

12 August 2015

Ministry for Primary Industries
PO Box 10-420
Wellington

COMMENTS ON THE NATIONAL ENVIRONMENTAL STANDARD – PRODUCTION FORESTRY

Fisheries Inshore New Zealand

1. Fisheries Inshore New Zealand Limited (FINZ) represents the inshore finfish, pelagic and tuna fisheries of New Zealand. It was formed in November 2012 as part of the restructuring of industry organisations. Its role is to deal with national issues on behalf of the sector and to work directly with and on behalf of its quota owners, fishers and affiliated Commercial Stakeholder Organisations. As part of that work FINZ also works collaboratively with other industry organisations, Sector Representative Entities and Seafood New Zealand.
2. FINZ represents 239 inshore fishstocks that are managed under the Quota Management System, the quota owning members of FINZ collectively own more than 51% of the quota in 187 fishstocks and between 40 and 51% in a further 17 fishstocks.
3. FINZ members also have interests in fishstocks in the freshwater environment, such as eels, that may be adversely affected.
4. Our key outputs are the development of, and agreement to, appropriate policy frameworks, processes and tools to assist the sector to more effectively manage inshore, pelagic and tuna fishstocks, to minimise their interactions with the associated ecosystems and work positively with other fishers and users of marine space where we carry out our harvesting activities.
5. This submission has been prepared by Jeremy Helson of Fisheries Inshore New Zealand Limited. Any queries should be directed to Dr Helson: 021 2728 727; jeremy@inshore.co.nz.

General Position

6. FINZ considers that there are serious shortcomings in the proposed National Environmental Standard and that the adverse effects on the seafood sector, and the marine environment generally, have not been sufficiently addressed.
7. FINZ supports the combined submission made by the Paua Industry Council, the NZ Rock Lobster Industry Council and the Specialty and Emerging Fisheries Group.

The Consultation Process

8. As the majority of the fishstocks represented by FINZ occur in the inshore marine environment at some stage of their life-history, many of these stocks will be potentially affected by sediment discharges generated by forestry activity.

9. Despite this clear and well-understood link, FINZ has not been directly consulted on this proposal or advised of the schedule of public meetings. We request that the proposed Standard does not proceed any further until consultation with the wider seafood sector has been undertaken.

Potential Impacts

10. Seafood is New Zealand's fourth largest merchandise export. The adverse effects of forestry activities on the coastal marine environment have been well documented. Impacts on these fisheries caused by sedimentation can have wide-ranging effects on the sector that may reduce export revenues and employment in regional economies.
11. MPI's own research shows the effects of sediments on fish and fisheries. For example, Morrison et al. 2009 state:¹

In New Zealand, arguably the most important land-based stressor is sedimentation, including both suspended sediment and deposition effects, and associated decreases in water clarity. ... Impacts may be direct on the species themselves. ... Indirect effects include the modification or loss of important nursery habitats, especially those composed of habitat forming (biogenic) species."
12. It would appear that the adverse effects on the marine environment, as discussed by Morrison et al., have not been considered in any detail. As such, the proposed standard may be contrary to section 43A(3)(b) of the *Resource Management Act 1991* as consideration of adverse effects was unreasonably confined three issues.
13. It is disappointing that the formation of MPI has not yielded closer integration between terrestrial and marine sectors such that policy can be developed in a more thoughtful and holistic manner.

Inadequate Conditions

14. The conditions proposed in the discussion document will not manage the effects of plantation forestry on the coastal marine environment. Because of the potential for direct sediment run-off from forestry activities, we would expect as an absolute minimum that any area within two nautical miles of the coastal marine area be zoned "red". We would also expect that any area that discharges into sensitive areas or areas that are known to be of significant value to fisheries management such as estuaries, harbours and enclosed marine waterways should also be zoned "red".

Other Fishing Impacts

15. While FINZ does not represent recreational or customary fishers, we acknowledge their right to use and enjoy our marine resources. FINZ works to ensure our fisheries resources are healthy and well managed for the benefit of commercial, recreational and customary fishers alike. The adverse effects of forestry activities do not solely reduce the quality of commercial fisheries, but all fisheries.
16. FINZ considers that the adverse effects on recreational and customary fishers should also be explicitly considered and appropriate and targeted consultation undertaken if this has not occurred to date.



Jeremy Helson
Chief Executive

¹ *New Zealand Aquatic Environment and Biodiversity Report No. 37.*