



**National Council of  
Women of New Zealand**

Te Kaunihera  
Wahine O Aotearoa

National Office  
Level 4 Central House  
26 Brandon Street  
PO Box 25-498  
Wellington 6146  
(04) 473 7623  
www.ncwnz.org.nz

26 September 2007

S07.44

**Submission to the Ministry of Conservation and the Ministry of Fisheries on the Marine  
Protected Areas -Draft Classification and Protection Standard, June 2007**

NCWNZ is an umbrella organisation representing 46 Nationally Organised Societies and National Members. It has 28 Branches throughout the country attended by representatives of those societies and some 150 other societies. It also has three satellite groups and three regional consultation groups. NCWNZ is representative of approximately 350,000 women, via its affiliated bodies. The Council's functions are to serve women, the family and the community at local, national and international levels through research, study, discussion and action. NCWNZ welcomes the opportunity to consider this Consultation Document. The response has been prepared by the Environment Standing Committee following circulation of the questions to NCWNZ members. Five branches and three NOS responded.

The NCWNZ passed a resolution in 1992 supporting the establishment of Marine Reserves, and many submissions have been made since then on the Marine Reserves Act.

It is recognised that there are approximately 25 Marine Protected Areas, mostly coastal, with a total of about 38,000 sq. Ha. This is only a small fraction of the total New Zealand marine environment of approximately 4.1 million square kilometres. This information was not in the document, which was surprising.

***Specific Comments:***

**Part 1, Coastal and Marine Habitat and Ecosystem Classification**

The majority of NCWNZ respondents support the purpose of the Report, which is to describe an approach to the classification of coastal and marine habitats and ecosystems and to explain what biological and physical information will be used to assist classification and Marine Protected Area (MPA) planning. The Department of Conservation is to be commended for this is world leading work which will assist us to further lock in New Zealand's reputation on the world stage as an environmentally conscious and active nation developing in a sustainable format.

However, it was noted that it has taken 15 years to formulate a Policy:

*"To protect marine biodiversity by establishing a network of MPAs that is comprehensive and representative of New Zealand's marine habitats and ecosystems"*

It is strongly felt by the majority of responders that this policy could have been expressed in 1992, being simple common sense. One branch thought that, given submissions and discussion have been taking place since 1992, then progress has been far too slow.

The present reports are beautiful, glossy, lengthy and illustrated, but use considerable time and money which could have been used to action findings and plans. There has been enough public consultation to know what should be done, and action should be taken much faster, even if not all the scientific information has been gathered. The Ministry of Fisheries could put a moratorium in place immediately if it is necessary to preserve fish species.





It is recognised that while this might put some fishing concerns out of business, so, also, will dramatic decline in fish stocks. Families may need to be supported by government allowances, as there are in many similar cases where jobs have been lost. Perhaps fishermen and their boats could be employed to monitor marine reserves.

*Are the Classification approaches appropriate and useable?*

NCWNZ supports the Classification approach, but again the majority felt that more work should not be needed for the coastal areas.

#### 5. "DEEP WATER MARINE CLASSIFICATION

"Significant recent work on classifying New Zealand's marine environment includes the Marine Environment Classification 2005 (MEC) which was developed for the Government by the National Institute of Water and Atmospheric Research (NIWA). The Ministry of Fisheries has commissioned a revision of the MEC to further contribute to understanding of NZ's marine habitats and ecosystems.

The Government recently accepted a proposal from representatives of the fishing industry to establish Benthic Protection Areas (BPAs) primarily in the Exclusive Economic Zone. (EEZ). As part of that proposal, the Government has agreed that implementing the MPA policy in the EEZ will not commence until 2013." (Page 15)

*Give suggestions for implementation and monitoring where applicable:*

If the MEC was constructed in 2005, it could be a basis to start work on MPAs. NCWNZ is concerned that because the fishing industry has proposed Benthic Protection Areas now, there is a delay in MPAs being set up until 2013. These BPAs offered by the industry were areas not suitable for fishing, and the industry therefore has not yielded anything.

Data collection for the present time and monitoring after establishment are essential.

#### **Part 2:** Interpretation and application of the Protection Standard

The purpose of this Report is to discuss how the Ministry of Fisheries (MFish) and Department of Conservation (DOC) propose to interpret and apply the Protection Standard to provide an operational definition for MPAs in New Zealand waters. The aim is to have appropriate management tools so that an MPA's biological diversity is maintained or recovers to a healthy functioning state.

The purpose of an environmental standard is to specify the limit of acceptable effects of human activity on the environment.

*Why do you support, or not support, the purpose of this Report?*

NCWNZ supports the purpose of this report as it is essential this work is done so that it is known what is there, how it works, and how to protect or to utilise to maintain sustainable ecosystems.

#### **Management Tools**

*Page 6: No. 15: "NZ Biodiversity Strategy contemplates the use of some management tools that allow some level of extractive use in MPAs"*

This must be very carefully defined, if allowed at all. It could be used in ways that result in much



more extractive activity than is initially contemplated.

*Given the continuing depletion of many of our fish species, such as Orange Roughy, Terakihi, Gurnard, Hoki, Schnapper, etc., what measures would you suggest be implemented to maintain long term viability of fish populations?*

The following measures were suggested:

- More large MPAs in deepwater regions immediately: the precautionary principle applies
- Frequent measuring of population mass and numbers, and size of fish catch would give warning of problems arising.
- Public information campaign to enlist public support for MPAs
- Amendment of the Fishing Act to remove current anomalies to reduce dumping of fish
- Diversification of fish species to be caught will take pressure off species
- Strong legislation to cover MPAs must be implemented to control illegal fishing
- More coast watch activities to catch illegal fishing in MPAs.
- Environment/biodiversity must be paramount over profit in all cases.

### **Conclusion**

The majority of NCWNZ members felt that this report was a very complex way of tackling the issue, and just another exercise in procrastination. Surely it is better to erect too many MPAs than allow more loss of biodiversity, and thus NCWNZ strongly supports the proposed new MPA of 1800 sq. Ha. on Northland's east coast, from Cape Brett, to Whangarei Heads and around Poor Knight Islands.

NCWNZ suggests that the next Report issued should be in the form of a progress report, with details of the numbers and areas of marine reserves, and a record of the increasing, or depleting numbers of fish.

Christine Low  
**National President**

Sara Dickon  
**Convener: Environment Standing Committee**