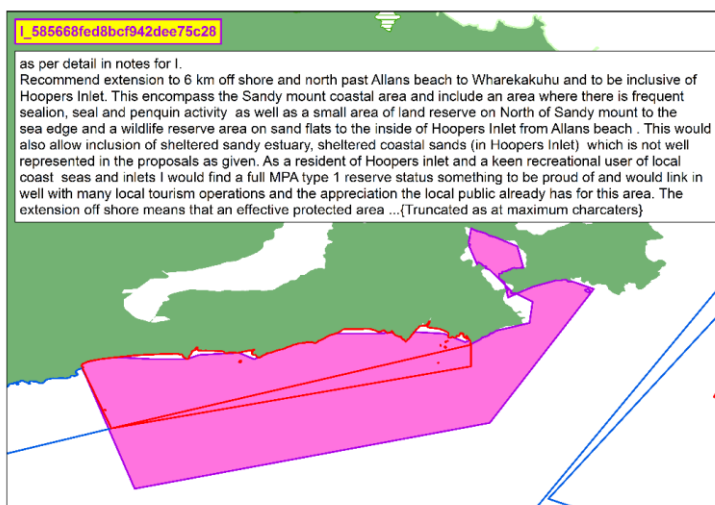
(#239 – linking provides more protection)



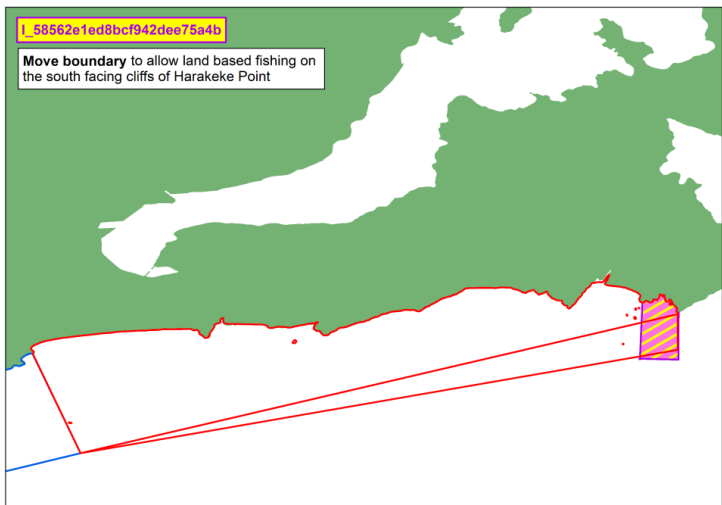
(#351) - I support site I with the extension to include Tow Rock with the greater biodiversity and larger area, but also recommend this site be joined with site F. As much of this area is remote, I support site I as a no take type 1 area.



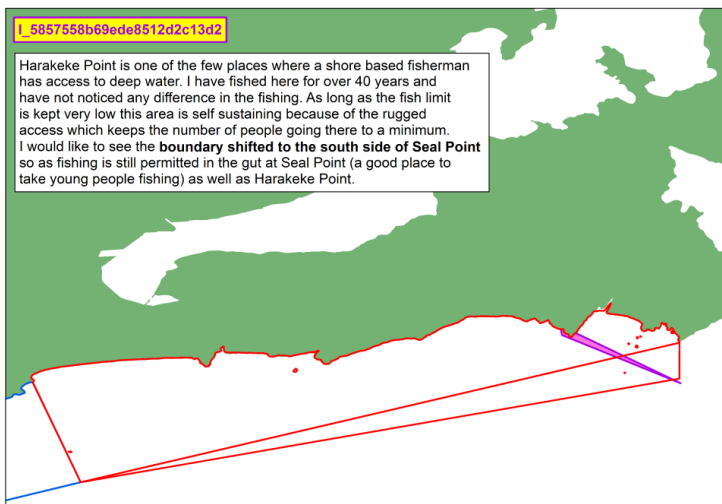
(#95)



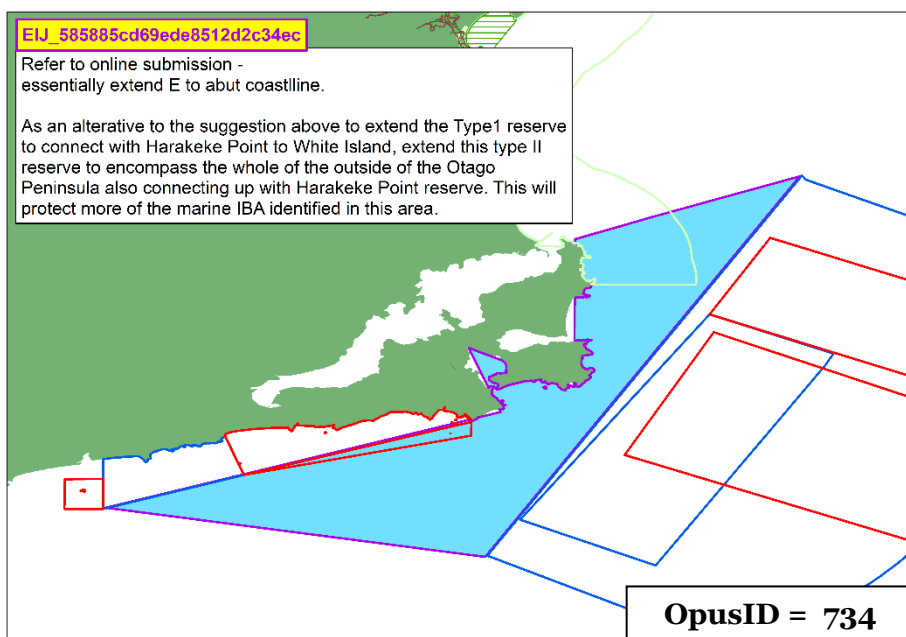
(#595)



(#578)







(#627)

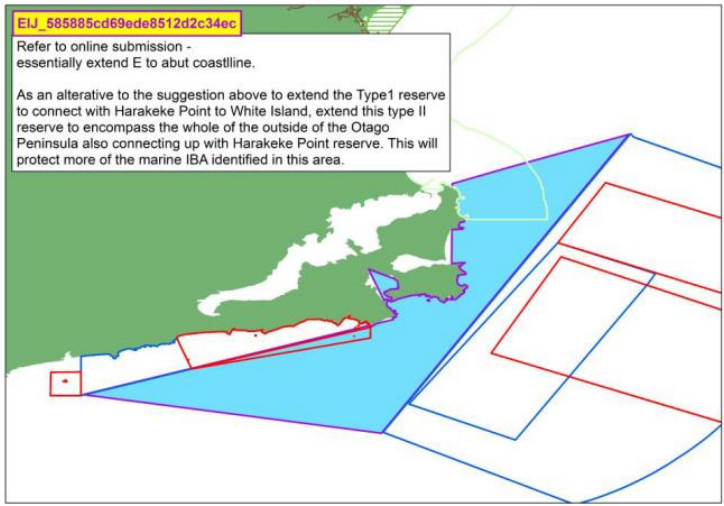




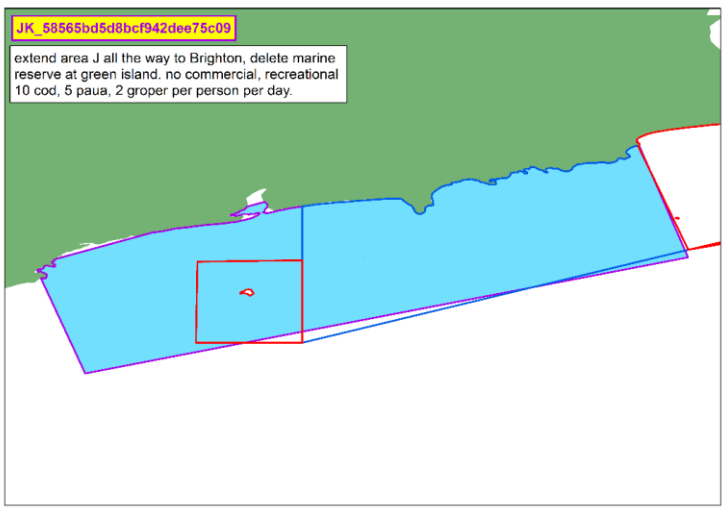
(#2672)

Appendix 12: Submitter maps for Site J- White Island to Waldronville (Type 2)

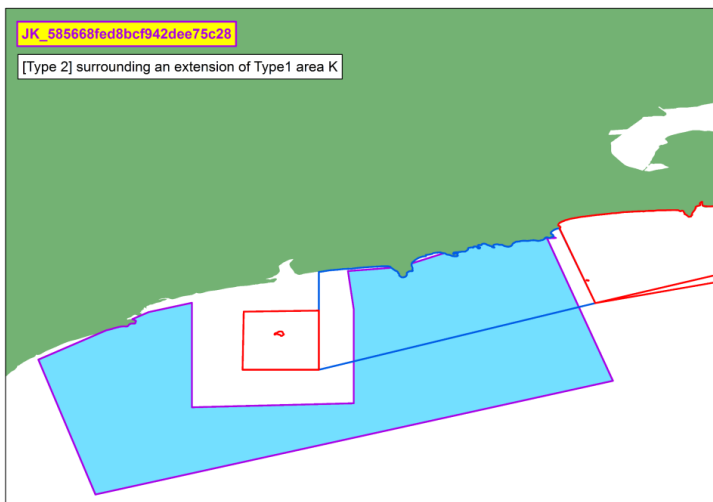
Type1:  Type 2:  Hashed Lines = change to Type 1  type 2 
 removal



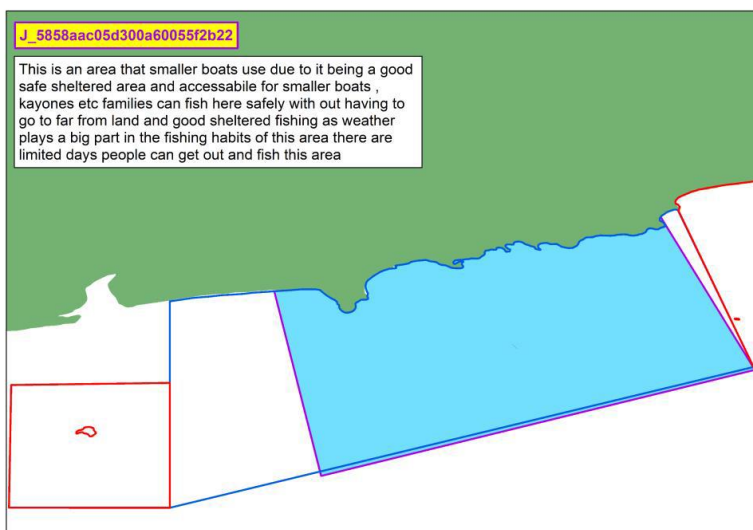
(#734)



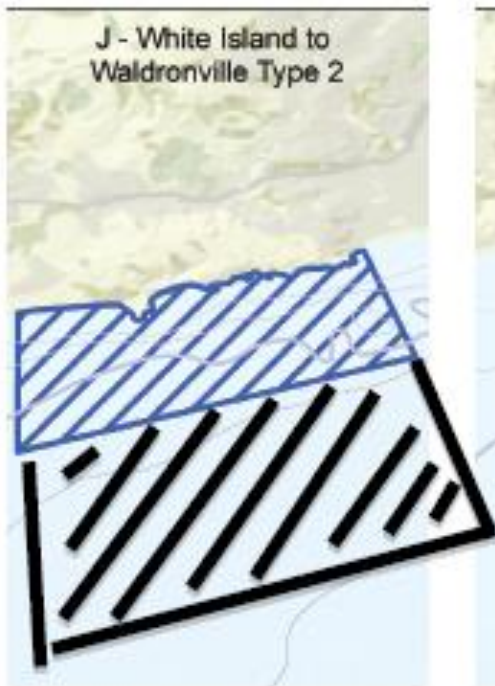
(#594)



(#595)







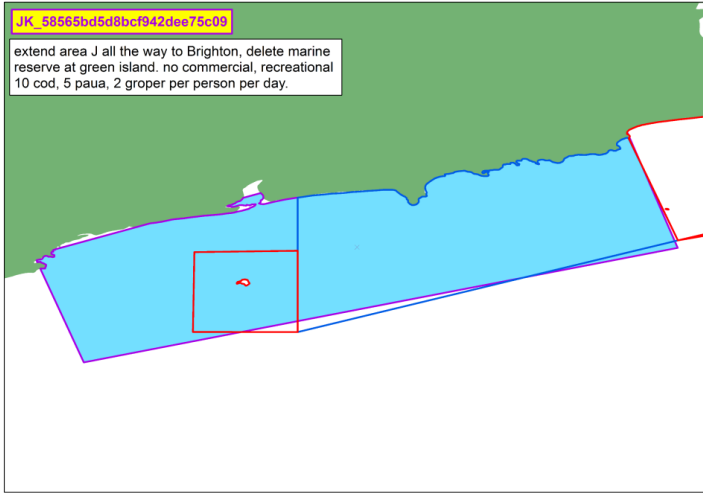
(#769)



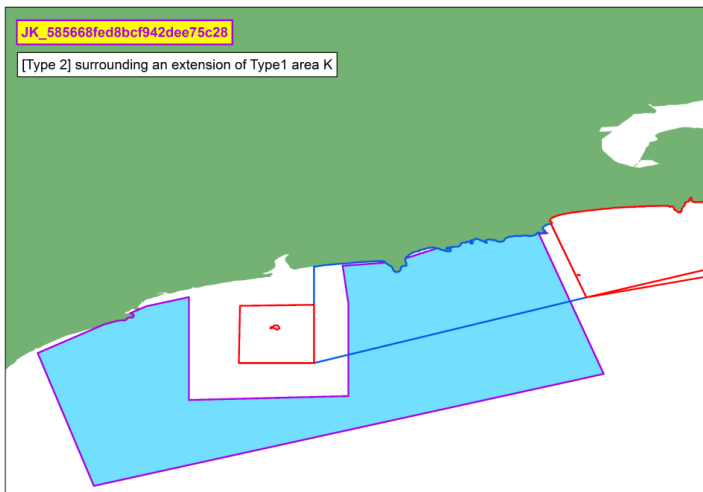
(#2672)

Appendix 13: Submitter maps for Site K- Green Island (Type 1)

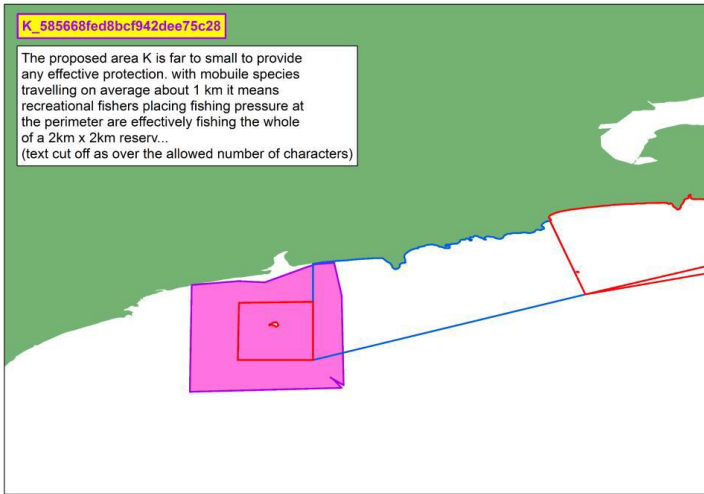
Type1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal



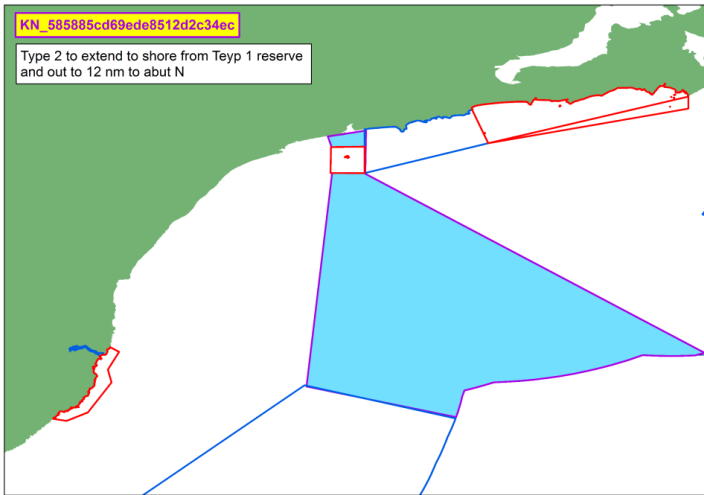
(#594)



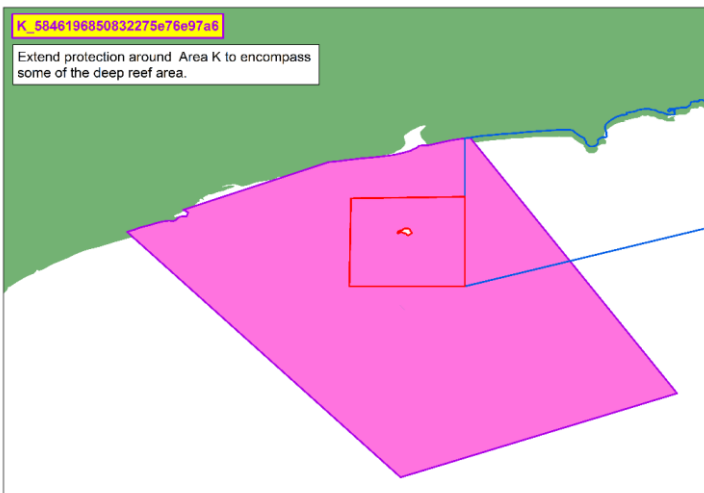
(#595)



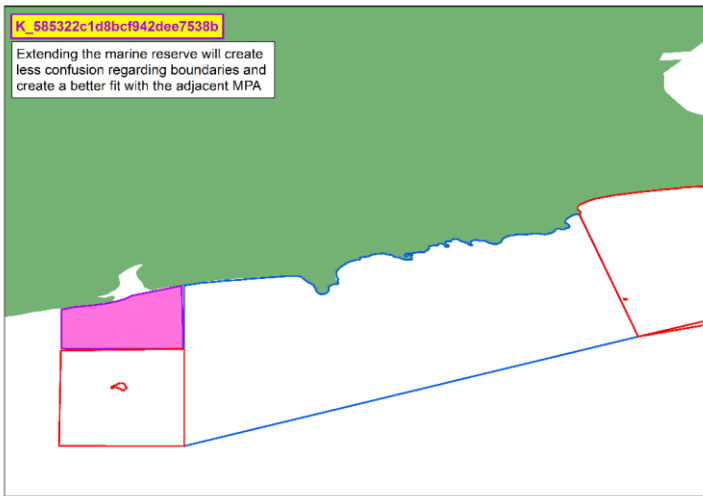
(#595)



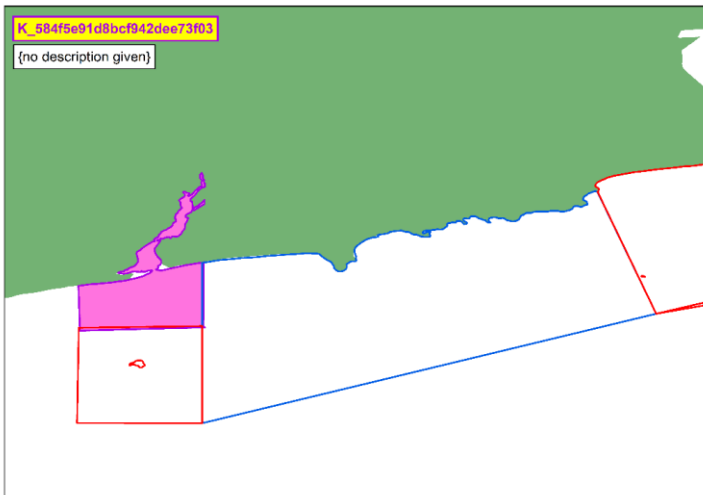
(#734)



(#95)



(#420)







(#355)



(#2672)





Appendix 14: Submitter maps for Site L-Akatore Estuary (Type 2)

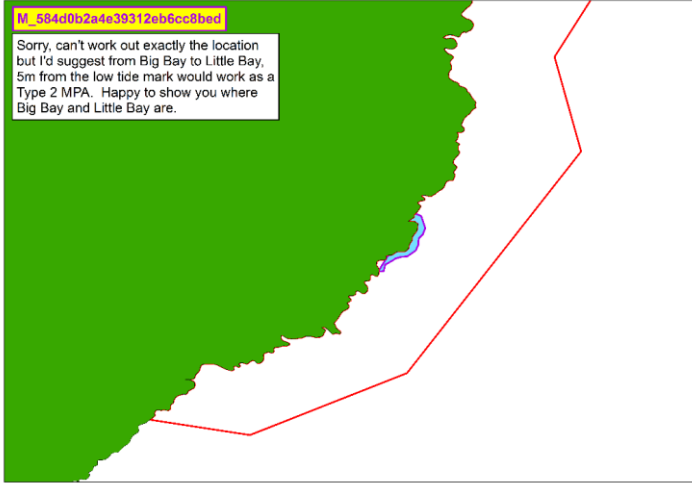
Type1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal



(#227) - Continue to include the connection to the sea. Akatore = "place of wading birds"

Appendix 15: Submitter maps for Site M-Akatore Coastal (Type 1)

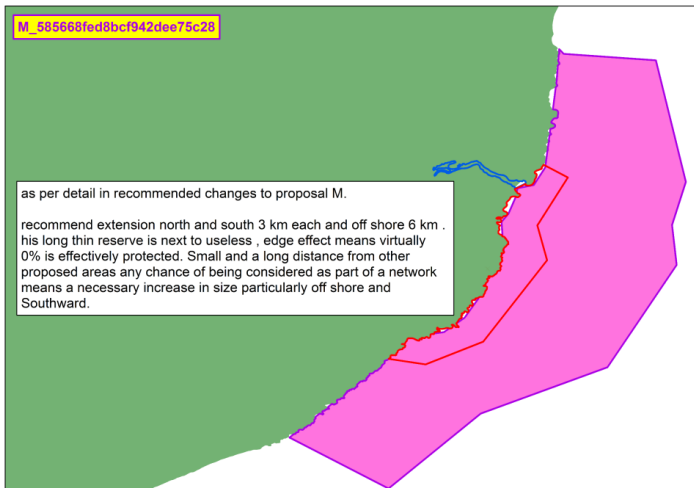
Type1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal



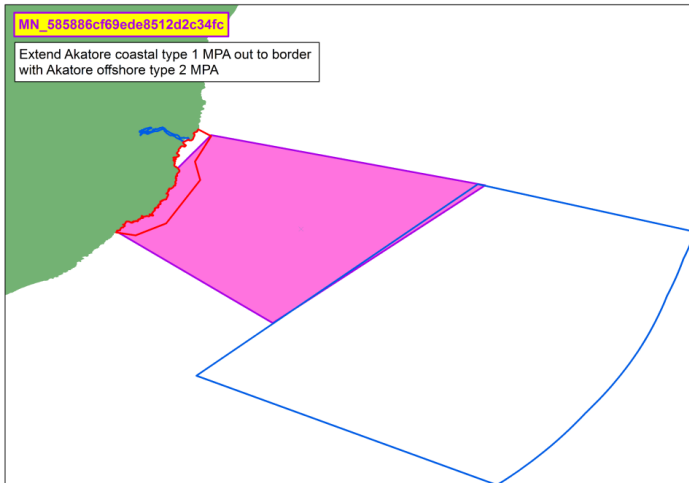
(#132)



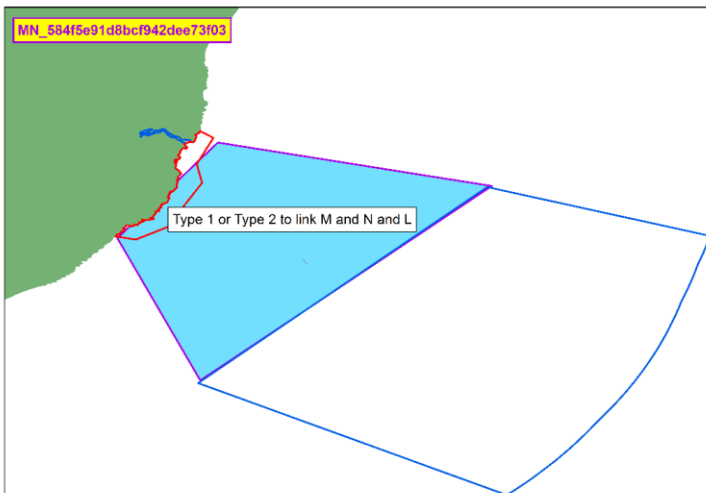
(#239)



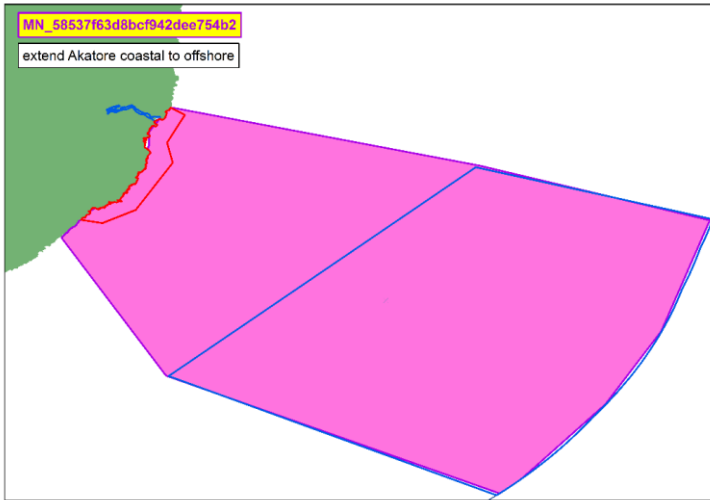
(#595)



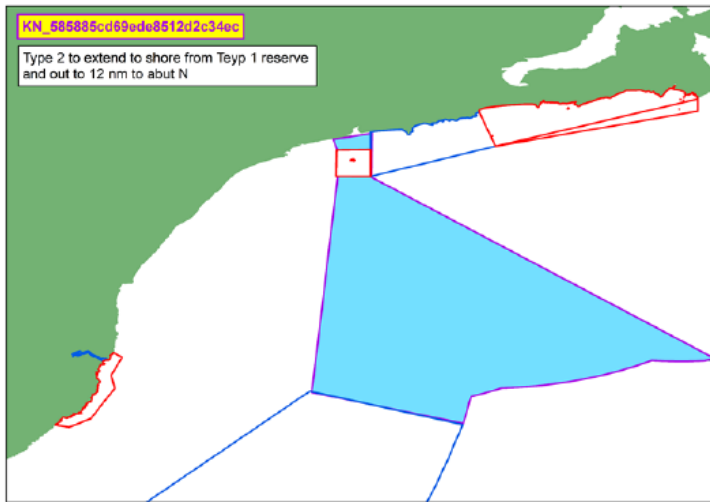
(#736)



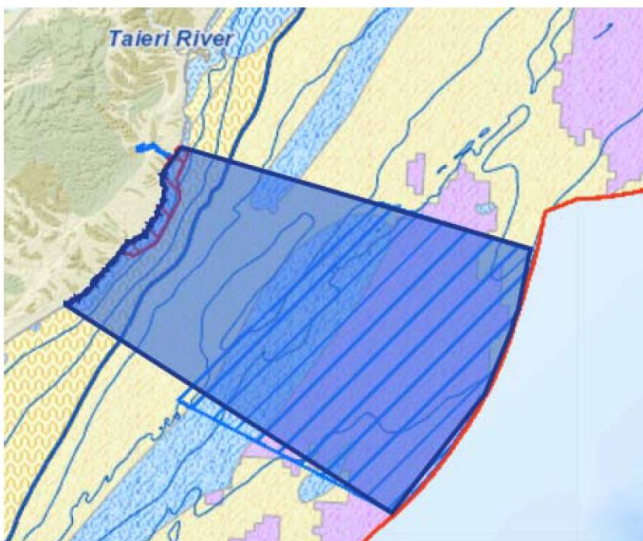
(#355)



(#426)



(#734)







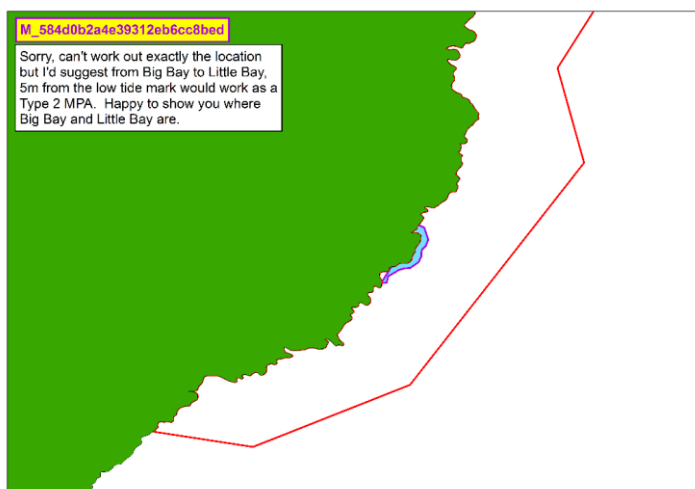
(#2494) Recommended Extension



(#2672)

Appendix 16: Submitter maps for Site N-Akatore Offshore (Type 2)

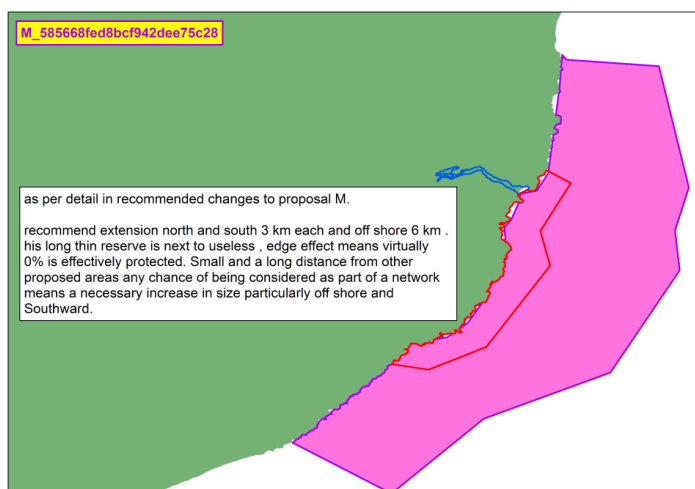
Type1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal



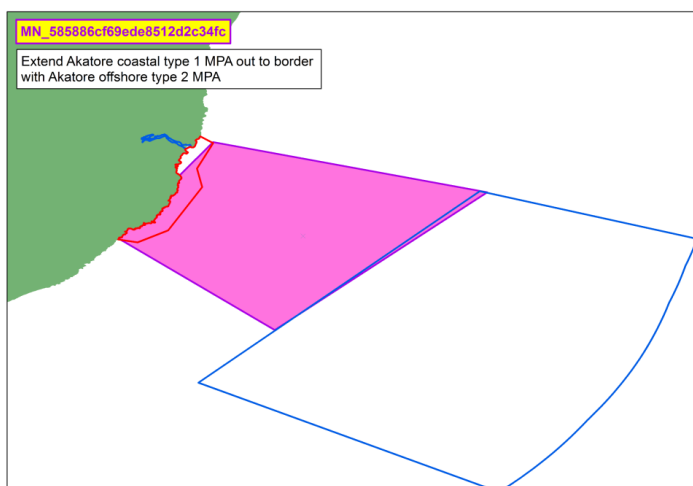
(#132)



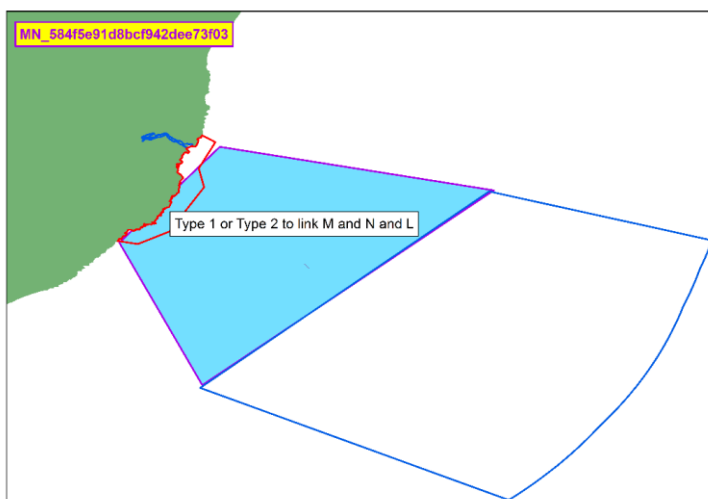
(#239 – extend to meet the type 1)



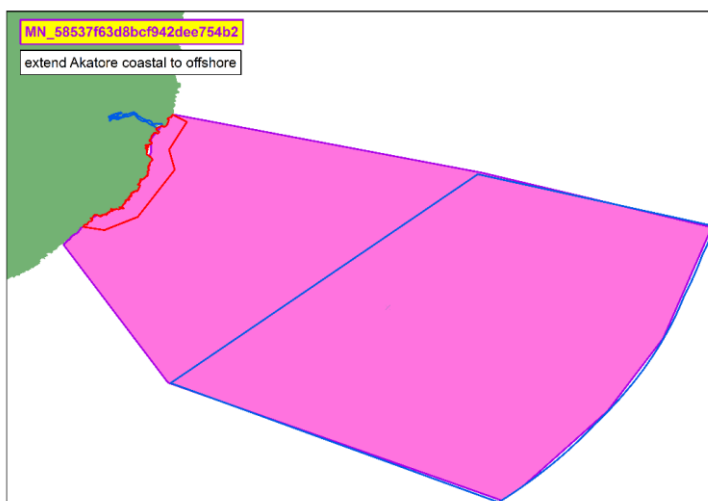
(#595)



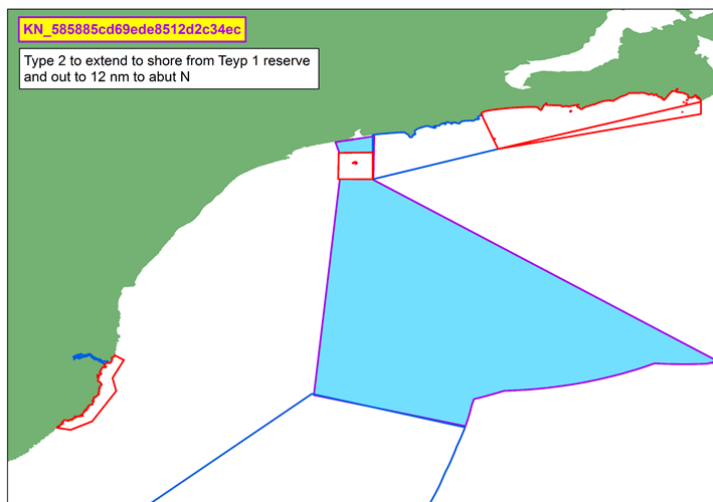
(#736)



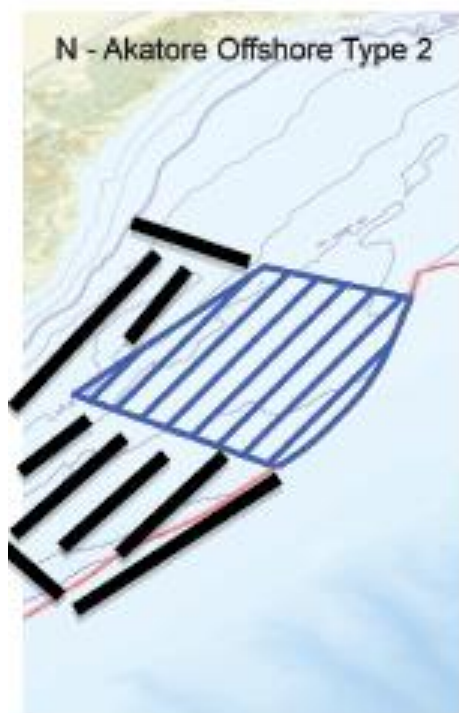
(#355)



(#426)







(#734)



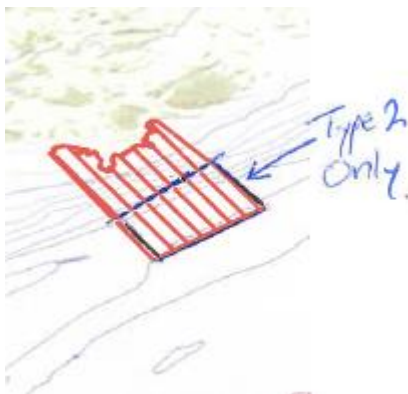
(#2672)

Appendix 17: Submitter maps for Site O –Long Point (Type 1)

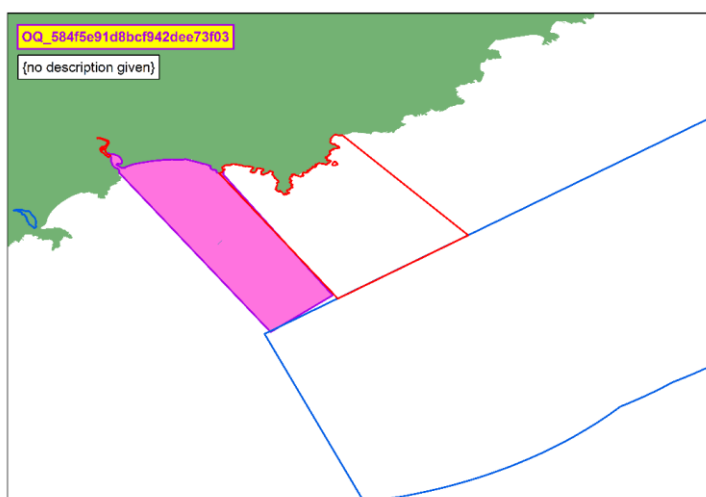
Type 1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal



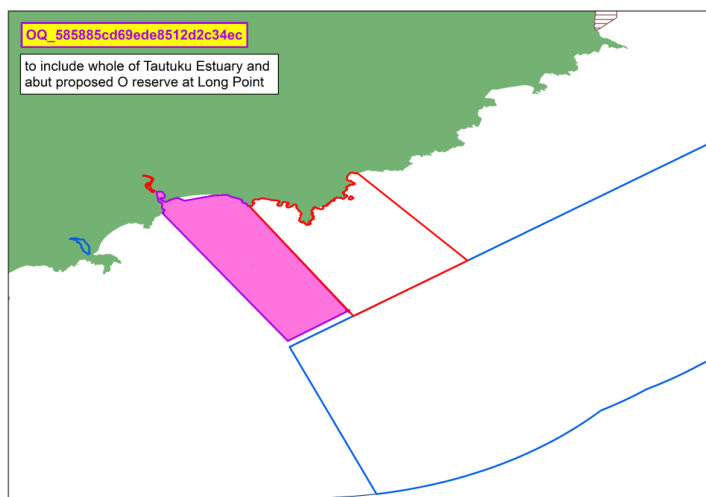
(#201) - Completely oppose Type 1 MPA here. Again, one of the rare places that blue cod can be caught from rocks that are accessible to those of us who can't afford a boat. A lot of locals and Crib owners affected. This needs to be type 2 if anything.



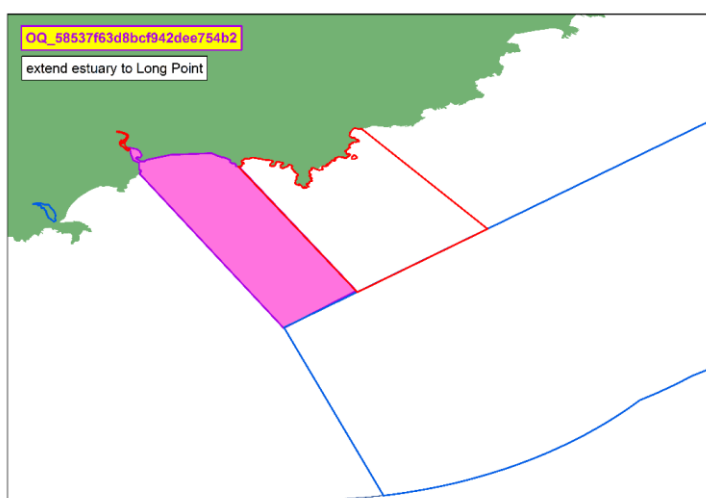
(#205) - I have been fishing in this MPA for many years and have found no decline in fish numbers. This MPA is now protected because of the extreme weather from the south and north east. It would also put all recreational fisher at risk because they would have to go further out to sea if the weather changed. I feel there are still good numbers of fish for all recreational fishers and all sea birds including penguins. If this purposed MPA goes ahead all recreational and commercial fishers would come into Papatowai bay and put fishing pressure where a lot of use fish now. Take the proposed MPA from Lone Point (o) to the Nuggets, there is a road to this area so it would be able to be policed. Make Long Point O into a Type 2 MPA. This would be a fear way for a fishers. Make this proposed MPA smaller in size.



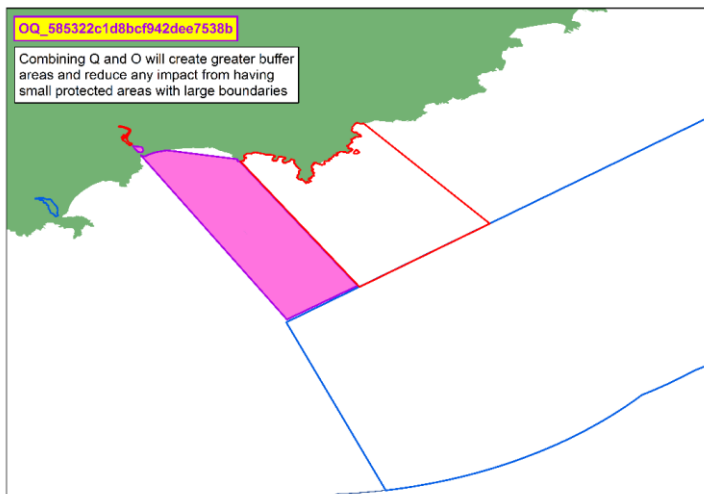
(#355)



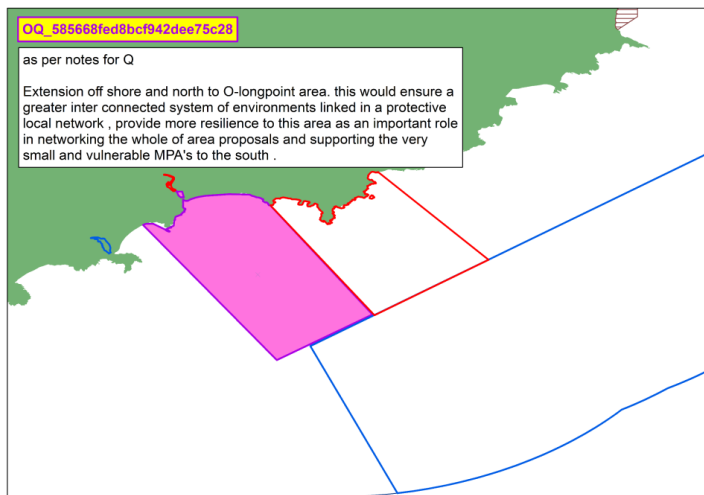
(#734)



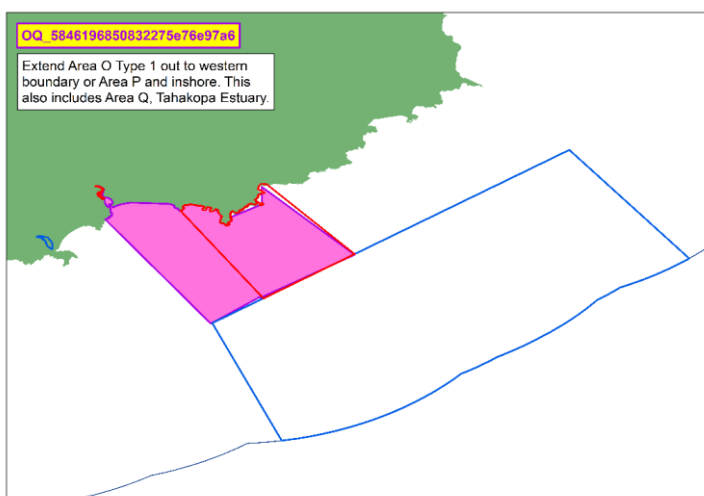
#426



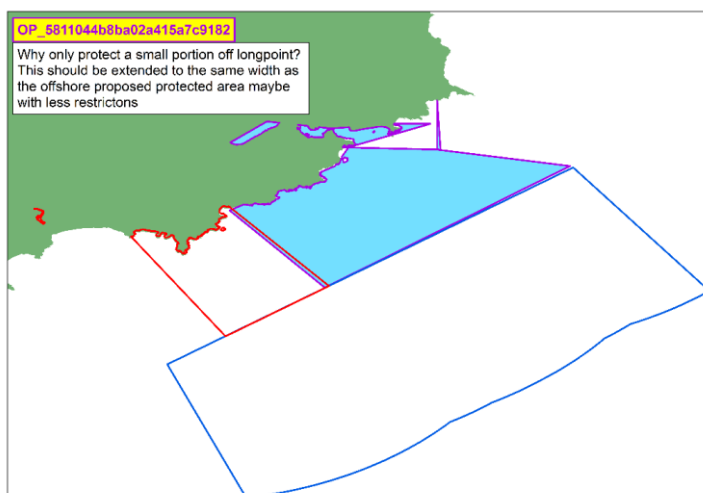
(#420)



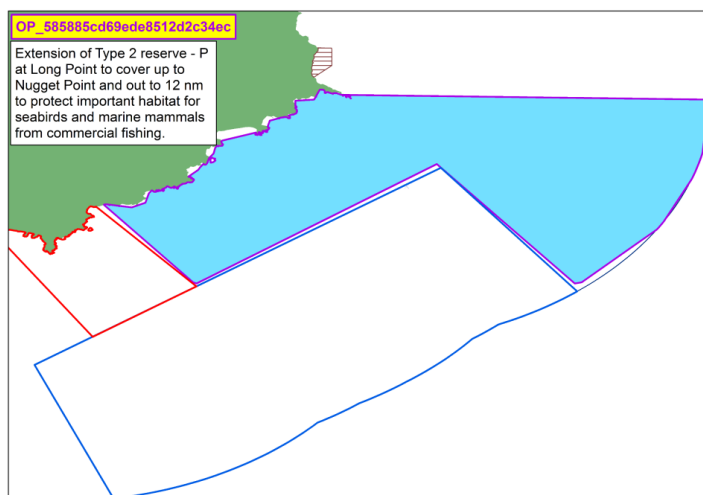
(#595)



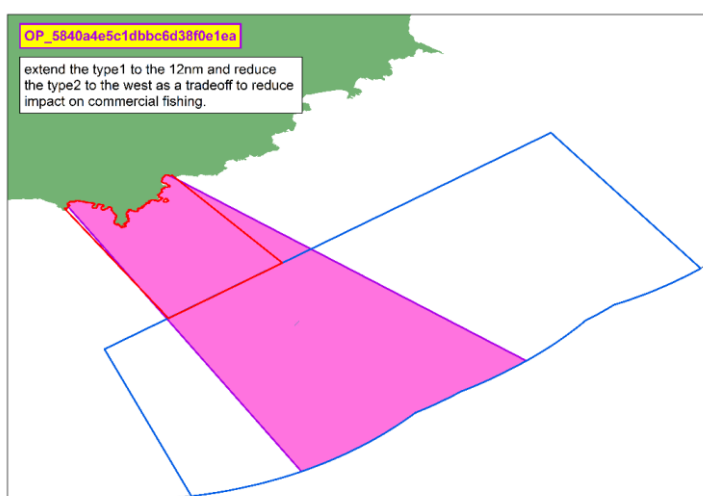
(#95)



(#9)



(#734)



(#770)







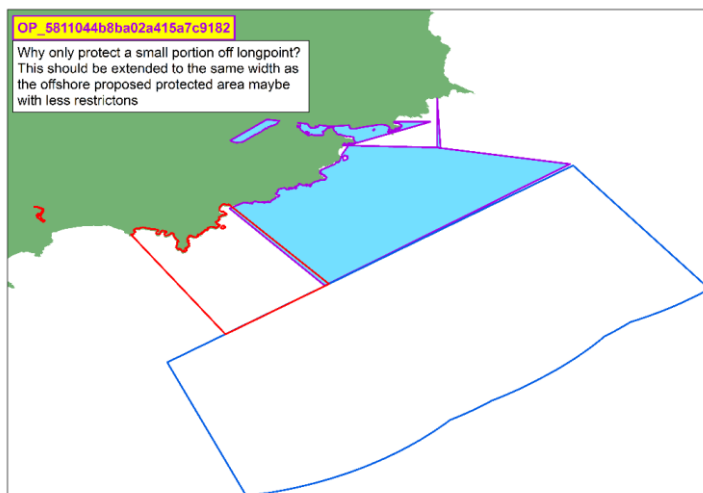
(#2494) Recommended Extension



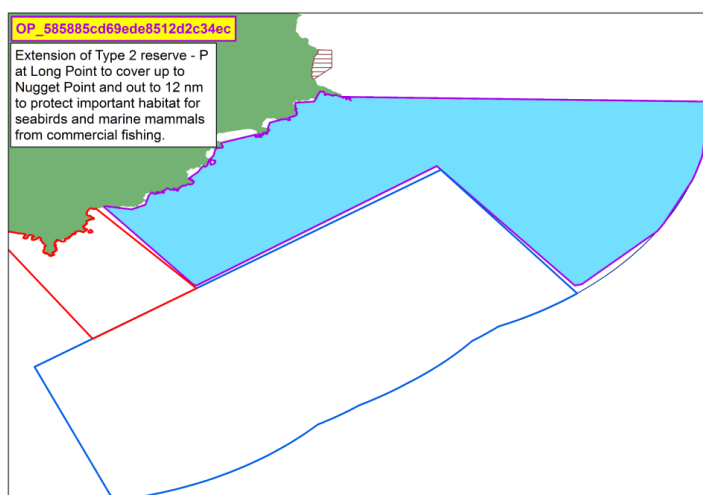
(#2672)

Appendix 18: Submitter maps for Site P- Long Point Offshore (Type 2)

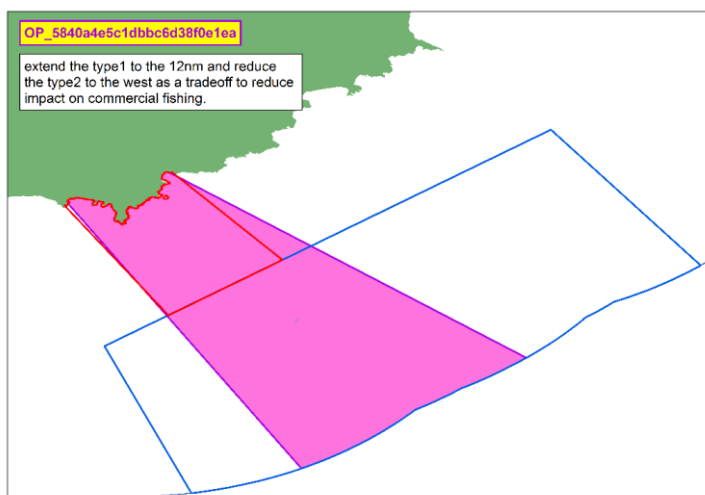
Type 1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal



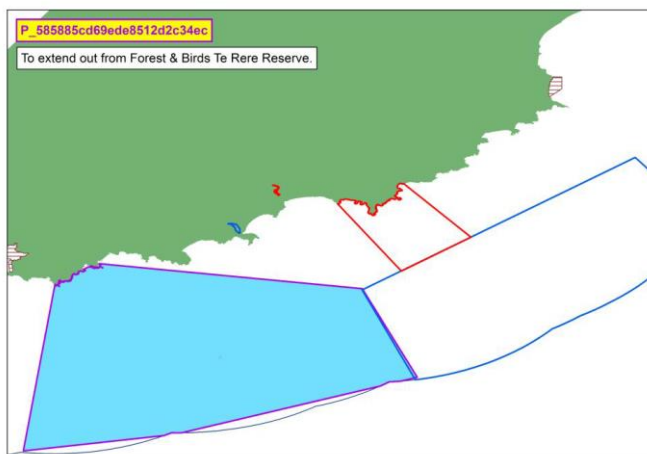
(#9)



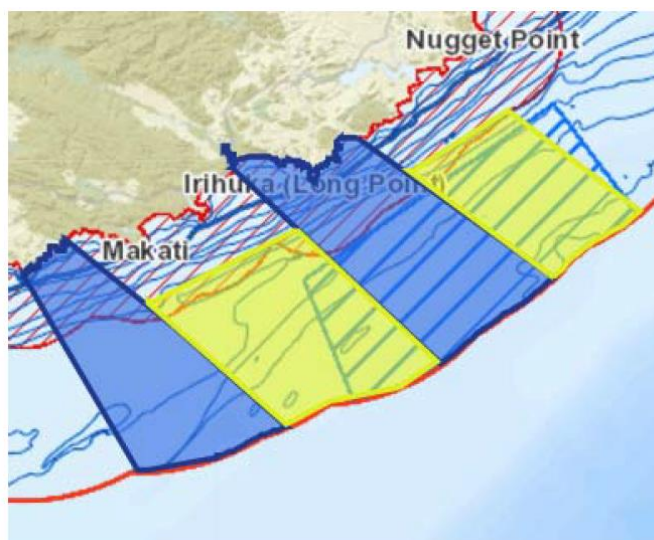
(#734)



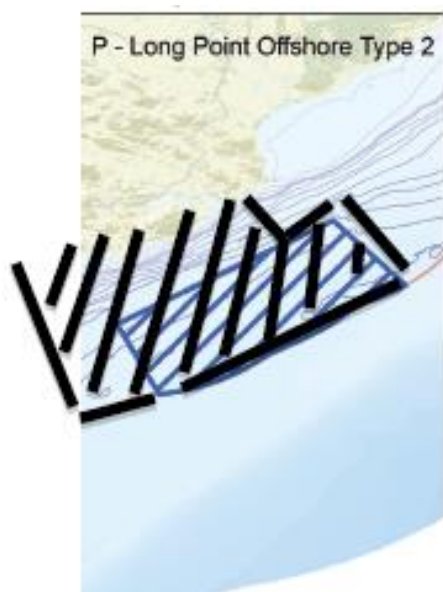
(#770)



(#734)







(#2494) Recommended Extension / Buffer



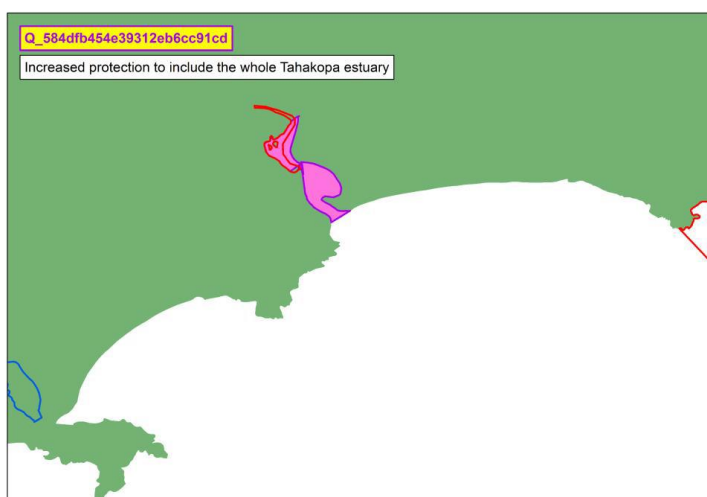
(#2672)

Appendix 19: Submitter maps for Site Q-Tahakopa Estuary (Type 1)

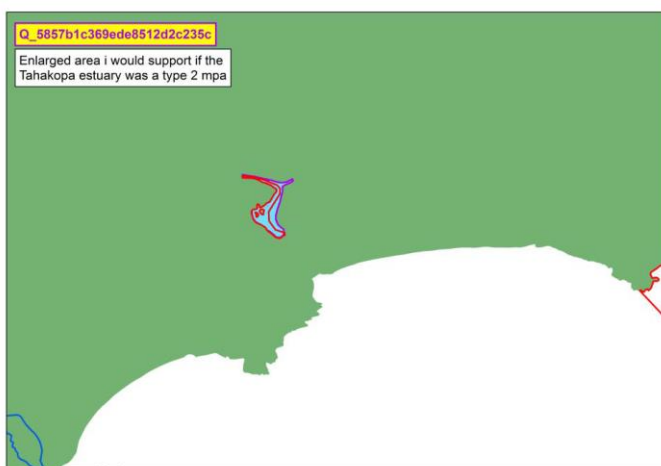
Type 1:  Type 2:  Hashed Lines = change to Type 1  type 2 
 removal



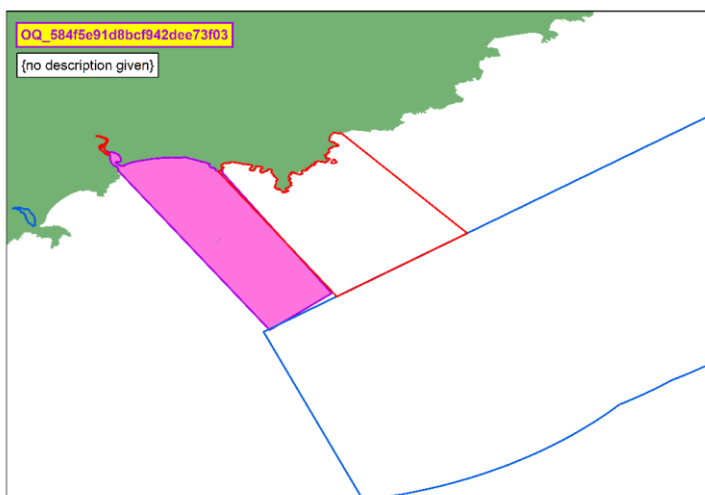
(#227) - Support, extend to join O



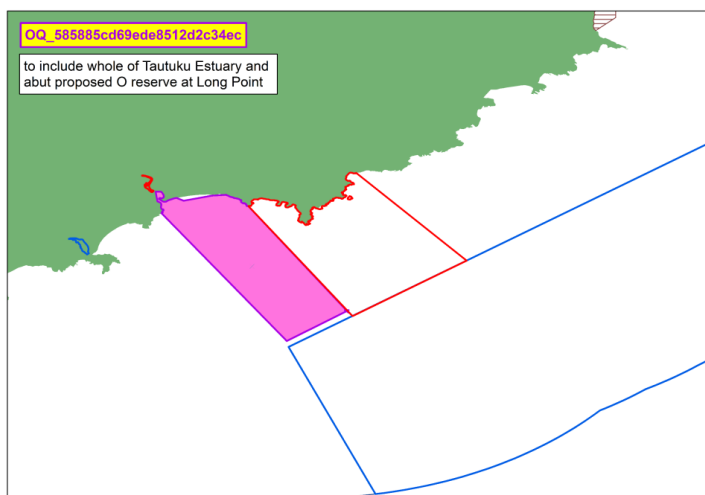
(#145)



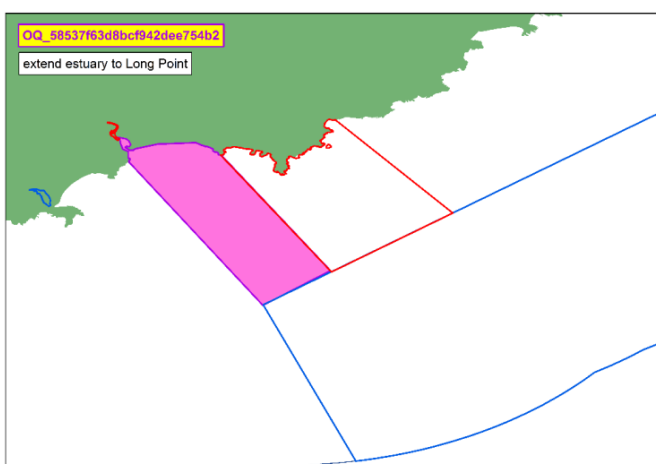
(#683)



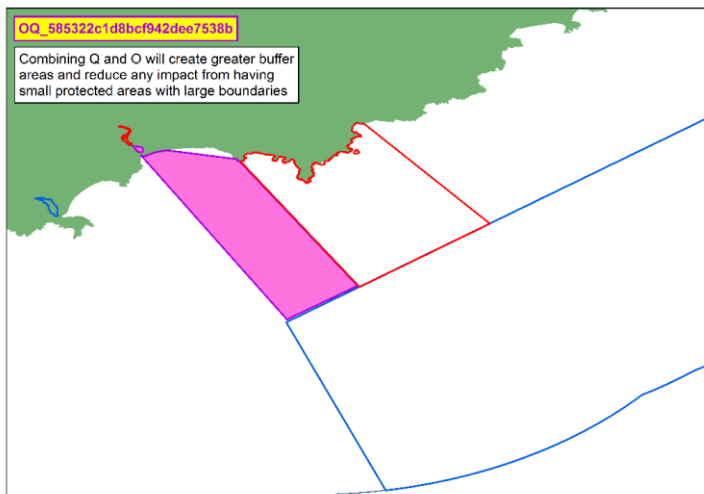
(#355)



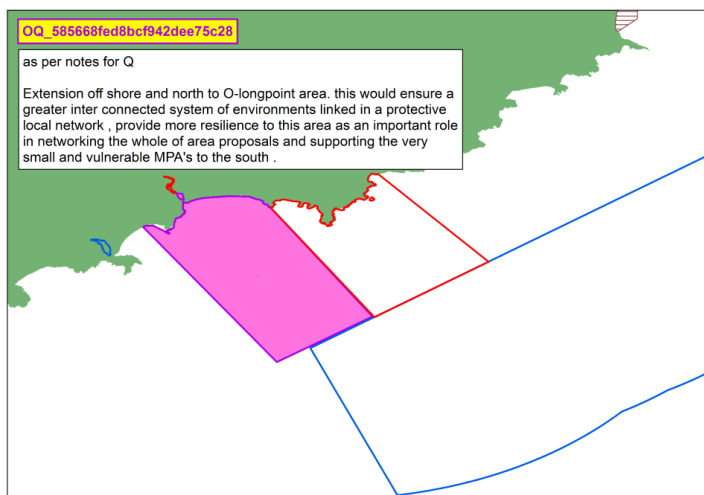
(#734)



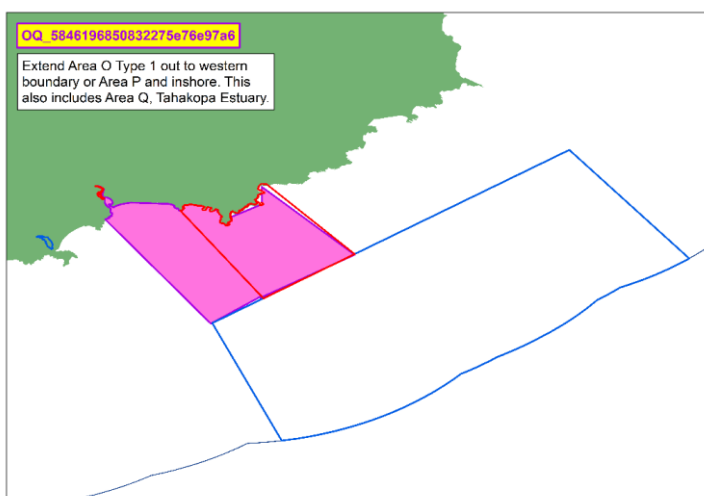
(#426)



(#420)



(#595)







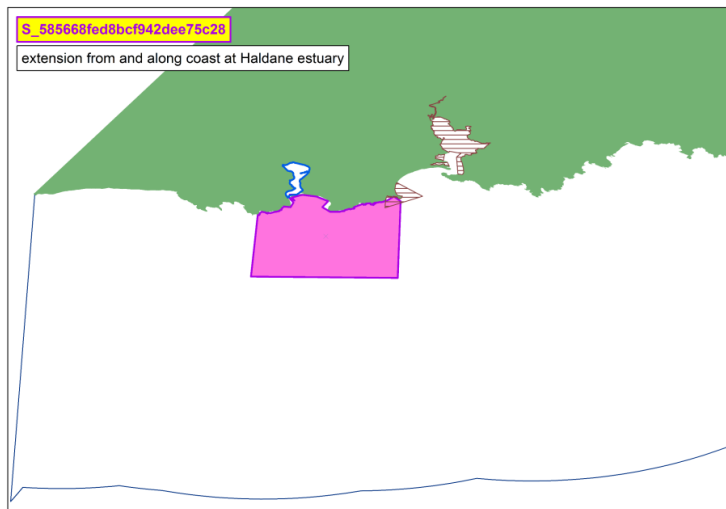
(#95)

Appendix 20: Submitter maps for Site R-Tautuku Estuary (Type 2)

No maps received.





Appendix 21: Submitter maps for Site S – Haldane (Type 2)

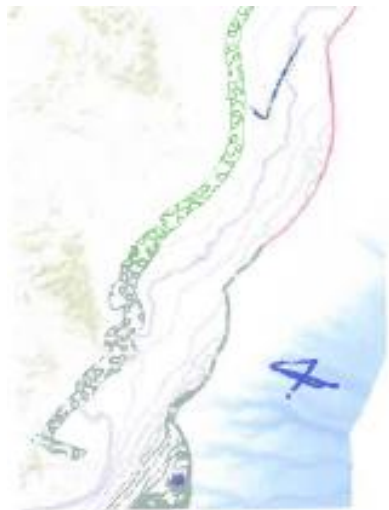
Type1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal



(#595)





Appendix 22: Submitter maps for Site T- Kelp Forest (Type other)

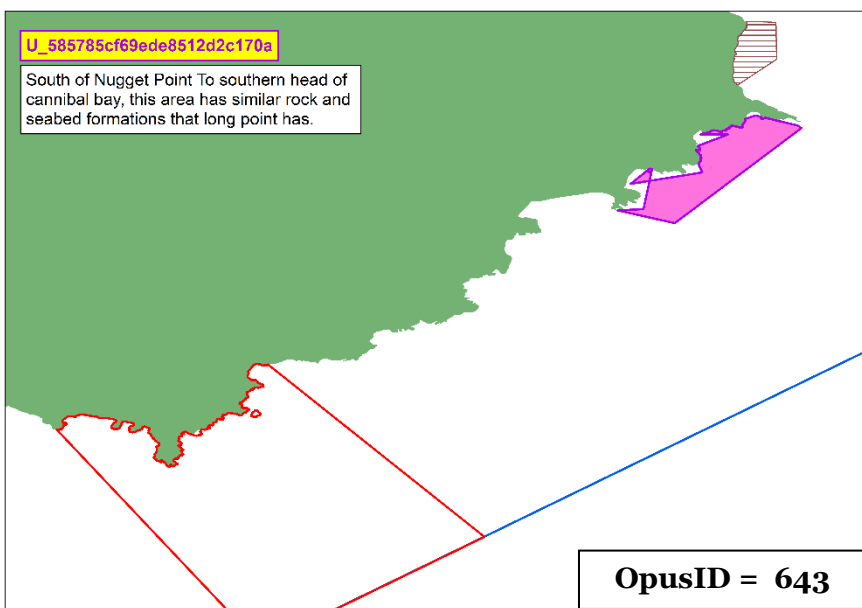
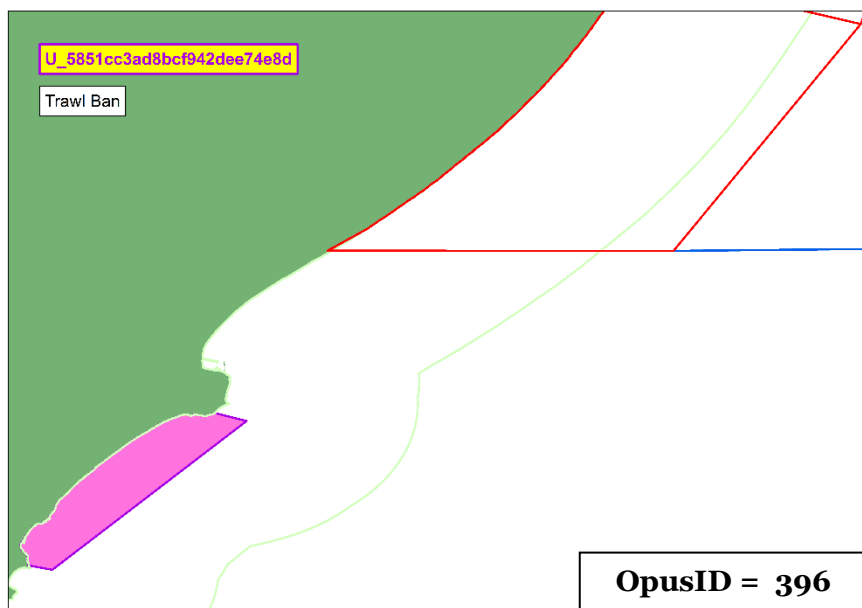
Type1:  Type 2:  Hashed Lines = change to Type 1  type 2 
removal



(#254) - I support the kelp forest because it is a good breeding ground for fish which recreation fishers would like to see. Would like to see tougher law to those who take to many the ocean should be used for recreational fishers to get a feed not fill a freezer.

Appendix 23: Submitter maps showing additional sites

Type1:  Type 2:  Hashed Lines = change to Type 1 removal  type 2 

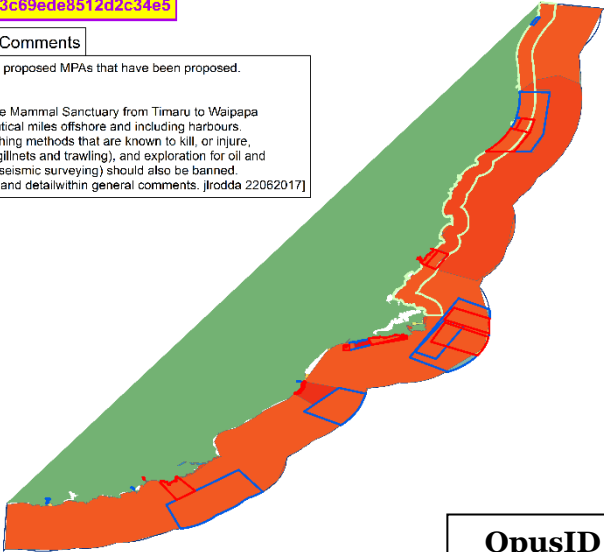


U All_5858853c69ede8512d2c34e5

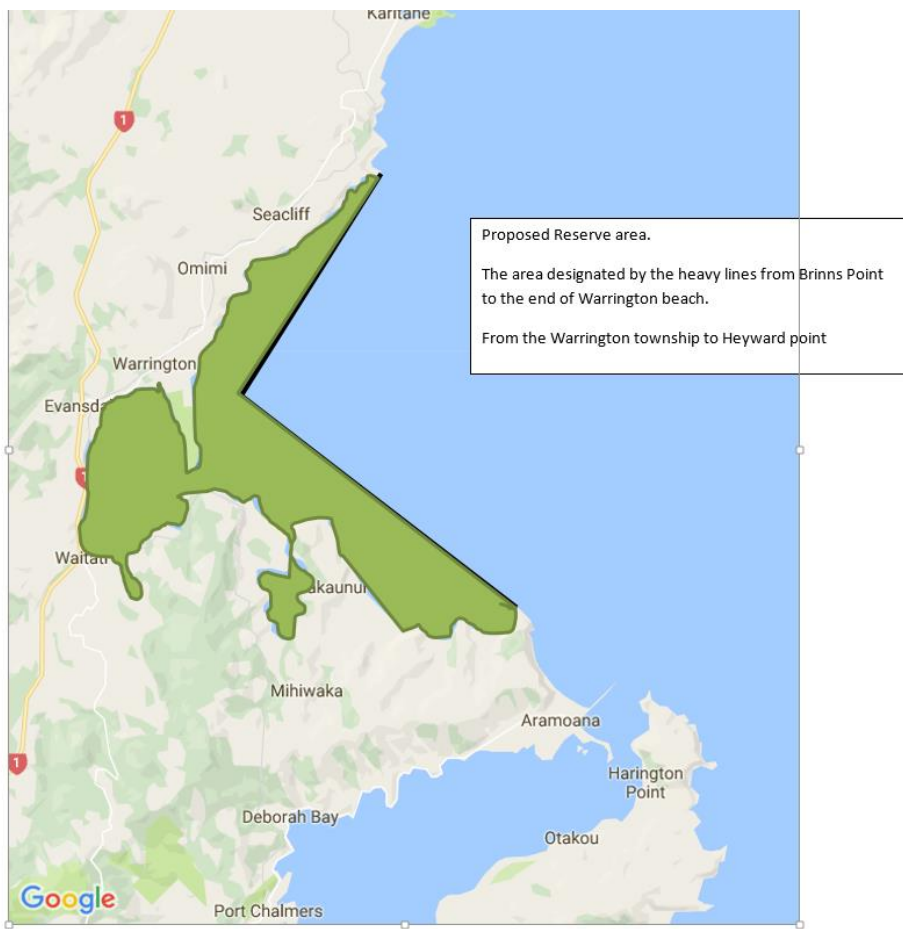
As in General Comments

I wish to support all proposed MPAs that have been proposed.

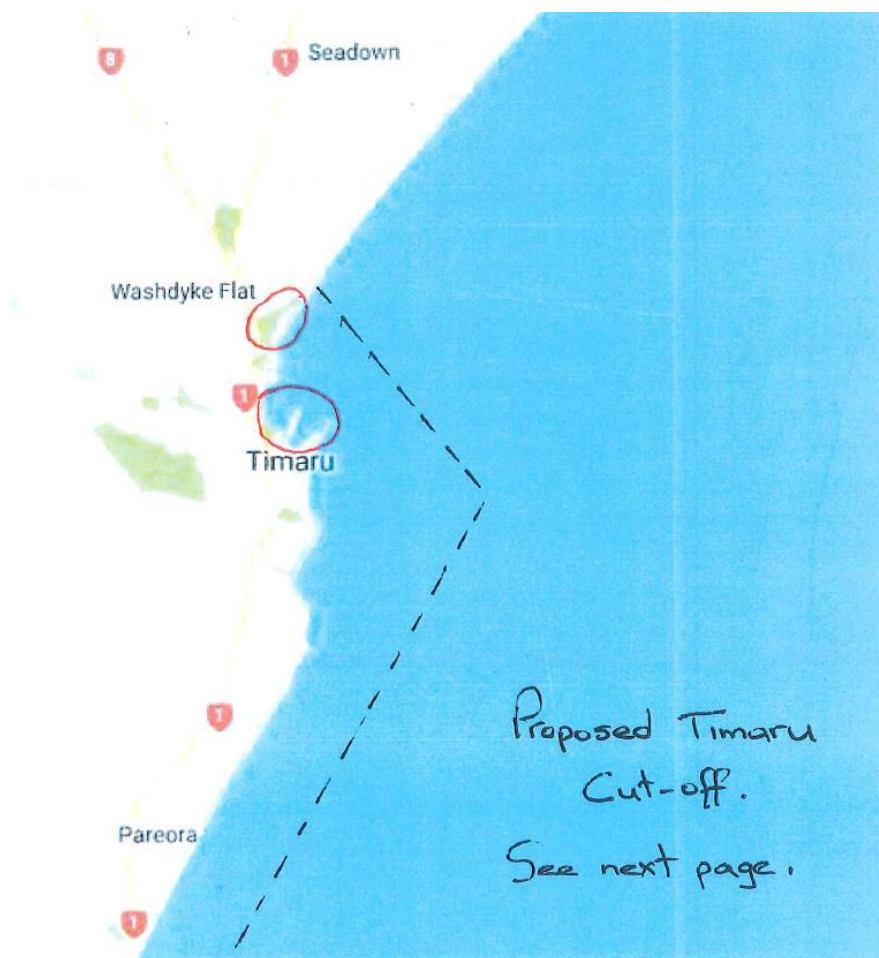
In addition:
Creation of a Marine Mammal Sanctuary from Timaru to Waipapa Point, out to 12 nautical miles offshore and including harbours.
Within this area, fishing methods that are known to kill, or injure, Marine mammals (gillnets and trawling), and exploration for oil and gas using airguns (seismic surveying) should also be banned.
[There is more text and detail within general comments. |Jrodda 22062017]



OpusID = 732



(#702)

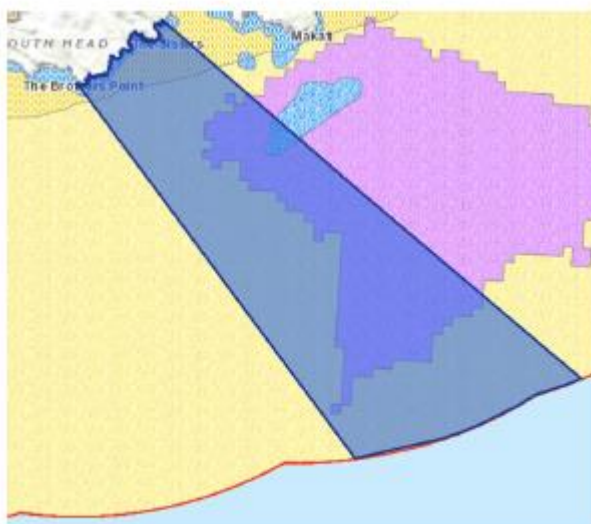


(#2466)

Recommendation for additional reserve at Te Rere, Catlins





The proposals do not represent any deep gravel habitats, or deep reef habitat within a high current area (according to Sea Sketch NIWA tidal current model) in the southern latitudes of the SEMP region. A marine reserve as shown below (231.6km²) would represent 6 coastal habitat types; deep sand, gravel and reef, exposed shallow sand and reef and a small area of exposed intertidal reef. Biodiversity here includes foraging area for yellow-eyed penguins at breeding colonies at Te Rere Forest & Bird Reserve and Shades Beach Conservation Area, sooty shearwater, spotted shags, Stewart Island shags, terns, gulls and various albatross species. The sedimentary rock strata ranges from vertical to horizontal, creating an extensive reef system with rock pools, providing a range of differing microhabitats including sheltered indented crevices and bays. Good public access is available to Dummy's Beach.

Forest & Bird Recommendation for Te Rere Type 1

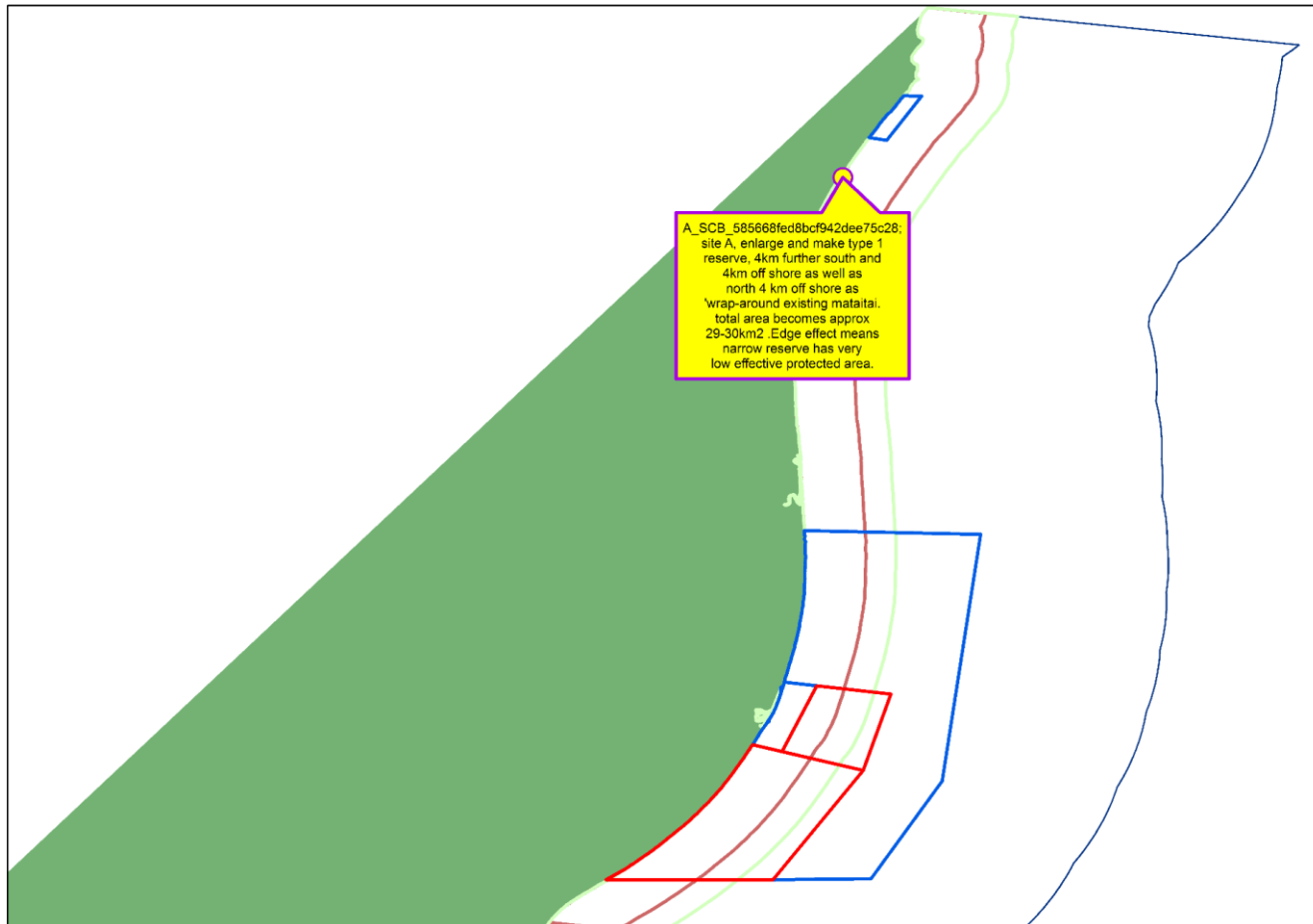


(#2494)

Appendix 24: Showing points of interest from Seasketch

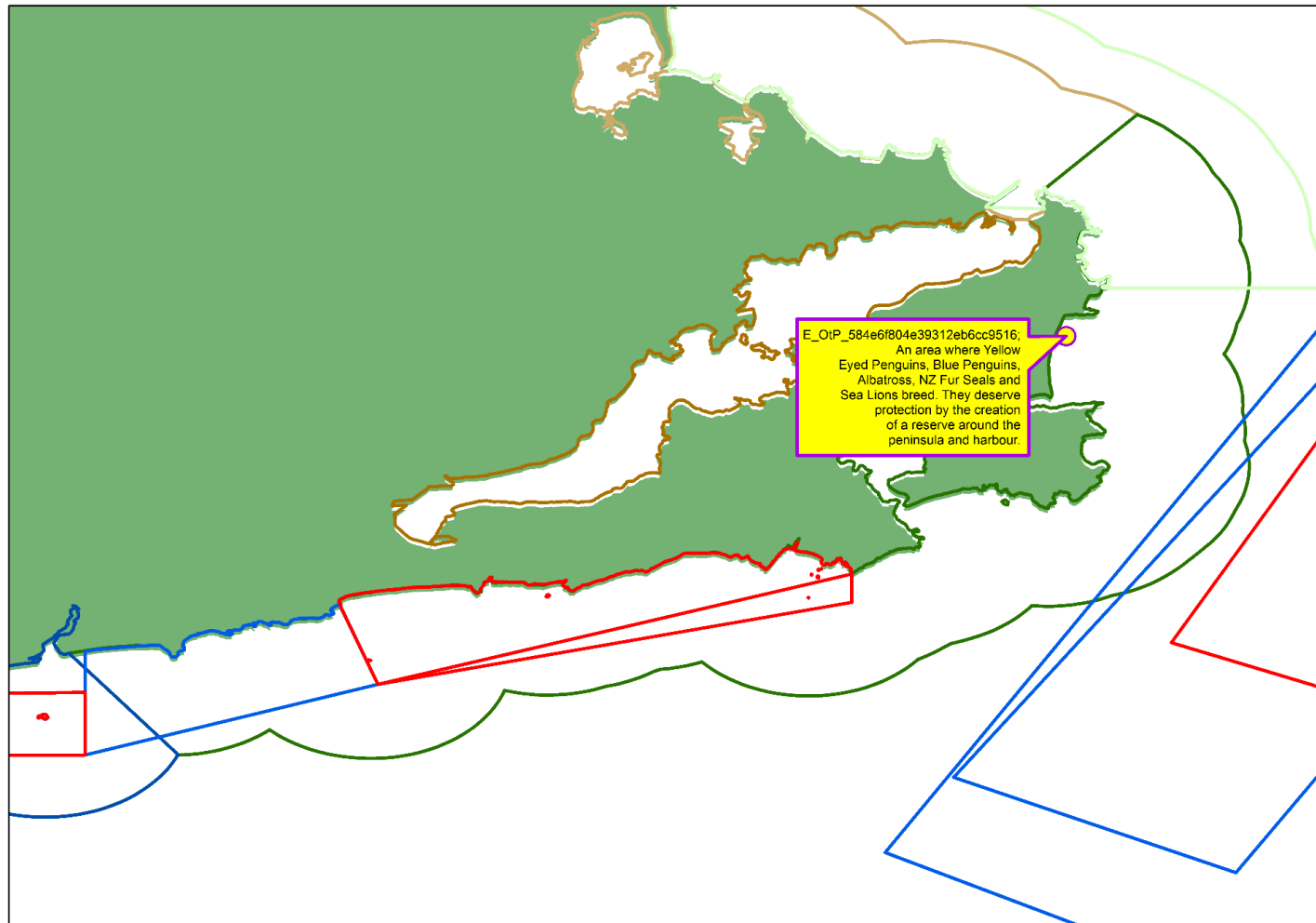
Type 1:  Type 2:  Hashed Lines = change to Type 1  or type 2  or removal 

Points of Interest – North Otago



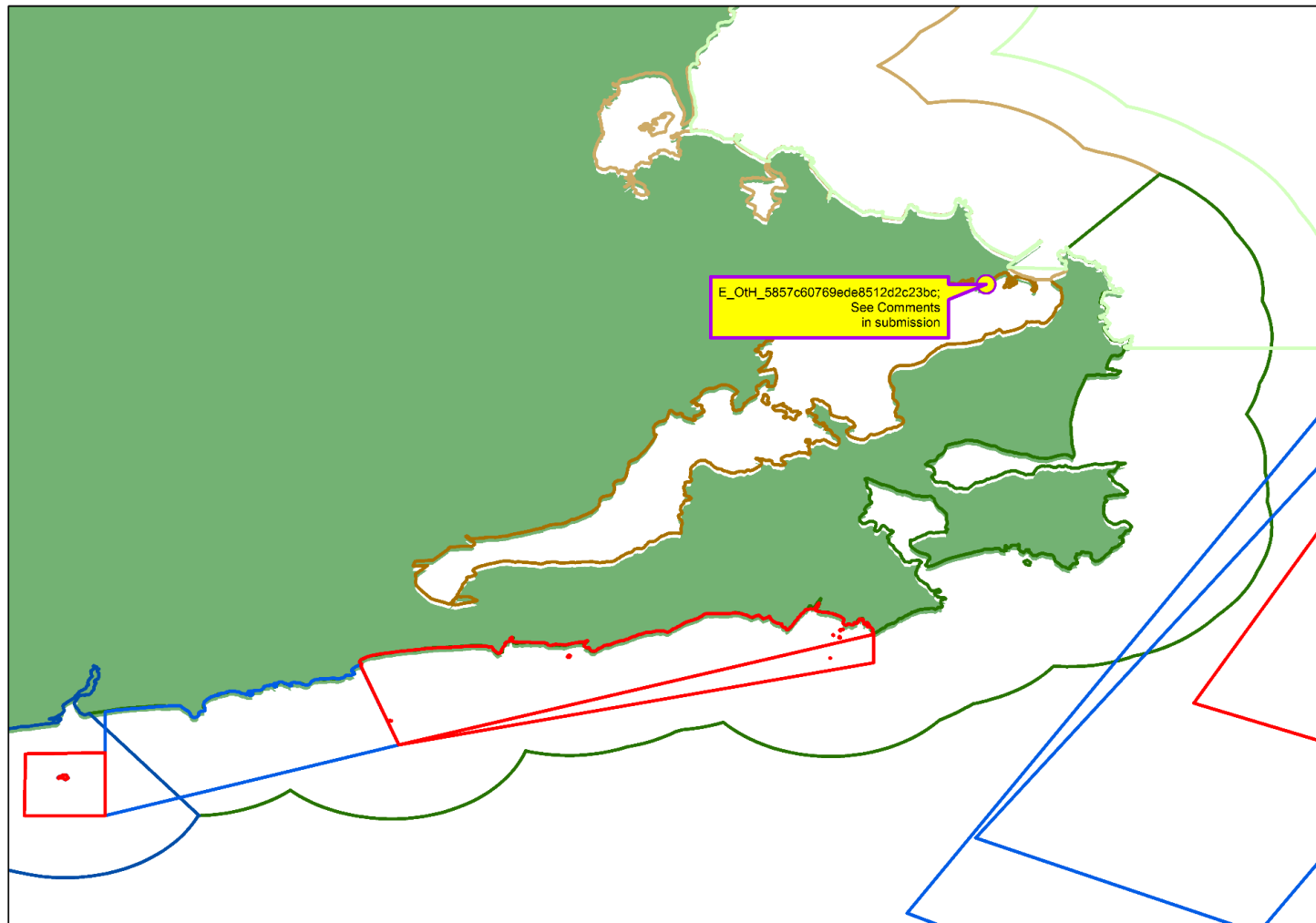
(#595)

Points of Interest – Otago Peninsula



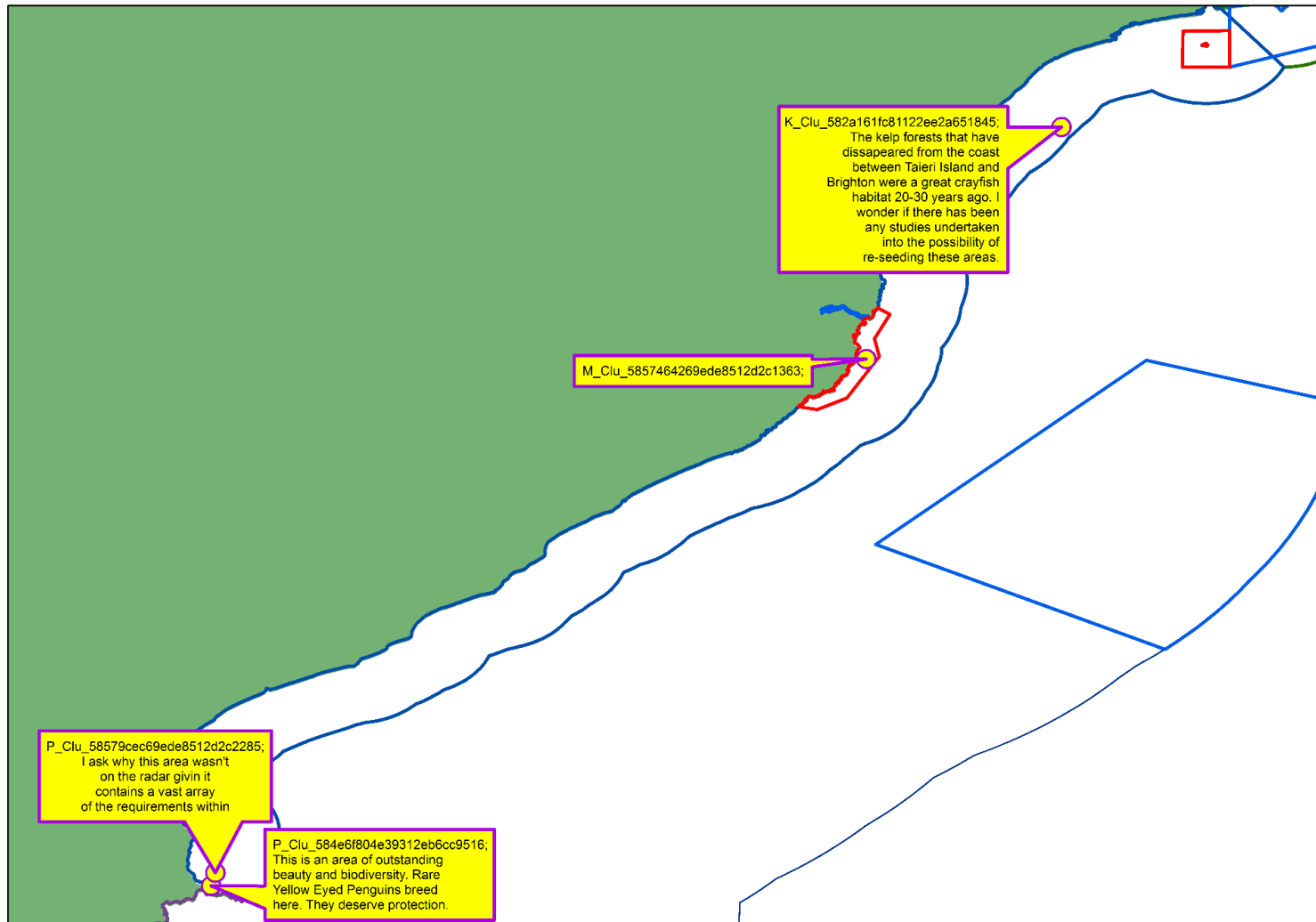
(#157)

Points of Interest - Otago Harbour



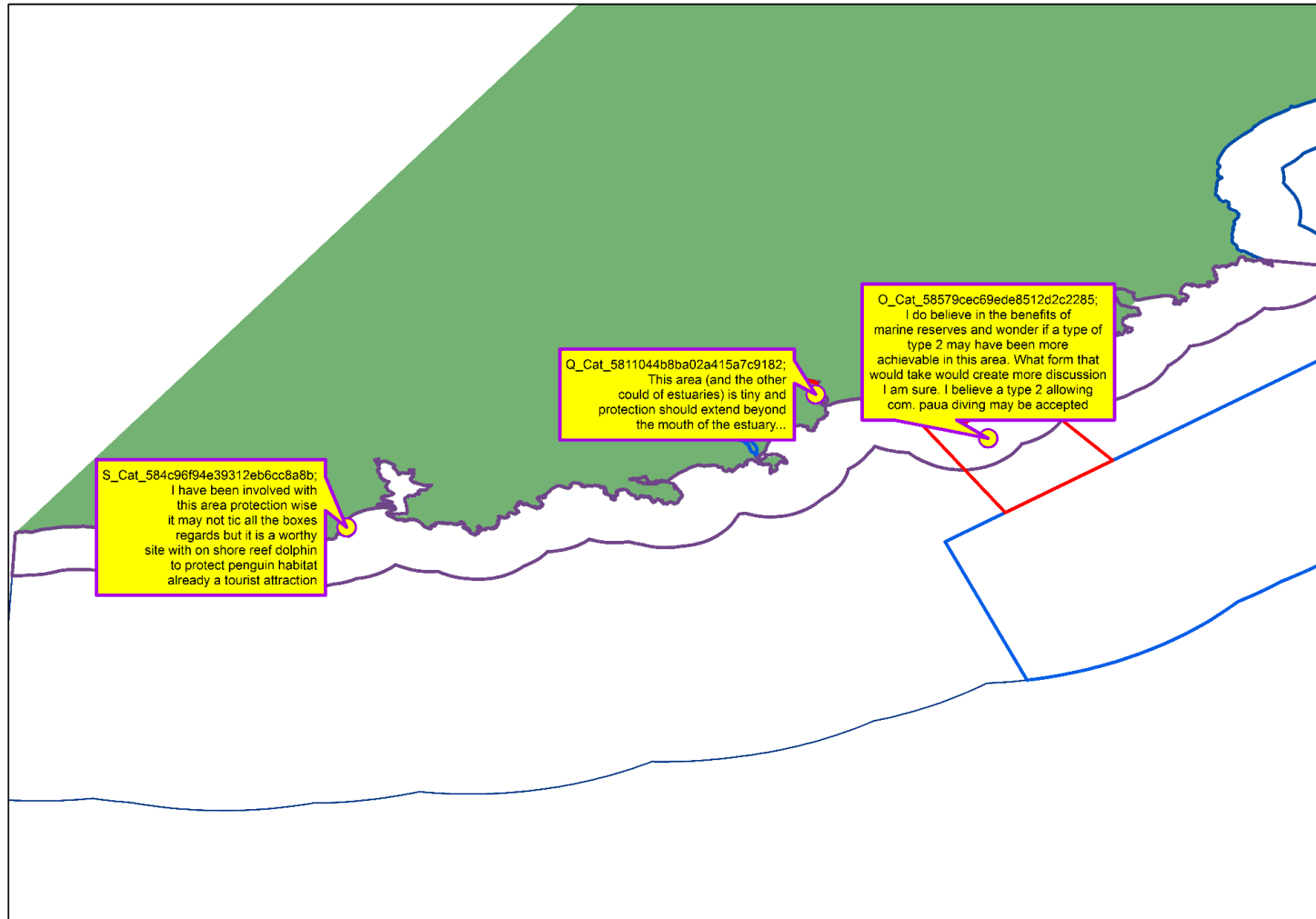
(#690)

Points of Interest - Clutha



(#660, 157, 623, 33)

Points of Interest - Catlins



(#124, 9, 660)

Appendix 25: Technical References

	References publications	Ecological / Habitat information	Commercial fishing information	Size/Spacing	Other
General Comments	<p>#213 Survey Results, newspaper articles, MPI publications</p> <p>#365 – References on benefits on no take reserves</p> <p>#477 Marine reserve design, Shifting baseline syndrome, Long Point fishing in 1920s,</p> <p>#1894 – Technical references</p> <p>#2484 – References various benefits and changes</p> <p>#1897 –Numerous references: science, policy, fisheries management,</p> <p>#2467 References, tables & figures</p> <p>#2501 – MPA Policy, Species – many references</p> <p>#2475 – Crown Minerals Act Provisions</p>	<p>#616 – Penguin habitat, threats, breeding, plans for future</p> <p>#642 - Lengthy discussion of Habitats</p> <p>#734 – IBAs, Penguins and Seabirds including maps</p> <p>#1108 Paua, Rock lobster, phytoplankton, southern flatfish and newspaper articles about Marine reserves</p> <p>#1897 Ecosystems and Habitat</p> <p>#2466 – Penguin habitat</p> <p>#2671 – Biodiversity</p> <p>#2473 – Sea Lions</p> <p>#2474, 2476 – Penguins – data</p> <p>#2498 – Conservation management</p> <p>#2495 – Marine conservation, international context and IBA Maps</p> <p>#2502 – Bird numbers</p> <p>#2479, 2677, #2678 & #2679– Hectors dolphins</p> <p>#2509 – Biodiversity and Habitat</p>	<p>#642 – Fish and shellfish stocks and paua, displacement</p> <p>#2469 – Catch displacement</p> <p>#2508, #2883 – Commercial quota</p> <p>#1957 – Eel and QMS catch data</p> <p>#2481 Paua industry</p> <p>#2508 – Rock Lobster Industry</p> <p>#2880 – Fishery displacement effort</p> <p>#2467 - Annual catch figures, Distribution of fishing effort, Expected commercial catch displacement/impac t</p>	<p>#2507 – Fragmented MPAs</p>	<p>#2465 – East Otago Taiapure</p> <p>#2469 – NTCSA98 Claim Area</p> <p>#2474 – Resource consent references</p> <p>#2475 Offshore Petroleum Exploration</p> <p>#642, 2479, 2677, #2678 & #2679 Iwi co-management</p> <p>#2495 Appendices attached and IBA Maps</p> <p>#2496 Consented discharge area</p> <p>#2500 Lack of protection</p> <p>#2511 Iwi relationship, Otakou Mātaaitai Reserve</p> <p>#2673 – MPA design principles and Forum Membership issues</p> <p>#2678 – youtube link provided</p> <p>#2882 – Consented discharge areas</p> <p>#2887 – Reference to New Marine Protected Areas Act Consultation Document & Displacement Policy</p>

	References publications	Ecological / Habitat information	Commercial fishing information	Size/Spacing	Other
Network Comments	#401 Marine reserves, habitat and other species information #427 Habitat reference #477 Marine Protected Areas #2472 Relating to size #2671 Biodiversity references #1897 Recommended area	#427 Benthic habitat		#401, #2472 Insufficient size and area	#2508 Displaced fishing effort, #2683 Lack of science

Sites

Site	References publications	Ecological / habitat information	Commercial fishing information	Recreational fishing information	Other
A	#2496 – Regional Coastal Plan, #2671 Various	#2466 Penguins	#2467 Catch displacement / fisheries impacts #2887 Displacement %		#2496 Resource consent information
B	#736 IUCN Red List of Threatened Species #1897, #2501 Marine Reserves Act 1971 #2671 Various	#1369 Habitat protection	#2467 Catch displacement / fisheries impacts #2887 Displacement %		
C	#2671 Various		#2467 Catch displacement #2887 Displacement %		
D	#642 Moller Et Al (2013) #736 IUCN Red List of Threatened Species, Dunedin City District Plan #2494 Hectors dolphin surveys #2671 Various	#736 Bird areas and conservation sites	#1957 Eel quota impacts #2467 Catch displacement/impact #2887 Displacement %		#462 Cultural values
E	#95 Juvenile Fish #186 MPA Guidelines #1897 Various references to documents on bryozoans. #2473 Sea Lions #2501 Impact of fishing, bryozoans	#710 Bryozoans	#2467 Catch displacement/impact #2887 Displacement %		
F	#95 Juvenile Fish #145 Various references on the characteristics and habitat of the Canyons. #427 Reference to document on canyon habitat.	#95 Penguin observations	#2467 Catch information - species		

Site	References publications	Ecological / habitat information	Commercial fishing information	Recreational fishing information	Other
	#657 Sea Lions, Personal Observations #1897 Various references to a wide range of species including birds, bryozoans, sponges and anemones. #2473 Sea Lions #2494 Canyon systems and habitats #2671 Various				
G			# 2467 Catch information - species #2887 Displacement %		
H	#735 References document on benthic invertebrates, demersal fish and top predators, including marine birds, pinnipeds and cetaceans		# 2467 Catch information - species #2887 Displacement %		
I	#735 References documents on marine habitats #2671 Various	#733 – Spatial Distribution of Foraging Dives #1897 Range of species	#2467 Catch displacement/impact – CRA7 Rock Lobster	#391 Species catch #661 Where fishing undertaken and the species caught	#2882 Resource Consent information
J	#2671 Various		#2467 Catch displacement/impact – CRA7 Rock Lobster		
K	#1897 Marine Reserves Act 1971		#2467 Catch displacement/impact – CRA7 Rock Lobster		
L	#1897 Council Plan cited #2667, 2681, 2682 MFE Document cited #2671 Various		#1957 Eel quota impacts #2467 – Eel Fisheries.		#186 Otago Coastal Plan #555 Values of Pukekura
M	#2501 Marine Reserves Act 1971 #2671 Various	#324 Personal marine mammal observations	#2467 – Commercial Fishing – Rock lobster, Blue Cod, Trawl fisheries		
N		#1897 Range of species	#680 Paua catch effort #2467 Commercial Fishing – Inshore trawl, set net fisheries #2481 Commercial fishing details		
O	#95 Bycatch #208 Blue Cod #375 Marine Reserves #1897 – Sea life reference cited. #2494 Biogenic Habitats #2671 Various	#402, 1897 Range of species #736 Bird areas and conservation sites	#2467 Catch displacement/impact - pāua, rock lobster, and trawl fisheries #469 Rock lobster fishing & impact #611 Flatfish trawling #2494 Flatfish #2887 Displacement %		#611 safe anchorages
P	#95 Reference to document on Yellow eyed penguin bycatch.	#402 Penguins #1897 Range of species	#2467 - Set net fishery targeting school shark and rig #2887 Displacement %		

Site	References publications	Ecological / habitat information	Commercial fishing information	Recreational fishing information	Other
	#402 Reference to document on Yellow eyed penguin				
Q	#735 Reference to document on reserve size #2667, 2681, 2682 MFE Biodiversity Document #1897 Council Plan cited #2671 Various		#1957 Eel quota impacts #2467 – Eel fisheries		
R	#2667, 2681, 2682 MFE Biodiversity Document #1897 Council Plan cited		#1957 Eel quota impacts #2467 – Eel fisheries		
S	#145 Reference to document on Sedimentation #376 Regional Plan #1897 Reference to document waterfowl habitat #2667, 2681, 2682 MFE Biodiversity Document	#186 Habitat range #370 Lengthy discussion on habitat including photographs #584 Bird count information	#1957 Eel quota impacts #2467 – Eel fisheries		
T	#622 Bladder Kelp report (advice to Minister) #716 statement by NIWA scientist re location of kelp #1897, 2501 Kelp #2454 Fisheries Act 1996 #2671 Various		#374 Seaweed Industry #2467 Impacts on commercial fishing #2485 Kelp harvest		