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19 June 2026

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Dear Sir/Madam

**Waikato Regional Council Submission on the review of measures for shore-based shellfish harvesting in the Auckland Coromandel area**

Thank you for the opportunity to submit on the review of measures for shore-based shellfish harvesting in the Auckland Coromandel area. Please find attached the Waikato Regional Council's (the Council's) submission, formally endorsed by the Council's Strategy and Policy Committee on **18 June 2026**.

Should you have any queries regarding the content of this document please contact Joao Paulo Silva, Senior Policy Advisor, Policy Implementation directly on (07) 794 97179 or by email [joapaulo.silva@waikatoregion.govt.nz](mailto:joapaulo.silva@waikatoregion.govt.nz).

Regards,

A handwritten signature in blue ink, appearing to read "Tracey May", with a small blue dot at the end.

Tracey May  
**Director Science, Policy and Information**

## Submission from Waikato Regional Council on the review of measures for shore-based shellfish harvesting in the Auckland Coromandel area

### Introduction

1. We appreciate the opportunity to make a submission on the review of measures for shore-based shellfish harvesting in the Auckland Coromandel area.
2. The Waikato Regional Council (the Council) core functions<sup>1</sup> relevant to this consultation include achieving integrated management of the natural resources in the region, and the maintenance and enhancement of ecosystems in coastal water. Accordingly, the policy direction under the Waikato Regional Policy Statement (WRPS) provides for the full range of ecosystem types, their extent and the indigenous biodiversity that those ecosystems can support existing in a healthy and functional state (Objective ECO-01).
3. The Council supports reviewing the rules for recreational harvesting in the Auckland Coromandel area. We agree that shellfish and other marine invertebrates are an important part of coastal ecosystems and a key source of kaimoana. Additionally, intertidal shellfish fulfil an important role in the marine food chain and as a component of coastal biodiversity, and their removal from an area can create a risk for other ecosystems such as birds and fish that rely on shellfish as a food source. We consider it essential to appropriately manage these activities to ensure that the intertidal ecosystems are better managed and enhanced.
4. We welcome the opportunity to comment on the following stages of developing rules for managing recreational harvesting of shellfish and other invertebrates in the Auckland Coromandel area. Additionally, if the opportunity arises, the Council wishes to be heard in support to this submission.

### Summary

5. In summary, this submission:
  - a. Supports reviewing the rules for recreational harvesting of shellfish and other invertebrates in the Auckland Coromandel area with a preference for Option 4.
  - b. Highlights examples of current and historical concerns relevant to this proposal in the Coromandel area.
  - c. Supports wider initiatives such as educational campaigns as well as scientific and community monitoring.
  - d. Answers some of the optional questions posed by the discussion document in the table below.

### Management options – Support for Option 4

**The Council supports Option 4** – a partial intertidal closure plus a combined daily limit of 10 shellfish for any other species.

6. We consider that there is sufficient understanding across the Gulf that a reduction in the recreational daily limit will be of benefit for the shellfish populations with consequential benefits for the intertidal and some subtidal ecosystems. Therefore, **we support option 4**, as it provides a balanced and targeted approach by managing unsustainable recreational take and associated ecosystem depletion, while still providing for use and cultural practices. It achieves key objectives, such as managing taxa like octopus, which have key ecological functions while still allowing harvesting of more abundant species like kina. This approach better balances protection and use than either the status quo or a full blanket closure.
7. Further, we consider that option 4 retains ability to harvest popular named species with species-specific daily limits from a defined closed area and introduces additional species-specific daily limits.

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<sup>1</sup> As listed in Section 30 of the Resource Management Act 1991 (RMA).

Additionally, it reduces combined daily limit from 50 to 10 per person for all other species outside the intertidal closure area, thus reducing risks to shellfish populations in more remote and inaccessible areas.

8. Nevertheless, we consider that ongoing monitoring will be essential to fully understand if option 4 will be sufficient to manage the current issue across the whole intertidal closure area, including monitoring of species abundance, size distribution, and ecosystem condition over time.
9. Accordingly, **we recommend Fisheries New Zealand (FNZ)** treats this as an evolving issue and provides mechanisms to refine future responses. **We also support** having a strong implementation framework that includes ongoing iwi and hapū participation, clear public education as well as scientific and community monitoring, including displacement monitoring, all supported with adequate resourcing from FNZ.
10. The Council **recommends** that FNZ establish formal review periods associated with the legislation, as appropriate to species, to ensure implementation effectiveness. The review periods should be sufficient to enable detection of patterns that may require review of legislation – including take limits and management location. A defined review timeframe is important to assess the effectiveness of the proposed closures and harvest limits, including whether they are sufficient to address localised depletion and whether any displacement of harvesting effort into the Waikato region has occurred. This will support adaptive management and ensure that the measures remain fit for purpose over time.

#### **Submitter details**

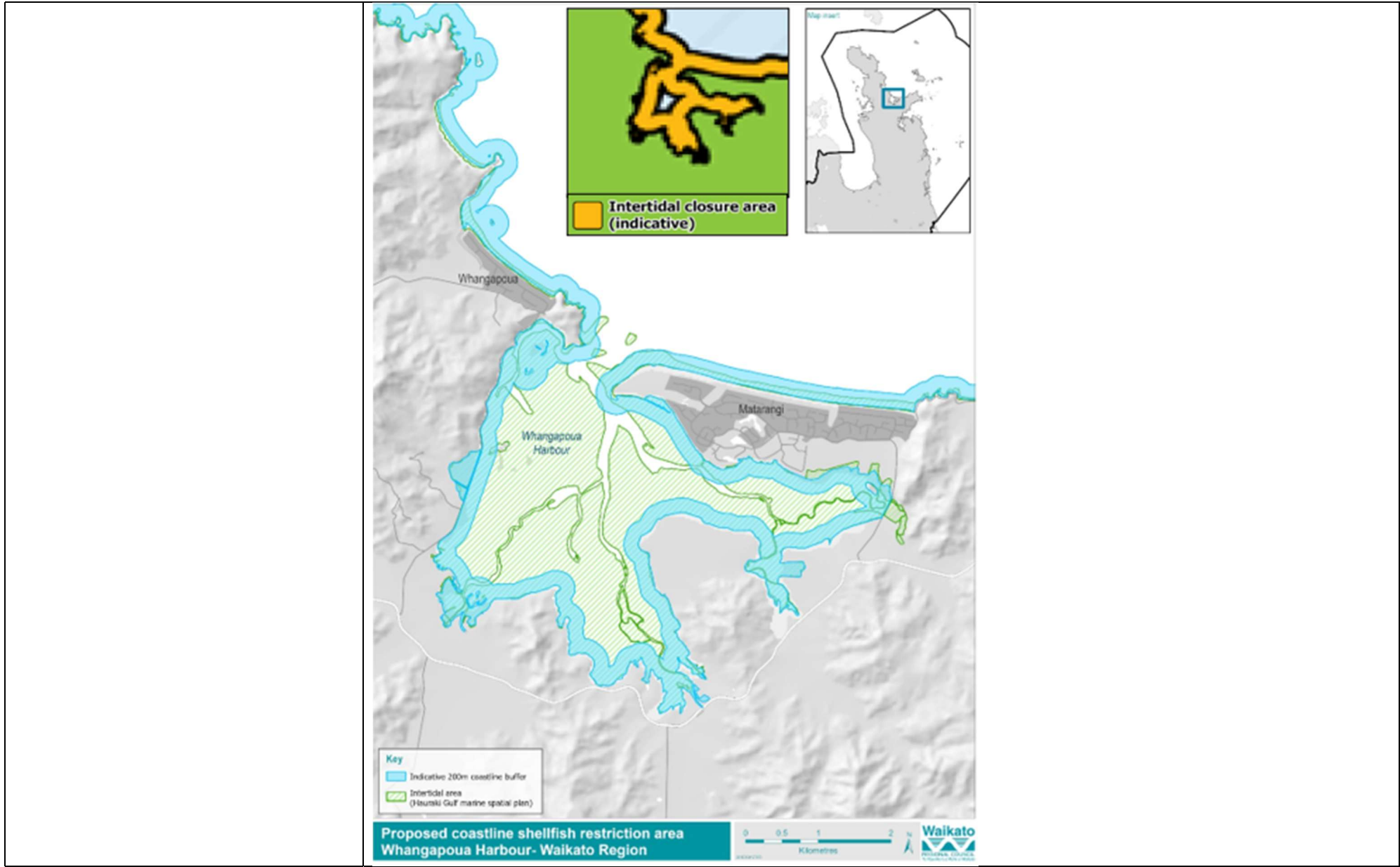
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**Table – Optional questions from the discussion document**

Question	WRC response
<b><i>Boundaries of the proposed intertidal closure area (high-water mark to 200 m offshore)</i></b>	
<p>Do you support the boundaries of the proposed intertidal closure area (i.e. high-water mark to 200 m offshore)? If not, what are some details of an alternative boundary you support?</p>	<p>We consider that the proposed boundary (high-water mark to 200m offshore) is practical in terms of providing for a clear spatial delineation of the intertidal closure area of the coastline. However, we note that in some instances the boundary in the discussion document looks to be further reaching than 200m. We understand that this is conceptual at this stage but <b>recommend</b> having a revised version including a higher quality map to avoid any ambiguity in terms of the extent of the intertidal closure for users as well as monitoring and compliance.</p> <p>We understand that this proposal is more focused on managing recreational takes in rocky reefs/rock pools, however we consider that estuaries have intertidal and subtidal ecosystems and are rich in fauna and can contain patches of rocky reef as well as hosting a range of harvested species. From our view, it was not clear from the description and figures in the proposal how estuaries would be considered, and this as an important detail across all options. For example, the conceptual figure in the discussion document indicated that all of Tairua Estuary would be covered while only part of Whangapoua Estuary would be covered. We have demonstrated what the 200m boundary would look like for Whangapoua Estuary below and included the discussion document map as an inset for contrast. We noted that paragraph 87 of the discussion document reads that there could some flexibility on the boundary to accommodate the geomorphology of bays, harbours and rivers.</p> <p>Therefore, <b>we recommend</b> clarifying how the proposal will intersect with estuaries also, as to whether all estuaries would be included (e.g. from the mouth), or all intertidal areas within estuaries, or only 200m from the high-water level as per the coastline.</p>



<p>Do you support the proposed intertidal closure area applying to the Auckland Coromandel mainland and Waiheke Island coastlines? If not, where do you consider the proposed intertidal closure area should apply?</p>	<p>We lack information to make a quantitative and fully informed choice of the options in terms of areas for intertidal closures. However, we are aware the Coromandel peninsula is subjected to significant harvesting pressure in certain areas. Anecdotally, we know that many of our shallow reefs close to more populated areas are relatively poorer in terms of ecosystem diversity and abundance. We consider that there is unlikely to be one single cause for this, but we consider that harvesting pressure is likely a contributing factor in some locations.</p> <p>Therefore, <b>we support</b> the proposed intertidal closure area for our region. We consider that having a comprehensive intertidal closure area throughout the defined mainland area will provide for a clear spatial boundary, which will be beneficial in terms of monitoring and for preventing displacement efforts to areas left not protected.</p> <p>Examples highlighting areas currently under pressure in the Coromandel peninsula include the areas in connection with the section 186A Temporary Closure<sup>2</sup> granted for Hauraki Māori Trust Board from 1998 to 2024 for the coastline extending from Ngārimu Bay to Wilsons Bay on the Thames coast, which encompassed Te Mātā and Waipatukahu. The closure from Hei o Wharekaho Settlement Trust<sup>3</sup> that includes the area along the coast from Whangapoua to Onemana and the East Coromandel scallop rāhui and temporary closure sought by Ngāti Hei<sup>4</sup>. The area extends across the eastern Coromandel coast from Whangapoua to Onemana for tipa/scallops.</p>
<p>Are there any other areas, including other populated islands, that you would like to see included in the intertidal closure? If so, please indicate what additional areas you think should be included and provide information to support your views.</p>	<p><b>We recommend</b> assessing and including Whanganui Island in the intertidal closure. We consider that the island meets the criteria under point 87 for inclusion. Whanganui Island is a coastal island that is easily accessible and walkable to at low tidal stages.</p> <p>We do not have any other areas to indicate at this stage. However, <b>we recommend</b> FNZ monitors whether harvesting effort shifts into other Waikato coastal areas, particularly during peak holiday periods.</p>
<p>How would the proposed closure boundaries impact you? Please provide details to support your response.</p>	<p>The Council is responsible for the integrated management of the natural resources in the region and the maintenance and enhancement of ecosystems in coastal water. Therefore, we have a role in helping to ensure our coastal ecosystems are not negatively impacted by unsustainable practices. Therefore, <b>we support</b> appropriately managing all species and ensuring that management keeps pace with changing needs, including the addition of new species that are currently being harvested but are not currently included in the management framework.</p>

<sup>2</sup> [51340-The-closure-request-for-extension-letter](#)

<sup>3</sup> [186A Fisheries Act](#)

<sup>4</sup> [Fisheries \(SCA CS Closure\) Notice 2023](#)

	<p>Additionally, the Council is responsible for managing some activities within the coastal environment through the Waikato Regional Coastal Plan (WRCP).. Therefore, <b>we recommend</b> that throughout the educational campaign that FNZ makes it clear that the restrictions under this proposal are prescribed under the fisheries management framework. This will ensure better understanding from the public on which activity is managed by which organisation, and reduce confusion regarding the respective roles of fisheries management and the regional coastal planning framework.</p>
<p>Do you have any other feedback on the benefits and/or risks associated with the proposed boundaries and spatial extent of the intertidal closure area?</p>	<p><b>We support</b> FNZ on using sustainability measures under the Act to address ecosystem depletion issues. <b>We agree</b> that sustainability measures provide flexibility to implement changes quickly to address sustainability risks without amendments to regulations (which can take longer).</p> <p><b>We recommend</b> FNZ resources the educational campaigns ensuring that the information (signs, pamphlets, etc) also reach the more secluded areas. We also recommend that the information should cover how to proceed when observing non-compliance. This should include clear, accessible guidance on how members of the public can report suspected breaches or illegal harvesting activity. Additionally, <b>we recommend</b> the resourcing of the monitoring and enforcement actions, ensuring that the monitoring also include other areas in which displacement of shellfish harvesting may happen.</p> <p>The discussion document notes that the available information does not fully capture rock pools, shellfish size structure, or all harvesting areas. <b>We recommend</b> FNZ addresses these regional data gaps. We consider that this will ensure better management of these ecosystems.</p> <p><b>We also recommend</b> FNZ develops a clear implementation plan for the intertidal closure with a review framework.</p>
<p><b><i>Partial intertidal closure + a combined daily limit of 10 shellfish (“any other” species) (Option 4)</i></b></p>	
<p>Do you have any other feedback on the benefits and/or risks associated with this additional option?</p>	<p>As mentioned at paragraph 8, we support Option 4 , and <b>we recommend</b> assessing the effectiveness of Option 4 in the near future and then re-evaluating areas for improvement.</p>
<p><b><i>Development of a refreshed education campaign</i></b></p>	
<p>What feedback do you have on the proposed education and engagement actions (pamphlets, digital communications, and community engagement), and how effective do you think these approaches will be in promoting sustainable shellfish harvesting?</p>	<p>We support ongoing scientific and community monitoring. We consider that this should include rock pools, rocky reefs, shellfish size structure, harvest pressures, and recovery indicators. <b>We recommend</b> FNZ works with councils, iwi, hapū, schools, and community groups to support local monitoring through equipment, training as well as developing monitoring methods, data standards, and regular public reporting.</p>

<b>Role of scientific and community monitoring</b>	
<p>What feedback do you have on the proposed approach to scientific and community monitoring of intertidal rocky shore species in the Auckland Coromandel area?</p>	<p>Council is presently establishing a subtidal rocky-reef programme, and following this will consider implementing an intertidal rocky-reef monitoring programme to fulfil statutory state of the environment monitoring responsibilities. The purpose and design of the monitoring is not appropriate for evaluating the efficacy of fisheries management. As such there is a need for an appropriate design and undertaking of monitoring by FNZ.</p> <p>Our experience is that a combination of both scientific and community monitoring is useful. The scientific monitoring provides the rigours of reliable, quantitative data on which decisions can be made, and community data has other advantages, for example, it can potentially cover more locations, has an important social component (ownership/kaitiaki) and in addition it provides for education and communication outcomes.</p> <p><b>We recommend</b> developing a monitoring programme targeting rocky strata (rock pools and rocky coastline), to be applicable across Auckland Coromandel, with the specific focus on informing shore-based shellfish harvesting. We suggest investigating the Hauraki Gulf shellfish monitoring programme<sup>5</sup> (which targets soft sediments) as example for developing the monitoring programme for the Coromandel. We consider that with AI, google lens and other supporting software, there have been technical advances that support species identification and could help in the identification and assessment of health of intertidal rocky reef habitats.</p> <p><b>The Council continues to support</b> two long-term Hauraki Gulf shellfish monitoring sites (Since 2008) in Whitianga and Wharekawa and would have interest in supporting an appropriately developed rocky reef community monitoring programme.</p>

<sup>5</sup> [Hauraki Gulf Community Shellfish Monitoring | Waikato Regional Council](#)