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Forest and Bird  
PO Box 5793  
Dunedin

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Guardians of Fiordland Fisheries and Marine Environment (Inc.)  
Private Bag 90116  
Invercargill.

Dear Guardians

**Re: Draft Integrated Management Strategy for Fiordland's Fisheries and Marine Environment**

The Dunedin Branch of Forest & Bird is pleased to have the opportunity to comment on this draft strategy. Many of our members value the Fiordland marine environment for recreation and enjoyment of its natural values. Like the Guardians, we are keen to ensure that Fiordland fisheries can be operated on a sustainable basis, that the general marine environment and special features are maintained, and that non-fishing recreational and cultural values are not unduly affected by fishing activity. We agree that a consultative approach involving all of those with interests in the Fiordland marine environment will be necessary to achieve this vision. The draft strategy places a great deal of importance on locally developed solutions to issues in the Fiordland area. While local knowledge and participation is indeed important, Fiordland has extremely high significance at a national scale, and the values of those individuals and organisations based outside the region must also be taken into account. Our comments below are grouped according to headings in the draft strategy.

2. Developing the draft strategy

We acknowledge that the Guardians have undertaken a considerable amount of research into issues relating to individual fish stocks and their use (2.3.1), but we note reduced emphasis on the diversity of Fiordland marine environments, with less research and less information provided.

We support the strategy's definitions of "special nature" (2.4), but we do not agree that the special nature of Fiordland's landscape features should only be associated with management action on the part of the Guardians if land-based issues have the potential to adversely affect the marine environment or the fishing experience. Clearly, land-based values such as peaceful enjoyment of a natural landscape can be affected by marine activities, such as noise from boat traffic or the visual impact of structures in the marine environment. Accordingly, the second paragraph under "Special nature of Fiordland's landscape.." should be deleted.

We agree that a basic characterisation of the Fiordland marine environment includes the separation of unproductive, inner fiord environments from productive, outer fiord environments (2.5.1). Genetic differences among fish populations that reside in these alternative habitats suggest there is negligible migration between them, and as the strategy suggests, will require conservative management, incorporating the precautionary principle.

### 3. The draft integrated management strategy: fisheries

We support the existing key objectives, but request an additional objective dealing specifically with the need for protection of the marine environment:

"Ensure that representative areas of the Fiordland marine environment are fully protected from exploitation so as to allow the operation of natural ecosystem processes, that will in turn facilitate the sustainable management of fisheries in other areas."

We note that depletion of fish stocks, in terms of both the size of individuals and populations, is a feature of every fished species discussed in the draft strategy (3.3.2). It is likely that these depletions have wider effects

on marine food webs and ecosystems. For instance, are fished species also food items for top predators such as dolphin or albacore tuna, and how does human catch of these prey items affect higher order predators? It is essential that the strategy encourages and incorporates the results of research that provides information on interactions such as these. Otherwise, integrated fisheries management is simply not possible.

We note that while recreational fishing takes place largely within the northern fiords, commercial harvesting is concentrated along the outer fiords and open coast. These productive areas can most likely support greater levels of commercial harvesting, but it is important that over-exploitation does not take place. Dunedin Branch believes that a network of protected outer coast areas will be helpful in terms of maintaining fish populations in adjacent fished areas, and allowing a sustainable harvest to be made of them.

The draft strategy makes a number of important points about access and how changing patterns of access are likely to make the more remote fiords much more accessible (3.3.4). The strategy should advocate for restrictions on access to areas that have high value due to special features or a high degree of naturalness. It may be necessary to prohibit certain types of access (e.g. flying boats in by helicopter) in some areas.

Dunedin Branch supports the “no accumulation” aspect for non-commercial fishing, and the prohibition of commercial fishing in the inner fiord areas (3.7). The proposed daily catch limits will need to be reviewed according to the results of monitoring of fish stocks, with a precautionary principle applying. We support the concept of a “total finfish bag limit”, but believe the total finfish bag limit (3.7.4) needs to be reduced from 30 to 10. Ten finfish should be more than enough eating “for a feed”, even if the fisher has several unsuccessful friends to provide dinner for. We support the proposed restrictions on bulk harvesting methods.

The strategy discusses storage of rock lobster pots outside the harvesting season, but fails to identify the potential adverse effects of such storage on the marine environment. These effects should be identified.

#### 4. Values of special significance

We have some concerns about use of small so-called “china shops” to protect known hotspot areas for biodiversity. Larger areas need to be protected around these biodiversity hotspots. Adjacent areas should be protected so as to allow for their restoration by colonisers dispersing from hotspots. It is also highly likely that additional biodiversity hotspots will be identified in future, and protecting larger areas will increase the chances of capturing some of these with a protected area network. The location of four “china shops” in close proximity along the southwestern shore of Malaspina Reach (Doubtful Sound) suggests, for instance, that this whole area has high value for biodiversity and should be protected in its entirety. In general, “china shop” areas should form the basis for fully protected, no-take, marine reserves, with clear rules and/or codes of practice where necessary to avoid damage from anchoring, diving etc.

The explanation for some of the “china shops” is confusing. Precipice Cove is identified as a site where anchoring on the sill is a threat, yet all-weather anchorage in Precipice Cove is advocated under the explanation to the next “china shop” at Gaer Arm. The Common Head “china shop” is listed as having no apparent threats, apart from a navigational hazard 100m off shore. This does not seem to be a direct threat to the biodiversity values present - perhaps the strategy is referring to the possibility of a boat sinking and releasing fuel?

Dunedin Branch supports the principle of protection of representative areas of the marine environment through creation of marine reserves. The representative areas described in the draft strategy can only be described as a starting point, however. None of the proposed representative areas, nor the “china shops” provide any protection to any outer coast areas, and little protection to the exposed parts of the outer fiords. As discussed earlier in the draft strategy, these areas have much greater productivity than the inner fiord areas. The current proposals seem to only be willing to give full protection to the less productive areas that in many cases have already suffered severe declines in fish stocks. This bias in the distribution of protected areas is admitted in 4.5, where only the “inside fiord habitat” is referred to.

Accordingly, Dunedin Branch requests that the following additions and modifications to the proposed network of protected areas are made:

**Milford Sound** is renowned worldwide for its natural beauty and has paramount importance for tourism and recreation in Fiordland. These values are exposed to the degradation by overcrowding, by over-fishing and by other adverse effects on the marine environment. We believe that the values of Milford Sound are so great that a strong case can be made for extension of Fiordland National Park to cover the entire fiord, from Yates Point to Saint Anne Point. We accept that this would require a change to the National Parks Act.

**Sutherland Sound.** The shallow sill at the entrance to this fiord produces a unique effect on the inner fiord environment and restricts the opportunity for commercial fishing. Because of this, it is probably one of the most unmodified fiords in Fiordland. A no-take marine reserve for entire sound and outside coast between Four Mile Point and Jagged Rocks appears fully justified.

**Bligh Sound.** Proposal lacks representation of outer fiord habitats. Extend marine reserve status to outer fiord area from Tommy Point to Flat Point.

**George Sound.** The “china shop” identified as an important northern location for sea pens should be protected by marine reserve status

**Caswell Sound.** Needs greater protection of outer fiord habitat. Marine reserve status from Hansard Point to McKerr Point and the unnamed point at grid reference B41: 479 637, including Styles Island. This would provide protection for a diversity of open and sheltered rocky outer fiord habitats.

**Charles Sound.** Gold Arm has been identified as an outstanding area of habitat diversity and deserves protection as a no-take Marine Reserve.

**Nancy Sound.** A spectacular, steep sided sound that can be accessed relatively easily from Thompson Sound and is likely to attract greater visitation. It deserves full protection as a marine reserve, extending from

Anxiety Point to the unnamed rocky point north of Burnett Point, and including Entrance Island.

**Doubtful Sound System.** Dunedin Branch recognises that the Doubtful Sound system is an important area for recreational fishing, due to the relative ease of access provided by the Wilmot Pass road. However the system is clearly large enough to support some areas where recreational fishing is allowed, and some areas where no-take marine reserves are established. This is already partially in place with respect to the small marine reserve in the Gut between Bauza and Secretary Islands. We advocate an extension of the Gut Marine Reserve further out to the mouth of the fiord, with a western boundary running from Bauza Island, to and including the Shelter and Nee Islands, with the eastern boundary formed by Secretary Island. The southern boundary should run between Marcaciones Point and Quintano Point. In Bradshaw Sound, we support the proposed representative area in Gaer Arm. It should be protected by marine reserve status. Precipice Cove, identified as a “china shop”, should also be given marine reserve status, and the strategy should advocate for restrictions to anchoring in this area. We advocate that the whole of Crooked Arm is protected under marine reserve status, given its importance as a nursery area for one of the two Fiordland populations of bottle nosed dolphin. In Malaspina Reach lies Tricky Cove, a site of early scientific research on the benthic ecology of the fiord. As this site has value for long term monitoring purposes, we recommend that it is protected as a marine scientific reserve, which would allow scientific study to continue but discourage recreational diving. The area protected should extend right across the fiord, and include the “china shop” areas between First Arm and Crooked Arm. Further toward the head of the fiord, the strategy identifies several important “china shops” in close proximity to each other, and to Deep Cove. We agree that these sites should all be included in a fully protected marine reserve. The proximity of these sites to Deep Cove should assist in advocacy for their protection, and monitoring of activities in the protected areas.

**Dagg Sound.** The draft strategy gives no protection to Dagg Sound, apart from a ban on commercial fishing in the inner sound. We find this remarkable since Dagg Sound occupies a unique position at the transition between the northern and southern groups of marine ecosystems in

Fiordland. It is also one of the most exposed fiords, since its entrance is open to the westerly swell and contains no islands to shelter the outer fiord area. We recommend that the whole fiord, and outer coast from Castoff Point to Towing Head, is fully protected as a no-take marine reserve.

**Dusky Sound system.** The Dusky Sound system comprises a very large area, parts of which are important for recreational fishing. As with Doubtful Sound, we advocate that some areas are fully protected while others remain open to recreational use. We request that the whole northern part of the Dusky Sound system be protected as a no-take marine reserve. This would include all of Breaksea Sound, the mouth of which includes several islands that are important for terrestrial biodiversity initiatives. Giving protected status to the waters surrounding these islands will enable full expression of biotic links between terrestrial and marine ecosystems. We support the decision to include Wet Jacket Arm as a fully protected representative area. To be truly representative, the Acheron Passage, between Breaksea and Dusky Sounds, should also be protected, since it is one of only two open-ended fiords within Fiordland. The marine environment in these areas has particularly strong currents that provide habitat for rich assemblages of filter feeders. We also request that the proposed representative area within the inner waters of the Five Fingers Peninsula be extended to cover the whole of the outer coast area, running up the coast to the mouth of Breaksea Sound. The outer coast of Resolution Island, including the Five Fingers Peninsula, is a very important habitat for seabirds, and whales, dolphins and sharks are often observed in the inshore waters of this area, implying high productivity and complex marine food webs.

These proposals would create a substantial marine protected area in the northern part of the Dusky Sound complex, while retaining the main Dusky Sound channel as an area within which commercial and recreational fishing could take place.

**Chalky Inlet.** A “china shop” is identified for Edwardson Sound, which is one of the few sounds where the inner fiord area is exposed to ocean swells. Consequently, communities that normally grow in the outer fiord areas are able to grow much further toward the head of the sound. The intricate

headwaters of the sound are fed by large amounts of fresh water issuing from Lake Cadman and Lumaluma Creek, creating estuarine habitats. We recommend that the whole of Edwardson Sound is protected as a marine reserve.

**Preservation Inlet.** This is the youngest fiord system in Fiordland and supports distinctive marine communities as a consequence, including species that are not found elsewhere within Fiordland. The shallow reef communities at the entrance to the inlet contain the best representation of shallow rocky communities in Fiordland. We support the proposed protection of marine ecosystems in Long Sound, but advocate that this protection should be extended to cover the whole of Preservation Inlet, stretching from Puysegur Point to the Balleny Islands, and across Broke Adrift Passage to Gulches Head. Preservation Inlet, like Milford Sound, warrants protection as an extension of Fiordland National Park

## 5. Risks to the marine environment

We support the strategy's focus on bioinvasion (5.2) and the code of practices specified for hull cleaning and discharges of ballast water. Educational material will assist participation of the general public in surveillance. Education should also be used to help minimise discharge of sewage and rubbish from recreational users. The Guardians should be active in resource consent advocacy for activities such as construction of facilities that need consents under the Resource Management Act. Section 5.4.3 discusses land slips and the effect that the spread of possums might be having on forest health. Dunedin Branch regards deer as a far more serious, and current threat to forest health in Fiordland. Deer have devastated forest understoreys in many areas and continued browsing pressure is resulting in elimination of palatable species. As well as indirect effects on the frequency of landslips, deer may also be disrupting the links between the marine and terrestrial environment, by destroying coastal habitat used by nesting seabirds. Such an effect is evident within relatively fertile coastal forests at West Cape, where the understorey has been 'hollowed out' by deer grazing. The Guardians should also advocate for effective control of deer in coastal areas of Fiordland. We support the Guardians focus on the impacts of increased visitation to the Fiordland marine environment, and ways to

minimise these. Restrictions on access should be among the tools used to control these effects.

## 6. Expressing Kaitiakitanga

Dunedin Branch of Forest & Bird supports the use of taiapure, mataitai and rahui as methods enabling management of local fisheries by local iwi. However we do not support the use of taiapure to cover the whole of the Fiordland marine fishery. Marine reserves may not be able to be created within taiapure areas, and purely local management of this nationally and internationally important marine area is inappropriate. Such management is likely to significantly disenfranchise large sectors of the public who do not live in the Fiordland area, yet appreciate its values. It is important that the overarching management framework used to coordinate Fiordland's fisheries is completely open to public input through preparation of management plans that have a statutory basis. It is also necessary for management to be able to draw upon all the tools available for fisheries management. We suggest the concept of a marine park would be most appropriate. A marine park could include the full variety of methods for managing Fiordland's fisheries and marine environment, ranging from marine and scientific reserves to local taiapure areas, commercial fishing restrictions and areas with no restrictions on fishing activity. Management of the park would be subject to processes involving full public input.

## 7. Implementing the strategy.

We respect the outcome of the negotiated process that has occurred to date between parties to the Guardians (7.1). However, we remind the Guardians that the results of full public consultation are not yet available and any agreement must be subject to this. In particular, environmental interests and those who value the Fiordland marine environment for reasons other than resource extraction have not been adequately represented in the process to date. We trust that the generosity and goodwill that has accompanied negotiations so far is extended to the public consultation process.

We fail to see the benefit of relying exclusively on existing legislation to achieve the strategy's vision (7.2). If the current legislative tools are too

restrictive, then new legislation should be considered. The Fiordland marine area is important enough to justify special legislation if necessary. We believe such legislation should be considered to allow extension of national park status to the marine environment, and creation of marine parks. In the meantime, progress toward achieving the strategy can be made using currently available legislative tools.

## 8. Compliance of the strategy

We support an integrated approach to ensure compliance, and the ‘carrot and stick’ approach specified. The remote nature of Fiordland provides particular difficulties for surveillance of activities, so education and peer pressure must be key components of any compliance strategy.

## 9. Monitoring the performance of the strategy

We agree that monitoring changes to the state of Fiordland’s fisheries and marine environment is critical. Creation of no-take marine reserves will assist with monitoring by providing baselines against which changes in the state of fished areas can be measured. We support the use of indicators to help monitor the effectiveness of the strategy. Clearly, these indicators will depend on the final strategy used. The draft strategy states that “The GIS is already providing important baseline data...” There seems to be some confusion about the role of GIS – it is a tool for integrating and displaying data, but systematic collection of new data will be needed if GIS is to play a part in monitoring.

## Conclusions

Dunedin Branch of Forest & Bird are grateful to the Guardians of Fiordland’s Fisheries and Marine Environment for giving us the opportunity to comment on the draft management strategy. It is clear that the Guardians have put a great deal of work into the strategy, which contains many good policies. We trust that our views will also be taken into consideration as the strategy is developed further.

Incorporating our suggestions into a management framework would allow a

much better representation of outer coastal habitats in a network protected areas, and protection of entire fiord systems in each of the northern, central, and southern Fiordland areas. Recreational fishing would remain available in the most accessible fiords (namely Thompson, Bradshaw, Doubtful and Dusky Sounds), and most of the outer coastal area would still be available for commercial fishing.

Commercial fisheries are noted for putting short term profit before long term sustainability. We hope that commercial, recreational and cultural fishers alike will view our proposals as a method of protecting Fiordland's unique marine ecosystems and biodiversity while at the same time ensuring the sustainability of fisheries in adjacent waters. We see our proposals as an important aspect of kaitiakitanga for Fiordland fisheries. We encourage the additional use of methods such as mataitai, taiapure and rahui in fished areas, where necessary to prevent local depletions of fish stocks.

Yours sincerely,

Paul Star, Secretary.