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Tēnā koe

### **Waikato Regional Council Submission to the Draft Hauraki Gulf Fisheries Plan**

Thank you for the opportunity to submit on the proposed Draft Hauraki Gulf Fisheries Plan. Please find attached the Waikato Regional Council's (the Council's) submission, endorsed by the Council's Strategy and Policy Committee on **1 March 2023**.

Should you have any queries regarding the content of this document please contact Joao Paulo Silva, Senior Policy Advisor, Policy Implementation directly on (07) 9497179 or by email [joapaulo.silva@waikatoregion.govt.nz](mailto:joapaulo.silva@waikatoregion.govt.nz).

Nāku iti noa, nā,

A handwritten signature in black ink, appearing to read "Tracey May".

Tracey May  
**Director Science, Policy and Information**

## **Submission from Waikato Regional Council on the Draft Hauraki Gulf Fisheries Plan**

### **Introduction**

1. We appreciate the opportunity to make a submission on the Draft Hauraki Gulf Fisheries Plan.
2. Waikato Regional Council (the Council) considers it appropriate to have a fisheries plan for the Hauraki Gulf (HG) and we overall support the draft plan. We acknowledge that the Fisheries Plan is constrained by the Fisheries Act 1996 (FA), and we note that engagement and coordinated actions with agencies and stakeholders will be needed to manage biodiversity restoration in the Gulf.
3. We look forward to further involvement in the draft plan and would welcome the opportunity to comment on any issues explored during their development.

### **Submitter details**

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## Summary

2. In summary, the Council's submission:

- a) Supports the partnership between the Crown and tangata whenua in the management of fisheries and acknowledges the importance of fisheries for tangata whenua.
- b) Recommends appropriate resourcing for FNZ to implement the plan and for tangata whenua, the wider community, and stakeholders (when necessary) to participate in any process concerning fisheries in the Hauraki Gulf Marine Park (HGMP).
- c) Acknowledges that there are concerns amongst communities regarding different tools addressing biodiversity restoration in the HGMP.
- d) Considers that scallop dredging should not be permitted within the HG given the extent of impact on the benthic environment, effects on other species and overall health of the marine ecosystems.
- e) Supports FNZ's moving towards an Ecosystem-Based Fisheries Management (EBFM) approach. EBFM is a holistic approach that recognises all the interactions within an ecosystem rather than considering a single species or issue in isolation.
- f) Recommends that plan should provide for a better connection between fisheries management outcomes and marine biosecurity activities and that FNZ should consider the impacts of climate change throughout the whole plan.
- g) Recognises that the plan is constrained by the FA and therefore other agencies and stakeholders need to work towards filling any potential gaps regarding biodiversity and environmental protection with regard to restoring the health of the HGMP.
- h) Provides a table with specific points to management actions.

## Overall comments on the Draft Hauraki Fisheries Plan

4. We acknowledge that Revitalising the Gulf has tools such as the draft Hauraki Fisheries Plan and the Marine protection proposals (Hauraki Gulf Marine Protection Bill) that are currently addressing, or proposing to address restoration of the HGMP, including the effects from fishing activities on biodiversity and the functioning of marine habitats in the HG. We consider that the different tools are causing confusion for our communities.
5. We recommend MPI provides a user-friendly diagram displaying all central government outputs (different plans, areas of coverage and their contents) regarding fishing proposals and publishing this in an accessible way for our coastal communities. This would bring some clarity and prevent misconceptions, such as the idea that the Waikato Region Coastal Plan (WRCP) is aiming to widely prevent or restrict recreational fishing in the HGMP.
6. In addition, the consultation for the trawl corridors may coincide with the notification of the proposed WRCP. Please be aware of the WRCP process and articulate clear messaging that the trawling corridors consultation is a separate process to the coastal plan review.

7. We understand FNZ is seeking high-level feedback on the trawl corridors. We note that at this stage we do not have enough information regarding the proposal. Therefore, we consider it appropriate to wait for the opportunity to assess the consultation documents and have a better understanding of the proposal to then to indicate our position.
8. The Council supports meeting legislative obligations for the partnership between the Crown and tangata whenua in the management of fisheries and acknowledges the importance of fisheries when providing economic, cultural, and social outcomes for tangata whenua. We consider this to be central for how FNZ manages fisheries. Therefore, we consider that MPI must ensure there is appropriate resourcing for tangata whenua, the wider community, and stakeholders (when necessary) to participate in any process concerning fisheries in the HGMP, including future engagement on the 'Trawl corridors'. In addition, MPI must also ensure there is appropriate funding for FNZ to implement the plan and to undertake compliance, monitoring and enforcement actions.
9. The Council recognises that the plan is constrained by the FA and therefore other agencies and stakeholders will work towards filling any gaps identified to manage biodiversity and protect the environment where they are affected by fisheries activities. To this effect, the Council is open to collaborate with FNZ around sharing information to inform model predictions, results from state of the environment monitoring, as well as advancing scientific research.
10. We support FNZ moving towards an Ecosystem-Based Fisheries Management (EBFM) approach. This is a holistic approach that recognises all the interactions within an ecosystem rather than considering a single species or issue in isolation. As such, EBFM can be a necessary component of wider EBM of the HG. We recognise that given the plan is prepared under the FA it does not fully implement EBM. This can be part of managing wider biodiversity values, but it will be necessary to consider if further actions by other agencies and stakeholders are required i.e. to manage biodiversity values without an inherent benefit to fisheries.
11. The Council notes that there is a gap in the plan addressing the connections between biosecurity and fisheries management. The Biosecurity Act 1993 sets responsibilities for Regional Councils for managing biosecurity pests, this aligns with fisheries tools when managing marine habitats and indigenous biodiversity. We recommend that plan should provide for a better connection between the fisheries management outcomes and marine biosecurity activities. This could be done by facilitating opportunities for collaboration and sharing of information between organisations. This would provide for better integrated marine management in an EBFM. In addition, we consider that FNZ should consider the impacts of climate change throughout the whole plan and not only in connection to management action 1.2.4.
12. We also note that the plan aims to support regional councils to adopt resource management measures to reduce sedimentation and other impacts on the HGMP (Management Action 3.4.5). The Council is currently working on implementing the National Policy Statement for Freshwater Management and National Environmental Standards for Freshwater, and we consider this work will address acceptable levels of nutrient and sediment that enters the Gulf.

**Table with comments on the management actions**

13. Table 1 – Specific submission points to management actions

Management Action	Support/ Oppose	Comments
1.1.2	Support	We support excluding recreational scallop dredging from the HGMP. We consider that scallop dredging is directly connected to the overall health of the marine environment in areas in which it is being undertaken. Scallop dredging causes significant physical disturbance in the seabed which impacts both soft and hard bodied organisms. Scallops themselves and many other species are reliant on the habitat complexity which is negatively impacted by the removal of shell material following scallop dredging.
1.1.4	Support in part	We recommend excluding commercial scallop dredging from the HGMP and removing the exception from 1.1.4. We also note that the facilitation approach proposed in 1.1.5 will assist in reducing the impacts of scallop harvest. The Council considers that currently, commercial scallop dredging is inappropriate due to the scallop population declining <sup>1</sup> and concerns over survival of juveniles (recruitment). Within the HGMP, commercial scallop dredging has impacts on the benthic environment and removes the habitat structure and complexity that likely supports scallop recruitment and other species to succeed. Every effort must be taken to support scallop population recovery, in an attempt to avoid repeating the issue of Golden-Tasman Bay where scallops were heavily fished, and populations have not recovered. <sup>2</sup> Scallops have not been well-managed historically or by FNZ. It has largely been local iwi and community action (rāhui) that have responded to the issue.
1.1.6	Support	We recommend FNZ adopts a more collaborative approach for management action 1.1.6. We consider it important to work together to address data gaps, model improvements and monitoring. This could be achieved by a collaborative or a joined-up approach to understand what each organisation is doing and coordinating efforts. There is an opportunity here to share data to inform model predictions and maximise benefits. We consider that data validation for the model prediction will be key to mapping the trawling corridors.
1.3.3 and 1.3.4	Support	We welcome participation and collaboration with WRC for management actions 1.3.3 and 1.3.4, given that these overlap with our function of managing, monitoring and researching marine biodiversity and the state of rocky reef habitats in our region. For example, we have recently mapped the distribution of ‘kina barrens’ (Shears et al. in prep) <sup>3</sup> for the Mercury Island group. We expect that kina management plans will necessitate interaction with the red rock lobster ( <i>Jasus edwardsii</i> ) fishery given its role as a keystone and critical species in temperate rocky reef ecosystems. Currently our surveying has found red rock lobster populations to be low in the Mercury Islands (~2 per 500m <sup>2</sup> ) with the population dominated by sublegal individuals.

<sup>1</sup> [Scallop closures among sustainability measures for fisheries | Beehive.govt.nz](#). and Williams (2022) Surveys of Northland (SCA 1) and Coromandel (SCA CS) scallops, 2021. Hauraki Gulf Forum meeting 28 February 2022.

<sup>2</sup> [Scallop recovery in top of the south still clouded by uncertainty | Stuff.co.nz](#)

<sup>3</sup> Caiger, P.E., Peleg, O. & N.T. Shears (in prep) Biodiversity and Habitat Assessment of the Rocky Reefs at the Mercury Islands.