The Mussel Reef Restoration Trust
Te Ohu Whakahaumanu i ngā Ākau Kūtai

Revive our Gulf

Submission to: Bottom Fishing Access Zones in the Hauraki Gulf Marine Park

6 November 2023

Contact:

Katina Conomos
Kaihautū / Programme Director
katina.conomos@reviveourgulf.org.nz

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 / 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), a NZ registered charity; The Nature Conservancy (TNC), a global environmental organisation; and the University of Auckland (UoA). The Revive Our Gulf projects are delivered in partnership with iwi / hapū across Tīkapa Moana / Te Moananui ā Toi / Hauraki Gulf.

4. The opinions expressed in this submission are those of the MRRT backed up by science from the UoA Institute of Marine Science. This submission does not reflect the views of TNC or all our Tangata Whenua partners.

5. MRRT is a member of The Hauraki Gulf Alliance – a collaboration of over 90 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 (HGMP).

General comments

6. We recognise the diverse interests Māori have in fisheries, including commercial, recreational, and customary practices. We fully endorse Mana Whenua's rightful exercise of their ancestral harvesting rights for local kaimoana and their participation in the management of sacred sites. Therefore, we support the Government's commitment to uphold the rights of Tangata Whenua concerning fisheries.

7. The increasing chorus for discontinuing bottom contact fishing methods in the HGMP is noteworthy, as evidenced by the following:

    a. The Sea Change Plan (prepared between 2013-2016) acknowledged the damaging impacts of bottom contact fishing methods on marine habitats and in response required a phase out of all bottom trawling, Danish seining and tipa / scallop dredging from the Hauraki Gulf, with all such methods excluded by 2025.

    b. The Hauraki Gulf Forum has a goal to “remove from the Marine Park of all fishing methods that damage the seafloor”.

    c. A survey commissioned by the Hauraki Gulf Forum in 2021 indicated 84% support for an end to bottom impact fishing in the HGMP.

    d. On the 22 June 2023 Ministers were presented with a 36,589 signature petition to stop bottom impact fishing in the HGMP.

8. Given the persistent calls from the community, it is perplexing and deeply disappointing that the Fisheries New Zealand Discussion Paper has failed to include an option for the complete removal of bottom contact fishing methods from the HGMP.

9. If such an option were to be proposed, it would be our preferred choice and our submission would be concise. In the absence of that option, we reiterate our perspective on why ending bottom contact fishing methods in the HGMP is necessary.

Statement from Ngāti Manuhiri

10. Te Moananui ā Toi and all the islands and rocky outcrops are connected by its own mauri / lifeforce. Ngāti Manuhiri have occupied these oceans for centuries as kaitiaki, and uphold their traditions and customs for time immemorial.

11. Destructive fishing practices such as trawling, dredging and seine fishing destroys Ngāti Manuhiri's rohe moana, deliberately diminishes their responsibilities as kaitiaki and fundamentally breaches Ngāti Manuhiri's interests and rights as Tangata Whenua guaranteed to all Māori under Te Tiriti o Waitangi.

12. Ngāti Manuhiri, as partner with Revive Our Gulf, opposes trawling and all options presented by government.

Bottom contact fishing methods, and why they should end in the HGMP

13. The HGMP is a unique natural asset valued for generations and being adjacent to Auckland, New Zealand's largest metropolis, it has had to, and continues to, endure intense pressure from urban development, sedimentation, pollution, and recreational and commercial extraction.

14. The seafloor is a crucial component of the ocean ecosystem as it provides a home for a diverse array of species, such as corals, sponges and shellfish, and plays a significant role in processes such as carbon and nutrient cycling, supporting the overall health of the ocean and the planet.

15. Bottom trawling and dredging harm seafloor ecosystems and habitats. These practices severely disrupt and, in many cases, destroy delicate seafloor habitats, killing and displacing marine habitat and altering important ecosystem processes.

16. This 1907 research trawl photo, from the Steam Trawler Nora Niven with the caption 'beautiful but profitless' depicts a coral and sponge haul. The caption characterises it as "muck" in trawling terms, acknowledging its uselessness but also praising its visual beauty.[1]

[1] With thanks to the Gulf Journal, Shaun Lee and Papers Past.

BEAUTIFUL, BUT PROFITLESS.

Image credit Auckland Libraries Heritage Collections NZG-19071116-0009-03

17. This image serves as a stark reminder of the extensive damage caused by mobile bottom impact fishing. While the industry narratives claim to only operate in "sand or mud" areas, it's evident that the Gulf's once diverse and intricate habitats, such as horse mussel beds, scallop beds, seagrass, and more, were thriving in these soft sediment environments. These habitats played a crucial role in supporting corals and other fauna that existed on or just above the seafloor, mounting up to a richer and more diverse marine ecosystem.

18. The history of bottom trawling outlined in the submission by the Environmental Defence Society documents how the long-term effects of bottom trawling and dredging have altered the seafloor and health and productivity of the Hauraki Gulf.

19. This history of significant alteration to the seafloor is why Revive Our Gulf exists. The HGMP once had over 600 sq. km of sub-tidal, soft-sediment mussel reefs which were once a fundamental biogenic habitat for the Gulf. From 1910-1965 these reefs were fished out for consumption, through bottom contact fishing in the form of dredging – until the fishery completely collapsed. Today, sub-tidal kūtai / green-lipped mussel beds are functionally extinct, and the same species is farmed extensively in various places in the Hauraki Gulf. In over 50 years since, these mussel reefs have not replenished on their own.

20. Today, we are still seeing history repeat. In 2017 the Southern Scallop Fishery (SCA7), which sits around the Nelson region, was fully closed following surveys confirming it had been depleted. It is now entering its sixth year of closure with the MPI website stating that “surveys have shown that scallop densities and recruitment are overall still too low to support sustainable fishing of scallops in SCA7.”

21. In December 2022, the then Minister of Oceans and Fisheries, David Parker, used emergency powers to close the two remaining Coromandel tipa / scallop fisheries near Little Barrier / Te Hauturu-o-Toi and in the Colville channel, because the scallop beds had shown a serious decline.

22. The discussion document highlights in the impacts of sediment plumes from bottom trawling, noting that sediment plumes can reach heights of 2-4 meters and disperse over significant distances, thus having consequences beyond the trawl site. Even small sediment deposits (a few millimetres) on the seabed can stifle the growth, expansion, or recovery of small corals. Sediment plumes choke filter-feeding animals and smother photosynthesising plants.

23. The adverse effects of dredging, the primary method for harvesting tipa / scallops, have unquestionably contributed to the collapse of both the scallop fishery in the HGMP and the Southern Scallop Fishery. MPI's Review of sustainability measures for scallop (SCA CS) for 2023/24 noted risks and threats including that "*The effects of fine sediments on scallop habitat may be exacerbated by the use of mobile bottom contact gears such as dredging and trawling*".[2]

24. Despite these devastating collapses, the commercial fishing industry (at large) has failed to voluntarily adopt newer and less damaging technologies.

Biosecurity threat - exotic Caulpera

25. We are currently confronted with a significant biosecurity challenge stemming from the discovery of exotic *Caulerpa* around Aotea / Great Barrier, AhuAhu / Great Mercury, Te Kawau Tūmarō-o-Toi, Waiheke Island, and the Bay Of Islands.

26. Exotic *Caulerpa* has the potential to profoundly alter the marine environment, displacing native species and significantly reducing biodiversity.

27. Considering the threat posed by exotic *Caulerpa* and the costly and complex efforts required to contain and remove it, engaging in trawling activities within the HGMP, especially in areas where known or potential exotic *Caulerpa* is found, is illogical and contradicts the precautionary principle.

28. All bottom contact fishing methods may worsen and hasten the spread of this invasive species and its detrimental effects.

29. We therefore seek the urgent and total removal of bottom trawling and Danish seining from the HGMP.

Scientific trawling

30. While we understand that the focus of this consultation is focussed on addressing the adverse impacts from fishing on benthic habitats, **we propose that as a component of this decision, the 'scientific' bottom trawling conducted by Fisheries New Zealand in collaboration with NIWA within the HGMP and in areas currently designated as protected from such activity should also be discontinued.**

[2] https://www.mpi.govt.nz/dmsdocument/54730-Review-of-sustainability-measures-for-scallop-SCA-CS-for-202324-Discussion-document

Ecosystem-Based Management as a basis for decision making

31. Through Te Mana o te Taiao and this Fisheries Management Plan, the Government has committed to ecosystem-based management of fisheries (EBFM).

32. Effective management of the benthic habitat is a fundamental component of EBFM.

33. MRRT supports the Environmental Defence Society's submission, which raises concerns about the reliance on modelling that considers only the presence or absence of specific species, neglecting the broader impact of trawling on soft seabed sediments.

34. Infauna (animals that live in the sediments) that are sensitive to bottom impact fishing were excluded from the modelling, we understand, due to technicalities.

35. An approach that does not recognise the value of all habitats and the interdependence of species within the Gulf's ecosystem health falls short of an EBFM approach.

36. Another shortcoming in the modelling we wish to draw attention to is that mobile species including tipa / scallops and burrowing animals like ghost shrimp and crabs were excluded from because they were mobile.

37. As outlined above, bottom impact fishing has been implicated as a key stressor of the collapsed tipa / scallop beds.

38. The failure to include tipa / scallops in the modelling means that options proposed do not account for tipa / scallop recovery in unknown beds and will allow bottom impact fishing on historic commercial beds. This is contrary to the Hauraki Gulf Fisheries Plan which signals a transition to alternative lower impact scallop harvest methods, including new innovative methods to reduce physical disturbance of tipa / scallop habitat.[3]

39. Again, we argue that **an approach that does not recognise the value of all habitats and the interdependence of species within the Gulf's ecosystem health falls short of an EBFM approach.**

40. We urge the Government in this parliamentary term to explore strategies for and implement an EBFM approach. The current approach to EBFM appears superficial, with horsetrading between industry revenue and environmental impact. There's a need to place ecosystem wellbeing at the core of decision making to address these concerns.

41. Until ecosystem wellbeing takes precedence in decision making, our current trajectory for the Hauraki Gulf remains a cause for concern.

42. The complete cessation of all bottom contact fishing methods, combined with the enactment of Hauraki Gulf / Tīkapa Moana Marine Protection Bill, would more effectively uphold the "nationally significant" status of this Park, as stated in Section 7 of the Hauraki Gulf Marine Park Act 2000.

[3] https://www.mpi.govt.nz/dmsdocument/58396-Hauraki-Gulf-Fisheries-Plan, Management Actions 1.1.2 and 1.1.3