



## Te Ngaru Roa ā Maui

P. O. Box 2  
Whaingaroa  
Raglan  
3265



### SUBMISSION BY

Te Ngaru Roa aa Maui

P.O.Box 2

Whaingaroa

Raglan

3265

07 825 6824

[cleanearth@clear.net.nz](mailto:cleanearth@clear.net.nz)

25 September 2009

Tracey Steel

Ministry of Fisheries

P O Box 1020

WELLINGTON

E mail [Tracey.Steel@fish.govt.nz](mailto:Tracey.Steel@fish.govt.nz)

Re the Mfish introduction of Bladder Kelp Kelp seaweed *Macrocystis pyrifera* into Quota management System (QMS) on 1 October 2010 into the Management Areas (FMA) 3 and 4.

Reason for submission:

Te Ngaru Roa aa Maui(TNRM) are **OPPOSED** to the introduction of Bladder Kelp seaweed *Macrocystis pyrifera* into Quota management System (QMS) on 1 October 2010 into the Management Areas (FMA) 3 and 4 as it appears that it automatically has to have TAC limits set for harvest or commercial use. TNRM have been informed by Mfish that once entered into the QMS a species has to have TAC limits set.

TNRM strongly **OPPOSE** any Total Allowable Catch (TAC) limits being set for the seaweed *macrocystis pyrifera* Fishery Management Areas 3 and 4.

TNRM note in point 6 of the Initial Position Paper 21 August 2009 that if the Minister decides not to introduce these Bladder Kelp kelp stocks into the QMS, he is required

to remove these stocks from Schedule 4C of the Act and provide for an open-access fishery.

The Ngai Tahu Deed of Settlement (p32) requires MFish to ‘decommercialise’ several individual seaweed species and while Bladder Kelp is not on their list at the time the deed was done; none the less it highlights that tangata whenua have grave concerns regarding the commercialisation of seaweed species.

TNRM supports the comments in FIGURE 1 point 19 and believe it highlights the key ecological roles of the Bladder Kelp kelp as a critical habitat and important for recruitment of many species. The statement itself is understated and there needs to be more robust research undertaken to gauge the potential adverse effect of non-commercial and commercial harvesting of seaweed species on the all the coasts.

FIGURE 1 point 19 has also highlighted the commercial use as high value and in situ as a medium value which is understated. TNRM support the Position Paper in point 20 that the attached Bladder Kelp seaweed plays a critical role in coastal, inshore and estuarine ecosystems and that it does provides for food, shelter and habitats for a very wide range of micro and macro-fauna including various fish and shellfish species.

The paper lacks any information on the value of protecting the Bladder Kelp seaweed in it is natural state. The table below is of the Waikato Region only and is indicative of the annual value of the NATURAL CAPITAL of our coastal intertidal zones and species.

**Table 1: The value derived from ecosystem services <sup>1</sup>**

<http://www.ew.govt.nz/Environmental-information/About-the-Waikato-region/Our-economy/The-hidden-economy/>

Ecosystem type	Total value per ha/year (\$)	Total \$ (million)	% of total value
Lakes and Rivers	19,700	1,856	19.8
Forests	2,400	1,848	19.8
Agricultural/Horticultural	1,100	1,460	15.6
Freshwater Wetlands	39,800	1,211	12.9
Coastal Marine Area (CMA)	500	1,113	11.9
Near Coastal Zone	8,000	915	9.8

Estuarine	46,400	863	9.2
Other:			
Scrub/Shrub	500	55	0.6
Seagrass/Algal Beds	38,900	21	0.2
Cropland	140	9	0.1
Mangrove	19,000	3	0.1
<b>Total</b>		<b>\$9,360</b>	<b>100</b>

The value of fish species alone that depend on the seaweed and kelp in an attached and unattached form has not been considered and TNRM maintain that until more research on the potential adverse effects can be adequately identified and the true environmental economic costs or benefits are stated ; that the Bladders Kelp seaweed be held on the moratorium.

A recent TV3 expose by John Campbell highlighted the pressure for commercial harvesting of the seaweed resources on our coasts which was alarming.

<http://www.3news.co.nz/Kiwi-seaweed-under-threat/tabid/817/articleID/122029/cat/221/Default.aspx>

A resource should not necessarily be exploited for commercial gain just because it is there. The resource should be thoroughly investigated and researched and both positive and adverse economic considerations should be investigated prior to any decision being made.

The QMS fishers are allocated rights in perpetuity to harvest a quantity of a species within a given management area and the above TV3 program demonstrated that large corporate investment companies are waiting in the wing to take advantage of the resource. TNRM dispute the contention that because quota is transferable the use of the resource tends to move to the most efficient user over time.

TNRM also dispute the contention that just because quota owners have confidence of supply, that the QMS will provide better incentives to invest in research to maximise sustainable use and improve the value obtained from a fishery. Also that QMS rights create positive incentives for quota owners to manage their fishing activities to ensure the long term sustainability of the fisheries resource.

History has shown the reverse in some cases. Our deep water fisheries are contentious with most of the quota holders contracting overseas companies to fish under contract and Mfish on board observes refusing to man the vessels because of the conditions on

board those vessels. An example of several ways of fish being mismanaged is the recent documentary THE GREAT NEW ZEALAND FISHING SCANDAL.

TNRM are highly concerned that once Bladder Kelp seaweed enters into the QMS that limited resources to actively manage any abuse will be a major constraint which in turn impacts on the social, environmental, cultural and economics of all those in Aotearoa.

In addition MFISH acknowledge that it is going to be problematic in differentiating between free-floating and attached bladder kelp and will be extremely difficult for fisheries officers to monitor compliance with commercial reporting requirements. Of concern is that there has been no mechanism suggested to mitigate the potential negative effects.

TNRM maintain that attached seaweeds are an important component of the coastal ecosystem intertidal margins and those robust protective mechanisms should be advanced rather than allowing for property rights in perpetuity.

Of concern is that the coastal hapu like ours that rely on our coastal water and ecosystems are under risk of losing critical resources to local and international industries in the bioceutical and pharmaceutical industries and commercial interests and inappropriate management systems. Species such as kina and paua are taonga and are potentially at risk.

Hapu with marae that undertakes customary harvesting rights in their rohe are potentially affected particularly if over harvesting has occurred. This in turn results in the affected hapu not being able to undertake their kaitiakitanga duties effectively.

Fishermen have produced evidence that bladder kelp removal or over harvesting has resulted in the species not recovering and fish species not being available in the area for many years.

TNRM state that there is also a lack of integrated management between the differing Crown agencies with conflicting statements and interests such as the recently released Niwa report and guidelines from (MfE) in its publication "Preparing for coastal change" (March 2009) which states that the "natural coastal margins should be secured and protected."

Of further concern to TNRM is this initiative is precedent setting and all attached Bladder Kelp seaweed on all the coastlines are now potentially at risk from commercial operators.

TNRM are opposed to Bladder Kelp seaweed entering into QMS as it immediately allows for harvesting rights to be set and urge the Minister to consider extending the moratorium until adequate research has been undertaken on the economic value of leaving the attached bladder kelp seaweed insitu plus the full economic value of species that rely on the beds are researched and considered.

In addition the Minister could utilize sec 11 (1) of the Fisheries Act 1996 to actively protect a taonga species to tangata whenua due to potential adverse effects to fish stocks and the aquatic environment.

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

Te Ngaru Roa aa Maui  
P.O.Box 2  
Whaingaroa  
Raglan  
3265  
07 825 6824  
[cleanearth@clear.net.nz](mailto:cleanearth@clear.net.nz)

Malibu Hamilton