BENEATH THE REFLECTIONS: DRAFT INTEGRATED MANAGEMENT STRATEGY FOR FIORDLAND'S FISHERIES AND MARINE ENVIRONMENT

Guardians of Fiordland's Fisheries and Marine Environment Inc.

RESPONSE TO SUBMISSIONS BY DRAFT SECTION

A guide to interpreting the contents of this document

- This document contains the Guardians' responses to issues/concerns raised in submissions. The responses are cross-referenced to submission number, a list of which is provided at the end of the document together with the names of submitters. The responses are sorted by section of the draft integrated management strategy.
- The majority of submissions did not refer their comments to specific sections of the draft. The process of sorting these comments by draft section so that the Guardians could respond in context was generally straightforward (e.g., comments about china shops were considered in section 4 of the draft), but some comments could apply to multiple sections of the draft. For example, (depending on the wording used) one sentence about consultation could be relevant to sections 1, 3, 4 and 7.
- This document does not contain responses to statements of support.

Abbreviations: DoC – The Department of Conservation, ES – Environment Southland, COP – code of practice, MSA – Marine Safety Authority, MFish – The Ministry of Fisheries, FNP – Fiordland National Park.

Section	Title	Submission numbers	Guardians' response
1	ABOUT THE GUARDIANS		
1.1	The vision	5, 32, 63, 76, 105, 123	The Guardians' vision and objectives are their cornerstone and fundamental to the group's direction and operations. Accordingly the group does not consider changes to be appropriate.
1.2	Turning the vision into reality	No comments	
1.3	Who are the Guardians?	6, 24, 32, 58, 63, 81, 106, 111, 120, 135, 137, 143, 145, 151, 169, 185, 188, 208, 209, 216	 Concerns were expressed about under-representation of environmental/wider interests, lack of participation of scientific and non-exploitative recreation interests, and that the recreational representatives were self-appointed and not necessarily representative. Some of these concerns may have been generated from information other than the draft strategy. Irrespective of this, the Guardians consider concerns of this nature will be addressed when additional detail about the following points is incorporated into the revised strategy: Appointment of members when the group was first established. Involvement of marine science/environmental and agency ex officio members when the group's mandate broadened from 2000 onwards. Involvement of other marine scientists since 2000. Criteria used to replace members who have left the group. The relationship between the regional recreational representatives and one national recreational organisation.
			Irrespective of representation, this consultation exercise has provided an opportunity for wider interests and the community to state their views about the proposals in the draft strategy - and there will be

			further opportunities in the process.
1.4	Why was the group formed?	32	The Guardians will clarify the meaning of the last bullet point on p13 of the draft by referring to the need for an over arching management framework within which existing legislative mechanisms would operate.
		80	The Guardians do not believe the draft strategy emphasises fisheries issues above other issues. There are also major sections in the draft devoted to values of special significance, risks to the marine environment and establishing kaitiakitanga.
		191	The Guardians consider that recreational fishing pressure does have the potential to impact on sustainability of Fiordland's fisheries, particularly inside the fiords. If measures are not taken now a Marlborough Sounds situation could result. Adopting a conservative approach proposed in the strategy is therefore warranted.
1.5	Who provides support and advice?	No comments	
1.5.1	Independent assessor	No comments	
1.5.2	Agency support and advice	No comments	
1.5.3	Support for the integrated management strategy approach	No comments	

2	DEVELOPING THE DRAFT STRATEGY	131	The Guardians note the IUCN's recommendations made in 1986 on this issue, but do not agree that the fiords should be managed as part of the Fiordland National Park. Management of Fiordland's fisheries and marine environment by people from the area with local knowledge and experience supported by the relevant agencies is regarded as the most appropriate approach for the marine situation.
2.1	The process	73	The Guardians held several information meetings prior to finalising the draft strategy. The draft strategy represents the first phase of

		32	consultation. Although the process is based on formal consultation requirements it is informal and not a statutory consultation process.Formal consultation is likely to be part of the ongoing process.Although the phrase '40 m band' is not used, the band and its special
			features are described on p20.
2.2	Defining the Fiordland marine area of interest	No comments	
2.3	Gathering information	76, 105	The Guardians thank submitters for providing details of their observations on Fiordland's fisheries and marine environment. In many cases, similar material is already contained within an earlier document produced by the Guardians: A Characterisation of Fiordland's Fisheries.
		32	The Guardians would welcome the opportunity to access information held by Fiordland Ecology Holidays.
2.3.1	Fiordland's fisheries	73, 143, 213, option4 standard letter	 Several submitters believed that insufficient data on Fiordland's fisheries was presented to justify the measures proposed or to allow members of the public to make an informed decision. There were also concerns about the weight placed on anecdotal evidence in the absence of scientific data. The following factors are relevant to these concerns: The Characterisation Report and the Bibliography, referred to on p19 contain much information about fisheries and the results of research. The lack of information at the individual fiord level is outlined on p17. Accordingly, surveys of fishers with knowledge and experience from long years of observations in Fiordland were conducted to collect this information. The Guardians have successfully advocated several research programmes to complement observational data.
			In the meantime, trends over time have indicated that there is cause for concern. Accordingly the Guardians have adopted a cautious

			approach that is reflected in the proposed measures.
			Finally, the draft strategy needed to be a manageable length and this precluded an exhaustive presentation of information.
		32	The Guardians will amend bullet point 4 on p18 to clarify what is meant by 'Compiled customary management provisions'. The management measures and tools available will be mentioned.
		32	One of the research projects the Guardians successfully advocated was for the identification of recreational fishing patterns and harvest. The project was not successful because the methods of identifying fishers did not work in the Fiordland situation.
2.3.2	Marine habitats, species and communities	58	The Guardians do not agree that there is reduced emphasis on the diversity of Fiordland's marine environments, with less research and less information provided.
			Environmental research is ongoing, and the Guardians have raised the profile of this research within the wider Fiordland/Southland community through their advocacy and support of what has become the Fiordland Regional Marine GIS project being conducted by a member of the Guardians and others.
		6	The Guardians identified that there was a lack of baseline information on fiord habitats and biodiversity. This data is now being collected. The Guardians agree that the GIS project could help scientists and managers of the area determine the productivity and resilience of the ecosystems.
		6	The Guardians were concerned by the lack of information available on fish movement and population processes within and between the fiords. Please note that the Guardians have successfully advocated research into the movement of blue cod (p18).
2.3.3	Publications	No comments	

2.4	Defining "special nature"	58, 83	The Guardians' definition of what makes the Fiordland marine environment special was developed and adopted by the group. The group recognises that individual perspectives vary, and thus what people consider special or important will also vary.
		100	The Guardians have acknowledged that the Fiordland marine environment is special both within New Zealand and globally (p19).
2.5	Understanding fiord habitats	100	The Guardians agree that the terminology used in this section needs to be better defined. Productivity is used in a fisheries sense rather than a strict biological one. The real focus of this part of the document was to differentiate between the inner and outer fiord habitat types.
2.5.1	Inside fiord habitats	78, 100	The Guardians will build this information into the text, and make reference to the intertidal zone and recruitment processes. The group considers the phrase 'deep-water emergence' has been used in an acceptable manner.
		32	The sentence referred to appears to be the case for resident populations, but crayfish move in and out of the fiords.
2.5.2	Transition from inside fiord to entrance/outer habitats	No comments	
2.5.3	Outer coast habitats	No comments	
2.6	Identifying issues	No comments	
2.7	A holistic approach	Support	

3	THE DRAFT INTEGRATED	105	This suggestion does not recognise the gifts and gains philosophy of the Guardians, and thus is not consistent with the Guardians vision.
	MANAGEMENT STRATEGY:	58, 123	The Guardians' objectives are the cornerstone of their operations
	FISHERIES		and changes are not considered to be appropriate. The apparent intentions of the proposed alternatives or amendments are already an integral part of the strategy. Please note that marine reserves are
			not a fisheries management tool. The Guardians have adopted a

			cautious approach and support research into the identification of habitats that might be of particular significance for fisheries management. However, the Guardians suggest that protection of habitats such as nursery areas (beyond the measures already proposed) requires the development of criteria to define what is meant by a nursery area. Work to identify nursery areas that subsequently provide sources of recruitment inside the habitat lines is considered to be important. The strategy will be flexible on this point and can be adjusted as more information becomes available.
		143, 194	With regards objective 2, the Guardians consider that there is a risk of an expansion in the number of people harvesting, which would result in an increased total harvest. The Guardians note the comments made regarding recreational fishing rights and public involvement in the development of the strategy to this point. The draft strategy was developed for public submission, and was not available until it was launched in October 2002. Please see s1.3 above regarding recreational fishers representation.
		149	The Guardians agree that 'ensuring continued availability of the resource to both recreational and commercial fishermen must be a bottom line objective' – please see p24 of the draft.
		170, 189, 192, 201	The Guardians do not agree with the generalisation that commercial and illegal fishers are the main cause of depletion in Fiordland.
3.1	Top priority – local depletion	78	The way "serial depletion" is used in the strategy has been defined. Whilst depletion of particular fish stocks might be taking place from one fiord to neighbouring fiords, the Guardians are also concerned with the transfer of effort from one species to another within a fiord (as is the case in Doubtful Sound where harvesting Jock Stewarts is becoming more popular; p28). One of the primary objectives of the strategy is to prevent/reverse stock depletion whether this be species based or area based.

		32	The extent of a "local" area can vary from a restricted part of a fiord to an entire fiord. The Guardians have no information to suggest
			that Dusky and Preservation should be included as sounds where
			serial depletion has taken place, although the Guardians
			acknowledge that there has been an increase in fishing pressure
			within these sounds.
3.2	Information by fiord	5	Your comment is noted. The seal population is growing. Normally,
			seals target pelagic species such as red cod and squid. Movement of
			seals into inland lakes could be an adaptive change, with seals
			discovering new and preferred food sources.
		32	Available data is QMA-based, but data is required by fiord to best
		52	manage this area. The Guardians focused on collecting fisheries
			information from those actually fishing in Fiordland.
3.2.1	Gathering the	No comments	
	information		
3.2.2	Interpreting the	No comments	
	information		
3.3	Fish stocks and	123	The baseline state of Fiordland's fisheries is not unknown. The
	fisheries of the fiords		Guardians are working to restore and sustainably manage harvested
			fisheries - no fisheries in Fiordland can be considered virgin.
		145	The impact of commercial fishing on Fiordland's fisheries was
		145	discussed in the draft.
		192	There has been no commercial netting in Fiordland in the last five
			years.
		73	There is evidence of a decrease in productivity over time that is not
2.2.1			related to the productivity of the habitat.
3.3.1	<i>Features at the fiord level</i>	32	The Guardians note your comments.
3.3.2	<i>Features of the</i>	6, 13	The Guardians agree that depletion of particular fish stocks has the
	harvested species	-,	potential to affect species that feed on them. Research is underway

		6 78 32	 to look at these issues. However for fish stocks that are managed sustainably a natural mortality figure is built in to take into account species that feed on them. The Guardians share your concerns, and have advocated increased research into paua stocks in PAU5A. The Guardians agree with your comments on kina. The Guardians will change the wording of this section so that there is no ranking by 'vulnerability'. The isolation of Fiordland, and distance from ports and markets means that little commercial fishing for blue cod takes place and stocks outside the fiords are subject to very limited harvesting. The recapture of blue cod soon after tagging most likely indicates that populations move very little - a finding that is being reinforced by other research being conducted within the fiords. The Guardians agree that lobster can move into and out of the fiords.
3.3.3	Features of the harvesting groups	60	The Guardians will include in the strategy that Tangata Whenua are making a gift to Fiordland by a voluntary rahui on the issuing of customary fishing permits in this area.
		78	The <i>Characterisation</i> report contains details of the history of the blue cod fishery in Dusky and Chalky.
		32	Refer to the latest rock lobster plenary report for details of the stock rebuild. CPUE has increased. Thank you for your information on the historical state of the blue cod stocks.
3.3.4	Access	141	The Guardians share your concerns, leading to the 'no accumulation' proposals.
3.4	Grouping Fiordland's fisheries	No comments	
3.4.1	Milford and Doubtful Sounds	No comments	

3.4.2	Inside the rest of the fiords	32	This information comes from the observations of those living and working in the area
3.4.3	Fiord entrances and outer coast	No comments	
3.5	Defining habitat lines	33	 The Guardians accept that rock lobster abundance does not necessarily vary between the inner fiords and outer fiord/coastal areas because they are omnivorous and move between the two habitat types. However the habitat line concept is fundamental to the package of proposed measures, and does define productivity of the two habitats in terms of the other fisheries. The withdrawal of commercial rock lobster fishers would be considered as a significant gift to Fiordland.
		29, 105, 112	 Habitat lines are being positioned on the basis of habitat type so that management measures can be tailored to the different habitats. There is no basis for placing the boundaries in a straight line between the heads of each fiord unless the change from outer to inner habitats occurs at that point. Habitat lines should be defined by habitat features but in the case where there is a broad transition zone between habitats, the placement of the line could take into account safety issues for recreational fishers. Finally, although recent (unpublished) research indicates that the transition is, on average, around 5 km in from the entrance of each fiord, the Guardians consider it is preferable to define individual lines for each fiord. The ground-truthing trip was carried out in October 2002, and preliminary results have seen adjustments to the position of some habitat lines.
		32, 137	The Guardians agree that <i>D. antarctica</i> is found towards the head of Edwardson Sound and that there is an extended transition zone in Chalky Inlet.

			As discussed in the draft, the group confirms the most practical approach to placing the lines is to put them between distinct geographical features wherever possible.
3.6	A management approach for Fiordland's three fisheries groups	123	With regards objective 4 on p34, the word 'pressure' will be removed. Entrance areas will be protected by the package of proposed measures (e.g., reduced limits, no accumulation)
	institutes groups	32	The measures proposed by the Guardians are designed to curtail the impact of uncontrolled expansion. Fisheries management areas will be defined through the use of habitat lines, as discussed in the draft. Although the Guardians have considered each fiord individually when defining the location of habitat lines, similar characteristics and issues between fiords allow for a grouped management approach (s3.4).
		32, 123	In response to concerns about a possible increase in fishing pressure in the fiord entrances, the Guardians consider this to be unlikely because if conditions are suitable for fishing the entrances they will also be suitable for fishing on the outer coast, where better fishing is available. See comments in s.3 above regarding nursery areas.
3.6.1	Milford and Doubtful Sounds	No comments	bee comments in 5.5 doove regularing nursery areas.
3.6.2	Inside the rest of the fiords	37	This approach would not take into account the science involved or differences in habitat
3.6.3	Fiord entrances and outer coast	No comments	
3.6.4	Accumulation of daily fish possession limits	143	The accumulation provision is just a defence mechanism. Accumulation is only provided for under the amateur 'possession' provision. The Guardians will replace 'encourages' with 'allows' in the sentence 'The present accumulation regime encourages excessive harvesting of some species'. The Guardians will also acknowledge that not everyone abuses this defence mechanism. Examples of abuse and effects on localised fish stocks can be

			supplied.
3.7	Proposed management measures	16, 35, 38, 56, 61, 73, 135, 143	Opposition to various proposals is noted.
		4, 14, 19, 28, 38, 39, 42,	The Guardians remain committed to the habitat line approach, as
		57, 61, 64, 67, 73, 77, 81, 85, 95, 99, 102, 110, 117, 119, 123, 127, 138, 139, 141, 143	they believe that different management approaches are needed for inner and outer fiord habitats. The habitat lines highlight the fact that there are different fisheries, habitat and management issues from the head to the entrance of the fiords. Although enforcement
			of different rules may not be easy, successful prosecutions and education will cause the message to filter through to users over time, leading to a high level of voluntary compliance.
		103, 113	Encouraging fishers to take bait into Fiordland and other suggested charter practices are appropriate for inclusion in codes of practice – an important component of the proposals in the draft.
		141	Please note that escape gaps on rock lobster pots minimise the necessity of handling immature/undersized animals.
		38, 60	The Guardians will acknowledge customary harvesting controls in the strategy, and also that Tangata tiaki/kaitiaki have acted responsibly to date and will continue to do so. Tangata tiaki/kaitiaki are observing a voluntary rahui on the issue of customary fishing permits for the Fiordland area - their gift to Fiordland's fisheries and marine environment.
		33	The Guardians acknowledge that restricting commercial fishing to outer fiords and coasts will impact on those people currently fishing in Thompson or Doubtful.
		73	Please note that it is no longer generally accepted that the sustainable yield increases as the virgin biomass is fished down when a fishery develops. Inside the habitat lines in Fiordland, there may be little mixing between populations, and productivity is

		limited by the habitat. Thus it is unlikely that the sustainable yield increases with increased fishing pressure in this situation.
65,	, 73, 143	The Guardians explained in the draft that they are trying to manage both existing and possible future increases in fishing pressure. The group considers the conservative package of proposed measures will go a long way towards achieving this. Until monitoring and research results are available a conservative approach is warranted but this could be revised on the basis of positive results. It is possible that the removal of accumulation may discourage some fishers from visiting Fiordland, but the Guardians are committed to a 'fish for a feed' philosophy for Fiordland - there are other areas of the coast where people can go to fill a freezer.
6, 1	141	Concerns were expressed about the potential expansion of charter fishing activities. A combination of Guardians proposals and Coastal Plan limits should address this. The Guardians have reduced the impact of charter fishers through proposals affecting bag limits and accumulation. The Coastal Plan sets limits on surface water activity, and Environment Southland manages charter operators by way of consents.
32,	, 57	Commercial kina fishing is not economically viable in Fiordland at this time, but would be limited from the fiords inside the habitat lines.
58		A range of tools can be used to protect/manage Fiordland's fish stocks and fisheries. For instance, most measures proposed throughout the draft strategy will confer benefits on the fish stocks and fisheries. For this reason the whole of Fiordland can be regarded as a Marine Protected Area. Furthermore within a specific area management mechanism such as a taiapure, the committee could adopt a variety of risk-based management measures that allow flexibility over time. No risks are currently recognised for the

			outer coast, and given that marine reserves are not a fisheries management mechanism the Guardians consider there is no justification for a network of marine reserves on the outer coast to help maintain fish populations in adjacent fished areas. A staged reduction in commercial rock lobster harvest to rebuild the stocks has resulted in a reduction in rock lobster fishing operations along the outer coast. The Guardians have proposed a reduction in bag limits to manage any increase in recreational harvesting effort.
		73, 143, option4 standard letter, 150, 151, 180, 186, 188, 193, 196, 200, 205, 211, 212, 213, 231	This consultation process is likely to be followed by formal consultation in which case there will be opportunities and time for further input. All the information the Guardians have considered in developing the strategy could not be detailed in the draft. The Guardians have developed their strategy for Fiordland because they consider action is needed in the short term and do not wish to delay until recreational rights are defined - sustainability issues need to be addressed or recreational fishing opportunities may be further compromised.
		221, 227, 236	Several submissions contained suggestions such as banning trawlers from inshore fishing. These comments may be valid in other coastal areas, but are not relevant in Fiordland. Trawling does not occur close to the coast in Fiordland. The Guardians recommend that all submitters read the draft strategy for a summary of the Fiordland fisheries (available on www.fiordland-guardians.org.nz)
3.7.1	Milford and Doubtful Sounds	60	The wording of this section will be amended to include a subsection on customary fishing.
		35, 38, 73	Opposition to the rahui is noted, but this is a sustainability issue. The Guardians also note concerns about a possible extension of the rahui without monitoring the effects of such a change. The Guardians intend that the effects of the proposals would be monitored following implementation.

		73, 99	The Guardians considered suggested amendments to the measures proposed for the inner fiords, but decided against changing proposals in the draft strategy because they would either
3.7.2	Inside the rest of the fiords	60	The wording of this section will be amended to include a subsection on customary fishing.
		32	One submission stated that the Deep Cove Outdoor Education Trust should reassess the necessity to offer important first fishing experience. The Guardians consider the Trust offers children valuable lessons about conservation in Fiordland and their philosophy with regard to fish and fishing is responsible.
		32	Individuals fishing from charter vessels will be subject to the same restrictions as other recreational fishers. Reduced bag limits and accumulation provisions should encourage charter boats to fish outside the fiords when possible. A code of practice is proposed to inform and reinforce conservative fishing practices.
		32	The strategy is intended to be a flexible, living document. If fish stocks are abundant, bag limits could be raised.
		32, 35	The Guardians considered suggested amendments to the proposed bag limits for Milford and Doubtful, but decided against changes to the proposals detailed in the draft.
		113	There will be further opportunities to discuss the proposed rahui during formal consultation.
		123	The Guardians do not think the rahui should be extended outside the habitat lines, as this would introduce a line in addition to the habitat line. Such an extension would also have safety implications for recreational fishers and would compromise the balance of gifts and gains. Reduced bag limits and accumulation provisions will protect the outer fiord area

			compromise the balance of gifts and gains or be too complex to implement.
		32	See 3.7.1
3.7.3	Fiord entrances and outer coast	60	The wording of this section will be amended to include a subsection on customary fishing.
		53, 68, 83, 105	The Guardians considered suggested amendments to the measures proposed for fiord entrances and the outer coast, but decided against changing proposals in the draft strategy because they would either compromise the balance of gifts and gains or be too complex to implement.
		135, 143	Opposition to the bag and tag requirement is noted.
3.7.4	Measures that apply both inside the fiords and along the coast	18, 32, 38, 54, 57, 58, 61, 123, 134, 137, 141	The Guardians considered suggested amendments to the proposed measures, but decided against changing the proposals detailed in the draft because they would either compromise the balance of gifts and gains, or were too complex to implement. The Guardians agreed, however, to include sea perch (Jock Stewarts) in the total bag limit and will incorporate this into the final strategy.
		15, 19, 21, 28, 39, 42, 55, 64, 65, 67, 69, 93, 98, 102, 110, 117, 123, 125, 127, 137, 138, 139	Many submissions contained concerns about the continued use of recreational rock lobster pots in the fiords. These pots are small and light, and use in the fiords is limited (most people dive for rock lobster). Furthermore very sensitive areas such as the china shops will be protected. The Guardians consider that the effects of 3 pots/boat will be negligible, but will revisit this issue if it becomes apparent that recreational pot use is a problem.
		24, 123	Concerns were also expressed about the continued use of cod pots in the outer fiords. The Guardians are only aware of one cod pot currently in use by recreational fishers in Fiordland. Although there is currently no demonstrable effect of cod pot use in the outer fiords this issue will be monitored.

		123	With the exception of rock lobster, there is no provision in the draft for accumulation within Fiordland. The accumulation limit proposed for rock lobster reduces the current limits by more than half.
		18, 24, 54, 58, 61, 67, 138, 142	The strategy is intended to be a flexible, living document. Catch limits will be reviewed according to the results of monitoring.
3.7.5	Storing rock lobster and holding (coff) pots	21, 26, 29, 33, 56, 58, 74, 123, 137 3	Storage areas are not accurately designated on the maps - this will be corrected in the final strategy. An explanation will be added to the strategy to clarify that storage is unlikely to affect biodiversity because the areas in which pots are stored are characterised by high freshwater concentration and sand/mud substrates. Pot storage will be restricted from china shops, but may take place on sandy substrates in restricted parts of representative areas (see draft). The CRA8 Management Committee is developing a code of practice to manage pot storage. The identification/charting/licensing of pot storage areas for navigation safety is a Coastal Plan issue. The Guardians recommend the development of a code of practice for the storage of commercial pots to minimise the visual impact of floats and navigational risks.
3.8	Package of fisheries measures – for the fish and the environment	32	Dealt with in s3.7.4.

4	VALUES OF SPECIAL SIGNIFICANCE	123	The Guardians' objective is broad and inclusive of other more specific objectives. The Biodiversity Strategy is a government initiative focused solely on biodiversity outcomes. In contrast, the Guardians draft strategy presents a negotiated balance between a range of values/uses that will all have positive outcomes for biodiversity.
4.1	Information gathering by fiord	58, 123, 137	The Guardians note the information provided

		14	The existing marine reserves are briefly mentioned in section 4 of
			the draft.
4.2	Identifying values of special significance	100	The need to recognise nursery areas is a very general statement and the Guardians consider the development of definitions and criteria are needed. Work to identify nursery areas that subsequently provide sources of recruitment inside the habitat lines is considered to be important.
		24, 28, 41, 61, 100, 102, 123, 133	Marine mammals are referred to in the draft. Marine mammal and Fiordland crested penguin habitats are/will be managed by the Fiordland National Park management plan, DoC and ES. DoC is responsible for marine mammal research and concerns should be directed to them.
4.2.1	"China shops"	5	The Guardians agree, and will express this concept in the risks section of the strategy.
		112	The Guardians have proposed a package of management measures for the express purpose of looking after fisheries (see S3). The primary purpose of china shops is to protect the special values contained within those areas from all identified risks.
		28	The Guardians disagree with your comments about the proposed china shops. The proposed package uses a range of mechanisms to protect fisheries and the environment. Representative areas complement china shops, thus addressing your concern.
		49	Your opinion is noted. The Guardians have defined the scales at which they are working in the draft.
		123	The Guardians will change the wording used in this section to better clarify the values exhibited within the china shops, including biodiversity.
		1, 6, 21, 24, 32, 57, 58,	

		77, 110, 123, 137	The issue of whether or not to identify the location of china shops has been the subject of extensive debate. In balance, the Guardians consider that the risks associated with not identifying these areas (e.g., inadvertent anchor damage and increasing diver knowledge of their location) are greater than those associated with identifying them. They agree that it is important not to encourage increased activity that could lead to damage. Management mechanisms must be selected on the basis of controlling realistic risks. Codes of practice tailored to each china shop have also been proposed.
4.2.2	Representative areas/fiords	100	The Guardians decided against using 'sensitivity to population collapse' as a criterion for representative areas, because such areas are possibly better managed using other tools (e.g., rahui). See section 3 for reference to nursery areas.
		112	This is a matter of scale – the Guardians await definition of 'representative' in the legislation before altering the scale at which they have identified representative areas.
		32	The Guardians will provide more explanation of the sentence 'Rather than focusing on special values, the group decided that representative areas would provide a more useful basis for advancing the Guardians' objective' to show how the Guardians thinking on these issues evolved.
4.3	Identification and description of china shops	65, 81, 103, 112	China shops are very specific sites, where the extent of the special features defines china shop size. The Guardians will revisit the issue of whether a 'buffer zone' is required around each special feature.
		114	The Guardians agree with your comments about the proposed codes of practice.
		100	The Guardians will consider a 'blanket rule' for the china shops when discussing management strategies.

		1, 21, 24, 58, 77, 100, 103, 110, 114, 123, 137	The Guardians will give further consideration to a range of marine protection mechanisms for managing the china shops. Identification of china shops will be ongoing.
		58	The Guardians will clarify/explain anchoring in Precipice Cove and 'offshore navigational hazard' at Common Head in the strategy. The Cove is the anchorage, not the sill, and anchoring on the sill would be prohibited. The offshore navigational hazard is a rock identified by a South Cardinal Mark.
		65, 123	The Guardians intend to match the best management mechanisms to the risks identified for each area. The Guardians believe this is the most appropriate approach to managing Fiordland's fisheries and marine environment.
		123	A map of the fiords showing anchorages is a good idea. Permanent moorings would have to be maintained, their placement would have to be consistent with the Coastal Plan and would be subject to resource consent processes. The Guardians will consider the best places for anchoring near china shops.
		32	R. Haydon's research on 'Diver Impacts on Benthic Species Composition in Doubtful Sound, Fiordland' has been considered and is in the bibliography.
		123, 14, 27, 41, 49, 50, 58, 69, 81, 93, 109, 110, 116, 140	Tricky Cove has been identified as a china shop. Currently scientific reserve legislation is land based and reserves are restricted to the land. To extend the concept into the marine environment would require a legislative change to be processed through parliament. The group considers that existing marine provisions (including the new marine reserves legislation once it is finalised) will be more appropriate for Tricky Cove than an extension of land based legislation.
4.4	Identification and	1, 3, 4, 5, 6, 14, 15, 19,	The Guardians have considered your comments. They note the

5	RISKS TO THE	112	Noted. This will be clarified. Some risks are being researched and
	MARINE		mapped by the agencies and this will be available for inclusion into

	ENVIRONMENT		the GIS risk layer
5.1	Identification of potential risks	32	The number of cruise ships visiting Fiordland decreased in the last year. Cruise ship activity is controlled by Environment Southland and the Maritime Safety Authority. Seven years developing the integrated management strategy for Fiordland's fisheries and marine environment represents a huge voluntary commitment on the part of the Guardians. During that time they have also made submissions on consents. Furthermore, the draft strategy is 'one of the many documents currently being used by ES in granting of consents'.
5.2	Bioinvasion	32, 78	Details will be added.
5.2.1	Where's the threat coming from?	No comments	
5.2.2	What's the impact?	78	Noted, will add further detail.
5.2.3	Hull fouling/cleaning	32, 65 65, 78 32	 How to enforce/achieve hull inspection is the subject of ongoing initiatives from other organizations, and will be part of the protocols that the Guardians will look to develop with ES and DoC. Will add detail to strategy and code of practice. The Deep Cove slipway is generally only used for maintenance and emergency work - not defouling. The Guardians view is that people
			should have their hulls cleaned outside of Fiordland.
5.2.4	Ballast water	32	The Guardians accept this, and believe education is the main way to minimise this risk.
5.2.5	Minimising the risk of bioinvasion in Fiordland	24	The Guardians consider that it is not practical to ban helicopters activities unrelated to management practices
5.2.6	Risk surveillance	Support	
5.2.7	Action on detection	65	The Guardians agree that a ready reaction response plan is needed
5.3	Pollution	15, 24, 67	Noise pollution is the responsibility of Environment Southland but it will be noted in the strategy.
5.3.1	Oil spills	32	Will correct the information contained in this section of the draft, and will amend the wording to reflect the Guardians' concern about

			oil spills anywhere in Fiordland. The MSA and ES are currently
			developing contingency plans to deal with oil spills in Fiordland.
5.3.2	Sewage	32	Will correct the information contained in this section of the draft. Environment Southland's Coastal Plan deals with sewage treatment
			in detail. The Guardians are not a research organisation but could identify the need for research into the effects of sewage on the marine environment
		58	The Guardians agree that education should be used to minimise
			discharge from recreational vessels.
5.3.3	Rubbish	141	Noted, but sometimes burning a limited amount of rubbish in drums on the shore is the most practical option.
		32, 58	The Guardians advocate a 'carry in, carry out' policy in the draft and believe that users should be educated to minimise rubbish.
		58	The Guardians are as active as their resources allow in the case of resource consents. See comments in s5.1.
		93	The Coastal Plan already covers the prevention of rubbish dumping on the shoreline.
		32	The Guardians will amend the strategy so that it does not advocate rubbish disposal facilities at access points.
5.4	Physical damage	65	The process used by the Guardians to develop this integrated management strategy is very similar to the model described.
5.4.1	Structures	114	This information will be added into the strategy.
		58	The Guardians are as active as possible in the case of resource
			consents as their resources allow. See comments in s5.1
5.4.2	Ships' wakes	No comments	
5.4.3	Land slips (possums)	14, 32, 58, 117	The Guardians disagree that deer are more of a problem than
			possums. They will, however, remove '(possums)' from the title,
ł			because they acknowledge that there are many other factors that
			could contribute to landslips. The statements in the draft about

			possums were based on local knowledge and DoC advice.
5.5	Altered flow/sediment dynamics	64	The Guardians note your concerns.
5.5.1	Power generation/sediment dynamics	141	Crayfish eggs held in freshwater do not survive.
5.6	Impact of increasing access (people) on wilderness values and visitor expectations	6, 13, 101, 137	Concerns about adverse effects on the marine environment of divers and anchoring will be addressed through codes of practice and education, as discussed in the draft.
		67, 100, 101	Eco-tourism activities are controlled under the Coastal Plan.
		50, 105	MFish is currently assessing the environmental impact of fishing methods.
		73 13	The Guardians' strategy contains provisions relating to the commercial travel sector - if fishing takes place this is subject to the fisheries proposals, sewage, rubbish and bioinvasion etc is subject of the proposals in the risks section and the special values are protected by proposals in that section.
		32	There is a maintenance issue associated with permanent moorings - rust is a big problem.
		32	Comments relating to the draft Fiordland National Park Management Plan are noted.
		58	 Please outline how Guardians intend to support initiatives to address the issue of increasing access. The Guardians are aware that Environment Southland and DoC are working on access issues and the group has offered to provide whatever expertise might be helpful. The strategy should advocate for restrictions on access to areas that have high values due to special features or a high degree of

			naturalness. It may be necessary to prohibit certain types of access (e.g., flying boats in by helicopter) in some areas. The Guardians' approach is to minimise the effects of activities on Fiordland's fisheries and the marine environment. The package of management measures includes proposals targeted at a range of different users.
6	EXPRESSING KAITIAKITANGA	60	The macrons will be inserted appropriately.
		187	There are clear definitions for Tangata Whenua and customary fishing rights in legislation to which NZ born Europeans do not conform. Customary rights belong to the Tangata Whenua who, for a particular area, are the iwi and hapu who hold manawhenua manamoana over that area.
		235	Your term "Urban Maori" is undefined, however, we reiterate that customary rights are inherited rights that belong to the Tangata Whenua for the area concerned (in the case of Fiordland this is Ngai Tahu Whanui) not Maori as a racial grouping.
6.1	What is kaitiakitanga?	91	The Guardians will correct the wording in the strategy. In order to conform to the provisions of the Te Runanga o Ngai Tahu Act 1996, this section of the strategy will make reference to Ngai Tahu Whanui (who are defined under the act as the primary hapu of Ngai Tahu, Kati Mamoe and Waitaha).
		6	The Guardians consider that the integrated package of tools designed according to a "gifts and gains" philosophy provides the best opportunity for sustainability of Fiordland's fisheries and marine environment
6.2	How is kaitiakitanga provided for in legislation today?	Support	
6.3	Ngai Tahu's association with the	14	As stated in the strategy, the material quoted in Appendix 3 is derived from the Ngai Tahu Claims Settlement Act 1998. The Ngai

	Fiordland coastal marine area		Tahu Whanui members of the Guardians wish to point out that the recognition of Ngai Tahu Whanui's long and intimate relationship with culturally significant areas such as Fiordland was a fundamental component of the settlement act. The traditions and histories in Appendix 3 do not make the claim that Ngai Tahu Whanui know every tree and rock in Fiordland - they are merely a simple account produced from what is known of this early association with Fiordland through oral traditions and archaeological evidence.
		85	We would request that the submitter read Appendix 3 and if they require further information to contact Oraka Aparima Runaka for a reference list. Ngai Tahu Whanui have had an association with Fiordland, through a migratory life-cycle, for over 800-1000 years. This clearly constitutes a significant tradition.
6.4	Expressing kaitiakitanga in Fiordland's coastal marine area: whose role is it?	58	The Guardians consider that the integrated package of tools designed according to a "gifts and gains" philosophy provides the best opportunity for sustainability of Fiordland's fisheries and marine environment.
6.5	How can kaitiakitanga be appropriately expressed in Fiordland?	112	The entire Fiordland area is of particular cultural relevance and special significance. Should the Guardians implement the strategy using a taiapure as the overarching tool then boundaries for this mechanism will be defined. The Tangata Whenua have yet to identify areas within Fiordland that may be suitable for mataitai.
6.5.1	Taiapure	1, 4, 9, 14, 24, 25, 38, 39, 41, 42, 49, 58, 69, 77, 80, 81, 85, 91, 93, 102, 111, 123, 127, 137, 138, 139	 Submissions registered opposition/concerns to the use of an overarching taiapure for a number of reasons including: taiapure should only be for small areas the use of taiapure implies preferential access for Maori the legal process surrounding the management of taiapure is dubious/weak/non-transparent taiapure exclude marine reserves taiapure do not provide sufficient protection taiapure should not be used because of the national and

international significance of Fiordland
The Guardians note that the views of some submitters are incorrect. Taiapure is a suitable mechanism for co-ordinating the fisheries management mechanisms of the strategy, and will be considered further.
Pursuant to the customary/aboriginal rights guaranteed under Article Two of the Treaty of Waitangi ("full, exclusive and undisturbed possession of theirfishery"), Tangata Whenua have always had preferential access to the fishery. However, since the arrival of the whalers and sealers in the takiwa (tribal domain) of Ngai Tahu Whanui, they as Tangata Whenua have always been willing to share this resource with others - Ngai Tahu Whanui see this as part of their obligation to manaaki (to care for or show hospitality to) those within their tribal domain.
The Guardians refer submitters to s174 of the Fisheries Act 1996 for further information on the legal framework surrounding taiapure. The application process for taiapure includes clear public consultation provisions. The Guardians strategy would form the basis of the management plan that would be developed for the taiapure. Oraka Aparima Runaka has stated that the principles on which a taiapure committee was based would reflect the principles of the Guardians committee. Such a taiapure committee is consistent with the "gifts and gains" philosophy of the Guardians.
The Guardians propose to implement the strategy in an integrated manner so that taiapure and marine reserves can both be established. The strategy describes an integrated mix of tools to look after the entire fishery and marine environment in Fiordland.

7	IMPLEMENTING	73	Because of the integrated nature of the strategy the provisions need
	THE STRATEGY		to be implemented together to retain the balance of gifts and gains

			negotiated.
		105	The Guardians agree that an inter agency approach is the most appropriate way of progressing the strategy given that the package of measures crosses agency boundaries.
		114	A summary of the management package will be included in the revised strategy.
		103, 138, 143, 212	Where possible, the process and timelines will be specified.
		143	The Guardians have identified specific threats to sustainability and future scenarios are specific. The public's right to fish for food is inherent in the strategy but sustainability concerns need to be dealt with in a timely manner. Information requirements have been identified and fulfilled over the seven-year period the Guardians have been developing the draft strategy.
7.1	The balance negotiated between groups	38	The Guardians will clarify customary harvest details in s3.7.1-3.7.4 of the strategy (see comments under s3.3.3 above).
		56	Your comments are noted.
		58	If government decides to progress the strategy, formal consultation will be a part of the process.
		32	The Guardians consider the balance reached will provide for sustainable fisheries and habitat.
		108	A series of information and feedback meetings held by the Guardians revealed local opinion to be generally very supportive.
		143	While the details may change, the Guardians believe that the overall balance must remain. The Guardians have consulted with an open mind. Implementing the package as a whole does not imply

			inflexibility, rather one major component cannot be implemented without another because the balance of gifts and gains will be compromised.
		143, 151, 159, 176, 178, 180, 185, 208, 222	The Guardians do not agree that the proposals are biased against recreational fishers in comparison with commercial fishers. Commercial fishers are also making substantial gifts in the interests of fisheries and the marine environment. Refer to section 3 of the draft for further details.
		143, option4 standard letter, 150, 151, 186, 188, 200, 213	The Guardians are a voluntary organisation with limited resources. Despite this they held information meetings throughout Southland/Otago prior to the release of this draft strategy. Although informal, this submission process is very substantial. If government progresses the strategy there will be further opportunities for making input, and for the NZRFC, NZBGFC and option4 to be involved.
7.2	Over-arching co- ordination of existing legislative provisions	6, 103, 114, 133	In finalising the strategy the Guardians will define the links between relevant legislation.
		94	The Guardians considers a Fisheries Plan is too restrictive to achieve their integrated management strategy objectives (see s7.2, p65)
		114	The strategy refers to the GIS in sections 2.3.2, 3.5 and 9.2.1.
		25, 58, 80, 92, 120	Individuals and organisations based outside Southland/Otago will have another opportunity to provide their views if the strategy is progressed.
		81	For an integrated management strategy, fisheries and environment measures must be progressed together as a package.
		49	The Guardians are aware of this, and these powers will be used

			where necessary.
		32	The reference to corals in the draft related to souvenir hunting by New Zealanders.
		137	The Guardians will consider the Great Barrier Reef legislation.
7.2.1	Taiapure		See section 6.5.1 above
			It is clear from the comments received that this section of the draft requires clarification of what is intended by 'over arching' and how the use of taiapure, marine reserve and other legislative provisions could be complementary.
7.2.2	Special legislation	20, 27, 32, 48, 49, 58, 65, 84, 85, 92, 93, 105, 106, 116, 119, 121, 123, 124, 127, 131, 134, 137 (F&B options)	There was considerable support for the use of special legislation, many comments suggesting that a Fiordland Marine Park be created. The Guardians proposals could be implemented using special legislation (as outlined in the draft) that would accommodate all interests. Another suggestion was that the National Park legislation be altered to allow the inclusion of marine areas. Adapting land based legislation for the management of the marine environment is not considered appropriate when there is already a range of marine based legislation available. Tailoring overarching special legislation to integrate existing marine based legislation is regarded as a much more finely focused solution for the marine environment than having parliament deal with the complexities of extending National Park legislation. There are also serious implications for harvesting and other uses under this scenario.
8	COMPLIANCE OF THE STRATEGY	32	The Guardians disagree. The commercial fishermen in Fiordland have demonstrated that voluntary compliance can work, both in terms of complying with the rules and providing information about illegal activities.

8.1	Compliance needs in Fiordland	114	The content of this section will be corrected accordingly.
		33, 61	The Guardians agree that the public support is required to achieve an acceptable level of compliance. It is very important that the management measures be seen to be achieving a worthy goal.
		33	It is important that the boundaries are clearly identified and identifiable. The intention is that they be adequately marked.
		32	The enforcement role is discussed in the draft strategy.
		176	Campaigning for tougher penalties for those who break the rules would have to be an initiative for the future – this is a nationwide issue.
8.2	The fundamentals of compliance	31, 32, 33, 49, 133, 215 (and see habitat line comments in S 3.7 above)	Several submissions expressed concerns about setting fishing rules without adequate enforcement and questioned how effective voluntary compliance can be. Although the Guardians feel that such concerns are valid, the approach taken to compliance in the draft strategy incorporates both encouragement by information/education and deterrents by the threat of prosecution. Support was expressed for this carrot and stick approach.
8.3	A support role for the Guardians	No comment	
8.3.1	Informing and educating fishers and other users about the	30, 56, 58, 66	The Guardians agree that education is vital. These issues are already discussed in the draft strategy.
	management package	6	The issue of applying a levy to all visitors to the fiords is outside the scope of this strategy. ES already levies some visitors. The Guardians do not support licensing of recreational fishers.
		32	Codes of Practice, pamphlets and signs would be funded as part of a combined Agencies/Guardians initiative.
8.3.2	Being the eyes and ears on the water	54, 33	The Guardians agree that the MFish presence in Fiordland is not high. Targeting reported cases of non-compliance is the most

			effective way to use the compliance resources available. It is therefore vitally important that observed cases of illegal activity are
			reported promptly to the relevant agency.
8.3.3	Supporting enforcement action	78, 100	MFish is currently rationalising numbers of honorary fishery officers (HFOs) because of OSH implications for those working alone. It is possible that agency workers could share compliance roles (e.g., DoC staff warranted as HFOs if acceptable to DoC employer). The Guardians advocate collective action in the strategy.
8.4	Local knowledge and compliance planning	No comment	

9	MONITORING THE PERFORMANCE OF THE STRATEGY	103, 138	Monitoring timeframes cannot be adopted until the strategy has progressed further.
9.1	Indicators	Support	
9.1.1	Fisheries indicators	32, 141	MFish funded projects on recreational and charter fishing and movement of blue cod are all relevant as indicators of fisheries.
			Part of the MfE funded Fiordland Regional Marine GIS Project currently underway in Fiordland is to provide baseline information that, in the longer term could be used to examine changes in fish stocks as a result of management changes.
9.1.2	Values of special significance indicators	Support	
9.1.3	<i>Risks to the marine</i> <i>environment indicators</i>	No comments	
9.1.4	Expressing kaitiakitanga indicators	No comments	
9.1.5	Overview indicators	No comments	
9.2	Measuring indicators	No comments	
9.2.1	Baseline information	58	Baseline information is information gathered at a particular point in time with which comparisons can be made at some later time. Comparisons between areas can also be useful whether they be managed as harvested or no harvesting areas. The Guardians will

	amend the wording to clarify that GIS is a tool, and ackn that angeing data collection is needed if the CIS is to play	U
	that ongoing data collection is needed if the GIS is to play monitoring.	a role in

10	IMPLEMENTATION	5	The role of the Guardians has yet to be determined.
	AND BEYOND –		
	WHAT ROLE FOR	32	If an advisory/management committee is set up after the strategy is
	THE GUARDIANS?		implemented the method of selecting members of such a committee would depend on the form of the advisory/management committee.
		78, 126, 18, 54, 61, 142	The Guardians will emphasise that the strategy is a living document that should be refined and modified as more information becomes available.
		103, 126	The Guardians resources are currently being invested in producing the integrated management strategy. Funding newsletters, etc to keep members of the public informed of progress is unfortunately not an option. However, this information will be posted on the Guardians website:
			<u>www.fiordland-guardians.org.nz</u>
	Appendix 1	No comments	
	Appendix 2	103, 113	The tables will be corrected.
	Appendix 3	60	The macrons will be inserted appropriately. The Guardians will also make it clear at the start of this appendix that the statutory acknowledgment was part of Settlement Act.
	Appendix 4	No comments	

		33	CRA8
Submission number	Name	34	Carol Middlemass
1	Karli Thomas	35	Robin Wilson
2	Rose Grindlay	36	Terry Inder
3	Peter and Iris Tait	37	Phil Wornall
4	Timothy John Langlois	38	Glen Darragh
5	Ken Swinney	39	Betty Kennedy
6	Chris Paulin	40	Chris O'Connell
7	Brigitte Nohl	41	Jane Marshall
8	Scott Mieras	42	Ann and Basil Graeme
9	Audrey Eagle	43	Stephen Ross McFaul
10	Wade Doak	44	Marie-Therese Griffin
11	Ross and Debbie Baird	45	Craig Barrow
12	Frank Wells	46	Mark Hosie
13	Graham Metzger	47	Mary Hosie
14	Barry Dunnett	48	Gillian Pollock
15	Jocelyn Bieleski	49	Murray Gavin
16	David Excell	50	Rowland H Taylor
17	Roger and Ruth Tuck	51	Norma J Hopkirk
18	Warren Ayers	52	Alan Emmerson
19	Kevin Collins	53	B Winseski
20	Jock and Alan Hughes	54	Barbara Traynor
21	Sue Bennett	55	Glanys Mather
22	Allan Remnant	56	W Hansen
23	Sandie and Mike Legge	57	Edith B Jones
24	Mark Fort	58	Paul Star
25	Dr Philip Hart	59	Jeremy Cooper
26	Garth Haggerty	60	Te Runanga o Ngai Tahu
27	Christine Thomasen	61	Nigel Lamb
28	Karsten Schneider	62	Karl Shepherd
29	Greg West	63	Lynne Dempsey
30	Cameron Miller	64	Chris Henderson
31	R W Cunningham	65	Wendy Nelson
32	Ruth Dalley and Lance Shaw	66	Julie M Campbell

67	John Carter	101	Barbara Woods
68	Colin Stevenson	102	Jenny Treloar
69	Jenny Campbell	103	Perry Ferguson
70	Garth McCone	104	Brian Edward Scully
71	Anne McDermott	105	Graeme Loh
72	Cliff McDermott	106	Muriel Clark
73	Jerry Freeman	107	G W Coulter
74	Craig & Susanne Smith	108	Miriam Collinge
75	Graham Bishopp	109	B J Hilder
76	Graham Falla	110	G Vincent
77	K Roberts	111	Roger T Austin
78	John B Jillett	112	Franz Smith
79	Karli Thomas	113	Deep Cove Hostel Trust
80	Paul Star	114	Bronwyn Archibald
81	Craig Carson	115	D A Wernham
82	Brent Thorpe	116	Delcie B McKenzie
83	R Neil Sutherland	117	Geoff Doring
84	J B Marsh	118	Andrew Dennis
85	M Peace	119	Beverly Woods
86	Jim Pickett	120	Keith Beauatraes
87	Jill McDowell	121	John L Turnbull
88	Phil McDowell	122	George Ryan
89	Alison Varcoe	123	Sue Maturin
90	Russell Varcoe	124	Rick Barber
91	Ken McAnergney	125	Bernadine Bourke
92	Kelvin Lloyd	126	Mike Saunders
93	Fraser Ross	127	Scott and Dinah Dunavan
94	Bruce Chapman	128	Neale Sutherland
95	Pat Fitzgibbon	129	S L Westgate
96	Alison Gibbs	130	Z Grammer
97	Michael Skerrett	131	Barry Weeber
98	Christine Grove	132	Judith Kissell
99	Allan McMillan	133	Daphne Taylor and Bill Gibson
100	Paul E Brewin	134	Stephen Logie

135	David S Ryan	169	Cameron Tapper
136	Paul Star	170	Neil Robert Sheppard
137	Andrew Penniket	171	Alan Hammonds
138	Meg Graeme	172	Paul Thompson
139	Meg Graeme	173	David Alan Wadman
140	Spencer L Drinkwater	174	Micahel J Gavin
141	Ernie and Jenny Cave	175	Chris Anderson
142	R A Meikle	176	Kevin Richards
143	Scott Macindoe	177	Terry Agate
144	Eric Jones	178	John Barker
145	Bruce Newmark	179	Warren Fountain
146	Anthony John Baylis	180	Stephen Cox
147	P Gillmore	181	Pieter Battaerd
148	Hayley Mills	182	Richard Johnstone
149	Cam Calder	183	Michael Wilson
150	Peter Groves	184	Gordon Mann
151	Trish Rea	185	Derek Brooker
152	G A Head	186	Graeme Clinton
153	Debbie Murphy	187	Dale Simpson
154	Yvonne McNabb	188	Bruce Underwood
155	John McNabb	189	Rewi Kemp
156	Richard David Ward	190	John Eric James Morman
157	R Saunders	191	Fraser Wilson
158	Annette Bates	192	Fraser Heaven
159	Judy Gilbert	193	David Manson
160	Patrick Innes	194	M W Hamblin
161	Trish Rea	195	Graeme Bell
162	Graeme W Holder	196	Brenton Mills
163	Leslie Einar Smith	197	Bryce Strong
164	Les Marinkovich	198	Ian Greig
165	Ron Gill	199	Glenn Beaumont
166	Norman & Angela Lloyd	200	Paul Matthews
167	Paul O'Reilly	201	Chris Briggs
168	Peter Rivers	202	Alan Gow

203	Bruce Catley	237	Ernest Welthagen
204	Grant Hudson	238	Bruce Hopper
205	L S Cooper	239	Robyn Bell
206	Chris Wilkins	240	Jimmy Simm
207	Brian Swale	241	Ken Spencer
208	Brett Oliver	242	Brent Kennedy
209	Neven Daniel	243	John Gould
210	Peter Blake	244	Chris McCartney
211	Donald Robert Meers	245	Kevin L Andrews
212	Ian Robert Buchanan	246	Kevin Slattery
213	Graham Dixon	247	Peter Campbell
214	Bob Hudson	248	Shane Campbell
215	Derick Heath	249	Phillipa Campbell
216	Kerren Packer	250	Martin Howard
217	Terry Bailey	251	Morri Andrews
218	Andrea Henderson	252	Geoff Dunne
219	Gavin Perris	253	Keith Hammond
220	Murray Robson	254	Tim Elley
221	Robert Bedford	255	Don Morrison
222	A A Hosking	256	J Perris
223	Barry Gray	257	Ian Balckmore
224	David Henry	258	Mike Barnes
225	Ric G D Dawick	259	Zainol A. Harun
226	Barry Elliott	260	Allan Dyer
227	Donald James Marshall	261	Wise Malcolm
228	Gavin Dann	262	D Adams
229	John Samman	264	Lawrence Haggart
230	Gary Smith	265	Mark Tauroa
231	Greg Arnold	266	Jerry Thorp
232	Peter White	267	Ken Phillip
233	Barry Wah Lee	268	John King
234	Richard Archer	269	D Goile
235	John Parker	270	Keith McLeod
236	Gary McGuire	271	Kevin O'Donoghue

272	Barrie Wickins	306	Fiona Brown
273	Denise Wickins	307	Jeremy Harness
274	Ben Wickins	308	Roderick Russell
275	Lydia Wickins	309	Alistair Parsons
276	IGM Wickins	310	Matthew Williams
277	Dave Goble	311	Barry Jaggar
278	Derek Gunn	312	Michael John Salisbury
279	Ewen Darling	313	Luke Daniel Wintle
280	Ken Pomeroy	314	Peter Alderton
281	Peter Ryan	315	Maarten Nieuwland
282	Mark Hemingway	316	Chris Munro
283	S F Sim	317	John MacMillan
284	Andy Wood	318	Warren Ladbrook
285	P Donnellan	319	Michael John Ward
286	Christine Nicholson	320	Brett Nicholson
287	Phil Moore	321	Ray Weston
288	Philip B Hawke	322	D C Kimpton
289	Greg Percy	323	Martin Smith
290	Gavin Harford	324	Adrian King
291	Keith Wilson	325	Mike Winter
292	Graham Little	326	Karen Burgess
293	Mark Roche	327	Mark Munro
294	Graeme Drewery	328	David Westwick
295	John Perris	329	Bob Maria
296	Lynne Perris	330	Greg Innes
297	John Balderston	331	Gerald Roos
298	Neil Westbrooke	332	Ken Lees
299	Nigel Snow	333	Nick Hekkens
300	D Rubie	334	Stewart Maclaren
301	Paul Rae	335	John Warren
302	Rodney Bosson	336	John Warren
303	Wayne Williams	337	Stephen Carter
304	Richard Barnett	338	Stephen Carter
305	Allan Sizemore	339	Korina Carter

340	Ian Masefield	374	Roy Gould
341	P D Cooney	375	Shayne Winter
342	Geoff Ward	376	K H McMillan
343	Waimaki Rangihuna	377	Steve McConnell
344	Miles Bland	378	Paul Heard
345	Martin Arrell	379	Peter Murphy
346	D Dorrington	380	David Theobald
347	John MacKinder	381	Neil Payne
348	Malcolm MC Whannell	382	Paul Matthews
349	N W Laurence	383	G S Mackie
350	Raj Rughunanan	384	Brett Manu
351	Tony Pike	385	B Kane
352	Peter Goodwin	386	Rob Wolffenbuttel
353	Michael Quin	387	Peter Selwyn Kennerley
354	John Jefferson	388	Kevin White
355	Ron Steers	389	Leigh Robinson
356	Mike Rewi	390	Damian Clayton
357	Graham Truman	391	Peter Rivers
358	Bruce John Jarvis	392	David Payne
359	Barry Coquhoun	393	Craig Stewart
360	Don Thorburn	394	W A Fowler
361	J Johnstone	395	Michael Lucas
362	Bill Grimes	396	Sean Kelly
363	Keith Cochius	397	Alan M Godfrey
364	J H Kelly	398	Fred Fairey
365	Bill Ford	399	Ian Reynolds
366	Bill Ford	400	Warren Gregory Jones
367	Bill Ford	401	Bill Scott
368	William Grace	402	Roger Gainford
369	Trevor Potter	403	J C McSkimming
370	Paul Fry	404	Graeme Bishop
371	Stephen Lester	405	Paddy Osborne
372	Stefan Weston	406	Bill Martin
373	Jason Foord	407	Blue Grant

408	Eric de Vries
409	Gail Alley
410	Andrew Coster
411	Mike Alley
412	Don Alley
413	Bob Cawker
414	Eddie Gardien
415	David Young
416	Barry Shaw
417	Monty & Sally Hine
418	Murray Thomas
419	Phil Smith
420	Russell Smith
421	Mark Bond
422	Gary Pervan
423	Allan Coyle
424	Barry Thomas Taylor
425	R Riley
426	Maree O'Grady
427	Keith Milham
428	James Timms
429	M J Sheild
430	Alex Triska
431	Brian Sewhoy
432	Jim Corbett
433	Leon and Helene Videler
434	Russell McQuarters
435	Graeme Hitchcock
436	Chris Berkahn
437	Gerald O'Rourke