



31 March 2011.

Proposed regional coastal plan: Kermadec and Subantarctic Islands
c/- Department of Conservation
P.O. Box 10420
Wellington 6143.

Attention: Sarah Hucker

Dear Sarah

Please find enclosed the New Zealand Marine Sciences Society submission to the proposed regional coastal plan for the Kermadec and Subantarctic Islands.

Yours sincerely

A handwritten signature in cursive script that reads "Colin McLay".

Colin McLay
President
New Zealand Marine Sciences Society
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Statement of Submission by the New Zealand Marine Sciences Society

General

The New Zealand Marine Sciences Society (NZMSS) is a professional society of New Zealand's marine scientists, affiliated to the Royal Society of New Zealand.

The aims of the society include encouraging and assisting marine research in New Zealand, and the provision of advice on management of marine resources. The Society has more than 260 scientists, managers, policy makers, and students working in all aspects of marine science in New Zealand and overseas.

The NZMSS makes the following submission on the proposed regional coastal plan for the Kermadec and Subantarctic Islands.

Provisions

[Please provide comments on specific provision numbers and pages. E.g. refer to them as Objective 1.1, page 26.]

The NZMSS comments on the followings sections and maps in the proposed plan as follows:

- Values of the Subantarctic Islands, pages 6 – 13
- Values of the Kermadec Islands, page 14
- Issue 1 Natural character, page 22
- Issue 1 Natural character, policy 25, page 29
- Surface water activities, page 50
- Other matters, Financial contributions, environmental compensation, page 53
- Other matters, Integrated management, page 54
- The keys for Map 1 and Map 4, pages 62 and 65, respectively

Support/Oppose

[Clearly indicate whether you support or oppose the specific provision.]

- **Values of the Subantarctic Islands, pages 6 – 13**

NZMSS neither supports nor opposes this section but wishes to point out that there is no mention in this, or other sections of the proposed regional coastal plan, recently announced by the Ministers of Conservation and Fisheries

(dated 29 January 2011) that marine reserves are to be established around the Bounty, Antipodes and Campbell Islands.

- **Values of the Kermadec Islands, page 14-15**

NZMSS opposes the statement that the Kermadec Islands Marine Reserve is the largest no-take marine reserve in the world and the section on cetaceans.

- **Issue 1 Natural character, page 22**

NZMSS neither supports nor opposes this section but wishes to point out that the damage caused by boat anchoring can cause significant adverse effects on the natural character of both the Kermadec and the Subantarctic Islands.

- **Issue 1 Natural character, policy 25, page 29**

NZMSS opposes the policy that allows for preferential treatment of an individual (Mr Stuart Cave) to place a temporary mooring within the area covered by the proposed regional coastal plan.

- **Surface water activities in the Kermadec Islands, page 50**

NZMSS supports existing rules but recommends these regulations be made more specific.

- **Other matters, Financial contributions, environmental compensation, page 53**

NZMSS neither supports nor opposes this section but requests an additional environmental compensation circumstance be included.

- **Other matters, Integrated management, page 54**

NZMSS neither supports nor opposes this section but requests additional matters be included.

- **Keys for Map 1 and Map 4, pages 62 and 65, respectively**

NZMSS opposes the current symbols in the keys for Maps 1 and 4.

Reasons

[Clearly state in summary the nature of your submissions and reasons for it.]

- **Values of the Subantarctic Islands, pages 6 – 13**

The announcement by the Ministers of Conservation and Fisheries that marine reserves will be established at the Subantarctic Islands, in addition to the current Auckland Islands Marine Reserve, reflects the significant public interest and support for establishing marine reserves there. The new marine reserves will protect the special and unique biodiversity values of the marine environment around those island groups.

Changes to the current status of the marine area around the Bounty, Antipodes and Campbell Islands will see a shift away from activities based on the extraction of marine resource. There will likely be an increase in scientific research of marine life in undisturbed habitats and ecosystems.

- **Values of the Kermadec Islands, page 14-15**

The Chagos Islands in the Indian Ocean was declared a marine reserve in April 2010 by the UK government and all commercial fishing ended in October 2010. At 544,000 km² in area, this marine reserve is now the largest in the world. Further, Australia's Great Barrier Marine Park has over a third of its area identified as "Green Zones", which are no-take. Collectively, these no-take areas are much larger than the Kermadec Islands Marine Reserve.

The material on whales and dolphins in the Kermadec region is out of date. Results from several recent surveys should have been included.

- **Issue 1 Natural character, page 22**

The damage caused by anchoring can cause significant adverse effects on the natural character of both the Kermadec and the Subantarctic Islands. Even along sheltered coasts anchoring can cause significant damage because attempts at mooring can be destructive during bad weather around small islands.

- **Issue 1 Natural character, policy 25, page 29**

Individual rights to moorings should not be provided for.

- **Surface water activities in the Kermadec Islands, page 50**

Effective best practice for checking vessels should be included.

- **Other matters, Financial contributions, environmental compensation, page 53**

Damage from vessel groundings can result in significant damage to the sea bed, particularly to vulnerable marine ecosystems such as the subtropical coral habitat of the Kermadec Islands.

- **Other matters, Integrated management, page 54**

The proposed regional coastal plan does not specifically identify that the Marine Reserves Act, 1971 and Marine Reserves Regulations are in force for the existing marine reserves (i.e. Kermadec Islands, Auckland Islands) and will be in force when the proposed reserves that have been identified by the Ministers of Conservation and Fisheries (i.e. Bounty, Antipodes and Campbell Islands) are established. Some activities identified in the regional coastal plan, such as, research, navigation, anchoring and pollution, are provided for under the Marine Reserves Act and that Act's regulations.

- **Map key for Map 1 and Map 4, pages 62 and 65, respectively**

NZMSS considers that one of the current symbols used in the keys for both these maps is misleading. Currently the symbol of a 'red 75 anchor' is used to represent areas where ships up to 25 metres can anchor (if wind speed is less than 35 knots). The numbers included in the other symbols is used to represent the size of the ship.

Decision

[State clearly the suggested changes you are seeking to be made in respect of the provision e.g. I would like the policy reworded to state the following....]

- **Values of the Subantarctic Islands, pages 6 – 13**

A statement should be included that text is inserted that recognises there will be marine reserves at the Bounty, Antipodes and Campbell Islands in the future. NZMSS considers that ALL changes, proposed or otherwise, should be summarized in your plan so that the public can understand how the Subantarctic Islands will be protected.

- **Values of the Kermadec Islands, page 14**

The current statement should be corrected to reflect that the Kermadec 7Islands Marine Reserve, while being the largest no-take marine reserve in New Zealand waters, is not the largest in the world.

- **Issue 1 Natural character, page 22**

Damage caused by anchoring activities should be highlighted under Issue 1. Rather than 'restricting' activities with the potential for adverse effects on natural character, these activities should be 'avoided'.

- **Issue 1 Natural character, policy 25, page 29**

Any moorings provided for under the regional coastal plan should be able to be used by any vessel owner on a first come first served basis.

- **Other matters, Financial contributions, environmental compensation, page 53**

An additional circumstance where a coastal permit has not been granted and an adverse effect from an activity, such as vessel grounding and resultant damage to the sea bed, should be included and a compensatory amount determined accordingly.

- **Other matters, Integrated management, page 54**

A statement should be included that identifies the relationship of the regional coastal plan to the Marine Reserves Act, 1971 and Marine Reserves Regulations for existing marine reserves (i.e. Kermadec Islands, Auckland Islands) and proposed marine reserves (as identified by the Ministers of Conservation and Fisheries, i.e. Bounty, Antipodes and Campbell Islands).

A statement that identifies how activities such as research, navigation, anchoring and pollution are provided for under both the regional coastal plan and the Marine Reserves Act should be included.

- **Map key for Map 1 and Map 4, pages 62 and 65, respectively**

The symbol of a 'red 75 anchor' should be replaced with a 'red 25 anchor' to reflect that ships up to 25 m, rather than 75 m, can anchor there.

Please tick applicable box(es)

The NZMSS wishes to be heard in support of its submission.



Signature DateMarch 31, 2011.....
(Person making submission or person authorised to sign on behalf or making submission)

Colin McLay
President
New Zealand Marine Sciences Society