



Proposed Marine Protected Areas for
the South Island's West Coast Te Tai o
Poutini, June 2009

Summary of Submissions

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18th December 2009

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1. Introduction

The West Coast Marine Protection Forum (the Forum) released the public consultation document, *Proposed Marine Protected Areas for the South Island's West Coast Te Tai o Poutini* on the 29th July 2009. This document was prepared by the Forum with input from the Department of Conservation (the Department) and Ministry of Fisheries (the Ministry). It invited public submissions on the marine protected areas (MPAs) proposed by the Forum for the West Coast.

The closing date for submissions was Friday 21st August 2009; however, extensions were given into September and all late submissions accepted.

In conjunction with the consultation document, the Forum held hearings for those who wished to present further information in support of their written submissions. Three hearings were held in Nelson, Westport and Hokitika in late September, plus a telehearing for submitters from further afield.

The Department completed an initial review of submissions before engaging Enfocus Consulting Ltd to undertake an independent analysis of submissions and prepare a summary of submissions, which is presented in this report. All material presented to the Forum (i.e. written submissions and information presented at the hearings) was provided to Enfocus Consulting Ltd for review.

1.1 Submissions received

The Forum received approximately 1100 submissions on the proposed MPAs. Of these, 800 submissions were sent by individuals as standard form submissions from the Greenpeace website. This represents by far the largest single group of submitters, or about 80% of total submissions. While many submitters have multiple interests, the remaining 20% of submissions can broadly be broken down as follows: recreational fishers and hunters (39%); individuals and community groups (36%), environmental interests – NGOs, individuals and conservation boards (11%), fishing industry (9%), and Maori (3%), with local government and the minerals industry each at about 1%.

The 800 form submitters did not provide a physical address, but most of the remaining submitters did. Of these, approximately 60% are from the West Coast and approximately 20% from Nelson and Canterbury, with the remaining 20% spread throughout the country.

2. Views of submitters on the overall package of proposals

This section provides a summary of the views of submitters in relation to the Forum's overall package of proposals, including issues relating to process and the wider MPA policy. More detailed comments on specific proposals are summarised in section 3.

2.1 Views of individuals & community groups

Support for proposals but concern that protection is inadequate

Approximately 80 submissions were received from individuals and community groups. Of these about one third expressed general support for the proposals but provided little further comment.

A further third strongly believe that the proposals provide inadequate protection because the proposed reserves are too small and fragmented to be effective, saying, for example:

- “This is an inadequate and minimalist proposal. Business as usual has predominated and the proposal fails miserably to provide meaningful protection for even the very modest target percent (10%)”; and,
- “The proposals remain too fragmented, carved into ... and ... too limited in area to amount to more than a token gesture towards what is required for marine conservation.”

However, most of these submitters, despite their wider reservations about the proposals, support the proposed Kahurangi marine reserve but they recommend that the proposed marine reserves at Punakaiki, Okarito and Gorge be extended to 12 nautical miles (nm) and/or to the 200m-depth contour. A few sought an additional marine reserve at Charleston to provide protection for blue penguins.

About 10 of these submitters also recommended that the educational showcase sites be extended, with some suggesting a minimum of 5km² and others a minimum of 10km². One submitter says that the educational sites are so small as to raise serious doubts about their ecological and even educational value and that to create educational sites this small is likely to be counter productive.

A number of these individuals believe the proposed boundaries are too complicated and that a mosaic of different types of protection will make enforcement overly complex. In particular, they say that the Okarito and Gorge proposals are too small and include a confusing mix of regulations/protection. Some also consider that the proposed protection of 8.8% of the area is not acceptable and seek at least 10% of the area protected through MPAs. A number believe that the principle of minimising adverse impacts on existing users, particularly commercial fishers, has taken precedence over biodiversity protection.

Opposition to proposals that remove local access & management

About 30 individuals and community groups oppose the proposals, particularly the proposed marine reserves, because they will deny local residents access to these areas for food gathering, fishing and recreational use. About half of this group strongly oppose the marine reserve proposed for Tauranga Bay, which they say is one of the few accessible food gathering sites on the West Coast. A smaller number oppose the proposed marine reserves at Punakaiki and Okarito for similar reasons.

Several community groups provide comment on specific MPA proposals. The Tauranga Bay Working group opposes the creation of a reserve at Tauranga Bay as an educational showcase site. The group is concerned that the Forum has not approached the Tauranga Bay working group to discuss this proposal for a marine reserve, even though the working group has been meeting for 14 years and has had a close working relationship with the Department. The views of the group are set out in more detail in section 3.5 below.

A group of university students submit that MPAs should be based on a scientific understanding of ecosystems, rather than habitat type. This group emphasises the importance of community-based management in marine and coastal conservation and suggests that the implementation of the proposed marine reserves will reduce stewardship of the coastal environment and resources by local people by banning their activities and reducing their enthusiasm for the coastal environment. The group opposes the establishment of marine reserves as educational showcase sites and would prefer to see community-based management, mataitai and other fisheries management tools that empower local residents.

2.2 Views of recreational fishers & hunters

Recreational hunters and fishers form one of the largest groups of submitters, with over 90 submissions from this sector of the community. Almost all these submitters express strong opposition to specific proposals.

In contrast, the New Zealand Recreational Fishing Council, a national organisation, supports the process followed by the Forum and the resulting proposals and especially the recognition given by the Forum to access for sustenance fishers. It does, however, recommend that shore-based fishers be allowed to “fish for a feed” in the area adjacent to the mouth of the Heaphy River.

Strong opposition to the proposed MPAs at Tauranga Bay & Okarito

In particular there is very strong opposition from more than 50 locals who identify as recreational fishers to the proposed marine reserve at Tauranga Bay, which they say is regularly used as a seafood gathering and fishing area by local residents.

There is also strong opposition from a similar group of submitters to the proposed marine reserve at Okarito Lagoon. The Okarito Recreation Society and the West Coast branch of Fish and Game New Zealand oppose marine reserve status for the lagoon and are concerned that the proposal ignores historic intentions for the area as wildlife reserve to provide for angling and duck shooting. These views are noted in more detail in section 3.

Many of these submitters comment that there has been little or no consultation by the Forum with local residents during the development of the proposals for marine reserves at Tauranga Bay. The Okarito Recreational society is also concerned that it was not formally consulted about the proposals for the Okarito Lagoon.

2.3 Views of Maori

Six submissions were received from iwi/Maori organisations and a number of individual submitters also identified themselves as tangata whenua. Their views are described in this section.

Concern that the Crown has failed to protect the interests of iwi

A number of Maori organisations express concern that in facilitating the West Coast MPA process, the Crown has failed to protect the interests of iwi with interests in the West Coast.

Ngai Tahu notes that, “it is immediately apparent that the Crown has failed to actively protect the customary non-commercial rights of Ngāi Tahu Whānui by facilitating the MPA process without facilitating a corresponding customary protection areas process”. Ngai Tahu has therefore attempted to protect these rights by facilitating the Customary Fisheries Protection Areas Project.

The Te Atiawa Manawhenua Ki Te Tau Ihu Trust claim manawhenua manamoana rights on the West Coast between Kawatiri and Kahurangi. The Trust opposes the MPA proposals because the Department and the Ministry of Fisheries have failed to consult with it. The Trust is especially concerned that the proposed MPAs “will remove our customary non-commercial rights without consultation and regard to our interests”. The Trust fully supports the submission from Te Ohu Kai Moana.

Te Ohu Kai Moana (Te Ohu) registers its concern at not being invited to participate in the process run by the Forum and only being given one opportunity to appear before the Forum. Te Ohu submits that the Crown has failed to actively protect the interests

of iwi or consult with iwi having an interest in the West Coast MPA proposals because two key groupings were not properly represented on the Forum:

- Iwi who claim customary rights in the West Coast; and,
- Iwi who have commercial fishing interests in the QMAs in the relevant areas.

Te Ohu notes that the question of who amongst iwi have interests in parts of the West Coast has been in dispute for some time and that therefore all iwi should at least have had an opportunity to express their views as proposals were developed. Te Ohu is especially concerned that the proposed MPAs will diminish Treaty settlement assets and rights and prevents Maori from carrying out customary and non-commercial fishing within their boundaries.

The Kaikaiawaro, Ngati Kuia and Te Hoiere Fishing Companies Ltd are the commercial fishing and asset holding companies for Te Runanga O Ngati Kuia Charitable Trust, which is a Mandate Iwi Organisation and an Aquaculture Organisation for Ngati Kui Iwi. These companies are concerned that the proposals will diminish Treaty Settlement rights by diminishing Maori access to customary commercial and non-commercial fishing grounds irrespective of whether there is any associated threat to marine biodiversity. They are also concerned that there has been a lack of consultation and particularly that there has been “no representation for Te Ohu Kai Moana, who holds inshore settlement assets that have yet to be distributed for our Iwi and 25% deep-water quota”.

Mixed support & opposition from Ngai Tahu

Te Runanga o Ngai Tahu (Ngai Tahu) makes a number of points in relation to each of the MPA proposals, details of which are provided in section 3 of this report. Ngai Tahu submits that it:

- a. *Supports* all of the Fisheries Act and Conservation Act tools proposed by the Forum
- b. Is *optimistic that it can support* the marine reserves proposed for Punakaiki, coastal Ōkārito (but not the lagoon) and Ship Creek with a boundary amendment and the Gorge (provided the commercial and non-commercial extraction of pounamu is allowed);
- c. *Opposes* the proposed marine reserves for Kahurangi, Okarito Lagoon and Jackson Head due to:
 - i. Adverse effects on proposed mataitai (direct effects for the Okarito lagoon and Jackson Head; indirect effects in relation to Kahurangi) and traditional fishing grounds; and,
 - ii. Because the Crown must provide for Ngai Tahu Whanui to develop their customary commercial and non-commercial rights (especially in relation to development of the paua fishery in the Kahurangi area but also in relation to Okarito Lagoon and Jackson Head); and,
- d. *Will likely oppose* the proposed Tauranga Bay marine reserve because the area is a traditional fishing ground of special significance.

Te Runanga o Makaawhio (TROM) represents descendants who whakapapa to the South Westland hapu (sub-tribe of Ngai Tahu). Its views generally align with those of Ngai Tahu.

Concerns about the process & wider MPA policy

Te Ohu believes that the MPA policy fails to adopt a targeted approach to biodiversity protection consistent with the ethic of Maori resource management and is also likely to diminish Treaty settlement assets and rights. It expresses concern that the policy (and the resulting proposals for the West Coast) does not use a targeted, risk-based approach to address specific threats to biodiversity.

Te Ohu submits that promoting marine reserves as the preferred protection tool will promote a 'race for space'; for example, the absence of established mataitai or taiapure reserves may be seen as a green light for establishing marine reserves in areas that might otherwise be used for customary fishing. It strongly opposes the policy that a marine reserve must be established to protect at least one sample of each habitat and each ecosystem type in biogeographic region through a marine reserve regardless of any specific threat to biodiversity.

Te Ohu considers that the proposed educational showcase sites are unacceptable because they are outside the scope of the MPA policy, extinguish Maori customary commercial and customary non-commercial rights and are unnecessary to meet the MPA protection standard, which it believes is more than adequately achieved for each island through the alternative proposals put forward by the fishing industry.

Te Ohu calls for a review and revision of the MPA policy and the West Coast Forum process. The Kaikaiawaro, Ngati Kuia and Te Hoiere Fishing Companies Ltd support the views of Te Ohu.

About 10 individuals who describe themselves as "tangata whenua and recreational fisher", or similar, oppose all marine reserves because they impact on customary fishing rights and wider Treaty rights.

2.4 Views of environmental interests

Seven submissions were received from environmental NGOs, two from Conservation Boards and 18 from individuals who identified as having environmental interests. A further 800 individuals provided a standard submission using a form downloaded from the Greenpeace website, as noted above. Many of these submitters share similar views, which are summarised here.

Proposals need to be strengthened & extended

Environmental NGOs consider that the proposals, with the exception of the proposed Kahurangi marine reserve, are too small to provide adequate marine biodiversity protection. These groups support the proposed Kahurangi marine reserve as "a decent size no-take marine reserve" that, in their view, offers the best protection of all the proposals.

The Royal Forest and Bird Protection Society of New Zealand (Forest and Bird NZ), the Environment and Conservations Organisations of New Zealand (ECO), the West Coast Blue Penguin Trust and approximately 800 individuals who provided a standard form submission from the Greenpeace website all express disappointment that the proposals do not go far enough. These groups make the following points.

- *Proposals provide too little protection* – protection of 8.8% of the West Coast through MPAs is too little and falls short of the national protection objective (10%)

and some international protection targets of 20-30% protection. They believe this to be a more appropriate long-term goal.

- *Commercial fishing interests overly influences proposals* – the proposals have been disproportionately steered by the interests of the commercial fishing industry and favour areas where fishing is largely unaffected.

Proposed reserves should be extended – all the large marine reserves should be extended out to 12nm or the 200m-depth contour to allow deep sub-tidal sand and deep sub-tidal mud habitats to be represented, to connect inshore marine habitat systems with those in deep water, and to protect the full range of marine habitats and ecosystems.

- *Additional marine reserve is needed at Charleston* – an additional marine reserve is needed at Charleston to protect seal and penguin habitats.
- *Educational showcase sites are too small* - the proposed MPAs and educational showcase sites are too small and should be extended to at least 10km².

Concern that proposals & wider MPA policy do not meet international best practice

Forest and Bird NZ expresses “*disappointment that the Forum has underachieved in terms of percentage protection of the marine environments of the West Coast*”, as the package presented covers just 8.8% of the area considered, with no-take marine reserves comprising 6% of the total area. It notes that, “*some countries have implemented more visionary marine protection in line with the IUCN World Parks Congress (2003)*”, citing Australia’s Great Barrier Reef Marine Park and South Africa’s declared intention to have 20% of its waters protected in no-take marine reserves by 2010.

Forest and Bird NZ also recommends that an independent scientific evaluation of the proposals be conducted with the aim of identifying any gaps in biodiversity protection without the constraint of user impact.

Similarly ECO submits that New Zealand’s MPA policy is inconsistent with international definitions of marine protected areas adopted by the IUCN and narrower in focus than the Marine Reserves Act. ECO considers that the Forum’s proposals are weak in their treatment of biological information, their consideration of how biodiversity relates to physical parameters. It is also “*concerned that the current proposals do not include the full range of natural habitats and ecosystems*”. ECO does not support the Forum’s choices of MPAs away from population areas noting, among other things, that MPAs closer to human habitation may be more enforceable and would be useful for monitoring the impacts of human activity.

Other concerns

The Nelson Branch of Forest and Bird does not support “a plethora of different types of [protection] status” and believes that marine reserves are the best protection tool. It submits that the proposed marine reserves should be extended to either 12nm or 200m deep and the educational showcase sites to an area of 5km² or, in some cases, 10km². The West Coast Branch of Forest and Bird makes similar points, recommending that Fisheries Act protected areas be used as buffers, not the main protection tool. Forest and Bird Golden Bay supports all sites proposed as MPAs.

Forest and Bird NZ is concerned that the irregular boundaries proposed by the Forum could be costly and ineffective and suggests that simple shapes such as

squares, rectangles or triangles would be better. It notes that the protection standard advises that boundaries should be kept simple. This concern is shared by a number of submitters from other sector groups.

The West Coast Blue Penguin Trust considers that, as proposed, the MPAs are unlikely to have any measureable benefit for either blue penguins or the Fiordland Crested Penguin “primarily due to their modest boundaries and particularly their [limited] offshore extent”, largely because it is likely that penguins go well beyond the outer limits of the proposed boundaries to even begin to feed.

Environmental NGOs make a number of more detailed recommendations in relation to the specific proposals, which are noted below in section 3.

Conservation boards support the proposals

The Otago and West Coast Conservation Boards support the proposed MPA sites, especially the proposed marine reserve at Kahurangi. However, the West Coast Conservation Board recommends that one or more of the three more southerly marine reserve sites also be extended to the 12nm limit to provide better protection for the full range of marine habitats and ecosystems. The Otago Conservation Board suggests more modest extensions to the Gorge and Jackson Head marine reserve proposals.

2.5 Views of local government

Two district councils provide submissions on the proposals. The Grey District Council recognises the important contribution the fishing industry makes to the local economy. The council is concerned about the potential impacts of the proposed marine reserves on recreational fishing and commercial fishing and is keen to ensure that the community is not penalized through the application of overly harsh methods of protection. The council is concerned that over time access and use of the West Coast’s resources will be “locked up”. It suggests that the Forum needs to demonstrate to recreational and commercial fishers how the MPAs will support the longevity of the fishing industry on the West.

The Grey District Council notes that the high level of awareness of the proposals indicates that the Forum has communicated well about the proposals but says that there appears to be little understanding or promotion of the benefits of such areas to the local economy; for example, the promotion of eco tourism.

The Westland Coast District Council is of the view that the proposals appear to be reasonable for the West Coast but is concerned that there may be some adverse effect on the existing recreational users at Mahanipua Creek/ Tuwharewhare and Okarito. The council encourages the Forum to continue negotiation with these users.

2.6 Views of the minerals & petroleum sector

There are three submissions from groups representing the minerals and petroleum sector, all of which express similar concerns about the proposals. The three groups are the Crown Minerals Group of the Ministry of Economic Development (Crown Minerals), which manages the Crown mineral estate; Petroleum Exploration and Production Association of New Zealand (PEPANZ); and Seafield Resources Ltd.

Crown Minerals seek reduced reserves at Kahurangi & Okarito

Crown Minerals submits that some of the areas covered by the proposals have potential petroleum and mineral wealth and that the Forum should therefore reconsider some of its proposals. It draws attention to the Government’s recognition

of the significant contribution that the petroleum and mineral resources sector could make to New Zealand's growth rate, levels of employment and quality of life before noting that the Crown owns all the petroleum in the bed of the territorial sea and has an expectation that it should remain possible to responsibly access these resources. It notes that the overall threat to marine habitats from petroleum exploration is minimal.

Crown Minerals is particularly concerned about the large size of the proposed Kahurangi Marine Reserve and notes that the Forum was divided as to the extent of the proposed reserve and says it would have been more helpful if the Forum had presented options. It says that, while there are currently no permits over the area proposed for the Kahurangi marine reserve, it has long been recognised as having potential for petroleum. Crown Minerals recommends that the Forum reconsider this proposal with a view to considerably reducing the extent of the area subject to proposed marine reserve status and limiting its outer boundary to no more than 1 nm from the shoreline.

Crown Minerals also recommends that the Forum reconsider the Okarito marine protection proposals and that, rather than being subject to part marine reserve/part Fisheries Act protection, the area be subject to Fisheries Act protection only. It notes that recent prospecting activity and commercial interest have confirmed that the Okarito area and marine surrounds have significant mineral potential. Crown Minerals considers that access arrangements should be a matter for the Minister of Conservation to determine under the relevant sections of the Crown Minerals Act 1991, rather than through the current process.

Concerns raised by industry groups

PEPANZ raises similar issues to Crown Minerals, expressing concerns about both the process and resulting proposals. These include:

- No options or alternative approaches were presented, even though all Forum members do not support the proposals;
- The petroleum industry was not represented on the Forum, while other commercial interests were; i.e. fishing and tourism;
- Educational showcase sites are outside the scope of MPA policy, which is about protecting biodiversity and not about "showcasing marine biodiversity" or public education;
- The consultation document does not make it clear that any recommendations from the Forum will need to be turned into formal applications under the relevant legislation and then progressed according to the criteria set out in the Marine Reserves Act, the purpose of which is the establishment of marine reserves for scientific study, not biodiversity protection;
- Failure to undertake an economic impact analysis of the proposals means submitters and decision makers have no real basis to determine whether the proposed MPAs are the optimal protection measure, or whether more targeted measures could achieve the MPA policy objectives at less cost and with less impacts on future users; and,
- Significant concerns about the proposed Kahurangi marine reserve, which it believes should not proceed in its current form for reasons similar to those provided by Crown Minerals; although it believes that the industry would probably

support a marine reserve out to 1nm offshore combined with Fisheries Act protected areas out to 12nm.

Seafield Resources Ltd is concerned that it was not consulted during the development of these proposals. It submits that the Forum has failed to take social and economic interests into account, as required by the MPA guidelines; and, that there is no evidence that robust scientific assessments have been undertaken to provide grounds for protecting the proposed areas. The company opposes the proposals in the Okarito area saying that it is essential to Seafield's wider prospecting activities on the Westland Shelf that it is able to continue to prospect and explore at Okarito and its environs.

2.7 Views of the commercial fishing industry

Significant concerns with process & resulting proposals

20 submissions were received from the commercial fishing industry. All of these submitters raise significant concerns with the process run by the Forum and the MPA proposals themselves. These concerns are summarised here.

- *Failure to present options* – the decision not to present options means it is difficult for submitters to determine whether there are alternative approaches that meet the MPA policy objectives about biodiversity protection. Genuine alternative proposals from submissions should be presented to Ministers.
- *Lack of transparency* – fishing industry submitters believe that the level of disagreement amongst Forum members regarding the proposals is not reflected in the consultation document. They submit that statements in the consultation document in relation to educational showcase sites claiming to represent the views of “the Forum” were in fact supported “by less than a majority of the Forum”, “yet submitters get no indication of this” from the document.
- *Process not inclusive* – many stakeholder groups were not invited to join the Forum and were either denied the opportunity to make presentations to the Forum or permitted to make only brief presentations late in the process. Proper engagement early in the process with the full suite of commercial fishing and minerals interests would have produced a much better product than the current proposals.
- *Lack of economic impact analysis* – the economic impacts of the proposals are not evaluated and submitters are given no information on the likely direct and flow on costs of these proposals. Decision makers therefore have no rational basis to determine whether the proposed MPAs are optimal, or whether more targeted measures could achieve the MPA Policy objectives at less cost and with less adverse impact on existing users. The Forum should commission an economic impact assessment, which should be made available to submitters and Ministers before any decisions are made.
- *Educational showcase sites are beyond scope of MPA policy* – these sites are beyond the scope of what the Forum is funded to do (i.e. biodiversity protection). A combined submission from fishing industry Commercial Stakeholder

Organisations (CSOs) (i.e. the combined fishing industry CSO submission)¹ says that educational showcase sites should be excluded from any further consideration because they:

- Are clearly outside the scope of the policy and set an unhelpful precedent for future forums
 - Work cumulatively with other spatial closures to effect rights and responsibilities of existing users
 - Are significant localities for the commercial (and non commercial) harvest of eels.
- *Representative habitats should not be used as a surrogate for ecosystem and biodiversity assessment* – marine protected area site selection needs to be based on a well informed and systematic approach to ecosystem linkages and processes, rather than an ad hoc colour coding exercise to identify and protect a series of representative habitats by different mechanisms.
 - *Use of misleading and inappropriate terminology* – Fishing industry submitters (along with ECO) note that there is no such thing as a “Fisheries Act Protected Area” and are concerned that the use of this terminology is misleading because it suggests that a specific Fisheries Act mechanism exists for the purposes of implementing the MPA Policy, which is not the case. These submitters say it is also misleading [for the proposals] to suggest that mataitai reserves meet the protection standard when bottom impacting fishing methods may legitimately occur within mataitai reserves. Mataitai reserves are imposed for the purpose of recognising and providing for customary food gathering, not biodiversity protection.
 - *Failure to coordinate the MPA process and the mataitai process* – these competing processes both seek to exclude commercial fishing, with no consideration of the cumulative impacts of commercial exclusion and displacement of fishing effort. The two processes must be coordinated to avoid a ‘race for space’.
 - *National MPA approach is required* – the West Coast Forum started operating before key MPA policy documents were completed and this has resulted in confusion as to which protection standard is being used. A transparent national level process should be put in place to avoid a fragmented regional approach to biodiversity protection.
 - *Significant adverse impacts on a number of commercial fisheries* – including commercial (and non-commercial) eel fisheries, the Paua 6 fishery, finfish and flatfish fisheries and various developmental fisheries (e.g. geoduck and kina fisheries). These impacts are noted below in relation to the specific proposals.

Commercial fishing interests propose a set of alternative management areas and protection tools for area based protection of marine biodiversity on the West Coast. The industry believes that their alternative proposals provide protection that meets the MPA standard for almost all West Coast habitats while minimising effects on existing and future commercial fishing interests, including developmental rights

¹ The combined fishing industry CSO submission is a combined submission from the Paua Industry Council, Pauamac 7, Challenger Finfish, CRAMAC 8, CRAMAC 9, South Island Eel Industry Assn. It is supported by a number of other commercial fishing interests/companies.

associated with quota rights. (These proposals are summarised in section 3 of this report).

3. Comments on specific MPA proposals

This section summarises comments on the Forum's specific proposals for MPAs in nine separate areas of the West Coast. For each of the areas, the Forum's proposals are briefly described and the views of submitters summarised. Alternative recommendations from submitters are set out in a table for each of the four main proposals.

3.1 *Kahurangi*

The Forum proposes a marine reserve for the whole Kahurangi site.

All the environmental NGOs and conservation boards, along with about half the individual submitters support the proposed marine reserve at Kahurangi. These submitters consider that the proposal is:

- The best of the proposed MPAs
- Sufficiently large to provide effective biodiversity protection because it extends to 12nm and is a full no-take marine reserve
- Covers a range of habitats; and,
- Provides connectivity between marine habitats and the adjacent national park.

On the other hand, Maori and industry groups oppose the marine reserve because it will cause significant adverse impacts on customary fishing (including customary non-commercial rights), mineral and petroleum exploration and commercial fisheries, predominantly trawl and paua fisheries. These concerns are summarised below.

- Ngai Tahu oppose the proposed marine reserve at Kahurangi because it will have indirect cumulative impacts on the mataitai that have been applied for by Makaawhio in South Westland; and, adverse effects on Ngai Tahu's customary non-commercial rights because it includes "a very significant component of the paua resource in the PAU6 fishery", as well as a significant section of the trawl fishery for this part of the coast.
- Te Ohu is concerned that the proposal is "excessively large" and includes an undeveloped paua fishery that iwi would not be able to access if a marine reserve is implemented.
- Crown Minerals and PEPANZ submit the Kahurangi marine reserve proposal should not proceed in its present form because it is likely to see the area closed to further exploration.
- The fishing industry does not agree with the proposal and propose alternative MPA options in the Kahurangi area for consideration. The industry gives a number of reasons for opposing the proposal.
 - It does not agree with the accuracy of the mapping of the deep-sea mud, deep-sea sand and shallow subtidal sand, and with the Forum's statement that there is a substantial variety of habitats out to 12nm. The industry says that these habitats are within the 30m-depth contour.
 - The proposed site includes multi-species trawl, longline and setnet fisheries for fishstocks, which include flatfish, redcod, gurnard, tarakihi, tuna, hapuka/bass, school shark, and rig. This area is also

important to commercial fishing for species such as paua, eel and developmental fisheries for surf clam and geoduck.

- Concern that the proposed extensive area of the marine reserve would interrupt the sample consistency and time-series data (collected in the NIWA trawl surveys) that is used for assessing the sustainability of several west coast fish stocks.
- The Paua Industry Council and commercial paua fishers note that 100% of the PAU6 total allowable commercial catch (TACC) comes from within the proposed reserve and are very concerned that the proposal will have the effect of extinguishing property rights, devaluing the Treaty Settlement, destroying quota value, removing developmental rights to the fishery and preventing the current and future economic return to New Zealand from the use of this fisheries resource. They are also concerned that, should the proposal go ahead, commercial and recreational fishing effort will be displaced to the smaller and less productive southern paua beds and the likely result would be to irretrievably collapse the fishery in a very short time period.
- CRAMAC 9 notes that the proposed northern boundary crosses over significant rock lobster fishing grounds that enable the TACC for CRAMAC 9 to be taken.
- The Picton Professional Fishermen’s Association opposes the “huge size” of the proposed marine reserve and suggests an alternative, smaller reserve (see table below). The association notes that the proposed site is the main travel path for small fishing boats travelling down the West Coast, which is a rough area, so proposal would force small boats far out to sea and also shift fishing effort to Cook Strait.
- The South Island Eel Industry Association opposes the inclusion of the estuarine area of Heaphy River mouth to about 1km upstream because it is a known eel fishery that fulfils part of the West Coast eel quota. It supports the options put forward by the collective fishing CSOs.

Alternative recommendations for the Kahurangi area

Proposed by	Recommendations for the Kahurangi area
Individual submitters	Some individuals seek extension of the proposed marine reserve to the 12nm limit and/or 200m depth contour along the Heaphy Track
Forest and Bird NZ	A northern extension to provide protection for the omitted habitat types at Kahurangi Shoals – deep and shallow sub-tidal gravel beds; and, commercial fishing vessels to be prohibited from an agreed distance off the Heaphy River Mouth
ECO	The southern area of the proposed marine reserve should be extended further offshore.
Crown Minerals	Forum should reconsider the Kahurangi marine reserve proposal and present the Ministers of Fisheries and Conservation with an alternative proposal that includes a near shore Kahurangi marine reserve with the outer boundary being no more that 1 nm from MHWS.

Proposed by	Recommendations for the Kahurangi area
PEPANZ	Further consideration needs to be given to whether a smaller marine reserve coupled with some other form of protective mechanism for the wider deep sub-tidal sand and mud habitats would be more appropriate and least cost/impact to users; for example, a marine reserve out to 1nm offshore, combined with fisheries protected zones out to the 12nm limit.
Combined fishing industry CSO submission	<p>Two alternate options recommended for consideration</p> <p>Option 1. Marine reserve with the following boundaries</p> <ul style="list-style-type: none"> a. From a point at the southern side of the Heaphy River and extending along the mean high water springs (MHWS) to the southern side of Kohaihai Bluffs; and b. And including an area 2.7Nm (5km) offshore from the points at the Southern side of the Heaphy River and a point at the Southern side of the Kohaihai Bluffs. <p>Option 2². Marine reserve with the following boundaries</p> <ul style="list-style-type: none"> a. From a point at the southern side of the Heaphy River and extending along the MHWM to the southern side of Kohaihai Bluffs; and b. And including an area 1Nm (1.852km) offshore from the points at the Southern side of the Heaphy River and a point at the Southern side of the Kohaihai Bluffs.
Picton Professional Fishermen's Assn	Suggest that the area from the Heaphy Beach, southwards along the shore, to the Kohaihai Bluff, then out to sea for 7km, then north to a point 7km off the southern end of the Heaphy Beach, then in a direct line into the Heaphy Beach, be a marine reserve instead of the current proposal.
The West Coast Whitebaiters Association	A change to the proposed marine reserve boundaries along the Heaphy River mouth to allow white baiting to continue.

² The fishing industry notes the following supporting reason for providing two options. It says that Option 1 provides for the MPA policy requirements to include the Deep Sea Mud habitat and notes that the fishing industry does not agree with the accuracy of the mapping of deep-sea mud it also proposes Option 2, which it says is a more pragmatic approach for the protection of the coastal habitats in this region and significantly minimises the impact on existing users and provides protection for all the habitats required i.e. intertidal bedrock, intertidal sand, intertidal boulders, shallow subtidal sand and deep subtidal mud.

3.2 Punakaiki

The Forum proposes a marine reserve for the whole site at Punakaiki, except for two portions around Pororari Beach & Razorback Point, which are proposed as Fisheries Act protected areas.

Environmental NGOs and a number of individuals support the proposals for the Punakaiki area, although they wish to see some or all of the proposed areas extend out to 12nm. The fishing industry opposes the proposals for Punakaiki and seeks substantial changes. A few local residents and about 20 recreational fishers also oppose the proposed MPAs at Punakaiki, although they do not provide reasons for their opposition.

Ngai Tahu is “optimistic that support” can be given for the Punakaiki proposals due to the fact that the traditional fishing grounds of special significance in this area have been excluded from the proposed marine reserve. Ngai Tahu notes that this area contains paua habitat but the commercial take from this area is unlikely to contribute significantly to the cumulative effect on the mataitai that have been applied for by Makaawhio in South Westland.

Environmental NGOs generally support the land boundaries of the Punakaiki proposal but recommend that the offshore boundary be extended (see specific recommendations in table below). The Otago Conservation Board would also like to see the proposal extend further offshore, at least for part of the area.

The fishing industry says the Punakaiki area is an extremely important trawl fishing area for flatfish and finfish, as well as paua and crayfish, which will be impacted by the proposed MPA. It proposes three changes to this site to reduce these impacts (see table below).

The South Island Eel Industry Association opposes the inclusion of the estuarine Punakaiki River Mouth and the tidal lagoon at the Pororari River Mouth into the proposed MPA because they are known eel fisheries that fulfill part of the West Coast eel quota.

Alternative recommendations for the Punakaiki area

Proposed by	Recommendations for the Punakaiki area
Individual submitters	Some individuals submit that the marine reserve should be extended to 12nm or the 200m-depth contour. A few individuals simply recommend extension without specifying by how much. One individual suggests constraining outer limits of FA MPAs to 100m and beyond MLWS; and, two others recommend that the Fisheries Act protected areas become part of the marine reserve. A further individual says the marine reserve should be extended north-east along the coast to encompass Seal Island or, as a compromise to Limestone Creek because the area between Perpendicular Point and Seal Island offer rich feeding grounds for roosting and breeding birds as well as visiting pelagic birds, including albatross species.
Greenpeace form submissions	The Punakaiki proposal should be extended out to 12nm and north to the Fox River

Proposed by	Recommendations for the Punakaiki area
Forest and Bird NZ; Forest and Bird Nelson	The offshore boundary be extended to the 12nm limit to help encompass the full representative range of habitats.
Forest and Bird West Coast	Extension seaward to 12nm and south to Motukiekie Bluff, including the Maher Swamp; or, <i>alternatively</i> an additional educational showcase site from Motukiekie Bluff northwards to the northern end of 14 Mile Beach in a Marine Reserve of 5km ² .
ECO	Include at least one of the major river features in the proposal and extending the reserve to 12 nautical miles offshore.
Combined fishing industry CSO submission	<ul style="list-style-type: none"> • The outer limit of the marine reserve be reduced back to 1nm offshore; • The southern marine reserve boundary be reduced to 1.6km south of Nikau; • The northern boundary of the type 2 MPA be extended to Perpendicular Point. <p>Supporting reasons: The readjustment of these limits will reduce the impact on the commercial finfish, paua and crayfish fishers but still maintain the requirements of the MPA policy. The marine reserve will protect shallow subtidal bedrock, intertidal bedrock, intertidal gravel, intertidal cobble and shallow subtidal sand habitats. The type 2 MPA will also protect estuarine river mouth and tidal lagoon habitats.</p>

3.3 Okarito

The Forum proposes marine reserves for the southern part of the site and the northern part of Okarito Lagoon, with the remainder of the site proposed as Fisheries Act protected areas.

Local residents, duck shooters, recreational fishers, Ngai Tahu, Crown Minerals, Seafield Resources Ltd, the fishing industry and eel fishers all strongly oppose the MPA proposals for Okarito unless they are considerably changed. Environmental NGOs, along with a number of individuals, support the nature of the proposals but wish to see the marine reserve extended out to 12nm or 200m. These views are set out in more detail in the remainder of this section.

Many Okarito residents, local duck shooters and recreational fishers do not support the proposed marine reserve at Okarito Lagoon, which they believe is unnecessary and too restrictive. They advocate common protection status for the entire lagoon and would prefer the lagoon to have mataitai status and/or protection under the Fisheries Act. The Okarito Community Association does not support a marine reserve for the upper part of the lagoon. Instead, this group supports Makaawhio's mataitai application for all of Okarito Lagoon (and associated coastline), which it believes is the best option for local voices in relation to responsible management of local resources. The Okarito Community Association also believes that the principles

embodied in the Ramsar Treaty are more appropriate to the lagoon than the proposed marine reserve. The group recommends an alternative marine reserve for the area that does not include the lagoon (see table below).

Ngai Tahu “is optimistic” that it can support the open coast component of the Okarito proposal but opposes marine reserve status for the lagoon due to the adverse effects on customary non-commercial use, as the lagoon is a traditional fishing ground of special significance. The proposed marine reserve also has a direct adverse impact over the proposed Okarito mataitai. Te Runanga o Makaawhio opposes the proposed marine reserve for similar reasons.

Approximately 30 local recreational hunters and fishers strongly oppose the proposed marine reserve at Okarito Lagoon because it will affect a long tradition of local duck hunting and prevent access to trout fishing. The Okarito Recreation Society says that the proposals do not recognise historic intentions for the lagoon as a Wildlife Management Reserve. The West Coast branch of Fish and Game New Zealand submit that duck shooting should continue to be allowed in the Okarito Lagoon area because in 1977 Westland anglers and gamebird hunters funded the purchase of coastal land between Waitahi Bluff and the Okarito River and then gifted 177ha to the Minister of Lands in 1978 in the understanding that the status of the area would enable traditional angling and game bird hunting to continue in perpetuity.

Forest and Bird NZ support the northern part of the lagoon becoming a marine reserve but seek further extensions (see table below). Other Environmental NGOs also recommend that the proposal be extended.

Crown Minerals notes recent prospecting activity and commercial interest have confirmed that the Okarito area and marine surrounds have significant mineral potential. It recommends that the Forum reconsiders the Okarito marine protection proposals so that, rather than being subject to part marine reserve/part Fisheries Act protection, it be subject to Fisheries Act protection only.

Seafield Resources opposes the proposal to protect the area between Waitahi Bluff and Waiho Beach (Okarito), which it says is not based on reasonable grounds. It notes that Okarito lies in the heart of a mineralogically very important area and that is essential to Seafield’s wider prospecting activities on the Westland Shelf that it is able to continue to prospect and explore at Okarito and its environs. Seafield also notes that it has sought a new prospecting permit that includes Okarito, as well as in the area between Karamea and Jacksons Head.

The fishing industry says that the Okarito region is “extremely important” to the commercial inshore trawl industry for species such as turbot, brill and lemon sole, stargazer, gurnard, redcod and elephantfish. The industry does not accept that any of the area should be closed off to trawling, dredging or Danish seining as an MPA, as it is a high impact area to commercial fishing and does not therefore meet the requirements of the MPA policy. The industry believes that the Forum’s MPA proposal for the Okarito area creates an unrequired duplication of habitats with MPAs.

The South Island Eel Industry Association says that Okarito eel fishery is a significant shortfin eel fishery that is critical to maintaining the West Coast eel quota. It opposes marine reserve status for the northern part of Okarito Lagoon as Marine Reserve and the inclusion of the rest of the lagoon as a Fisheries Act protected area. It does not oppose inclusion of the estuarine river mouth of the Waiho River as marine reserve as it is not a known eel fishery. A separate submission from a commercial eel fisher

that fishes the lagoon also recommends that the proposed marine reserve for the top of the lagoon be deleted, as it would destroy his livelihood.

Alternative recommendations for the Okarito area

Proposed by	Recommendations for the Okarito area
Individual submitters	<p>Approximately 25 individual seek extension of the proposed marine reserve out to the 12nm limit and/or a depth of 200m.</p> <p>One individual suggests that the Fisheries Act protected area boundary could be extended out to at least six nautical miles from Waitahi Bluff (proposed boundary point d) to Omoeroa Bluff (proposed boundary point b) to provide a buffer.</p> <p>One individual seeks an additional marine reserve adjacent to the proposed marine reserve in the lagoon.</p>
The Okarito Community Association	<p>Remove the proposed marine reserve in Okarito Lagoon and:</p> <ul style="list-style-type: none"> • Would support a new marine reserve at Three – Five Mile Beach <i>subject to</i> coastal boundary beginning at the outlet of Three Mile lagoon and ending at Waiho Bluff, noting that the Waiho Beach should not be included, beach mining by hand methods should be permitted, and motorbike access along the beach and gathering of driftwood for firewood must also be permitted within the proposed marine reserve. • Support a marine [fisheries act] protection area with new boundaries between the Three-mile Lagoon outlet and Abut Head out to the 12nm limit. • Support an additional marine reserve from Abut Head to Ulipa Hill, extending out to 12nm.
Ngai Tahu	<ul style="list-style-type: none"> • Remove the proposed marine reserve in Okarito Lagoon. • Suggest that Saltwater Lagoon may be a better alternative for a marine reserve over estuarine tidal flat habitat due to the fact that it has Scenic Reserve status.
Forest and Bird NZ	<ul style="list-style-type: none"> • An extension of the offshore marine reserve boundary to the 12 mile limit • The establishment of an MPA under the Fisheries Act and/or a mataitai, that excludes commercial fishing, from Waitahi Bluff to Kohuamarua Bluff and extend seawards for 100 metres • That the Forum proposes a prohibition on any commercial eeling in Okarito Lagoon.
Forest and Bird Nelson	<p>All the proposed area at Okarito needs to be a marine reserve (including the lagoon) that extends out to 12nm.</p>

Proposed by	Recommendations for the Okarito area
Forest and Bird West Coast	Extend proposed reserve to 12nm or alternatively the proposed Fisheries Act Protection Area must be changed to a marine reserve.
ECO	Extension of the marine reserve to cover all the depth range out to 200m.
Greenpeace form submissions	The Okarito marine reserve needs to be expanded to reach from Ulipa Head to Waiho beach in the south and out to 12nm, with a narrow strip out from Okarito beach that allows local food gathering but prevents trawling. The northern half of Okarito lagoon must be kept in marine reserve.
Crown Minerals	The Okarito area to be subject to Fisheries Act protection only.
Fishing industry	None of the proposed area should be closed off to trawling, dredging or Danish seining as an MPA, as it is a high impact area to commercial fishing and does not therefore meet the requirements of the MPA policy.
Eel fishers	Remove the marine reserve and Fisheries Act protected areas from the Okarito Lagoon.

3.4 Gorge

The Forum proposes a marine reserve for the coast from Longridge Point to Hackett River out to about 30m depth or about 1km, with remainder of site proposed as Fisheries Act protected areas.

A number of individuals say that the proposed Gorge marine reserve is too small and looks like tokenism. Two say it is, “a lamentably inadequate proposal, missing [an] extraordinary and important opportunity to provide [a] wide range of ecological, social and economic benefits. These submitters wish to see the proposed marine reserve extended out to the 12nm limit or 200m-depth contour.

Ngai Tahu is “optimistic that it can support” the proposed MPAs for the Gorge area (*provided* the commercial and non-commercial extraction of pounamu is included in the management of the marine reserve) because traditional fishing grounds of special significance in this area have been excluded from the proposed marine reserve.

Environmental NGOs do not support the proposals at Gorge in their current format. It says that the proposed marine reserve is far too small to deliver any valuable scientific or ecological benefit. They recommend that the entire Gorge area be made a marine reserve and the boundaries extended out to 12nm or the 200m contour. Forest and Bird NZ comments that, “the bizarrely shaped Type 2 (Fisheries Act) MPA is a classic example of a complex MPA boundary. It fails to meet the design criteria in the protection standards – to keep boundaries simple.” A number of other submitters also comment that proposed boundaries are overly complicated and likely to make enforcement difficult.

CRAMAC 8, which represents the southern New Zealand rock lobster industry and covers the South Westland area, submit that the proposed Fisheries Protected Area for the Gorge area is not required to satisfy the objectives of the MPA policy. It believes that the proposal adds a layer of complexity that is not needed and that it should be abandoned. CRAMAC 8 believes that the intent of the MPA Policy can be met by establishing the area currently proposed as marine reserve as a MPA where potting and other fishing methods that do not impact on the sea bed are not prohibited. Other fishing industry groups support this recommendation.

Alternative Recommendations for the Gorge area

Proposed by	Recommendations for the Gorge area
Individual submitters	Approximately 25 individuals seek an extension of the proposed marine reserve out to the 12nm limit or 200m-depth contour.
Greenpeace form submissions	A full marine reserve needs to extend from Barn Bay south to Awarua Point and out to the 200m-depth line.
Forest and Bird groups & ECO	Recommend that the entire Gorge area be designated a no-take marine reserve, with the northern boundary meeting the shore at the northern end of Barn Bay to Watsons Bluff, including the Barn Islands, extending offshore to the 200m contour (or 12nm).
Combined fishing industry CSO submission	Recommend that only the area for the Gorge site proposed by the Forum as a marine reserve be considered for a Type 2 MPA through the use of Fisheries Act regulations. Reason for recommendation: The Forum's proposal duplicates habitats already represented in marine reserves. This alternative proposal will protect intertidal sand, intertidal boulder, shallow sub tidal sand and deep subtidal sand habitats.

3.5 Proposed educational showcase sites

As noted above, individuals and environmental interests generally believe that the proposed educational showcase sites are too small to provide useful environmental protection, while other submitters (mainly industry submitters and, in some cases, affected local residents) do not support the concept at all.

This section presents specific issues raised by submitters in relation to the five educational showcase sites proposed by the Forum. Most of these comments relate to the proposed marine reserve at Tauranga Bay, for which there is significant opposition.

There are relatively few comments about the specific proposals for the remaining four educational showcase sites, beyond the generic comments that the sites are either too small to be useful and should be extended up to 10km² (some individuals and environmental interests); or, that they are beyond the scope of this process and should not be progressed (fishing and mining industries). The few alternative recommendations for these sites are incorporated in the commentary, rather than presented in tabular format as for the four main MPA proposals.

Tauranga Bay

The Forum proposes a marine reserve for the whole site.

Local residents, many of whom are recreational fishers strongly oppose the proposal to establish a marine reserve at Tauranga Bay.

The Tauranga Bay Working Group submits that the area can already be used for education purposes without the formation of a formal reserve. It notes that the West Coast is fairly inaccessible over large distances, which protects the environment so there is little merit in creating reserves that will limit the use of those areas that are accessible. The group would not oppose a reserve from the Seal Colony to the Lighthouse taking in Siberia Bay but excluding Wall Island; and, excluding the area of the beach around the populated residential area.

More than 50 recreational fishers also strongly oppose the proposed marine reserve at Tauranga Bay, which they say is regularly used as a seafood gathering and fishing area by local residents. Many are concerned that there has been little or no consultation on the proposals with locals. The Tauranga Bay Working Group shares this concern.

A number of individuals describe themselves as “tangata whenua and recreational fisher” and oppose the proposal to create a marine reserve in Tauranga Bay.

Ngai Tahu advise that it is likely it will oppose the proposal for Tauranga Bay because this area is a traditional fishing ground of special significance; however, the rununga is waiting for further advice from Ngati Waewae before it confirms this position.

Forest and Bird NZ recommend that the proposed marine reserve be extended to around 10km² and include a rocky and sandy shoreline, an offshore island and sand flats. Other environmental NGOs also recommend extending the marine reserve to either 5km² or 10km². ECO suggests extending the reserve to at least the 100m-depth contour to include the area where Hector’s dolphins are found offshore.

Mahinapua Creek / Tuwharewhare

The Forum proposes that the Mahinapua Creek / Tuwharewhare site be transferred to DOC as public conservation land.

Forest and Bird West Coast supports the proposal but believe the area covered should be larger.

ECO says it is unclear what the Forum proposes for this area and that it seems to be more a change in land management than a marine protected area.

The Westland District Council is concerned that there may be some adverse effect on the existing recreational users at Mahinapua Creek/ Tuwharewhare and encourages the Forum to continue negotiation with these users.

The South Island Eel Industry Association opposes the inclusion of the lower reaches of the Mahinapua Creek/ Tuwharewhare as an MPA as this is a known eel fishery that fulfils part of the West Coast eel quota. The association notes that it would not oppose this area becoming an MPA if all existing rights to commercial eeling (without the need for DoC concession) were retained.

Ship Creek

The Forum proposes a marine reserve for the whole site.

ECO and Forest and Bird NZ recommend that the marine reserve around Ship Creek be extended to the 200m-depth contour. Forest and Bird NZ also recommends it be extended south to Haast River and north to Cole Creek; and, that Fisheries Act MPA tools be established around the Waita and Haast River mouths to allow for recreational fishing to about 100 metres beyond the beach. Forest and Bird West Coast recommend extending the marine reserve to the 200m-depth contour and a size of about 5km². Several individuals also recommend extending the proposed site to take in Coal Creek Beach.

Ngai Tahu is “optimistic” that it can support the proposal with a minor boundary amendment, either to the proposed marine reserve or the mataitai application.

The West Coast Whitebaiters Association seeks a change to the proposed marine reserve boundaries at Ship Creek to the extend boundary up stream to protect whitebait spawning sites.

The South Island Eel Industry Association opposes the inclusion of the lower reaches of the estuarine tidal lagoon at Ship Creek mouth as an area where all commercial fishing will be prohibited, as this is a potential eel fishery that could assist in fulfilling part of the West Coast eel quota.

Jackson Head

The Forum proposes that both parts of the site are marine reserves.

A number of individuals say that the proposed marine reserve at Jackson Head is too small to be effective and should be extended. Some of these submitters seek an extension out to the 200m-depth contour, while others are less specific.

Ngai Tahu opposes the proposed marine reserves at Jackson Head because it is a traditional fishing ground of special significance and a proposed mataitai reserve because it will have adverse effects on Ngai Tahu’s customary non-commercial rights to develop tikanga-based management practices within the proposed mataitai.

Forest and Bird NZ recommend that the marine reserve around Jackson Head be extended to the 200m-depth contour. It also recommends a Type 2 MPA near Ocean Beach as a buffer for the marine reserve. Forest and Bird West Coast recommend extending the marine reserve to 5km².

Hapuka Estuary

The Forum proposes that the Hapuka Estuary site be transferred to DOC as public conservation land.

The South Island Eel Industry Association opposes the inclusion of the lower reaches of the Hapuka Estuary upstream of the main road bridge as an MPA, as this is a known eel fishery that fulfils part of the West Coast eel quota.

Forest and Bird West Coast supports the proposal for the Hapuka Estuary. Other submitters commented on this proposal only in relation to more general statements about the proposed education showcase sites (i.e. that they should either be extended or that are beyond the scope of this process).