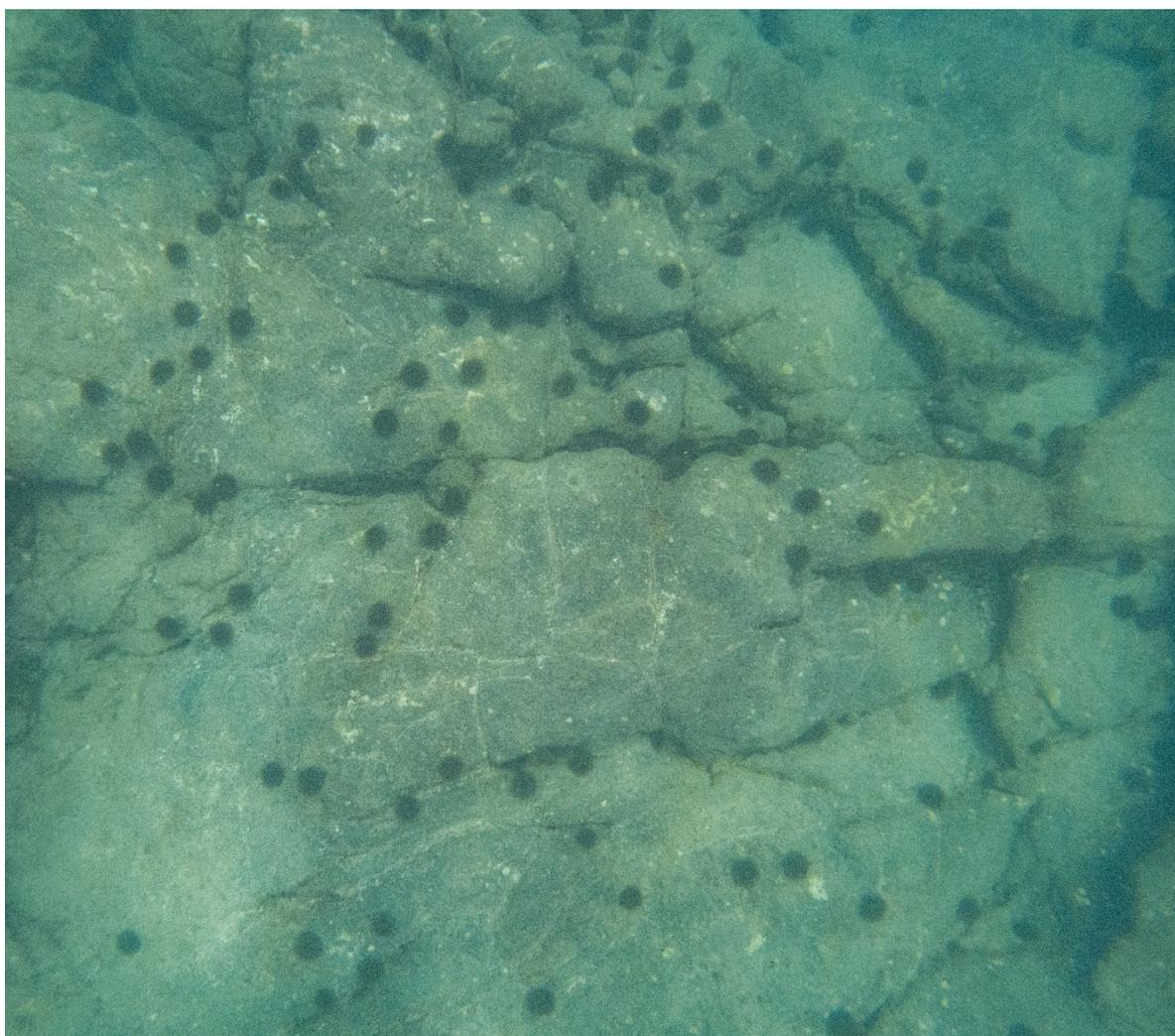


## Submission on Draft CRA 2 Management Target Fisheries Plan

20/08/2025

The Hauraki Gulf Marine Park is in ecological and economic crisis. Incremental kōura (spiny rock lobster) catch reductions have failed to restore reef health. Restored kelp forests could be worth NZ \$127–292 million per year—up to 29 times more than the entire CRA 2 fishery. The only logical and economically sound response is a full closure of CRA 2 until recovery is secured.



*Kina barrens on Aotea February 2025. Photo by Shaun Lee.*

## Recommendations

STET Limited supports setting an ambitious biomass management target and threshold for CRA 2 that reflects both the ecological role of kōura and the urgent need to address barren reef proliferation in the Hauraki Gulf and Bay of Plenty.

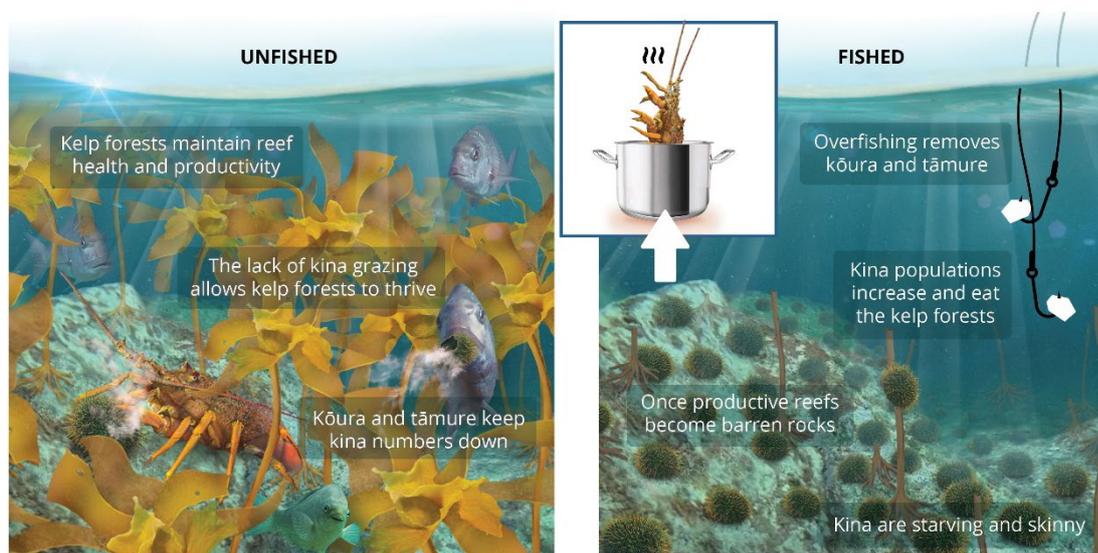
We recommend Fisheries New Zealand manage lobster populations based on kelp forest extent rather than biomass targets. However, in the interim we support the following targets:

- Management target:  $3.5 \times \text{BMSY}$  ( $\approx 42\%$  of unfished exploitable biomass) for CRA 2.
- Management threshold: 50% of the above target ( $\approx 21\%$  of unfished exploitable biomass).

These settings are the most likely to restore ecosystem function, rebuild large predator abundance, and deliver long-term fisheries resilience.

At the same time, the economic evidence strongly favours **urgent action**. Restored kelp forests in CRA 2 are worth an estimated NZ \$127–292 million per year, compared with only NZ \$10.17 million per year for the entire fishery. Given the scale of this disparity, and the proven success of full closures in restoring predator populations and reversing reef degradation, a full closure of CRA 2 is the most logical and economically sound response until recovery is secured.

Past management changes in CRA 2 show that incremental catch reductions have repeatedly failed to rebuild stocks or restore ecosystem function. Partial measures prolong biodiversity loss and economic decline, while a full closure offers the only realistic path to rapid recovery and long-term value.



*Kina barrens are created by overfishing. Graphic State of Our Gulf 2020.*

## Economic rationale for full closure

Overseas studies value kelp forests at up to NZ \$242,700 per hectare per year<sup>1</sup>, based on global estimates of key ecosystem services such as fisheries production, nutrient removal, and carbon capture. At least 425 ha<sup>2</sup> of mapped rocky reef exists on the Auckland east-coast side of the Hauraki Gulf (Auckland Council rocky-reef layer, reported in 2024 for a Blue Carbon paper, so it is likely these reefs are shallow kelp habitat). No number is available for the Waikato / Coromandel half of the Gulf, but it is reasonable to assume a similar area. CRA 2 also extends into the Bay of Plenty, where shallow rocky reef habitat is widespread around offshore islands and headlands. On this basis, we estimate that CRA 2 contains about 1,200 ha of shallow rocky reefs. In fished areas, kina barrens cover approximately 30% (range: 7–49%)<sup>3</sup> of shallow reef habitats.

**NZ \$106,000–242,700/ha/yr × 1,200 ha = ~NZ \$127 million to NZ \$292 million per year.**

The Fisheries New Zealand sustainability review (December 2024) notes a high economic value of NZ \$10.17 million<sup>4</sup> for the CRA 2 fishery, which appears to be a broad estimate likely reflecting total fishery value, including wider economic factors or export earnings. By contrast, the estimated landed value of the CRA 2 commercial catch is only NZ \$6.9 million<sup>5</sup>.

Using the NZ \$10.17 million figure, **restored kelp forests in CRA 2 could therefore be worth 12–29 times more than the entire CRA 2 fishery.**

*“The best available scientific information indicates that the implementation of no-take marine protected areas is an effective means to rebuild the abundance of urchin predators (including snapper and rock lobster) and reduce urchin abundance. There are currently no examples of this type of restoration occurring outside of full no-take marine protected areas.”<sup>6</sup>*

Given the critical role kōura play in maintaining healthy reef ecosystems, a full closure of the CRA 2 fishery is the only logical response when the potential ecological and economic gains so vastly outweigh the limited returns from continued fishing.

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<sup>1</sup> <https://www.nature.com/articles/s41467-023-37385-0>

<sup>2</sup> <https://knowledgeauckland.org.nz/media/t0xff2ul/tr2024-10-blue-carbon-potential-in-the-auckland-region.pdf>

<sup>3</sup> <https://www.tandfonline.com/doi/full/10.1080/00288330.2024.2336081>

<sup>4</sup> <https://www.mpi.govt.nz/dmsdocument/66717-Review-of-sustainability-measures-for-spiny-rock-lobster-CRA-2-for-202425/>

<sup>5</sup> <https://nzrocklobster.co.nz/stock-summaries/cra2/>

<sup>6</sup> <https://www.mpi.govt.nz/dmsdocument/66717-Review-of-sustainability-measures-for-spiny-rock-lobster-CRA-2-for-202425/>

## Opposition to ineffective measures

### 1. Special Permits for Urchin Removal:

Kina removal under the current special-permit system is extremely labour-intensive—requiring around 50 diver-hours per hectare to reduce densities to ecologically meaningful levels (less than 1 kina per m<sup>2</sup>)—making it insufficient as a long-term solution to reverse barrens.<sup>7</sup>

### 2. Reliance on Industry-Led Non-Regulated Measures:

Reliance on industry-led, non-regulated measures has repeatedly failed in CRA 2. For example, voluntary shelving of quota between 2015 and 2018 did not prevent the stock from collapsing to historically low levels, forcing Fisheries New Zealand to impose a 60% cut to the TACC in 2018<sup>8</sup>. International reviews also confirm that voluntary approaches lack durability and effectiveness. Such measures cannot replace robust, enforceable regulation and must not be relied upon to achieve management goals.

## Conclusion

A 3.5 × BMSY target with a 50% threshold is the right goal to restore CRA 2 and secure a resilient fishery for future generations. But to rebuild kōura populations fast enough to regain ecological balance and lost productivity, a full closure is necessary. Fisheries New Zealand has both the mandate and the opportunity to act decisively; anything less risks ongoing biodiversity loss and economic decline.

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<sup>7</sup> <https://www.sustainableseaschallenge.co.nz/assets/dms/Reports/Kina-barrens/Kina-barrens-to-kelp-forests.pdf>

<sup>8</sup> <https://eds.org.nz/wp-content/uploads/2025/04/Draft-EDS-Submission-on-fisheries-reforms-20250404-Website.pdf>