

Submission

**Endangered Species Foundation Submission in response to
'Draft Hauraki Gulf Fisheries Plan'**

Nature of submission

The Endangered Species Foundation opposes key elements of the **Draft Hauraki Gulf Fisheries Plan**.

This submission calls for an end to longlining, bottom trawling, dredging and Danish Seining in the Hauraki Gulf, and supports the creation of a High Protection Area in the Pakiri / Mangawhai rohe.

Date:

21 February 2023

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 aim to protect the habitat of endangered species and their ecosystems including LegaSea, ECO, Greenpeace, The Hauraki Gulf Alliance, Te Whānau o Pakiri, Friends of Pakiri Beach, Save our Sands Mangawhai Pakiri, and the Mangawhai Harbour Restoration Society.

The destructive effects of bottom trawling, dredging and Danish seining

ESF compares the impact of seabed bottom trawling, dredging 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.

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.

ESF's principal concerns around the 'Draft Hauraki Gulf Fisheries Plan' are the lack of protections across the Gulf which include:

1. The threats to endangered marine and bird life.
2. The lack of recognition and impact of climate change.
3. Continued destructive fishing practices including longlining, bottom trawling, dredging and Danish seining.
4. The current fragile state of this area, linked with seabed damage and declining marine life.
5. The lack of recognition and provision for Māori cultural practices (tikanga), and the Principles of Te Tiriti o Waitangi.
6. The lack of recognition of proven environmentally sustainable, commercially viable alternatives.
7. The irreversible destruction of seabed eco systems.

We already have a badly damaged Hauraki Gulf

A great deal of damage has already occurred to the Hauraki Gulf through sandmining, seabed bottom trawling, dredging 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 has 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.

ESF opposes the 'Draft Hauraki Gulf Fisheries Plan' which will enable dredging, bottom trawling and Danish seining to continue in the Hauraki Gulf.

Dredging, bottom trawling and Danish seining are destructive fishing practices that destroy the seabed and entire ecosystems. There are significant impacts from these fishing methods 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 negatives effects on marine species from noise pollution and sediment plumes.

Evidence also shows that Danish seining frequently occurs in areas where regulations prohibit it. While the number of bottom trawls has declined, the number of Danish seine sets has remained similar, and around 22% of Danish seine sets occurred in areas where regulations prohibit this method between 2016-2019.

Climate change impacts

Fishing is important to NZ's future, but dragging heavy trawl nets over seabeds is not the future of fishing. A healthy seabed is the basis of a healthy ocean, and vital to productive fisheries. Bottom trawling, on the other hand, does huge damage and releases stored carbon from the seabed - it's also more fuel intensive than other, more sustainable fishing methods.

The ocean is the world's biggest carbon sink and has absorbed 40% of our carbon dioxide emissions since the industrial revolution. It can be our greatest ally to combat climate change, but only if we look after it. We know that bottom trawling releases carbon from the top metre of seabed, which contains almost twice the amount of carbon as soils on land. Bottom trawling also destroys deep sea ecosystems and catches large quantities of sea life, making the ocean less able to absorb carbon emissions - and as one of our greatest carbon sinks, this is a big problem for all of us.

If we keep allowing bottom trawling to destroy ocean life, the twin crises of climate change and biodiversity loss will worsen.

At-risk and endangered species in the Hauraki Gulf include the following:

Bryde's Whale

The Hauraki Gulf is home to a resident population of Bryde's Whales. These whales are considered endangered due to threats such as habitat loss, pollution, and accidental entanglement in fishing gear. The Hauraki Gulf population of Bryde's whales, estimated at **less than 200 individuals**, is one of only a few places in the world that can boast of a semi-resident population of a critically endangered whale species.

New Zealand Dotterel

The New Zealand Dotterel is a bird species that breeds on the beaches and islands of the Hauraki Gulf. This species is considered endangered due to habitat loss and disturbance caused by human activity.

Little Blue Penguin

The Little Blue Penguin is the world's smallest penguin and can be found in the Hauraki Gulf. Habitat loss and degradation, along with predation by introduced species, have contributed to the decline of this species.

Spotted Shag

The Spotted Shag is another bird species found in the Hauraki Gulf that is considered at risk. Habitat loss and degradation, along with disturbance caused by human activity, have contributed to the decline of this species.

Manta Ray

The Hauraki Gulf is an important habitat for Manta Rays. These gentle giants are considered vulnerable to extinction due to overfishing, habitat loss, and pollution.

New Zealand Sea Lion

One of the most notable endangered species in the Hauraki Gulf is the New Zealand sea lion. The species is considered endangered due to habitat loss and bycatch in fishing gear.

These sea lions are found in only a few places in the world and are considered one of the rarest species of sea lion. They are listed as nationally critical in New Zealand, with only around 12-13 breeding females remaining in the Hauraki Gulf. The main threats to their survival are accidental capture in fishing nets, disease, and habitat loss.

Te Kōura, kina, kelp and tāmure (snapper)

Crayfish populations have been substantially reduced, leading to their functional extinction in heavily fished areas. Kelp forests are vital to maintain reef health and productivity, and the lack of kina grazing allows these forests to thrive. However, overfishing removes the kōura and tāmure, leading to increased kina populations that eat the kelp forests. As a result, once productive reefs have become barren rocks, and kina populations are now at levels similar to those in unprotected areas in the mid-1990s.

Tuangi

The availability of harvestable tuangi (cockles) has been reduced due to shellfish gathering, with a decline in the density of harvestable tuangi over the last 20 years at monitored sites. Increases in harvestable tuangi have only occurred in monitored sites where seasonal harvesting bans are in place.

Tara iti – NZ Fairy Tern

The tara iti is listed as “nationally critical” and with only 10 breeding pairs left it is New Zealand’s rarest endemic breeding bird with a current population of just 37 birds. Overfishing and destructive fishing practices put these already extremely vulnerable birds and further risk.

Tara iti feed on live fish and require health ocean ecosystems to survive. "...the mullet populations and marine fish populations with small fish related young have diminished"¹.

¹ – State of our Seabirds 2021 <https://gulfjournal.org.nz/wp-content/uploads/2021/10/SOOS-screen.pdf>

Protected species bycatch in the wider Hauraki Gulf region 2019-2020

A number of at-risk species have been caught in the Hauraki Gulf between 2019 and 2020 according to information obtained via an OIA request by Shaun Lee².

These species include:

- black petrels caught by snapper longline fisheries
- flesh-footed shearwater caught by snapper longline fisheries
- flesh-footed shearwater caught by minor bottom longline fisheries
- white pointer shark caught by snapper longline fisheries between 2019-20
- leatherback turtle caught by bigeye longline fisheries between 2019-20
- Olive Ridley turtle caught by southern bluefin longline fisheries

ESF is calling for long-lining, bottom trawling, Danish seining and dredging to be banned due to the destructive effects these have on whole ecosystems and endangered and at-risk species.

² <https://blog.shaunlee.co.nz/protected-species-bycatch-in-the-wider-hauraki-gulf-region-2019-2020/?fbclid=IwAR3OTYWA3nWuPmyGuAOqWWIP0g-wqL3UzS8TuWsYftJlycTd1eO1fJCchLM&mibextid=Zxz2cZ>

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 especially 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 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.

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

Threatened species	Threat category
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

At Risk species	
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

Pakiri / Mangawhai needs to be designated a High Protection Area.

We are calling for the Pakiri / Mangawhai area to be designated a High Protection Area.

Sandmining and destructive fishing practices in this rohe / area, do 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.

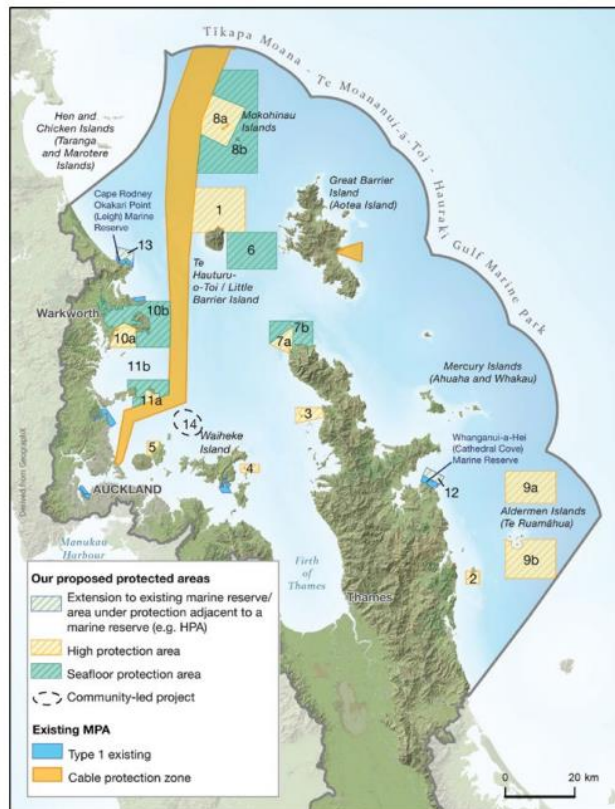
Research and data indicate that sand mining and destructive fishing practices should be off limits for ever and they should be stopped at least until further work can be carried out to understand the true impact of them on fauna and flora and consultation is properly held with of tāngata whenua, whānau 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 destructive fishing methods (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 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.

2023 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.

There are many at-risk and endangered species in the Hauraki Gulf and we need to take action today to end the destructive fishing practices of longlining, bottom trawling and Danish seining.

References:

<https://www.doc.govt.nz/globalassets/documents/getting-involved/students-and-teachers/posters/fabulous-facts-marine-life.pdf>

<http://www.knowledgeauckland.org.nz/media/1509/state-of-our-gulf-2020.pdf>