

From: [Jean Davis](#)
To: [RPS](#)
Cc: [Alicia McKinnon](#); [Allen Frazer](#); [Sam Thomas](#); [Sonja Austin](#)
Subject: Correction: Updated FNZ comments on proposed RPS
Date: Friday, 3 September 2021 11:34:15 a.m.
Attachments: [Proposed Otago RPS Formal Submission 2021.docx](#)

Kia ora,

Fisheries New Zealand sent through comments on the proposed Otago RPS earlier this week. However, we noted that it was not in the correct legal format. Our formal comments are attached here in the formal format required by ORC.

Please use this version and disregard my first email.

Kind regards,

Jean Davis

Dr Jean Davis | Fisheries Analyst
Inshore Fisheries - South
Tini a Tangaroa – Fisheries New Zealand
Manatū Ahu Matua – Ministry for Primary Industries
73 Otaki St | Ōtepoti – Dunedin 9012 | New Zealand
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From: [Jean Davis](#)
To: [RPS](#)
Cc: [Alicia McKinnon](#); [Allen Frazer](#); [Sonja Austin](#); [Anne Sutton \(Anne\)](#); [Sam Thomas](#); [Michael Nielsen](#)
Subject: Fisheries New Zealand Comments on ORC Proposed RPS
Date: Wednesday, 1 September 2021 12:13:15 p.m.
Attachments: [Review of Proposed Otago Regional Policy Statement_03-09-21.docx](#)

Kia ora,

Thank you for the opportunity to comment on the proposed Otago Regional Policy Statement.

Please see the attached comments from our Coastal Planning Team within Fisheries Management at MPI. Don't hesitate to get in touch with me if you have any questions around our submission.

Ngā mihi,

Jean

Dr Jean Davis | Fisheries Analyst
Inshore Fisheries - South
Tini a Tangaroa – Fisheries New Zealand
Manatū Ahu Matua – Ministry for Primary Industries
73 Otaki St | Ōtepoti – Dunedin 9012 | New Zealand
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Proposed Otago Regional Policy Statement 2021

Information for Submitters

Submissions must be in the prescribed form (Form 5) specified by the Resource Management Act and must be received by Otago Regional Council
by 3 pm Friday 3 September 2021

Privacy: Be aware that **all submissions are considered public**, including your name and address which will be uploaded to ORC website as part of this process. The Council and further submitters will use your name and contact details for correspondence in relation to the making of the Regional Policy Statement.

LODGE A SUBMISSION MANUALLY (*USING FORM BELOW*)

A template complying with the requirements of Form 5 is provided below. Once completed, please forward to ORC by one of the following:

Email: rps@orc.govt.nz Submissions in MS Word or other editable format are preferred, if possible

Post: Otago Regional Council, Private Bag 1954, Dunedin 9054. Att: ORC Policy Team

Hand Delivery at

Dunedin: Otago Regional Council Office, 70 Stafford St, Dunedin, Att: ORC Policy Team

Queenstown: Terrace Junction, 1092 Frankton Road, Queenstown, Att: ORC Policy Team

Alexandra: William Fraser Building, Dunorling Street, Alexandra. Att: ORC Policy Team

INQUIRIES

Email: rps@orc.govt.nz

Phone: ORC Call Centre: 0800 474 082, Monday - Friday, 8am-5pm

NOTES TO PERSON MAKING A SUBMISSION

If you are a person who could gain an advantage in **trade competition** through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be **struck out** if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Go to Written Submission Form on next page

Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)

To: Otago Regional Council

1. Name of submitter

Fisheries New Zealand

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.

3. I **could not** gain an advantage in trade competition through this submission.

4. I **wish** to be heard in support of my submission

5. If others make a similar submission, I **will** consider presenting a joint case with them at a hearing

6. Submitter Details

a. Signature of submitter *(or person authorised to sign on behalf of submitter)*

Jean P Davis

b. Signatory name, position, and organisation *(if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)*

Name Jean Davis

Position Fisheries Analyst

Organisation Fisheries New Zealand, Ministry for Primary Industries

c. Date

September 3, 2021

Address for service of submitter *(This is where all correspondence will be directed)*

d. Contact person *(name and designation, if applicable)*

Jean Davis

e. Email:

jean.davis@mpi.govt.nz

f. Telephone:

0220102095

g. Postal address (or alternative method of service under [section 352](#) of the Act):

Ministry for Primary Industries, 73 Otaki Street, South Dunedin, Dunedin 9012

7. My submission is:

Column 1	Column 2	Column 3	Column 4
<p><i>The specific provisions of the proposal that my submission relates to are:</i></p> <p><i>(Please enter the relevant objective, policy, method, or 'other' provision reference where possible. For example, 'AIR-O1'.)</i></p>	<p><i>I support or oppose the specific provisions or wish to have them amended.</i></p> <p><i>(Please indicate "support" or "oppose" or "amend")</i></p>	<p><i>The reasons for my views are:</i></p>	<p><i>I seek the following decision from the local authority:</i></p> <p><i>(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</i></p>
<p>SRMR – I7 – Rich and varied biodiversity has been lost or degraded due to human activities and the presence of pests and predators. (p. 79)</p>	<p><i>Amend</i></p>	<p><i>This statement summarizes impacts of human activities like fishing and sedimentation on biodiversity:</i></p> <p><i>P.79 "The extent of impacts on marine species and environments is not well understood. Sedimentation is known to have contributed to the loss of kelp forests.³⁶ In addition to sedimentation, other human impacts on kelp forests</i></p>	<p>This section (P. 79) could be rephrased to say: "In addition to sedimentation, other human impacts on kelp forests in the Otago region may include land-based nutrient inputs, rising sea surface temperatures associated with climate change, the introduction of invasive species like <i>Undaria pinnatifida</i> (Suárez-Jiménez et al. 2017) and fishing. There has also been a 70% decline in the abundance of hoiho (yellow-eyed penguin) on the Otago coast since 2008³⁷ although the factors</p>

		<p><i>include rising sea surface temperatures associated with climate change and trophic cascades from fishing pressure; together with downward trends in fish and crayfish catches. There has been a 70% decline in the abundance of hoiho (yellow-eyed penguin) on the Otago coast since 2008³⁷ and downward trends in ngohi (fish) and koura (crayfish) catches. The effects of climate change will add significantly to risks of continuing biodiversity decline.”</i></p> <p>The statement “downward trends in fish and crayfish catches” is an inaccurate portrayal of the status of all local fisheries. Also, we cannot find any literature showing evidence of trophic cascades from fishing pressure in kelp forests in the Otago region.</p> <p>Catches fluctuate and may show a decreasing trend for a number of reasons including stricter controls in terms of the total allowable commercial catch within the Quota Management system, reductions in recreational limits. Catches can also decline as a result of declines in abundance, however: “There is no indication that the crayfish stock in the Otago region (CRA7) is declining to low biomass levels based on the most recent scientific information available (full stock assessment in 2015 and management procedure update in 2019). The stock is very likely to be at or above the target level, there has been an increase in catch-per-</p>	<p>causing this are not fully understood. The effects of climate change will add significantly to risks of continuing biodiversity decline.”</p> <p>Suárez-Jiménez, R., et al. (2017). "The invasive kelp <i>Undaria pinnatifida</i> hosts an epifaunal assemblage similar to native seaweeds with comparable morphologies." <i>Marine Ecology Progress Series</i> 582: 45-55.</p>
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		<p>unit-effort (a relative indicator of abundance), and there is no evidence of overfishing. Please refer to p. 428 of the most recent plenary document MPI produced in November 2020 (November Plenary report 2020 (mpi.govt.nz). An updated CRA 7 stock assessment will be available in November 2021.”</p> <p>Blue Cod, the largest inshore fishery in Otago, are now managed under MPI’s National Blue Cod Strategy (https://www.mpi.govt.nz/fishing-aquaculture/sustainable-fisheries/national-blue-cod-strategy/) which introduced a reduced size limit, reduced mesh size on fish pots and more restrictive bag limits in 2020. Other inshore fish stocks including Elephant fish and Gurnard are not in decline on the east coast of the South Island. See MPI’s May 2021 plenary for updates on these species: https://www.mpi.govt.nz/dmsdocument/45373-Fisheries-Assessment-Plenary-May-2021-Stock-Assessments-and-Stock-Status-Volume-1-Introductory-section-and-Alfonsino-to-Hake</p>	
<p>IM–M1 – Regional and district plans IM–M2 – Relationships IM–PR1 – Principal reasons CE–M5 – Other incentives and mechanisms</p>	<p><i>Support</i></p>	<p>Fisheries NZ supports a proactive and an integrated approach to the management of marine biodiversity.</p> <p>We encourage ORC to work collaboratively with tangata whenua, stakeholders, and local and central government on the development of an integrated system as it relates to marine biodiversity.</p>	<p>N/A</p>

		<p>In practice, Fisheries NZ has tools available under the Fisheries Act to protect habitats, ecosystems and protected species from fishing. We aim to identify opportunities where mechanisms under the Fisheries Act may be appropriate for protecting biodiversity. We also aim to support the mitigation of land-based impacts on the marine environment by identifying key stressors and vulnerable fisheries and fish habitats. Fisheries New Zealand along with fisheries stakeholders and many iwi are particularly concerned about sediment impacts from land use and coastal development contributing to declines in Otago's kelp forests, and other important habitat for fisheries such as paua, tuaki and blue cod.</p>	
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Note: Additional rows for each separate provision or submission point should be added as required.