Bay of Plenty CMS Review
Department of Conservation
PO Box 1146
Rotorua

email: bopcmsreview@doc.govt.nz

Dear Sir/Madam,

Submission on: Bay of Plenty CMS Review

The New Zealand Marine Sciences Society (NZMSS) is a scientific society affiliated to the Royal Society of New Zealand. It comprises over 260 scientists, managers, policy makers, and students working in all aspects of marine science in New Zealand and overseas. Society members work for universities, Crown Research Institutes, and other research providers, as well as for various central and local government departments, agencies and non-governmental organizations. Our members, therefore, have a wide range of views and experiences on most issues confronting the management of New Zealand's marine environment. Our elected Council has the task of providing comments on marine science issues in the public realm, including government policy and marine conservation. This submission represents a consensus view of the NZMSS Council concerning the scientific issues related to the draft Bay of Plenty Conservation management Strategy. Our major points are listed below.

1. **The management objectives for marine ecosystems, habitats and species listed in Section 1.3.4 on page 28 are too limited in scope to confront the known threats to marine ecosystems.** The draft CMS properly lists some of these on page 27. We suggest that the draft CMS focus on marine reserves as the principal management tool to conserve species and mitigate the effects of this broad range of threats is too narrow. Marine reserves can only protect species or habitats that suffer the direct and/or indirect effects of exploitation and the scale of that protection is limited to those species that stay within the reserve boundaries most of the time. A wide range of other threats to marine ecosystems, habitats and species are more generic in nature and are not constrained by marine reserve boundaries. The clear statement on page 25 that the Conservation Act 1987 gives the Department of Conservation a broad mandate for advocacy on marine conservation issues should be acted upon to increase the department's

range of responses.

Action (i). We suggest that the draft CMS include a statement of intention to identify and quantify the level of threat to BOP marine ecosystems and habitats from each source and develop management strategies in collaboration with the agencies listed in Management Policy 1 (page 28) for mitigating each of these. These actions should also be listed as new objectives and milestones in the table in section 3.3.

2. **The existing marine reserves in the BOP Conservancy protect only a limited range of habitats from the direct and/or indirect effects of exploitation and no clear target for protection is specified.** The two existing marine reserves within the BOP Conservancy both contain offshore rocky reef habitats. There are no marine reserves containing slope, shelf, coastal or harbour habitats. We strongly support the need for gap analysis identified in section 1.3.4 page 28 to identify the habitat types that are not represented in existing marine reserves but note that this analysis is not listed as a milestone in the table in section 3.3. Furthermore, we strongly suggest that this analysis should be extended to estimating the optimal distribution of protected areas. New fine scale data sets on the distribution of commercial demersal fishes, rocky reef fish, rocky reef invertebrates and macro-algae, the fauna of vertical rock walls, and estuarine and harbour fish communities are now available and can be used to model the most efficient distribution of protected areas to a specified level of protection (eg. 10%). A good example of this is a recent report for DOC by Leathwick et al (2008) that demonstrates the use of recent advances in statistical learning and conservation prioritization using reserve planning software to produce MPA scenarios with varying benefits to NZ inshore waters (<200 m depth) based on the analyses of 118 demersal and reef fish species. We note that the draft BOP CMS does not specify any target for protection of marine habitats in marine reserves. The national DOC target is 10%, which seems like a reasonable target for the Bay of Plenty.

   Action (ii). The gap analysis identified as Policy 3 in section 1.3.4 page 28 to identify the habitat types that are not represented or are under represented in the existing marine protected area network should be listed as a 1-3 year milestone of Objective 2 in the table in section 3.3.

   Action (iii). That an additional policy to carry out a conservation prioritisation analysis using reserve planning software based on existing fine scale distributional data in order to estimate the optimal distribution of marine protected areas be listed in section 1.3.4 on page 28 and be added as a 1-3 year milestone of Objective 2 in the table in section 3.3.

   Action (iv) In objective 2 of section 3.3 add a 10 year milestone target of protecting 10% of each marine habitat within the Bay of Plenty.

3. **Lack of compliance and enforcement milestones in Section 3.3.** The value of

marine reserves as areas protected from the direct and/or indirect effects of exploitation are severely compromised if illegal fishing takes place. This is clearly stated in section 2.5 on page 77 but is not reflected in the milestones listed in section 3.3.

Action (v). Add 3, 5 and 10 year milestones to Objective 19 in Section 3.3 that indicate the need for adequate compliance and enforcement measures are in place to ensure that the protection of habitats and species in marine reserves is not significantly compromised by illegal exploitation.

Approved by the NZMSS Council 8th May 2008

Yours sincerely,

Dr Alison MacDiarmid
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