



## Endangered Species Foundation

Submission in response to 'Revitalising the Gulf' marine protection zones proposed by the Department of Conservation.

Link: <https://www.doc.govt.nz/haveyoursayonthegulf>

### Nature of submission

The Endangered Species Foundation opposes key elements of the current proposal for the entire Hauraki Gulf, and particularly in relation to the Pakiri and Mangawhai coastal areas.

This submission supports the ending of bottom trawling and seabed mining in the Hauraki Gulf, including the creation of a High Protection Area in the Pakiri / Mangawhai rohe.

### Date:

18 October 2022

**On behalf of The Endangered Species Foundation and its 2200+ supporters.**

The Endangered Species Foundation (ESF) is a registered charitable organisation supporting high-priority conservation projects that protect New Zealand's most vulnerable indigenous species and habitats from extinction.

Our vision is to enable sustainable, long-term support needed for endangered species and to provide a way for all New Zealanders to get involved and to make a lasting contribution.

ESF is backed by 2200+ supporters and supports submissions by other groups and individuals who we are in coalition with to protect the habitat of endangered species and their ecosystems including Te Whānau o Pakiri, Friends of Pakiri Beach, Save our Sands Mangawhai Pakiri, and the Mangawhai Harbour Restoration group.

**The destructive effects of seabed mining and bottom trawling**

ESF compare the impact of sand-mining, seabed bottom trawling and Danish Seining to the destruction of 190 million years of kauri forests over a period of a few decades to the benefit of a very few and the long-term damage to the environment and the people of New Zealand.

According to Professor Mike Hilton, these processes at best leave a 'ploughed paddock' in their wake, at worst a desert where nothing can live or grow and many hundreds of years will be needed to recover if they recover at all.

We also concur with statements made by experts asked to submit to the panel on seabed mining Professor Mike Hilton and Doctor Shaw mead as below;

*"The results of the DML survey also provides further support to the conclusions I have so far presented, and raise concerns about the environmental impacts of dredging the offshore area of the Mangawhai-Pakiri embayment. The current application worked on the assumption that the large scale impacts now visible in seabed imaging by DML were not occurring, and as a result there are assumptions and conclusions that are likely no longer valid with respect to both physical and biological impacts. Had the conditions of the consent been correctly exercised and regulated from when dredging began and produced such as those in the recent seabed imaging, it is questionable whether 5 dredging would have continued in the same way it has until today, or indeed whether it would have been allowed to continue at all."*

*"The available evidence indicates that the current trend is one of erosion/retreat and a lack of expected recovery following storm events, which are projected to become increasingly more energetic due to climate change".*

Dr Shaw Mead, 27 years' experience in coastal restoration technologies

*“The data gained by DML Ltd provides a very worrying picture of the extent and density of trenches and marks on the surface character of the Pakiri seabed. The pattern and close spacing of trenches, compared with areas of seabed outside the mining areas, is suggestive of a ‘ploughed paddock’, one that is tens to hundreds of hectares in area. This intensity of extraction, over a large area, must raise questions as to the extent to which the activity is consistent with the imperative to preserve the natural character of the coastal environment.”*

Professor Mike Hilton

*“Sand mining was stopped off Mt Maunganui Beach in 1976. Today the Mount has a well-formed beach. Mangawhai and Pakiri Beaches ecosystems are presently revealing increasing symptoms of unsustainable and induced sand budget deficits; the protracted long-term offshore dredging activities are now impacting and damaging existing back-beach and foredune zones”.*

Gregory Jenks, 25 years’ experience in marine research and consulting, reported:

These views are not only held by academics and environmental groups -individual members of the public have seen the degradation that has occurred over the years and on 19 November 2021, a Horizon Research poll, commissioned by the Hauraki Gulf Forum, showed that;

***84% of the public who live in the vicinity of the Hauraki Gulf oppose mobile bottom contact fishing to continue due to the destructive impact it has on marine species and ecosystems on the seafloor. This is in contrast to the recent Revitalising The Gulf proposal which suggests allowing these activities to continue in the future.***

**ESF’s Principal Concerns around the ‘Revitalising the Gulf’ proposal and the lack of protections across the Gulf include;**

1. The threats to endangered marine and bird life;
2. The lack of recognition and impact of global warming;
3. The current fragile state of this area, linked with seabed damage, finite sand supply and declining marine life;
4. The lack of recognition and provision for Māori cultural practices (tikanga) , and the Principles of Te Tiriti o Waitangi;
5. The lack of recognition of proven environmentally sustainable, commercially viable alternatives;
6. The irreversible destruction of seabed eco systems;
7. The operational integrity of the commercial interests involved.

A great deal of damage has already occurred to the Hauraki gulf through sand-mining, seabed bottom trawling and Danish Seining. Sand mining has been occurring for over 70 years, causing huge loss of biodiversity in the area including species of fish, crayfish, scallops and horse mussels to name a few. This not only impacted on the ability of sea birds to source food for themselves and their chicks but also local iwi's traditional rights to source kaimoana in the area.

There are significant impacts from the practices of Danish seining, bottom trawling and suction hopper dredges, which plough the seabed, smash corral, destroy mussel beds and catch non-target species as well as smothering marine plants and wildlife. As well as this physical damage there are negative effects on marine species from noise pollution and sediment plumes.

### **Seabed mining at the Pakiri coastline to the Mangawhai sandspit threatens whole ecosystems**

ESF's view is that threatened, at risk and endangered marine life and birds have been negatively impacted by the sand mining and seabed bottom trawling particularly at Mangawhai and Pakiri.

Several species of bird in this area are declining or critical, most obviously and critically the tara iti, NZ fairy tern. The tara iti is listed as "nationally critical" which is the highest threat ranking for any endangered species. With only 10 breeding pairs left it is New Zealand's rarest endemic breeding bird with a current population of just 37 birds.

Once widespread around North Island coasts, its current breeding sites are Waipu, Mangawhai, Te Arai, Pakiri and Papakanui Spit. The damage being caused by seabed bottom trawling is more difficult to see but it is clear much damage both to the seabed ecosystem and the fauna and flora living there is occurring.

According to an expert on birds, Ian Southey MSc (Hons) the degradation of fairy tern nesting areas and feeding areas caused by the sand mining could lead to their functional extinction in the region. It is clear that the encroachment of human activity on their nesting grounds is a major threat to these birds.

**"Beach narrowing, due to loss of sand, forces the terns to nest closer to the sea, putting their eggs at risk during storms and king tides".**

Mangwhai harbour is also home to 26 threatened and at-risk species of birds and continued mining in this area puts the habitats of all these birds at risk:

<b>Threatened species</b>	<b>Threat category</b>
White Heron	Nationally critical
Fairy Tern	Nationally critical
Australasian Bittern	Nationally critical
Reef Heron	Nationally endangered
Grey Duck	Nationally vulnerable
Caspian Tern	Nationally vulnerable
Wrybill	Nationally increasing
Brown Teal	Nationally increasing
New Zealand Dotterel	Nationally increasing

<b>At Risk species</b>	
New Zealand Pipit	Declining
North Island Fernbird	Declining
Lesser Knot	Declining
Banded Dotterel	Declining
Banded Rail	Declining
South Island Pied Oystercatcher	Declining
Black-billed Gull	Declining
Red-billed Gull	Declining
Bar-tailed Godwit	Declining
Spotless Crake	Declining
White-fronted Tern	Declining
Variable Oystercatcher	Recovering
Pied Shag	Recovering
Black Shag	Relict - population now survives in only a few localities
Little Shag	Relict - population now survives in only a few localities
Little Black Shag	Nationally uncommon
Royal Spoonbill	Nationally uncommon

Sandmining in this rohe / area, does not consider the kaitiakitanga values of tāngata whenua, whānau and hapū and the communities most directly impacted by the activity. It is a direct breach of the duty of active protection of taonga (treasures) including the restoration of mauri (life-force). The proposed activity impacts adversely on marine environment, cultural values, customary activities and way of life.

**ESF opposes the current proposal which will enable sand mining, seabed bottom trawling and Danish Seining in the Hauraki Gulf.**

We want to see an end to seabed mining and bottom trawling in the Hauraki Gulf, and are calling for the Pakiri / Mangawhai area to be designated as a High Protection Area.

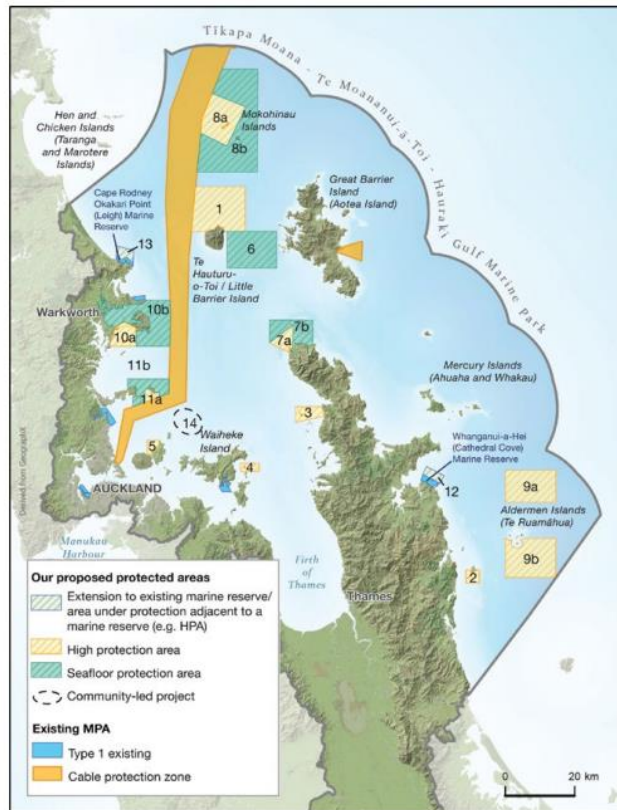
While research and data indicate these practices should be off limits for ever, they should be stayed at least until further work can be carried out to understand the true impact of them on fauna and flora and consultation is properly held with of tāngata whenua, whānau and hapū and the communities most directly impacted by these activities.

We believe that the bare minimum, in the short-term, given the rampant desecration and destruction of this sea floor area a High Protection Area is needed in the Pakiri / Mangawhai area to:

- maintain, restore and protect ecologically important habitats while allowing for compatible uses.
- protect seafloor habitats and communities susceptible to damage from activities such as fishing (particularly dredging, bottom trawling and Danish seining), sand extraction and mining.

On an ongoing and longer-term basis, the management to enable restoration of the mauri and mana of the Pakiri / Mangawhai area, and any activity that takes place, needs to be done in partnership and collaboration with Ngāti Manuhiri, who are the recognised tāngata whenua of this area. We need to enable this iwi to lead so that collectively we can embrace the concepts and values of te Ao Māori and enable true kaitiakitanga for this rohe.

Figure 8: Locations of the protected area proposals that we will engage and consult on.





## Finally

The many organisations and individuals fighting to save the seabed, marine life and species such as the tara iti in this area do not have equal resources in regards to commercial interests but we do have numbers, the people of the area do NOT want these practices to continue, they want sustainable practices led by the kaitiakitanga values of tāngata whenua, whānau and hapū and the communities most directly impacted by the activity to get the required studies completed and make good, long term decisions on managing this iconic area.

2022 is not the time to turn a blind-eye to the long-term damage that has been and is still occurring in the seabed and foreshore which has benefited a very few individuals and companies to the cost of every other New Zealander, this is the time for change, for making some tough decisions in the hope that some of these wrongs can be righted and that our mokopuna have something to thank us for.

Species such as the tara iti can never be replaced, and decisions such as enabling further sand mining must be delayed until all the required information is gathered, analysed and can be used for ensuring the best decisions are made for all parties.

**We need to take action today to end destructive seabed mining, bottom trawling and Danish Seining and support more sustainable practices for future generations and te taiao.**