



BAY OF MANY COVES RESIDENTS & RATEPAYERS ASSOCIATION INC.

Representing the community of the Bay of Many Coves, Queen Charlotte Sound, Marlborough.

Registered Charity CC46089

c/-The Secretary
72 Ferry Road, Spring Creek,
Marlborough, 7202

Bay of Many Coves Residents and Ratepayers Association Inc. SUBMISSION on the MPA Act, 10 March 2016

Our organisation represents most of the temporary and permanent residents residing in the area known as Miritu, or the Bay of Many Coves. Our membership is made up of people who have had an association with the Queen Charlotte Sound for many years, if not decades or generations, and have knowledge of the environment in that area. Many of our members are also recreational fishers.

Generally we applaud the government for proposing long overdue legislation to address marine protection for New Zealand waters. However we also have some serious concerns about some of the proposals.

Below we have listed our main concerns with the current proposals. On behalf of our organisation, I have attended two of the public meetings presented by the Ministry and attended by Nick Smith, and have read the consultation document.

For expediency, I have firstly bullet points dealing with the bill in general and secondly the issues dealing with the establishment of “fishing parks”.

General Points

- What are the implications of the RMA intentions in relation to this bill?
- The timeframe government has set is unrealistic to develop and pass effective legislation including consultation.
- The exclusion of the entire EEZ for the development of MPAs is bombastic and negates any chance of New Zealand honouring its international marine conservation obligations. It further limits the opportunities to protect special or endangered habitats. We believe this exclusion has been motivated by an economical based view of potential exploitation excluding environmental protection.
- The consultation document makes mention of integrated marine habitats but does not explain how this may work. As the bill makes no mention of taking time and money to explore and access data as to where MPAs should be established and interface, we do not see how this could work. The process of information gathering and potential establishment of MPAs is a slow process and should have wide and detailed information for decision making.
- The Bill makes little reference to environmental impacts to the marine environment from land based activities. Nor shows any initiative to address the effects of these activities on the marine environment.
- Gas oil and mineral extraction or exploration should be subservient to the need to establish MPAs.
- A Board of Inquiry, appointed by government is a top down approach and does not reflect the will of the people affected. The lack of mention of the development of community input into marine management appears to be a parental disdain for involving community and iwi with the process. For this bill to work, it must be inclusive of a collective of interested parties.

Recreational Fishing Parks

- As the fishery parks do not offer protection of the fish stocks nor marine environment, they should not be part of this legislation. Fish parks are not MPAs, they are extraction zones.
- Our organisation does not view the commercial fishing sector to be the major contributor to the current poor fish stocks. The elimination of commercial fishing in the Marlborough Sounds will undermine the Quota Management System and destroy the balance which has been established. It will also lead to the lack of real data as to how much is caught.
- There is no evidence that a positive fishing experience will be created by the creation of fishing parks.
- The Fishing Park proposal does not build into it any conservation measures to promote the increase of fish stocks, nor address the contributing factors of habitat decline. This omission is one of the greatest concerns to our association.
- Effects on the marine environment are a collection of impacts. The fact that the bill intends to allow marine farming and other commercial species take, is inconsistent with the parks intention of improving recreational fish extraction. Marine products and systems should be controlled collectively.
- Who will manage the fish parks? What will the management regime look like, and where does science and research fit into that management?
- Concessions will require approval and how will these be regulated?
- Bill does not allow for total “no take “zones within the fish parks.
- The use of taiapure, rahui and mataitai reserves should be a flexible and simple management tool within the marine environment.
- We have not been asked what our opinions are on the establishment of recreational fishing parks even though this was an election promise. We have not been asked to be involved with anything to do with the concept except for this late submission process.

In summary, we will support the good aspects of this bill and apologise for not listing them within this submission. We think the government is on the right track by responding to the necessity of drafting such a bill. However, we are concerned with the haste and lack of consultation in which it has proceeded to this point. There are several models which could work to develop and implement positive outcomes for this eventual MPA Act. The model we favour has already been established here in Marlborough through the Marlborough Sounds Integrated Management Trust and Marine Futures. This is an inclusive group of stakeholders representing a very wide community involvement of the commercial, recreational, environmental, local government, iwi and residential populace of Marlborough. Ideas, knowledge, support and commitment for the development and by-in of this proposed act must come from the grass roots of community. All the successful MPAs in existence in New Zealand are the result of this community process.

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