



October 18, 2007

Submission to Hectors and Maui Dolphin Threat Management Plan – Draft for Public Consultation August 29, 2007

Please find below the submission on the above Threat Management Plan (TMP) on behalf of Venture Taranaki Trust (VTT), the regional economic and tourism development agency for Taranaki. VTT also has responsibility for events funding, film and major projects, and is incorporated as a charitable trust. VTT is a council-controlled organisation which facilitates business success from enterprise inception through to sustainable growth based on international competitiveness.

Background to Taranaki Fishing Sector

Taranaki has a relatively small but thriving fishing sector, including two fish processors and approximately eight full-time fishing boats based at Port Taranaki. Because of the often extreme weather and sea conditions along the North Island's western seaboard, commercial fishing is safer and more fruitful in the summer months. Commercial fishers are limited in the winter months to certain areas off the Taranaki coastline, and very rarely venture into waters below Cape Egmont for safety reasons.

Taranaki fishermen predominantly use finfish trawling and line fishing, and tend to stay with their nets up to 50% of the time. These fishermen tend to set their nets at night, when the weather is calmer, and collect the catch in the early morning. This is the most economical way of fishing in Taranaki waters, as the sea can be too rough for lucrative catches during the day, and the fish caught here tends to feed at night.

It is clear that some commercial fishing industries will be less affected by the options in the TMP, in particular rock lobster and aquaculture. However, if the region loses local processing facilities, then those industries may not be viable either.

The Taranaki fishing sector supplies approximately 70% of the region's fresh fish supplies, and the region's largest fish processor (Egmont Fisheries) exports its products around the world as well as throughout New Zealand.

Taranaki fishermen have accommodated and supported the 2003 set-netting prohibition, which runs from Pariokariwa Point (north of New Plymouth) to Maunganui Bluff (north of Dargaville) out to four nautical miles, and takes in an area 30km-40km north and south of the verified sightings at the time. There have been four reported mortalities of Maui's dolphins since 2003, none of which have been attributed to fishing.

Compared with other industries, a large proportion of production from the processing sector is exported outside the region, making it one of Taranaki's significant exporters.

According to an Economic Impact of the Fishing Industry on Taranaki undertaken by Business and Economic Research Ltd (BERL) in September 2007, the following is a breakdown on the commercial fishing and seafood processing sector on the Taranaki region:

- **Two processing companies employing 19 full-time equivalents, with sales expected to be around \$6.6 million;**
- **Ten commercial fishing vessels employing 32 fulltime equivalents, with sales of close to \$3.4 million;**
- **An output of \$8.85 million, GDP between \$2.81 million and \$4.49 million;**
- **Adding indirect and induced effects, the figures are an output of \$13.06 million, GDP of between \$4.74 million and \$7.62 million, and employment of 79 fulltime equivalents;**
- **There is potential for the industry to contribute at least a further \$500,000 to GDP, which would employ a further five people in the region.**

Hector's and Maui's Dolphins

The TMP clearly indicates that this species of dolphin is extremely reclusive and very little is actually known about them or where they tend to live. Previous research on dolphins has been limited because of cost, and no Government-funded research is believed to be scheduled or currently taking place.

What is known is that the Maui's Dolphin population is critically endangered and is the smallest out of any of the Hector's Dolphins. It is estimated that there are between 48 and 252 of these animals left, with a median of 111. These dolphins are particularly susceptible to brucella and pneumonia, and appear to be more delicate in both size and health than their Hector's Dolphin cousins.

This particularly type of dolphin is late maturing (seven to nine years), has a slow reproductive rate (one calf every two-to-three years), and only lives to around 20. It is believed there may be fewer than 30 breeding females still alive.

However, due to the lack of information and data about these species of dolphin, it is impossible to accurately pinpoint exactly how many are alive and the territory they prefer to live in. It is believed that they prefer waters around the Manukau Harbour, and there have been a number of sightings in the Manukau area. There has only been one unverified Maui's Dolphin sighting in Taranaki waters since 2003.

There have been recent public sightings of dolphins reported in the Taranaki Bight, but investigations indicate that all but one are unlikely to be a Maui's Dolphin. This single possible Maui's Dolphin sighting is unable to be confirmed because of inconclusive information. The Department of Conservation has included Taranaki in aerial surveys, but has made no sightings of Maui's Dolphins since 2003.

It is now believed that Maui's Dolphins are most common between Manukau Harbour and Port Waikato within four nautical miles of the coast. The Taranaki Bight was once a core area of distribution of Maui's Dolphins, but this is no longer the case and the southernmost verified sighting in recent times was around Mokau.

As the TMP clearly states in its 'Population Characteristics' section: "Most recent sightings of Maui's Dolphins have occurred between Maunganui Bluff on the North Island's west coast, south to Tongaporutu, 40km north-east of New Plymouth. Confirmed sightings outside this range are rare, although Maui's Dolphins were once found along most of the WCNI and up the east coast as far as Bay of Plenty. The lack of Maui's sightings in the south Taranaki-Wanganui region since the 1970s indicates a reduction in range from what was once a centre of the dolphin population."

It is clear that information on the extent of fishing impacts on these dolphins is inadequate and uncertain, to say the least, and to make sweeping changes with limited information that increase restrictions would have a major negative impact on people's social, cultural and economic wellbeing.

We believe that, for the TMP to be implemented in any way other than the status quo, the following questions must first be answered with up-to-date and accurate information:

- What evidence is there of Maui's Dolphins inhabiting water south of the current set net prohibition area? How are the numbers/guestimates substantiated?
- Have any **confirmed** sightings of Maui's Dolphins been documented in the Taranaki fishing zones since the 1970s?
- Where have the 17 deaths and two net entanglements of these dolphins since 1988 taken place?
- MFish reports that 390 Hector's and 40 Maui's Dolphins have been killed since 1921 – where does this information come from? How have they died and where?
- Why has the exclusion zone been extended south to Cape Egmont and beyond four nautical miles, when it is not certain that Maui's Dolphins have ever ventured down this far?

Possible Fisheries Measures

There are three options offered for consideration in the TMP – predominantly the status quo, a moderate change to current practices, and a full prohibition along the West Coast from Kaipara to Cape Egmont out to 12 nautical miles.

Option One

For Taranaki's fishing sector, this option is by far the most palatable. Additional partial prohibitions inside harbours along the coast are easily implemented, and further/increased monitoring on vessels operating within four nautical miles between Maunganui Bluff and Pariokariwa Point would be accepted by the sector. The local fishing industry believes this current option is protecting Maui's Dolphins, as evidenced by the fact that no dolphins have been killed, maimed or even confirmed as seen in Taranaki waters since the protection plan was put in place in 2003.

Option Two

Mandatory net attendance and no overnight settings in North Island harbours would present major difficulties for Taranaki fishermen, and would probably result in the closure of the region's fishing sector. As mentioned above, the prevailing weather conditions off the coast of Taranaki (particularly in winter) and the feed patterns of the fish means that day fishing and net attendance could be both dangerous and financially unviable.

Option Three

A full prohibition along the west coast of the North Island from Kaipara to Cape Egmont extending out to 12 nautical miles of recreational and commercial fishing would almost completely kill off the fishing industry in Taranaki, due to the closure of summer and winter fishing grounds and the ban on overnight fishing.

The TMP states that the Minister, in determining whether additional controls on fishing activity are necessary to reduce the effect of fishing-related mortality, is not required to eliminate all risk to dolphins from fishing but must also consider the effect that options have on people's ability to use fisheries resources.

It is clear that Options Two and Three above will have a catastrophic effect on Taranaki's fishing sector, in all reality decimating it and adversely affecting both those employed within the industry and also those in the population who buy fish.

According to the BERL economic impact assessment on the Taranaki fishing industry: "There are likely to be ongoing structural impacts from the loss of the industry. These include difficulties in changing occupations resulting in longterm unemployment, lost export revenue, lost capital and fishing quota. It would also negatively impact on retailers that purchase seafood off the processors.

"If the option chosen in the Draft Threat management Plan were to result in the commercial fishing and seafood processing industries have to close, the Taranaki economy would lose between \$4.7 million and \$7.6 million in gross domestic product (GDP) and 79 fulltime equivalents."

We have been advised that there is great concern amongst local iwi relating to the loss of income through quota sales. Fishing companies using Port Taranaki regularly purchase quotas off iwi, and these transactions ensure local Maori gain a decent income from the resources they own.

Consultation Times

Those involved in the fishing industry in Taranaki have been concerned at the short public consultation timeframe around the TMP. The large document was released for consultation on August 29, after a preliminary meeting on April 26 of representatives from regional commercial and recreational stakeholder organisations, and Taranaki iwi.

However, the far-reaching and potentially catastrophic options outlined in the TMP were not anticipated, and many stakeholders wishing to place submissions feel very pressured by the timing.

In a letter to Keith Mawson of Egmont Fisheries from Jim Anderton, the Minister of Fisheries said the consultation timeframe was built around the Government's desire to make decisions prior to Christmas this year, and any change to the submission deadline would jeopardise that goal.

We believe that due to the far-reaching consequences of this plan, adequate time should be given to all offering submissions on the TMP. There appears to be no real requirement to decide on this matter before Christmas – in fact, given the lack or up-to-date credible evidence and research, and the potentially industry-ending effect the TMP could have on the Taranaki fishing industry, any rushed consultation period is both insulting and unfair.

Proof of 'Facts'

Upon reading the TMP, it is clear that certain 'facts' pertaining to the plight of Maui's dolphins are not backed up with firm or bonafide research. Of most concern to VTT is the suggestion that only one confirmed Maui's dolphin has been sighted in the Taranaki Bight, and that was 17 years ago.

This means that Options 2 and 3 may well be 'overkill', when there is little evidence that Maui's Dolphins actually live in these waters. The effect on Taranaki's fishing industry would, therefore, have no substance or reasoning, and would – in our opinion – detrimentally affect businesses and individuals for no discernable or reasonable gain.

Ongoing Implications

As said above, the TMP states that the Minister, in determining whether additional controls on fishing activity are necessary to reduce the effect of fishing-related mortality, is not required to eliminate all risk to dolphins from fishing but must also consider the effect that options have on people's ability to use fisheries resources.

There is an argument that in times of low unemployment (Taranaki is still maintaining record low unemployment levels of around 3%) that jobs lost in an industry such as fishing will be quickly found in other sectors. In this case, however, that scenario is unlikely, due to the types of skills required in the fishing sector. More likely will be displaced people joining the unemployment lines, or moving outside the region to continue working in the commercial fishing sector.

If the Taranaki fishing industry were to halt, exports outside Taranaki would fall, regardless of whether the resources were re-allocated or not. The majority of capital assets lost would be unique to the fishing industry (boats or nets, for example) and these could not be easily deployed or transferred to other industries.

According to BERL's economic impact assessment:

“We argue that employees in the fishing industry would find it difficult to find work in other sectors of the economy and are likely to leave the region to continue in their industry. The seafood processing sector has a relatively high export component, which would be lost to the region. Finally, a significant proportion of the capital assets (including quota) are unique to the industry and would likely be mothballed rather than sold, resulting in capital losses to the individuals and to the region.”

Recreational Threat

As a volatile and extremely long coastline, Taranaki emergency services often struggle to adequately cover the area around the bight. The fishing industry is often called upon by coastguard services to help with rescuing or aiding recreational fishermen/boaties in trouble off the coast.

If such an emergency unfolded, and there were no commercial fishing boats closeby that were available to help, fatalities could easily occur. This situation would be of extreme concern to emergency services in Taranaki, along with local authorities.

Fish Availability and Prices

The Taranaki fishing sector supplies an estimated 70% of fresh fish supplies to the Taranaki region – this includes both fish monger establishments and takeaway shops. It is fair to assume that - if the fishing industry is decimated by the management plan decrees – Taranaki fish prices will rise substantially and good quality fresh fish will be harder to source.

It is also suggested that fish will have to be imported into Taranaki from other parts of the country, or even brought in from Asian countries. It seems ironic that a region with one of the longest coastlines in New Zealand would need to be reliant on fish supplies nationally or internationally, increasing spending and the impact on the environment.

It would seem certain that the Taranaki community would be extremely concerned about this situation, particularly given the recent concern about the standard of other types of food imported from Asia.

According to the BERL economic impact assessment:

“Others in the industry, such as the lobster operations, rely on the processors for bait and ice. Their operations would be adversely affected if the processors could no longer supply those factors of production. Other local retailers who purchase off the processors would also be adversely affected (in particular, the fish supply on the marina, which is inextricably linked with Ocean Pearl fisheries).”

Economic Impact of the Fishing Industry in the Taranaki Region

Upon becoming aware of the TMP, Venture Taranaki commissioned Business and Economic Research Ltd (BERL) of Wellington to provide an economic impact of the proposal on the fishing industry in Taranaki.

The size of the fishing sector in Taranaki is available through Statistics New Zealand data, and shows that the commercial fishing industry in the region consists of 19 businesses employing 34 FTEs. This suggests that each business employs – on average – less than two FTEs.

As mentioned above, there are some commercial fishing industries that will not be affected by the TMP – such as rock lobster and aquaculture. However, if local processing facilities are no longer available, then those industries may not be viable either.

There are two seafood processing plant identified in the region, with the largest employing the equivalent of nine FTEs. Whilst small, the commercial fishing and seafood processing industries have a positive impact on output, GDP and employment in the region.

Case Study:

Seafood on the Beach is a fresh fish supplier and takeaway food operation on the harbour’s edge at Port Taranaki. A \$250,000 start-up business, it currently has a turnover of around \$1 million per annum, and employs nine fulltime and seven part-time staff. It provides a quality product that caters not only for the local market but also the tourist market (electronic beepers are offered to customers so they can explore the port area whilst their meals are being cooked).

Without access to fresh locally-caught fish from processors/fishermen, Seafood on

the Beach will not be able to provide their unique product. The owners would not have risked their initial investment, as it is impossible to import fresh fish of the types they require, due to the lack of availability and geographic location. Therefore, their investment, employment and economic activity (including that involving the wider community/tourism) will disappear along with the seafood industry of Taranaki, if the TMP recommendations are implemented.

Further Research

In the opinion of Venture Taranaki Trust, further research is required before sweeping changes are made via the TMP. This research must concentrate on the following statements:

- It is clear that Maui's dolphins are critically endangered and need protection.**
- There have been no verified Maui's dolphin sightings south of the closed area since it was implemented in 2003, and no verified sightings of Maui's dolphins in Taranaki waters in 17 years.**
- There is no accurate documentation on whether Maui's Dolphins live in Taranaki waters. No research has been completed on this matter, and none is planned.**
- Maui's dolphins are subject to ill health, likely due to inbreeding, and suffer from such illnesses as brucella and pneumonia. It could be assumed that a significant percentage of dolphin deaths may be due to these illnesses.**
- There have been four reported mortalities since 2003, none as a result of fishing practices and none inside Taranaki waters.**

Recommendations

The TMP is a far-reaching document that, if implemented, will have a significant effect upon the fishing industry – and therefore the economic, social and cultural wellbeing of the region - in Taranaki. It is clear that Maui's Dolphins are critically endangered and need to be protected. However, it is also clear that very few of the dolphin sightings have been made in Taranaki waters, and there is no accurate information relating to these dolphins actually existing south of Tongaporutu (out of the existing exclusion zone) at all.

Fishers in the region are very cognisant of the dangers bad fishing practices have on the future of Maui's Dolphins, and make significant effort to ensure dolphins are not caught in their nets. In fact, Keith Mawson from Egmont Fisheries has stated that fishermen are

generally distraught when any kind of dolphin is injured or killed in nets, and avoid incidents at all cost.

Adopting Options 2 and 3 will have a catastrophic effect on the Taranaki fishing industry, with Option 3 instantly killing off the industry altogether. This will result in the loss of many jobs, expertise and plant, and have ongoing ramifications for other sectors, such as the port, transport and maintenance industries. This serious consequence far exceeds the possibility of any Maui's Dolphin being hurt or killed by Taranaki's fishing fleet, particularly when there is no proof that these particular dolphins even inhabit the region's waters.

Recreational safety could also be in jeopardy, because a breakdown of Taranaki's fishing fleet will mean fewer boats able to assist or save amateur fishermen out at sea.

Venture Taranaki believes that the ramifications and ongoing effects of the TMP should be further investigated, and that the time frame surrounding submissions must be extended for that investigation to take place. This is particularly crucial for the commercial fishing industry, and local iwi.

Venture Taranaki Trust recommends the following:

- **That the existing exclusion zones are maintained until further notice;**
- **That independent scientific research is commissioned and undertaken to examine Maui's Dolphins habitat and behaviour patterns to ensure an accurate assessment is made on reliable substantiated information;**
- **That further social and economic research is undertaken to gauge the longterm effects that any changes to the exclusion zone will have on fishing communities, sectors and related industries along the western coastline.**