

Submission supporting the application for a temporary fisheries closure (Rāhui)

28 October 2025

STET, a social enterprise supporting restoration and conservation projects in New Zealand, strongly supports the application by Ngāti Manuhiri Settlement Trust for a temporary fisheries closure under section 186A of the Fisheries Act 1996. STET explicitly acknowledges the mana of Ngāti Manuhiri Settlement Trust as mana whenua in exercising their kaitiakitanga and initiating this critical protection measure.



Algae diversity in a rockpool in the Tāwharanui Marine Reserve. Photo by Shaun Lee.

1. Support for closure scope and rationale

STET supports the scope of the proposed closure, which covers all invertebrate and seaweed species from the intertidal zone down to one metre below chart datum.

The widespread decline of key intertidal species, including pipi (*Paphies australis*), tuatua (*Paphies subtriangulata*), kina (*Evechinus chloroticus*), and other gastropods like ngākihi (limpets) and pūpū (cat's eye), requires this comprehensive protection. The exclusion of all

harvesting is necessary to restore the ecological function of these habitats, which currently suffer from unsustainable pressure, including sedimentation and other environmental stressors.

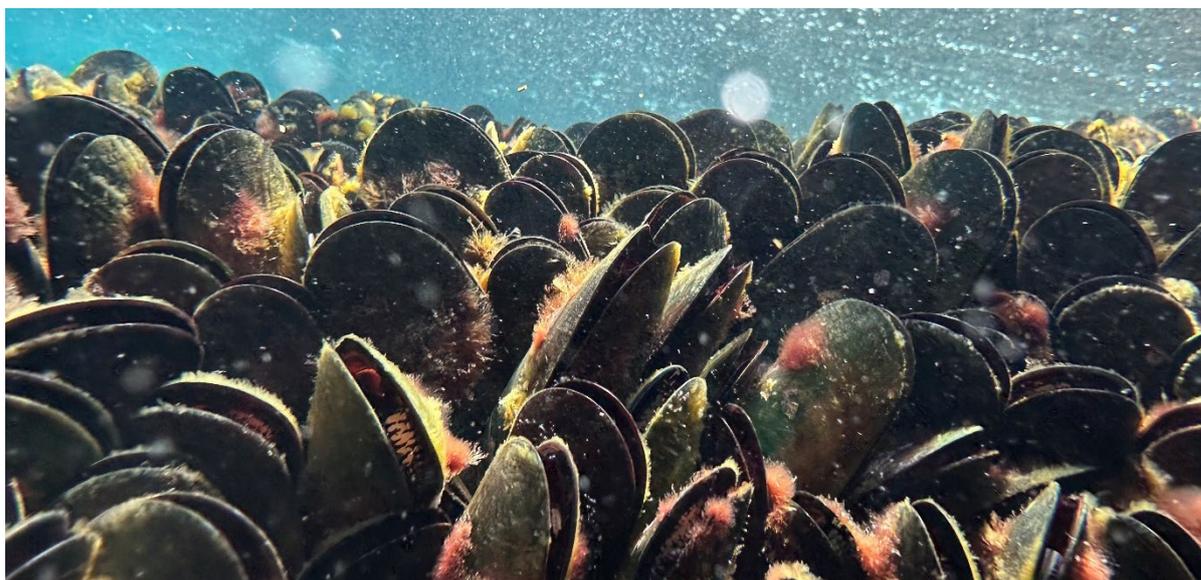
2. Addressing data deficits and policy terms

A key challenge is the critical lack of historical data concerning the historic abundance of invertebrate and seaweed species from the intertidal zone down to one metre below chart datum. This absence means modern population numbers are measured against an already degraded baseline, masking the true extent of depletion.

Inference of historic abundance suggests that soft-sediment bivalves (tuangi / cockles, pipi, tuatua) were once vast and stable, able to support a significantly higher harvest rate than today. Sheltered rocky shores were also dominated by extensive tio (native oyster) populations.

There is a scarcity of large tuangi across monitored areas¹, this indicates that few tuangi are reaching the necessary size to maximise spawning output and seed new beds across wider coastal areas. Large tuangi provide predation refuge for post-settlement juveniles² a particular density threshold of adult individuals may be required to enhance juvenile survival and retention, necessary to maintain the resident population.

Recreational catch is not reported. The proposal to close the area is a necessary policy intervention to establish a new, protected baseline for future population management.



Intertidal kūtai beds protected by a rāhui around Waiheke Island. Photo Shaun Lee.

3. Sub-tidal restoration and kūtai beds

The historical presence of large sub-tidal beds of kūtai (*Perna canaliculus*) is a matter of oral history, such as those recorded near the mouth of the Puhoi river. These extensive kūtai beds served as vital ecosystem engineers, filtering water and providing complex habitat.

¹ <https://fs.fish.govt.nz/Page.aspx?pk=113&dk=25997>

² <https://doi.org/10.3354/meps14466>

The intertidal closure provides a novel effort to support Aotearoa’s largest active marine restoration programme³. Throughout the Gulf kelp habitat range is suppressed by sediment from poor land use practices. This means many kelp species are range restricted to the shallows. Some of these species are critical to the life stages of marine animals like kūtai⁴. It is logical that sub-tidal mussel reef restoration begins in the shallows, but a lack of protection from human harvesting has meant this has not been an option⁵.

³ <https://www.reviveourgulf.org.nz/>

⁴ <https://www.reviveourgulf.org.nz/stories/understanding-juvenile-kutai-habitats/>

⁵ <https://blog.sh Shaunlee.co.nz/the-mussel-line/>



Rural landslip on Tāwharanui Peninsula. Photo by Shaun Lee.

4. Identifying multiple stressors

While overfishing is the immediate trigger for this application, STET notes that sedimentation and degraded water quality are likely more critical long-term stressors on intertidal communities. However, while fishing pressure continues, it is extremely difficult for researchers to isolate and quantify the respective impacts of fishing versus sediment load.

Removing fishing pressure is a relatively fast and direct policy action that can be immediately enforced, allowing populations to build resilience while longer-term catchment management (to reduce sediment) is addressed. This is crucial given the growing pressures from climate change⁶ and human population growth.

⁶ <http://environment.govt.nz/publications/our-marine-environment-2025>

5. Critical edits:

Duration

The proposed two-year duration for this closure is ecologically insufficient given the scale of degradation and the long-term historical impact of harvesting. Overfishing has occurred since human arrival in New Zealand, leading to significant, chronic declines. STET strongly recommends a closure of 10 years or more, as a two-year period has been proven insufficient for structural recovery.

There is significant interest in extending closure periods. A six-year extension to a s186A temporary closure was made by five iwi organisations in November 2023⁷.

This recommendation is based on compelling evidence:

- **Insufficient recovery time:** The 15-year closure at Whangateau Harbour has yielded minimal recovery of harvestable tuangi and pipi; adult densities remain critically low at 23 per square metre for tuangi (186a Application, Page 13). This evidence confirms recovery is extremely slow.
- **Need for reproductive maturity:** A longer duration is necessary to enable slow-growing species to reach ecologically significant sizes and reproductive maturity, which builds resilience against mass mortalities and environmental stressors.
- **Conservation of threatened species:** A multi-year commitment is required to restore mauri by rebuilding ecosystem complexity, and to support Threatened and At Risk species, including the Conservation Dependent Tūturiwhatu (Northern New Zealand dotterel) and *Torea pango* (variable oystercatcher), whose intertidal food sources are currently depleted.

The two-year period is simply insufficient to achieve the goal of rebuilding biomass and ecosystem complexity to a functional, resilient state.

Introduced species

The harvesting ban must exclude introduced species, for example wakame, exotic *Caulerpa* and Mediterranean fanworm. However, STET notes that the ban must include all oysters (Tio) due to the difficulty for the average fisher to differentiate between the native rock oyster (*Saccostrea glomerata*) and the introduced Pacific oyster (*Magallana gigas*). Protecting the native Tio is paramount.

⁷ <https://www.mpi.govt.nz/dmsdocument/61774-Request-for-Further-Extension-of-Temporary-Closure-of-Mahinga-Mataitai-for-6-Years-186A-Fisheries-Act>

6. STET's recommendation and key messages

STET strongly recommends that the temporary closure be extended significantly beyond two years to align with the ecological timeframes required for meaningful recovery, as demonstrated by other long-term closed areas. A two-year closure will result in only a marginal recovery that will be immediately overexploited upon reopening.

Action Required: Grant the closure and

- 1) Significantly increase its duration, targeting a 10-year timeframe.
- 2) Exclude introduced species other than Pacific oyster.

We also implore the iwi to consider using the Resource Management Act (RMA) protection tool. This allows for temporary bans of up to 10 years via Regional Council Coastal Management Plans. Although this measure is not designed to manage intertidal species harvest, it reflects a more holistic perspective of the moana, which we understand is preferred by tangata whenua. The 10-year provision aligns with the timeframe required to restore abundance from critically low levels and fits international standards for 'high protection'.

Justification: The chronic overfishing since human arrival, coupled with evidence of slow recovery in existing long-term closed areas and compounding environmental stressors, necessitates a long-term policy instrument to restore ecosystem health. Excluding introduced species allows them to be actively managed.

Outcome: A multi-year closure for is necessary to support the active restoration of sub-tidal kūtai beds and passive restoration of other native species.

Thank you for considering our submission.

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