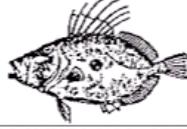


WELLINGTON
RECREATIONAL MARINE FISHERS'
ASSOCIATION (Inc)



WE RECOGNISE MANAGED FISHERIES

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21 September 2009

Tracey Steel
Ministry of Fisheries
P O Box 1020
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**Re Mfish introduction of Bladder Kelp seaweed *Macrocystis pyrifera* into Quota Management System (QMS) on 1 October 2010.
To introduce Bladder Kelp seaweed *Macrocystis pyrifera* in Fishery Management Areas (FMA) 3 and 4 on 1 October 2010.**

Reason for submission:

To support to the proposal to introduce the bladder seaweed *Macrocystis pyrifera* into the QMA.

To strongly oppose any Total Allowable Catch (TAC) limits being set for the seaweed *macrocystis pyrifera* now or into the future for the whole of New Zealand not just for Fishery Management Areas 3 and 4.

To stress that bladder seaweed *macrocystis pyrifera* must be totally protected from any harvesting now or into the future. In fact the WRMFA know this seaweed to be so important we are most concerned that the Ministry of Fisheries has even considered commercially harvesting it. There is serious lack of information presented in Initial Position Paper (IPP) as it fails to describe the adverse impacts while we know Mfish have ample information that could have been used to describe those.

Dear Tracey

The committee and members of the Wellington Recreational Marine Fishers Association know the value of this seaweed to marine species as it grows in the waters where we fish. We have also been witness to the impacts on other marine life when some misguided individuals cut back stands of this seaweed at Pipinui Point so that they could bring in fish without guiding them around or through the bladder kelp. The result was the bait fish the kingfish and kahawai were attracted to in the bladder kelp forest never came back until it grew back five years later, but still today ten years later it remains depleted.

We therefore strongly dispute the theory put forward by Mfish in section 16 of the IPP that bladder kelp grows a metre in a day. We have yet to find a diver from this region who supports that theory either. Simulated laboratory and computer programmes have a history of producing serious misinformation through resource consents and Mfish would be wise to not be guided in managing the marine environment through these computer programs. It is not possible to foresee the severity or length of the adverse storm conditions we experience throughout New Zealand.

Cutting down this seaweed will conflict with Government guidelines, the Fisheries Act and place the Ministry of Fisheries in breach of the Marine Mammal Protection Act.

For example:-

The removal of bladder seaweed while knowing or not knowing its value to a large number of marine species will place the Ministry of Fisheries in breach of the Fisheries Act 1996 Section 11 Purpose and Principles 9 Environmental principles subsection (C) *“Habitat of particular significance for fisheries management should be protected.”*

The proposal to harvest bladder kelp is also going against the advice published by the Ministry for the Environment paper titled “Preparing for coastal change” (March 2009) which was 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.”

History has already recorded the impact of harvesting bladder kelp. In Tasmania they introduced bladder kelp harvesting in the 1960s and 1970s and time has proved it was not sustainable. In fact they describe there are now plans to make macrocystis kelp forests an endangered habitat type and that these forests be listed alongside the Great Barrier Reef as Special Marine Areas by the Department of Environment, Water and Heritage of Australia. The impact from their harvesting of bladder kelp was massive as they never recovered and today they only have 30% of their original bladder kelp forests remaining. They have linked this to the decline of their paua and finfish species.

Removing or smothering other native seaweed species has already been proven to have an adverse impact on marine species. When the past Minister of Fisheries Hon John Luxton

selected Judge Tapsell to find a cause as to why the snapper numbers had declined in the Tauranga Harbour, he found it was caused by the environmental damage to the snapper spawning areas and loss of native wetland plants.

In 1997 we warned Government that since the introduction of the fast ferries to the Marlborough Sounds in 1993 the massive pilchard and yellow eyed mullet schools had disappeared. In 2003 Mfish failed to understand our submission to the blue cod plan which identified the bladder kelp forests had been wiped out and the native sea grass beds had been smothered in mud and silt by these ferries. The sea grass beds became smothered in mud enabling sea lettuce to establish which in turn smothered another blue cod food source. The ferries drive units easily blasted the thirty metre deep sea bed with jet units able to blast the sea bed to fifty metres. It was not until 2003 and I had driven into the wake of the fast ferry and taken a photo off my sounder of the jet unit blasting the sea bed in forty metres, that the full impact was realised by Government, when I sent it to Sandra Lee the then Minister of Conservation. The fast ferries were pulled from service shortly after. The Ministry of Fisheries should have done this years before using the Fisheries Act 1996 Section 11 Purpose and Principles 9 Environmental principles subsection (C) "*Habitat of particular significance for fisheries management should be protected.*"

If bladder kelp forests had been surveyed prior to 1970 the loss of these forests would be a national concern, just as the loss sea grass beds are and now moves would have been made to protect them not harvest them. The impact on bladder kelp forests has come from dairy farming run off and our cities waste water becoming over loaded with chemicals. The knowledge that Mfish and Government sectors allowed the discharge of waste water into waters less than fifty metres describes that those involved have a serious lack of marine knowledge, as the impact has been massive. The destruction of the massive bladder kelp forests can also be attributed to the lack of intertidal knowledge by Government, regional and local councils who allow silt and mud to flow into the sea from poorly designed sediment traps. Sediment traps in use to day are no better than the dams we built as children.

The Wellington City Council provides a perfect example of the impact of waste water when the cities waste water treatment plant at Moa Point becomes overloaded. The chemicals and storm water they direct into the system combine and it only takes a little rain and the process can't cope, the product then by-passes the system and the bladder kelp forests in Lyall Bay are flooded in the product. Bladder kelp grows up to the surface and as seaweed does not grow in fresh water it quickly dies after coming into contact with the freshwater on the surface. Now the bladder forests in Lyall Bay have been severely reduced and the seaweed that now arrives on the surrounding beaches is black burnt with the cities chemicals.

Another impact on bladder kelp forests has been from the excessive harvesting of paua in small areas which allows kina to take over the area. Kina eat the stems of bladder kelp and have been observed climbing up the stems. A television documentary is due to be broadcast on 25 September 2009 describing this.

The Executive summary section 7 considers “that the harvest of bladder kelp has economic potential for New Zealand”. Section 7 also considers it to be important habitat-forming specie”. Then makes the bold statement that “harvest will need to be carefully managed to ensure its sustainability as well as the fisheries resources it supports”, yet the Ministry lacks a history of protecting any habitat of particular significance for fisheries management.

The Ministry of Fisheries has proven with the blue cod fishery in the Marlborough Sounds, they lack interest in providing any information on the value of any habitat to marine specie, or more importantly correcting the errors in the Mfish Plenary where a number of marine spawn. The Ministry fails to provide information where commercial specie spawn through resource consents and to those involved in the proposed current generators at Kaipara Harbour. The Ministry failed to protect Ohau Bay through the Meridian West Wind turbine project in Wellington or the intertidal zone in the Makara Stream through the Mills Creek turbine project. This is a history describing the lack of environmental, intertidal and near shore marine knowledge and makes the statement in section 7 the “harvest will need to be carefully managed” impossible for the Ministry. Based on past experiences it will be impossible for Mfish to develop overnight a management structure, select personnel with the required experience and proven intertidal knowledge and skills to even begin acquiring knowledge to manage the harvesting of bladder kelp without causing an environmental disaster.

In 2009 we responded to a proposal submitted to the Department of Conservation called Tourism Effects on Dusky Dolphins at Kaikoura New Zealand. The Fishery Management Area (FMA) 3 covers the region where Dusky Dolphins are found and a report by the Kaikoura Dusky Dolphin Tourism Research Project, while carrying a major failure in not identifying what the dolphins were feeding on. In our experience their research indicated that Dusky Dolphins are no different to other dolphins as to where they find their food. From our experience the GPS position of where the dolphins travelled it is obvious to us that they also feed on yellow eyed mullet to provide themselves with their protein for spawning. The GPS tracks identified them travelling into the bladder kelp forests north of Haumuri Bluffs in summer and autumn, a time when we observe bait schools inside the kelp forests.

To remove these bladder kelp forests in FMA 3 will seriously threaten a major food source for the Dusky Dolphins along the Kaikoura Coast and easily place the Ministry of Fisheries in breach of the Marine Mammals Protection Act. Not only will these Dusky dolphins start to slowly disappear just as the Hector Dolphins have been doing since their food source was poisoned and destroyed by regional and local council’s coastal mismanagement, but the loss of these Dusky Dolphins will seriously impact on a major tourism industry that is attracting world wide interest. Then just as what is happening with Hector Dolphins we will see Government and Eco groups blaming recreational and commercial fishers for these dolphins demise, only this time we have identified the cause and predicted their demise, you have been warned. Five years from the introduction of harvesting bladder kelp these dolphins will start disappearing also.

Cutting down this seaweed will have a devastating impact on a huge number of marine specie as follows:

- Warehou can be seen feeding among bladder kelp stands.
- Trevally and snapper are often found feeding in the forest of bladder kelp.
- Butterfish are well known to feed on the plant.
- Paua gut contents have proven they also feed heavily on the bladder kelp.
- Kina feed on the stems of bladder kelp resulting in mats of bladder kelp being carried along with the surface currents up and down the coast.
- Drifting bladder kelp then provides the shelter for the very young finfish of a number of specie.
- Research by NIWA has found hapuku in the dense clumps of drifting bladder kelp.
- In the northern waters kingfish can also be found hunting the bait fish within the floating bladder kelp.
- In the forests of bladder kelp we often see piper, yellow eyed mullet and horse mackerel using the forests as shelter from predators.
- As these bait fish move in and out of the bladder kelp forests they in turn provide other specie a food source at change of light.
- Bladder kelp forests do not grow everywhere in the Cook Strait but are found off the headlands of beaches where a number of marine specie are known to gather for spawning.
- The forests provide crayfish with shelter and the habitat where they find food has become trapped in the bladder kelp stands. Crayfish and paua exports will decrease from the waters of the FMA 3 and 4 just as they did in Tasmania when they removed bladder kelp.
- The loss of native seaweed plants has already been proven to deny blue cod a food source. Yet today Mfish have still not the acquired the marine knowledge to comply with the Fisheries Act as senior management has allowed resource consents to pass without opposition to further destroy the bladder kelp forests in the Marlborough Sounds or prevent them from re-establishing on the rocks. The silence of Mfish in 2009 through the resource consent to allow Transrail shipping to travel at 20 knots through the Sounds proves Mfish have not acquired the resources to know how (bladder kelp) “harvest will need to be carefully managed”.
- It is obvious bladder kelp plays a major part in protecting coastal margins as not only is it found on inshore reefs but it is also found at the entrance of bays in the Cook Strait. Another function of this plant is after a storm when it breaks free to either come ashore to enhance the beach fauna or drifts out at sea held afloat by its flower pods providing habitat and protection for juvenile fish specie.

The proposal lacks marine knowledge

We find once again Mfish has failed to research the value this seaweed plays when it is washed ashore to then become beach cast seaweed. The food source as the seaweed rots down provides a habitat for sand hoppers, sand flies maggots, kelp fly maggots then the flies which in turn provides the protein for the successfully spawning of yellow eyed mullet, mackerel, piper, moki, flounder, red gurnard and blue cod to name a few.

The specie yellow eyed mullet have been scientifically proven to be a major prey providing other marine specie with their protein for successful spawning. These fish also form a major

portion of the dolphin's food sources including our endangered Hector Dolphins which have been reported by DOC and Mfish feeding in the inshore waters. Removing the potential food sources of Hector Dolphins will not only place the Ministry of Fisheries in breach of the Marine Mammal Protection Act but their marine management will be subjected to public ridicule as more and more people understand the importance of the intertidal zone to marine specie and dolphins.

The lack of research into the value of bladder kelp when it becomes beach cast seaweed is a national disgrace and Mfish senior management have failed to record the science paper that I supplied to Mfish through the South-west recreational regional forum.

In 2007 we responded to the draft of the Threat Management Plan for Hector Dolphins by the Department of Conservation and Ministry of Fisheries, then the final version. With 298 pages the report had just twelve lines theorising that pollution may be impacting on the dolphins food source it became obvious to the reader that neither DOC nor Mfish had any understanding of the intertidal zone.

We are still waiting for Mfish to research the food sources of blue cod in the Marlborough Sounds. Mfish has catch data showing a rapid decline in the commercial catch of blue cod off Patea but could not provide an answer for the decline. Local knowledge has established it was directly caused by the mud flows after the Wanagaui floods which had smothering the off shore bladder kelp forests and sand ecosystems in mud.

The marine environment has many dimensions. Just as mud smothers marine ecosystems and everything that was living dies, it is equally important that what provides the major habitat for marine specie, namely bladder kelp is not destroyed by man's greed or lack of marine knowledge.

We support the proposal to introduce the bladder seaweed *Macrocystis pyrifera* into the QMA but we are strongly opposed to any harvesting of this seaweed now or into the future for the whole of New Zealand not just for Fishery Management Areas 3 and 4. We ask that serious consideration be given to having bladder kelp protected.

A signed copy is in the mail.

Yours sincerely

Jim Miko
Vice President
Wellington Recreational Marine Fishers Association