

"More fish in the water/Kia maha atu nga ika ki roto te wai"

Tracey Steel Ministry of Fisheries PO Box 1020 Wellington tracey.steel@fish.govt.nz

22 September 2009

Dear Tracey

Introduction of Bladder Kelp Seaweed (KBB) in Fisheries Management Areas 3 and 4 into the quota management system on 1 October 2010.

Submission:

⇒ That Bladder Kelp Seaweed, Macrocystis pyrifera, in all Fisheries Management Areas is not introduced into the quota management system on 1 October 2010.

The option4 and Hokianga Accord Working Group teams believe while it might be administratively convenient to manage Bladder Kelp Seaweed within the quota management system, we would be better served with knowing what other management options are available.

At this stage we are not aware of any other mechanism that can protect species of such ecological and cultural significance. If there is no suitable mechanism available then the Minister ought to continue the moratorium until one is found.

We **do not agree** with creating private property rights by issuing any Individual Transferable Quota (ITQ) for this species after October 2010. That is because attached Bladder Kelp Seaweed has very high ecological, environmental, social and cultural values.

Attached Bladder Kelp Seaweed is a taonga [treasure] that needs to be conserved so the environment can sustain itself and future generations of New Zealanders.

Conflict with MfE guidelines

The proposal by MFish to harvest Macrocystis contradicts recent advice from the Ministry for the Environment (MfE) in its publication "Preparing for coastal change" (March 2009). This publication is based on an extensive NIWA report. The MfE publication notes as one of four key principles for managing coastal hazards:

"Importance of natural coastal margins. The dual role of natural coastal margins as the fundamental form of coastal defence and as an environmental, social and cultural resource must be recognised in the decision making process. Consequently, natural coastal margins should be secured and protected."

Margins include rocky coast and kelp beds.

Our team members emphasise that extensive research of seaweeds is required before any harvesting is considered. This is particularly important in FMA3, where Dusky Dolphins are found.

Given the environmental, social and cultural significance of seaweeds we expect and encourage the Minister to take a precautionary approach to managing these species, and in doing so apply the statutory obligations to provide for the input and participation of tangata whenua having a non-commercial interest in Bladder Kelp Seaweed and an interest in the effects of fishing on the aquatic environment in the area concerned, and have particular regard to kaitiakitanga [guardianship] in relation to this natural resource on which so many species rely on for health and abundance.

We appreciate the opportunity to submit on these proposals for attached Bladder Kelp Seaweed and would like to be kept informed of any future developments.

Yours sincerely

Trish Rea On behalf of the option4 team PO Box 37951 Parnell, Auckland.

Paul Haddon On behalf of the Hokianga Accord PO Box 263 Kaikohe