

Subantarctic Marine Protection Planning Forum Consultation
Department of Conservation
PO Box 10 420
Wellington 6143
30 July 2009



Dear Forum Members

Submission on the Implementation of the MPA Policy in the territorial seas of the Subantarctic Islands

Forest & Bird appreciates the opportunity to comment on the consultation document developed by the Subantarctic Marine Protection Planning Forum.

Forest & Bird

Forest & Bird (Royal Forest & Bird Protection Society of New Zealand Inc) is New Zealand's largest independent conservation organisation. Established in 1923 we have campaigned for over 80 years for the protection of New Zealand's native species and the habitats on which they depend.

We have grown to number around 40,000 members - many of whom join us to save their local species and habitats. Our members are people who care passionately about New Zealand's unique and special natural environment and native species, and want to make sure that these natural treasures are protected so that they can continue to be enjoyed by future generations.

The constitutional purpose of Forest & Bird is to:

“To take all reasonable steps within the power of the Society for the preservation and protection of the indigenous flora and fauna and natural features of New Zealand, for the benefit of the public including future generations.”

Forest & Bird has a long history of advocacy for the protection of New Zealand's marine environment and has been at the forefront of efforts to protect New Zealand's marine biodiversity. Forest & Bird is represented on the Forum by its Advocacy Manager; Kevin Hackwell.

Marine Biodiversity Protection Agreements

Under the International Convention on Biological Diversity (CBD) the New Zealand government has agreed to protect 10% of the marine environment in a network of representative marine protected areas (MPAs) by 2010.

Over 30 marine reserves are now in place around the New Zealand coast, over half of which have resulted from applications from tangata whenua, conservation groups, fishers, divers and marine science interest groups. Yet only 0.3% of our total marine environment is currently protected by them. This compares to over 30% of mainland New Zealand that is protected.

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In our coastal waters (territorial sea), marine reserves protect just 7% of our coastal marine habitat. The majority of this protected area is due to the two large marine reserves around the Kermadec Islands in the far north and the Auckland Islands in the far south.

Background to Forest & Bird's recommendations

In 2005 the government released the Marine Protected Areas Policy and Implementation Plan (MPA Policy), which outlines the process through which our marine biodiversity will be safeguarded both now and for future generations.

The objective of the MPA Policy is to:

“Protect marine biodiversity by establishing a network of MPAs that is comprehensive and representative of New Zealand’s marine habitats and ecosystems.”

This is further clarified:

“The MPA network will protect representative examples of the full range of marine habitats and ecosystems, and also outstanding, rare, distinctive or internationally or nationally important marine habitats and ecosystems”. (Para 16)

All the marine habitats and ecosystems of the territorial seas around New Zealand’s subantarctic islands meet these criteria:

Outstanding:

The marine habitats and ecosystems are outstanding not only for the unique biodiversity they individually and in combination support, but also for their lack of modification.

Distinctive:

Each subantarctic island group and surrounding seabed has a unique geologic make-up and history. The seas around the island groups each experience important differences in their oceanographic and physiographic environments. Each island group has a unique combination of land based animals and plants that interact with the surrounding marine habitats. The same is true of the animals and plants of the marine habitats and ecosystems, with each island group having marine species that are endemic just to that group.

While the marine habitats and ecosystems of each subantarctic island group are distinctive from each other, in combination they are also distinctive with respect to the rest of New Zealand’s marine environment.

Rare:

Because the marine habitats and ecosystems of each subantarctic island group is distinctive from the other, they are individually rare at both a national and international level.

Internationally important:

In 1998 international importance of the subantarctic islands and the territorial seas around them was recognised when UNESCO listed the subantarctic islands and their territorial seas as World Heritage sites. The listing conveys the highest possible international conservation status for these islands, recognising that they have outstanding conservation and scientific significance. The 1997 nomination for World Heritage listing identified the

following natural features of “outstanding universal value” that had direct links to the marine environments surrounding the islands:

- (a) the most diverse community of seabirds in the world;
- (b) ten seabird taxa endemic to the region, including six species (three shags, two albatrosses, one penguin) restricted to single island groups;
- (c) ten albatross species (42% of the world’s taxa), including six species endemic to the region and one species endemic to New Zealand;
- (d) four penguin species, including two endemic to the region and one endemic to New Zealand (the world’s rarest, the yellow-eyed penguin);
- (e) the largest populations of great “wandering” albatrosses found at a single breeding area anywhere in the world;
- (f) the world’s rarest cormorant (the Bounty Island shag);
- (g) 30% of the world’s petrels – 21 species or subspecies;
- (h) a phenomenally large population of breeding seabirds;
- (i) 11% of all seabird taxa in the world (40 taxa);
- (j) a rare and threatened endemic sea lion whose principal breeding range is restricted to fewer than five sites; and
- (k) a significant breeding population of southern right whales, formerly endangered.

Nationally important:

The marine habitats and ecosystems around the subantarctic islands are clearly of national importance. This has already been recognised by the New Zealand Government’s nomination of the territorial seas around the islands for World Heritage status.

The options

Because of the remoteness and relative lack of human activity in the region, the marine environments of the subantarctic islands are largely unspoilt. There is almost no fishing activity within the territorial seas of the island groups and there are few other activities apart from tourism, scientific study and conservation management.

Forest & Bird supports the option for marine reserve status for the entire territorial seas around each island group (option 2). This option recognises the international importance (World Heritage status) of the islands and the territorial seas around them. It also recognises that the protection level of the nationally significant marine environments should match the protection already afforded to the terrestrial environment of the islands (joint nature and national reserves status) - the highest protection status available in New Zealand.

There are very strong linkages for the islands’ rare and threatened biota with coast and sea surrounding each island group. The marine ecosystem of the subantarctic region as a whole and the territorial seas of each island group individually contain high levels of biodiversity and endemism. In each case option 2 will provide a strong protective status to the entire interconnected land and sea ecosystem around the subantarctic islands.

We would note that the complete protection options would result in comprehensive protection of these special marine environments, consistent with the level of marine protection already applied to the territorial Kermadec Islands and to the Auckland Islands.

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Forest & Bird does not support the alternative partial marine reserve plus Fisheries Act prohibitions options. The types of fishing which would still be allowed within the Fisheries Act prohibition areas would still have the potential to impact on and disturb the marine environments. For example the ling long-lining which has been occurring around the subantarctic islands has recorded bycatch of bottom dwelling invertebrates such as sponges, corals and anemonesⁱ.

The marine environment is a complex, dynamic interconnected system, whereby impacts on components within the water column or on the seabed can have direct and indirect impacts on the other parts of the system. In the case of rare or keystone species this impact may be significant and irreversible.

Another reason that Forest & Bird does not support these partial marine reserve options is that the marine habitats around the subantarctic islands have developed specific marine ecosystems with high levels of endemism. Preliminary evidence from dive surveys close to the islands suggests that these marine environments support rich and diverse communities, with ecological uniqueness.

Given the oceanographic and physiographic setting of these islands, a continuation of the single-island endemism observed in shallow water can be expected in deeper waters within the territorial seas. Therefore the relatively arbitrary selection and orientation of the proposed partial marine reserves does not provide any certainty that all the outstanding, rare, distinctive or internationally or nationally important marine habitats are represented within the proposed partial marine reserves.

Recommendations

With reference to the options put forward by the Forum for the protection of the marine environments in the territorial seas of each of the subantarctic island groups, Forest & Bird recommends that the Forum adopt the complete no-take marine reserve option in each case:

The Subantarctic Marine Protection Planning Forum should recommend to the Ministers of Conservation and Fisheries the full protection of the marine habitats and ecosystems within the territorial seas of the subantarctic islands:

- Antipodes Island – Option 2: complete no-take marine reserve
- Bounty Islands – Option 2: complete no-take marine reserve
- Campbell Island – Option 2: complete no-take marine reserve

Yours faithfully

Mike Britton
General Manager
Royal Forest & Bird Protection Society

ⁱ Horn, P.L 2004. A review of the auto-longline fishery for ling (*Genypterus blacodes*) based on data collected by observers from 1993 to 2003. *New Zealand Fisheries Assessment Report 2004/07*. 28p.