

Submissions were received in many forms from a wide variety of individuals and organisations. Many submitters completed 'template' submissions (referred to as proforma submissions) which had been drafted by an organisation.

Many of these submissions contained identical information – where this is the case, we have provided a single example of each type of proforma. Proforma submissions that contained additional comments or information have been included as unique submissions in the complete set of collated submission files.

This is the proforma submission that the Royal Forest & Bird Protection Society of New Zealand prepared for submitters to use.

From: webadmin@forestandbird.org.nz on behalf of [REDACTED]
To: [sempf](#)
Subject: Submission on South-East Marine Protected Areas
Date: Monday, 28 November 2016 8:51:17 p.m.

I support the implementation of the full extent of marine reserves and marine protected areas (MPAs) proposed by the South-East Marine Protection Forum, with expansions and additions to provide adequate protection. These additions are necessary in order to meet the Government's MPA Policy, and our international obligations. The proposed sites do not go far enough to provide adequate protection for this important region. The extent of protection required to ensure the ongoing conservation and protection of marine biodiversity is internationally recommended to be at least 30% of the sea in no-take Type 1 reserves. The Forum's current proposal offers a mere 5.3% protection in Type 1 MPAs. This is not enough. There are obvious opportunities to extend that protection to 18%, outlined below, and I call on the Forum to work towards a goal of at least 30%. With less than half a percent of New Zealand's marine environment fully protected and with no reserves currently in the South Canterbury, Otago and Southland regions, a comprehensive network of marine reserves and MPAs is essential to allow fish and other marine species a chance to thrive. Such a network will provide species in the region with some resilience from human impacts and this will in turn benefit the region as a whole. The proposed reserves must also be modified to reflect best practise in the MPA Design Guidelines. The South East bioregion is home to some of the New Zealand's most iconic marine animals, including yellow-eyed penguins, Hector's dolphins, New Zealand sea lions, and various species of albatross. Many of these species are critically endangered. Yet currently the proposal does not do enough to protect their foraging habitats. Marine reserves are most effective where they include the full range of habitats. I recommend the addition of protection for habitats that are not adequately represented in the proposed network. The network must include enough no-take reserves that are big enough to provide a meaningful haven and maintain full ecosystem functions. To achieve this I recommend the following: A Tuhawaiki to Pareora (Type 2): Support. This area is a hot spot for Hector's dolphins. B Waitaki Coastal (Type 1): Support the extension with a further extension out to 12 nautical miles (nm) to provide better representation of foraging habitats used by blue penguin, yellow-eyed penguin and Hector's dolphin. This area is an internationally recognised 'Important Bird Area' (IBA). C Waitaki Offshore (Type 2): Support with a further extension out to 12nm to provide better representation of habitats used by blue penguin, yellow-eyed penguin and Hector's dolphin. This area is an internationally recognised IBA. D Pleasant River to Stony Creek (Type 1): Support, and recommend further extending to include more deep subtidal reef habitat which is underrepresented in the proposal, and increased protection for fish communities associated with kelp forests. This area is an internationally recognised IBA for yellow-eyed penguins and Otago shags. E Bryozoan Bed (Type 2) – Option 1: Support. This option provides the best representation of the range of bryozoan species and associated faunal communities. F Saunders Canyon (Type 1) – Option 1: Support but recommend that it be reconfigured to extend to the coast to include Hooper's Inlet and link to Harakeke Point (Site I). Saunders Canyon is larger, deeper and more complex than the Papanui Canyon, and so provides better more comprehensive representation for this habitat type. This is also the only proposal to contain representation of a deep water highly productive plateau, with its special bryozoan species. The extension to shore would take in an example of an Otago Peninsula inlet, which have not been represented in the proposed network. Hooper's Inlet is a nationally and locally significant saltmarsh and nursery area for flat fish. The connection to Harakeke point would allow for the inclusion of the Chasm, a high current headland and

biologically productive area. Such areas are poorly represented in the proposal. G Bryozoan Bed (Type 2) – Option 2: Don't support. This option does not represent the full range of habitats associated with the Bryozoan communities. H Papanui Canyon (Type 1) – Option 2: Don't support. This option does not represent the full range of deep water biodiversity. I Harakeke Point to White Island (Type 1): Support, and recommend inclusion of Tow Rock. This marine reserve will likely be most effective if the highly productive area of Tow Rock is included. This will be a significant marine reserve for education, research and public enjoyment, being close to a major city, and world class if connected to site F. J White Island to Waldronville (Type 2): Support. While this Type 2 protection does not in itself achieve much in the way of biodiversity protection it may provide a buffer, through fisheries restrictions on the adjacent proposed reserves of Green Island (K) and Harakeke point (I) K Green Island (Type 1): Support. This has a high diversity of life in a small area and will be valuable for research, public enjoyment and education. L Akatore Estuary (Type 2): Support. Estuaries are significant nursery areas for flat fish, and habitat for shore and sea birds. M Akatore Coastal (Type 1): Support, but recommend that it be extended to include site N Akatore Offshore to ensure that the offshore deep reef habitat is protected in a marine reserve. Also recommend straightening the boundary to make it a rectangle, as simple shapes make for easier reserve management. N Akatore Offshore (Type 2): Support but as a marine reserve linked to Site M as above. O Long Point (Type 1): Support, with a further extension to 12 nm to better represent yellow-eyed penguin foraging habitats. This area is an internationally recognised inshore and offshore IBA. P Long Point Offshore (Type 2): Support, and recommend that it be aligned with the current set net prohibition. Q Tahakopa Estuary (Type 1): Support, and recommend that it extends to join with Long Point (Option O). This is the only representation of an estuary in the southern area and needs to represent all the habitats associated with the mouth of the estuary. R Tautuku Estuary (Type 2): Support. Estuaries are significant nursery areas for flat fish, and habitat for shore and sea birds. S Haldane (Type 2): Support. Important estuary habitat. T Kelp Forest (Type other): Support. Kelp forests provide habitat for numerous fish and invertebrate species. This habitat needs to be better represented within marine reserves in the proposal. Additional Protection Needed I seek that all indiscriminate bulk fishing methods, marine farms and mining be prohibited in all the MPAs Additional Reserve Needed I also recommend the creation of a marine reserve between The Brothers Point and The Sisters, in the Catlins area. This reserve should be from the coast offshore to 12 nm to give representation of deep subtidal gravel habitats within the area of highest current speed inside the Forum's boundaries. This habitat type is not represented in the proposed MPA network. A reserve here would also represent yellow-eyed penguin foraging habitats associated with Forest & Bird's Te Rere yellow-eyed penguin reserve. Thank you for the opportunity to make a submission.

Yours,

A large black rectangular redaction box covering the signature area.