

Submission to: Revitalising the Gulf Marine Protection Proposals

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About us

1. The Revive Our Gulf project is an initiative to restore the seabed kūtai / green-lipped mussel (*Perna canaliculus*) reefs of Tīkapa Moana / Te Moananui ā-Toi / The Hauraki Gulf.
2. The project vision is a Hauraki Gulf ecosystem with restored mauri / life essence, and returned to a state of natural biodiversity and abundance.
3. The project has three core collaborative partners: the Mussel Reef Restoration Trust (MRRT), an NZ registered charity; The Nature Conservancy (TNC), a global environmental organisation; and the University of Auckland (UoA). We work in partnership with iwi / hapū across Tīkapa Moana / Te Moananui-ā-Toi / The Hauraki Gulf on mussel reef restoration projects.
4. The opinions expressed in this submission are those of the MRRT backed up by science from the Institute of Marine Science UoA. This submission does not reflect the views of TNC or our tangata whenua partners.

General comments of support

5. **We support the Revitalising the Gulf, Marine Protection Proposals package** to establish new marine and seafloor protection areas in the Hauraki Gulf Marine Park / Tīkapa Moana / Te Moananui-ā-Toi (the Gulf).
6. **We encourage Ministers to proceed as quickly as possible** to implement these much needed changes.
7. We support the Hauraki Gulf Forum in its stated goals to protect 30% of the Hauraki Gulf Marine Park and restore 1,000 sq km of shellfish-bed and reef.
8. There is broad scientific consensus that protecting or conserving at least 30% of land and oceans is the minimum needed to curb biodiversity loss and to reach global climate goals. The Hauraki Gulf Forum's 30% marine protection goal accords to the proposed United Nations Convention on Biological Diversity target of 30% marine protection by 2030.
9. MRRT is a member of The Hauraki Gulf Alliance – a collaboration of environmental and recreational fishing organisations – calling for an end to destructive mobile bottom contact fishing methods that impact the seabed in the Hauraki Gulf Marine Park.
10. Globally, marine areas that abound densely populated cities are under significant pressure. Auckland and the Hauraki Gulf Marine Park are not unique in this challenge, and increasing protection and more careful management of inshore coastal areas is vital.

Why marine protections are important to us?

11. The Revive Our Gulf project is all about regenerating ecosystems which have been removed from the Gulf or are severely depleted. Marine protection is critically important to the success of our kaupapa.
12. Marine protection will protect some known critically important wild mussels. These remaining, older wild mussels are vital brood stock. Large adults make a disproportionate contribution of eggs and sperm. They are now incredibly valuable as a source of scientific study and as potential brood stock while we are attempting to regenerate the reefs.
13. New research indicates that mussel farms may not add to viable larval flow indicating the importance of wild stock (Toone et al. 2022). The intention of the Revive Our Gulf project is to create large kūtai/mussel beds that will increase larval supply and stimulate natural recruitment.
14. The proposed marine protection package includes areas where we are currently undertaking active restoration and others areas we are planning restoration work. Protection helps insure our investment in this mahi.
15. Kūtai are dependent on algae species to complete their lifecycle, specifically, larvae usually settle first on flexible filamentous surfaces such as seaweed. Reducing fishing effort (by creating HPAs) should aid the restoration settlement substrate needed for kūtai, and we note that kūtai are farmed extensively and available cheaply at the supermarket.

Support for customary practices, special legislation and active restoration

16. We acknowledge and support the Government's work to recognise customary practices of Mana Whenua while meeting the needs of marine protection in the Hauraki Gulf.
17. We request that the Government puts appropriate effort into public education around customary practices as, presently, little information is available to support public understanding.
18. We support customary management tools such as rāhui, and observe that their increasing use in the Hauraki Gulf Marine Park is symbolic of a failure of Government agencies to manage and protect the Gulf's marine ecosystem through current legislative and regulatory tools.
19. **We therefore support the Government creating special legislation** (i.e. the Hauraki Gulf Marine Protection Bill) for the Hauraki Gulf Marine Park.
20. In creating special legislation **we request the Government be future focussed and:**

- Provide a mechanism to introduce additional marine protected areas over time.
 - Include a marine protection target of 30% marine protection for the Hauraki Gulf, to provide clear points of reference for ongoing engagement with iwi and stakeholders and to align to the goals already set by the Hauraki Gulf Forum.
 - Be based on best practice marine protected area design principles: no take, well enforced, old (>10 years), large (>100 km²), and isolated by deep water or sand (Edgar et al 2014).
 - Recognise ecosystem based management principles, including explicitly acknowledging the interconnectedness among systems, such as between land and sea; and recognising the strong interdependencies between ecological, social, economic and cultural perspectives. (TNC Marine Spatial Planning).
21. In a New Zealand context, an ecosystem based management approach would also incorporate both science and mātauranga measures to recognise and meet Tiriti obligations and because such an approach should get the best results for the environment.
22. **We support the inclusion of “active habitat restoration initiatives**, such as the removal or addition of marine life (translocation) to improve habitats of interest” in the HPA proposals.
23. Our research shows that active restoration alone is unlikely to restore the Gulfs historic kūtai reefs at any scale. Passive restoration will need to work hand-in-hand with active restoration to reduce the cost of the restoration effort in order to achieve square km scale.
24. **We request that the Government take care when designing the legislative provisions for active habitat restoration, so as to enable the ability to add species and also supporting material, such as substrates, and structures.**
25. We also request that care be taken to ensure the planning and consenting processes for such activities are pragmatic and able to be responsive to urgent situations and opportunities. For example, earlier this year, Revive Our Gulf prepared and undertook a large mussel deployment in just six weeks, to coincide with the first Matariki public holiday, at the request of one of our iwi partners.
26. The Government could consider allowing Territorial Authorities to manage such permissions under regional plans and consenting processes, or in the very least, ensure that the responsibilities between the Territorial Authorities and the Department are clearly articulated.
27. We are interested in undertaking mussel reef restoration in several of the HPAs. **We would therefore kindly request to be included in discussions with Mana Whenua about biodiversity objectives.** We are also working on translocations of other species which may accelerate biodiversity goals.

28. We already have relationships and plans with several Tangata Whenua for mussel reef restoration in their respective rohe. We believe by being included in the kōrero about biodiversity objectives we may be able to offer our support to realise those objectives faster.

Seafloor Protection Areas (SPAs)

29. As noted above, MRRT is a member of The Hauraki Gulf Alliance – a collaboration of environmental and recreational fishing organisations – calling for an end to destructive mobile bottom contact fishing methods that impact the seabed in the Hauraki Gulf Marine Park.
30. We support the Hauraki Gulf Forum’s policy to remove all industrial bottom trawling and scallop dredging harvest techniques from the entire Hauraki Gulf Marine Park.
31. These fishing techniques were responsible for the loss of huge (100s of square kilometres) kūtai ecosystems in Aotearoa New Zealand.
32. Although we would like to see the entire seafloor of the Hauraki Gulf Marine Park protected, we were also involved in the Hauraki Gulf - Benthic Spatial Planning Advisory Group (HG-BSPAG) with DOC which was run by Fisheries New Zealand. In the design process, the SPAs were useful in limiting the impact of bottom trawling and Danish seining on the seafloor, and in that vein, we understand that the SPAs are critical to the design of the bottom trawling corridors.

Regular review and adaptive management

33. *Revitalising the Gulf* refers to the development of a monitoring and reporting framework for the Hauraki Gulf, which will be underpinned by an adaptive management cycle to ensure management actions can be adjusted based on regular evaluation.
34. The *Marine protection proposals* consultation document is currently silent on the matter of evaluation.
35. Although we understand the sense of review to assess progress and refine goals and conservation targets, we suggest the Government exercise caution when defining how regular evaluation will take place. The IUCN definition of a marine protected area includes that the area should be managed in perpetuity and not as a short-term or temporary management strategy (IUCN 2008,2013).
36. *Revitalising the Gulf* also refers to the development of a monitoring and reporting framework, and the development of a Gulf research plan.

37. As an organisation that invests in and undertakes considerable research and development we would be interested to work with the Government in preparation of its research plan.
38. Over the last four years the Government has provided some seed funding for mussel reef restoration – for which we are grateful. MPI/FNZ has also put in resources, created the biosecurity risk assessment and given guidance on mapping.
39. MRRT already has a good understanding of most of the topics identified for the *Habitat Guidance Framework*, the key deliverable for Active Habitat Restoration identified in Revitalising the Gulf. A bigger impediment to progress is the lack of funding needed to develop capability and capacity.
40. In the short-term, funding is required to undertake extensive habitat mapping and to establish collaborative projects with Mana Whenua. Over time, funding to build capacity for scale will be needed. In 2020, Australia’s Federal Government invested [\\$20 million \(AUD\)](#) in shellfish restoration (TNC 2020).
41. The Sea Change Ministerial Advisory Committee report noted that “Our major concern with this part of the strategy is a complete lack of reference to funding sources for restoration. While identifying regulatory barriers is mentioned, there is no mention of funding barriers, which are arguably just as significant. Active restoration efforts will require resources to implement and sources of funding should be identified.”
42. We request the Government allocate funds for monitoring, research and reporting for the Hauraki Gulf, to match the scale of the problem we are working with.

Conclusion

43. If implemented along with the Hauraki Gulf Fisheries Plan, the marine protection proposals have the potential to move the needle on ecosystem health for Tikapa Moana / Te Moananui ā-Toi / The Hauraki Gulf.
44. It has now been almost 10 years since stakeholder engagement on Sea Change commenced.
45. There is broad public support for more marine protection in the Hauraki Gulf. **77% of respondents supported the idea of putting 30% of the Hauraki Gulf into marine protected areas. Only 5% were opposed in a [recent Hauraki Gulf Forum research poll](#)** conducted by Horizon Research. There is clear mandate to proceed with this proposal, and more substantial protections in the Hauraki Gulf Marine Park.
46. Along with many other organisations, including land based restoration activities, Revive Our Gulf is working to build a healthier, more vibrant moana, but it is the Government that holds the keys to unlock the benefits that would result from marine protection of this scale. We need all these efforts combined.

47. **Urgent action is needed to repair damage to the Gulf and to stop it degrading further. We encourage Ministers to proceed as quickly as possible to implement these much needed changes. It has our absolute support.**

The Mussel Reef Restoration Trust / Revive Our Gulf project
www.reviveourgulf.org.nz

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