

## Summary of public submissions on the draft

### Te Kaweka Takohaka mō te Hoiho and Te Mahere Rima Tau

Prepared by the Hoiho Technical Group  
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#### 1.0 INTRODUCTION

This report has been prepared by the Hoiho Technical Group for the Hoiho Governance Group, to summarise the results of the public consultation process on the draft documents, Te Kaweka Takohaka mō te Hoiho and Te Mahere Rima Tau.

Submissions were received through a Survey Monkey web tool which asked for responses to specific questions, and as email submissions or attachments to an email address. A small number of submissions were also received directly by partners. An inclusive approach was taken to analysis of all of the submissions regardless of the pathway that the submissions took (i.e. email or survey).

A spreadsheet was generated from the Survey Monkey responses. All of the email responses were combined in a single pdf document. A spreadsheet was then created which combined responses from the written (email) submissions and survey submissions. HTG members analysed submissions and populated the spreadsheet. The results of this analysis are reported separately in: Recommendations following analysis of public submissions on the draft Te Kaweka Takohaka mō te Hoiho and Te Mahere Rima Tau

#### 2.0 SUMMARY OF SUBMISSIONS

This includes an overview of the submissions – totals, method, group involved – and then a detailed breakdown of submissions by theme and structure, vision, goals). Numbers in brackets signify the number of submissions with that particular response. Greyed out submission responses sit outside the scope of that particular theme, i.e. they are considered elsewhere under another theme.

##### 2.1 Overview

- There were 105 submissions in total, but some of these were double ups and two had no content. In effect this means that there were 93 submissions (excluding blanks, and double ups from the same person but including submissions from the same person under different groups).
- Method of submission:
  - 66 via survey monkey

- 33 via the “hoihorecovery” email address
- 6 via other email addresses
- There are multiple submissions from some individuals:
  - Two individuals completed one email submission for the strategy and one for the action plan.
  - Four individuals completed both a survey and sent an email. One individual completed a survey and two emails.
  - In addition three individuals contributed to two submissions by different groups / organisations, and four people contributed to three different submissions by different groups.
- Group that submitters identified with:

|  |            |
|--|------------|
| General public                             | 26         |
| Researcher                                 | 20         |
| NGO  | 10         |
| Penguin field worker                       | 10         |
| (blank)                                    | 7          |
| Tourism                                    | 5          |
| Commercial fisher                          | 5          |
| Penguin rehabilitator                      | 5          |
| Vet  | 4          |
| Zookeeper/aviculturist                     | 3          |
| Tangata whenua                             | 3          |
| Journalist/media creator                   | 2          |
| Manager of penguin habitat (not landowner) | 2          |
| Landowner                                  | 1          |
| Local authority                            | 1          |
| Recreational fisher                        | 1          |
| <b>TOTAL</b>                               | <b>105</b> |

## 2.2 Group structure

Nineteen submissions commented specifically on group structure.

Comments on group structure included:

- Failed to involve relevant scientists & other experts in development of the plan. (4)
- Be more inclusive of all those working with hoiho. All stakeholders involved in implementation should be involved in drafting the plan. Include government agencies, local government, rehab groups, tourist operators, vets, site managers, NGOs (e.g. F&B), local communities & scientists. (3)
- IUCN guidelines (international best practice) state importance of stakeholder inclusion to define vision, goals, objectives and actions. (3)
- Role of researchers in evaluating whether targets have been achieved is important. (3)
- Writing excluded input from researchers (e.g. Otago Uni) and doesn't reflect researcher perspective. (3)
- Rehab expertise is missing (e.g. Penguin Rescue). (2)
- Hoiho task force required– small group of independent experts to develop an effective recovery plan. (2)
- Well thought out and includes tangata whenua and partners. (1)
- Ngāi tahu is favoured over all other parties - this will lead to ill feeling. (1)

- Strong Crown and TRONT partnership needed but with a single point of accountability (i.e. DOC). (1)
- With partnership approach it is not really clear where the real responsibility lies. (1)
- Query why volunteer groups and researchers not involved. (1)
- Steps in right direction (e.g. fishing industry, Kāi tahu), but need to include all components of society. (1)
- Support partnership with Kāi Tahu and government agencies, including involvement in all stages from HGG, HTG, to development and implementation. (1)
- HGG should include science. (1)

### 2.3 Process and document structure

Thirty-five submissions commented specifically on process and document structure.

Comments on the process and document structure included:

- Robust management framework required with SMART actions and performance indicators. (14)
- Acknowledgement of effort by TRONT, DOC, YEPT and Fisheries NZ to develop documents. (11)
- General support of strategic priorities and actions. (11)
- Urgency required. (8)
- Too timid - bold actions needed. Remove qualifying words (e.g. encourage, further, work towards). (10)
- Urgent elimination of known threats (e.g. bycatch, habitat degradation, disease, invasive mammalian predators, unregulated human access and dog kills). (6)
- Acknowledge those involved in hoiho conservation. (6)
- Commitment to funding and resources (& transparency). (5)
- Indicate accountability - clearly state responsibility & collaborators separately. (6)
- Living documents – annual reviews, and digital only copies. (6)
- Principally addresses symptoms without focusing on the cause / actions. (4)
- Prioritise - strategic priorities in order of importance. (3)
- Recommendations for a re-write with a new framework. Four proposed re-structures were:
  1. Fundamental Objective: Maximise persistence of hoiho. (4)  
Performance indicator: Minimize the probability of hoiho extinction (in e.g. 100 years)
    - Focus 1. Mainland populations
      - Issue 1. Marine habitat
      - Issue 2. Health, survival and productivity
      - Issue 3. Terrestrial habitat
      - Issue 4. Knowledge gaps
    - Focus 2. Sub-Antarctic populations
      - Issue 1. Knowledge gaps
  2. Effective crisis model (overlap between operations, communications & management) rather than hierarchical (strategy, action plan, tikaka). (1)
  3. 2 level approach: strategic and tactical action plan (Te Mahere as strategic plan; tactical plan focused to execute actions with measureable outcomes). (1)
  4. Use kakapo model - hoiho recovery plan developed by experts. (2)
- Marine threats are a priority. (2)
- Management approach needs to be flexible to allow for adaptive approach. (2)
- Need to manage marine threats at the same time as managing individual birds. (2)
- Follow accepted international norms (IUCN: vision leads to goals which lead to objectives). (2)
- Integrate current scientific knowledge and include references. (2)
- Recommend inclusion of ecological (2) and legislative context. (1)

- Understand cultural values but cannot support cultural practice here. Slap in the face for people who spend time protecting hoiho. (1)
- Action plan is not easy to read (2) and more detail is required for many of the actions. (1)
- Too many actions –administratively burdensome & possibly dilute effectiveness. (1)
- Support separate management of Northern & Southern populations as the mainland is a hotspot for ocean warming. (1)
- Please share Mātauraka Māori with us. (1)
- Acknowledge that hoiho are a subantarctic species and not well adapted to the mainland. (1)
- Delivery through other workstreams (e.g. CSP, AEWG, PF2050). (1)

## 2.4 Vision and goals

Eleven submitters commented specifically on the vision.

Comments on the vision included:

- Agreement with the vision - admirable and excellent. (4)
- Not aspirational or clear (should secure wild populations across distribution for future). (2)
- Suggested rewording to: 'Hoiho feed on abundant, good quality kai, and return safely to the whenua to breed, feed their young, and socialise, without facing human-induced threats. We are guided by tikaka and the best available information in how we act to enable hoiho to persist as stable and resilient populations throughout their natural range'. (2)
- Inadequate. Refer to need for thriving populations, reduction & management of threats & strong commitment of partners to resolve issues. (1)
- Resolve inconsistencies; state no disturbance of hoiho yet future harvesting is an aspiration. (1)
- Vision for northern population should be worded ' to avert imminent extinction'. (1)

Forty-one submitters agreed with the 5 year goal, 23 disagreed and 40 did not comment specifically.

Suggestions for change to 5 year goals:

- Shorten timeframe - immediate urgency (e.g. 2 year goals). (9)
- More ambitious goals (e.g. don't just halt decline, reverse it). (8)
- Southern population needs more than a monitoring programme. (4)
- Vague and not aspirational. (3)
- Add recommendations for immediate marine protection and later fishing restrictions. (3)
- More goals required. (2)
- Return the population to the numbers of 2011-12 pre-crash. (2)
- May be impossible to halt decline. (1)
- Don't express uncertainties here. (1)
- Rewrite as: The northern hoiho population is stable and increasing. The current status of the southern population is determined. (1)
- 1<sup>st</sup> goal: "Halt the decline of all hoiho in all locations" 2<sup>nd</sup>: "Implement monitoring programmes in all locations" 3<sup>rd</sup>: "Provide rangers in all areas of significant habitat to prevent public abuse of species. Otherwise, prohibit general public from accessing habitat." (1)

Thirty-eight submitters agreed with the 20 year goal, 16 disagreed and 68 did not comment specifically.

Suggestions for 20 year goals:

- Shorten timeframe - urgent action (e.g. 10-year goals, or 2 year goal). (8)
- More ambitious goal - populations increasing rather than stable. (6)
- Both populations are maintaining or expanding their geographical distribution. (2)
- Clearly define a 'resilient, healthy and stable' population. (2)
- Add 10 or 15-yr goal for terrestrial habitat & a 20-yr goal for fisheries & marine habitat. (1)
- More resourcing & public engagement /education. (1)
- Amend to: "Northern and southern populations of hoiho are resilient, healthy, and self-sustaining." (1)
- Need a quantifiable goal able to be supported by marine and terrestrial environments. (1)
- Environmental change may mean distribution of hoiho (4<sup>th</sup> goal) are beyond our control. (1)
- Rewrite as: "Northern population has expanded with thriving breeding populations throughout their natural range, with no need for individual management. Southern population is thriving". (1)

Nineteen submitters suggested other goals.

Suggestions for other goals:

- Marine reserves and fishing restrictions. (10)
- More urgency and tighter timeframes. (3)
- Captive breeding programme. (3)
- Tourism controls. (2)
- More field workers (e.g. for disease treatment & control). (2)
- Tourism economic value of hoiho against interests of primary production on land and at sea. (2)
- Benefits to other iconic wildlife. (1)
- Coordinate response to give effect to the National Policy Statement on Biodiversity. (1)
- All hoiho breeding sites are safe. (1)
- Clear trend of population increase. (1)
- Hoiho recognized widely as taonga in NZ. (1)
- Future generations. (1)
- Education and awareness. (1)
- Hoiho management should be based on precautionary principle. (1)
- Marine revolution; long-term public interest is paramount, no permanent private rights in the sea. (1)
- 2-yr, 5-yr, 10-yr, 15-yr and 20-yr goals (with set of objectives, performance measures & actions). 2-yr goals: >200 breeding pairs in northern population & monitoring programme for southern population. 10-yr goals: both hoiho populations are increasing, stable and maintain geographical distribution. 15-yr goals: Northern population increases to 500-600 pairs. Southern population resilient & self-sustaining. (1)

## 2.5 THEME 1: Health and monitoring

### Strategic priorities

Forty-four submitters agreed with the strategic priorities, 16 disagreed and 45 did not comment specifically.

Reasons for disagreement with priorities for theme 1 included:

- Too vague and not measureable. (3)
- Need to explain Te Reo concepts more clearly (e.g. kawa, tikaka, cultural monitoring). (3)
- Known threats and the cause of underweight hoiho must be addressed urgently. (2)
- Prioritising care of individuals over protection of habitat on land and at sea is counter-productive. (1)
- Implement and resource the plan immediately. (1)
- Unnecessary to have “tikaka” duplicated in the 1<sup>st</sup> and 3<sup>rd</sup> bullet points. (1)
- Uncertain what additional intervention options are being considered & would not support if captive management & translocations (not long-term solutions and adequately researched). (1)
- The purpose of monitoring penguins is to ensure their survival, not populate management data. (1)
- Fail to address the loss of habitat, human interference and other identified contributors. (1)
- Developing additional intervention options may take resources away from rehab. (1)
- Need to clarify that this only applies to the northern population. (1)
- Include a proactive response to care. (1)

Twenty-eight submitters suggested additional strategic priorities.

Other suggested strategic priorities for theme 1 included:

- Minimise impact of fishing. (6)
- Use knowledge of national and international vets, rehabbers and researchers. (4)
- Increase number of breeding pairs (by increasing adult survival, increasing recruitment). Maximise breeding success (by increasing hatching success, increasing fledging success). (4)
- Prepare for worst case scenario (e.g. maintaining genetic diversity, captive breeding). (3)
- Urgent action (3)
- Establish marine reserves. (3)
- Monitoring programmes for southern population need careful planning based on science. (2)
- Ban dogs on beaches. (2)
- Education for public and tourists. (2)
- Minimise impact of pollution. (2)
- Commit resources for every bird (1)
- Expand monitoring and intervention options for Rakiura / Fiordland. (1)
- Fence a large area in order to keep juveniles (specifically) within a controlled area. (1)
- Ensure guidelines implemented and set standards. (1)
- Develop computer models to allow advance forecasting of seasonal hoiho mortality risk. (1)
- Develop a comprehensive rehab program. (1)
- Roll count of nests in the Catlins. (1)
- Sea lion question. (1)

### Actions

Twenty-eight submitters agreed with the actions, 15 disagreed and 62 did not comment specifically.

Reasons for disagreement with the actions for theme 1 included:

- Actions are not strong or ambitious enough. (3)
- We should not be considering captive management. (3)
- Too slow – urgent action required. (3)
- SP5: move southern population monitoring to Year 1. (2)
- Remove risk assessment action – procrastination. (2)
- More financial support for rehab delivered by qualified personnel only. (1)
- Acknowledge groups who will take on some of these priorities. (1)
- Conduct cost-benefit analysis (i.e. focus on intensive interventions detrimental to mitigating threats e.g. fishing). (1)
- Increase priority for review of priority sites for intensive management (E not H for Rakiura). (1)
- Run out of time to be developing tikaka. (1)
- High priority to investigating captive breeding. (1)
- Don't know - too much info, too complex, and too much Te Reo. (1)
- Reword SP2: "Commission and fund research to characterise disease...." (1)
- Remove dispensation under SP3. (1)
- SP2: Implementation of mosquito control should continue through years 2 to 5. (1)
- SP5: Need more detail on monitoring and marking programmes - which sites, methodology. (1)
- SP4: translocations should not take place until source of decline addressed. (1)
- SP4: beyond the point at which management based on super breeders is relevant. (1)
- SP5: what are cultural monitoring tools (2), what is the evidence they are better than current practices? (1)
- Implementation of best practice should be in year 1. (1)
- SP3: unclear what is proposed regarding bycaught birds [dispensation process]. (1)

Twenty-five submitters suggested additional actions.

Other suggested actions for theme 1 included:

- Captive breeding programme. (6)
- Management interventions need to be well informed & effectiveness assessed. (4)
- Suite of intervention options are recommended (e.g. candling, dummy eggs, artificial incubation, hand rearing, semen bank). (3)
- Acknowledge other groups involved in hoiho conservation / rehab (3)
- Work on immediate 2 year set of priorities. (2)
- Provide support for remote penguins or uplift eggs/chicks to improve chance of survival. (2)
- Translocation of adults (non-breeding birds) to spread risk rather than having 1 or 2 large colonies. (1)
- Ensure all sites are counted so a full annual population census can be achieved. (1)
- Build a rehab facility in the Catlins. (1)
- Mosquito-proof rehab centres and protect moulting birds. (1)
- Seek development of a recurrent funding model for core rehab groups / hospitals. (1)
- Develop computer models to allow advance forecasting of seasonal hoiho mortality risk. (1)
- Undertake cost-benefit analysis of threat mitigation interventions to determine financial priorities. (1)

- Apply actions to the Southern population. (1)
- Undertake monitoring to identify localised threats (e.g. identify malaria vectors). (1)
- Focus on prevention of disease instead of management and post-death analyses. (1)
- Compare nutritional stress (using corticosterone) for southern population. (1)
- Support research undertaken by Otago University to create an avian diphtheria vaccine. (1)
- Monitor nesting success of hoiho. (1)
- Improve secure penguin transport (with wet sand so penguin can cool itself) (1)
- Monitor chicks & non-breeders. (1)
- Investigate factors affecting breeding success and possible threats. (1)
- Establish a management team for the recovery programme including a full-time vet dedicated to hoiho (e.g. kakapo recovery programme). (1)
- Set up a dedicated hoiho rehab facility and partner with a dedicated wildlife vet care facility (1).
- Implement knowledge from international vets (1)
- Enable medications such as Primaquine to be used in NZ. (1)
- SP1: Compare demographic trends (e.g. chick/adult survival) under different management regimes. (1)
- SP2: Yr1-5 clarify aetiology & epidemiology of diseases recorded in hoiho. (1)
- Yr2-5: Evaluate pathogens circulating in the mainland population to inform disease risk assessment. (1)
- SP3: collaborate with k̄i tahu and western scholars to evaluate how hoiho are appreciated and how to communicate effectively with different communities. (1)
- SP4: break down into separate components (e.g. genetics, demographics, translocation). (1)
- SP5: use standard methods and minimum standards to monitor sites. (1)
- Ensure communication between all parties is open and clear. (1)
- Control over free-running dogs at beaches (spot-fine). (1)
- Ensure hoiho have reliable access to adequate and appropriate food supplies. (1)

## Other comments

Other comments on theme 1 included:

- Gather info for southern population (size/trends, demographics, breeding success, limiting factors). (7)
- Proposed intensive management is not a long-term solution. Rehab and other highly intrusive interventions are short-term solutions whilst fundamental threats are addressed. (6)
- Understand causes and drivers of disease and mass mortality events. (6)
- Greater resources, funding and coordination for rehabilitation and hospital care (3)
- Define cultural monitoring tools and tikaka. (3)
- Risk assessment to identify cause of deaths, so resources can be directed appropriately. (2)
- Mosquito proof rehab facilities. (1)
- Purpose built dedicated facility for hoiho rehab would enable best care & help manage stress & diseases. Current facilities not designed / resourced for large numbers of birds. (1)
- Concern about delivery of intensive intervention programme. Necessary but big change for DOC, not currently geared (structure/resourcing) to deliver; significant investment required. (1)
- Highlight the need to incorporate K̄i tahu tikaka. (1)
- Development & implementation of protocols should include liaison with wider community. (1)
- Action plan seems to be health / rehab heavy. (1)
- Separate Theme 1 into 'Health & disease surveillance' and 'Population monitoring'. (1)



- Focus on actions rather than research - research must be secondary to keeping population alive (i.e. supplementary feeding & disease mitigation). (1)
- Develop projects to mitigate disease (e.g. diphtheria & malaria) & prioritise mosquito control. (1)
- Stop removing hoiho chicks from the wild. (1)
- Stop tagging hoiho (tags act as lure and attract barracoota). (1)
- Estimates of non-breeders and juveniles too (e.g. twice yearly beach counts). (1)
- No captive breeding in NZ or overseas (1)
- In poor food years consider taking eggs off breeders. (1)
- Base management decisions on quantitative evidence-based data. (1)
- Machine learning models to predict mortality risk for hoiho (using survival data, vet records, oceanographic & climatic data. (1)
- SP1-5 are critical to this strategy. (1)

## 2.6 THEME 2: Marine impacts

### Strategic priorities

Forty-one submitters agreed with the strategic priorities, 23 disagreed and 41 did not comment specifically.

Reasons for disagreement with priorities for theme 2 included:

- Not urgent and ambitious enough. (10)
- Need zero tolerance for bycatch and ban set nets, limit trawling. (7)
- Need greater focus on hoiho food availability - marine protected areas / no take reserves across hoiho foraging areas. (7)
- Too vague – need to be more specific and measurable. (3)
- Mandatory cameras on fishing vessels. (1)
- Fishing industry not involved enough. (1)
- Concern at focus on eliminating any risk from fisheries – not possible with existing knowledge to disentangle effects of fishing on hoiho from wider oceanic and climatic conditions. (1)

Thirty-one submitters suggested additional strategic priorities.

Other suggested strategic priorities for theme 2 included:

- Establishment of large marine protected or no take areas. (12)
- Eliminate bycatch and ban set netting in hoiho foraging areas. (11)
- Addressing food availability and resource competition from fisheries. (10)
- Develop plans to address recreational and customary fishing impacts on hoiho. (1)
- Work with fishing communities to outlaw gill nets. (1)
- Moratorium on fishing around Auckland Islands and other important hoiho areas. (1)
- Moratorium on set netting and bottom trawling for 5 years. (1)
- Economic evaluation of the fisheries that might be compromised by a moratorium. (1)
- Identify main causes of diet shift and starvation. (1)
- Include a ban on mineral activity in the marine habitat of hoiho. (1)
- Advocate for hoiho in national policy initiatives relating to ocean acidification and climate change. (1)
- Make food source / addressing starvation a priority on its own. (1)
- Education for marine users. (1)

### Actions

Thirty-five submitters agreed with the actions, 19 disagreed and 50 did not comment specifically.

Reasons for disagreement with the actions for theme 2 included:

- Not enough emphasis on marine protected areas /marine spatial planning. (6)
- Not strong or urgent enough – need action now in order to make a difference, not just identifying, fostering, encouraging, researching etc. (4)
- Current decline will not change until specific actions for improving food availability are implemented as a priority and asap. (4)
- Need to prevent/eliminate bycatch. (3)
- Ban set netting. (1)
- None of the actions are specifically linked to SP7 (protection of marine habitat). (1)

Twenty-nine submitters suggested additional actions.

Other suggested actions for theme 2 included:

- Eliminate bycatch (rather than minimise) in hoiho foraging areas. (19)
- Implement marine spatial planning and marine reserves immediately. (12)
- Increase focus on identifying key foraging areas for hoiho and effectively protect these. (9)
- Prevent bottom trawling in hoiho foraging areas, at least temporarily until seabed and hoiho recover. (9)
- Require 100% observer coverage on fishing vessels in hoiho foraging areas immediately. (5)
- Require 100% cameras on fishing vessels immediately. (4)
- Ban oil and gas exploration. (4)
- Education to get greater buy in and collaboration. (3)
- Make mandatory for fishers to submit bycaught hoiho for necropsy and conservation purposes. (2)
- Better understand effect of trawling on hoiho habitat/food. (1)
- Work with fishers and other stakeholders to establish immediate voluntary temporal and spatial closures as interim measure before establishment of more large marine protected areas. (1)
- Rahui on fishing in hoiho foraging grounds, until legislated protected in enacted. (1)
- Moratorium on fisheries. (1)
- Support additional monitoring of fishing boats where it doesn't mean an extra person on a vessel. (1)
- If necessary, fund the adjustment to suitable fishing techniques. (1)
- Reduce catch limits for recreational fishers in hoiho foraging areas. (1)
- Expand SP7: include planning documents produced under these Acts e.g. RMA, district/regional plans. (1)
- Investigate innovative and selective fishing techniques and support for fishing industry to transition. (1)
- Research foraging ecology including diet in sub-Antarctic populations. (1)
- Experiment with fisheries closures and effect on penguin foraging (e.g. trial at one or two colonies). (1)
- Improve availability of data on spatial distribution and timing of hoiho bycatch, enabling targeted prevention methods. (1)
- Shift shipping lanes away from hoiho areas. (1)
- Remove action relating to investigation of predation by sea lions. (1)
- Investigate role of marine pollution and climate change in causing mortality events. (1)
- Analysis of bycatch data by independent scientists. (1)

## Other comments

Other major comments on theme 2 included:

- Drivers of marine productivity are not well understood, understanding of use of marine habitat at all hoiho sites, seasons, ages and stage is incomplete. (2)
- Concern that impacts from fishing industry being held responsible for wider ecosystem impacts, and too much focus on impacts from fishing rather than changing oceanic and climatic conditions. (1)
- Kāi Tahu, as a major stakeholder in hoiho protection and the fishing industry, could invest in paid observers on fishing vessels who are required to submit independent and confidential reports to HGG. (1)
- Establish whether hoiho can survive in a warmer climate, as they are a Southern Ocean species. (1)
- Tourism is worth more to NZ economy than fishing industry so protecting marine tourism opportunities is economically valuable to NZ. (1)

- Support for investigation of options to transition fisheries away from set netting (e.g. compensation for income, purchase of asset base, quote parcels etc) and improved modelling of direct and indirect economic consequences this transition. (1)
- Red cod quota needs to be cut. (1)

## 2.7 THEME 3: Human disturbance

### Strategic priorities

Forty-six submitters agreed with the strategic priorities, 12 disagreed and 47 did not comment specifically.

Reasons for disagreement with priorities for theme 3 included:

- Researcher disturbance seen as unfairly targeted and disturbance by monitoring not addressed (5)
- Close hoiho beaches to people. (5)
- Close hoiho beaches to dogs. (3)
- Too vague, not enough specificity. (2)
- Kaitiakitaka undefined. (2)
- Not bold enough. (1)
- Education of public required re dogs & disturbance. (1)
- DOC needs to have regulating role on private land. (1)
- Disturbance should be included under Terrestrial Habitat. (1)
- Identify risks from recreational activities. (1)

Twenty submitters suggested additional strategic priorities.

Other suggested strategic priorities for theme 3 included:

- Improve public education regarding the risks to hoiho and how these can be minimised. (3)
- Eliminate disturbance from fishing. (2)
- Reduce unregulated human access to hoiho. (2)
- Consider deliberate translocations for the benefit of tourism. (1)
- Reduce the risks posed by stock. (1)

### Actions

Thirty-five submitters agreed with the actions, 14 disagreed and 55 did not comment specifically.

Reasons for disagreement with the actions for theme 3 included:

- Actions are not strong enough and lack measures of success. (4)
- Be more specific about the recreation activities that need to be managed. (1)
- Develop effective and enforceable bylaws to prohibit dog access to hoiho breeding areas. (2)
- Dog control enforcement/spot fines. (2)
- Dog actions in SP10 must be maintained beyond year 1. (2)
- Object to creating research opportunities for Kāi Tahu. (1)
- Visitor control actions must be in year 1. (1)
- Rephrase action to "undertake regular reviews of the impact of tourism activities on hoiho informed by Mātauranga Māori and behavioural / physiological research". (1)
- Move action under SP11 & second action under SP11: into theme 5: working together. (1)

Twenty-eight submitters suggested additional actions

Other suggested actions for theme 3 included:

- Stop unregulated public access to hoiho nesting areas/provide guided only access. (18)
- Improve public education regarding the risks to hoiho and how these can be minimised. (9)
- Dog enforcement & increased penalties. (6)
- Reduce vehicles on beaches. (4)
- Stop dog access to hoiho beaches. (3)
- Dogs on lead or muzzled on all beaches. (2)
- Provide rangers or exclude general public by imposing scientific reserves over habitat. (1)
- Stop boat launching on Conservation reserves. (1)
- Provide webcam live streaming of penguin nests/colonies instead of physical access. (2)
- Move all at risk birds, not just moulters. (1)
- Fence moulting sites to protect from dogs, predators and humans. (1)
- Conduct behavioural & physiological research to evaluate potential impacts of research & monitoring activities. (1)
- Create specific dog beaches, dogs must be banned from all beaches unless it is a dog approved area. (1)
- Ban public drone use around wildlife. (1)

### **Other comments**

Other major comments on theme 3 included:

- Include eliminating human disturbance under terrestrial habitat. (4)
- Serious mind shift required from everyone in NZ, requires government, operational and individual response. (1)

## 2.8 THEME 4: Terrestrial habitat

### Strategic priorities

Forty-nine submitters agreed with the strategic priorities, 10 disagreed and 46 did not comment specifically.

Reasons for disagreement with priorities for theme 4 included:

- Wording too weak/vague - use objectives instead. (4)
- Increasing ethical standards are precluding the use of proven effective trapping methods. (1)
- Removal of stock has made penguin access difficult. (1)
- Vehicles on beaches and boat launching from reserves must be addressed. (1)
- Rats should be addressed. (1)
- Exclude stock now. (1)
- Habitat protection should be a higher priority than other themes. (1)

Nineteen submitters suggested additional strategic priorities.

Other suggested strategic priorities for theme 4 included:

- Reduce the impacts of coastal erosion. (4)
- Improve public education regarding the risks to hoiho and how these can be minimised. (2)
- Be more specific about methods and ensure resources available. (2)
- Increase the extent of suitable breeding habitat. (2)
- Development of a specific prescription for protecting yellow-eyed penguins from mammals with the key threat species identified and the conditions that promote high number of them monitored. (1)
- Need a contingency plan for response to fire. (1)
- Absolute compliance with existing rules. (1)
- Sea lions. (1)

### Actions

Thirty-three submitters agreed with the actions, 10 disagreed and 61 did not comment specifically.

Reasons for disagreement with the actions for theme 4 included:

- Weak actions by unidentified parties with little detail. (3)
- Move action 9 (identify employment opportunities) into theme 5, SP11. (1)
- Sea level risk assessments should be accompanied by an action and how we will maintain this action (1)
- There is enough habitat it just is not suitable (providing more habitat is not what we need). (1)
- Evidence required for benefits of removing stock. (1)
- Exclude stock now. (1)
- Exclude cattle only, not sheep. (1)
- SP 13: Object to action about creating employment opportunities for Kāi Tahu. (1)
- SP 13: Identify *and provide* employment opportunities for Kāi Tahu (1)
- SP14: request that the reclassification of land status for important hoiho sites is brought into 2019/20 to aid with both visitor management and dog control (1)
- SP14 &15: Better protect hoiho on non-conservation land (e.g. identify priority areas for purchase or covenants for protection, targeted funding, assist with fencing). (1)

Thirteen submitters suggested additional actions.

Other suggested actions for theme 4 included:

- Predator & people exclusion by fencing. (4)
- Engage wider community in protection of hoiho using education. (3)
- Reduce vehicles on beaches. (2)
- Add 'possums' to list of introduced animals to be controlled. (2)
- Stop boat launching from DOC reserves. (1)
- Ensure humane pest control methods are used. (1)
- Enforcement for infringement by stock trampling. (1)
- DOC to negotiate purchase or management of private lands used by endangered species. (1)
- SP14: Land-based management options should include methods for minimising the risk of fire starting, not just preventing it from spreading. (1)
- Active prosecution of cases where hunters release deer pigs and goats. (1)
- List deer as a pest in the Otago Regional Council Pest Plan. (1)
- Exclude stock from all hoiho breeding areas immediately. (1)
- Nest boxes need to be provided where habitat has been destroyed by stock. (1)
- Strategies for saving a big enough population that won't need such hands-on interference. (1)
- Consider more intensive management. (1)
- Use people on community service programmes to build/set traps and educate participants. (1)
- Research other options for predator control that are safer than using poisons in future. (1)
- Waterway protection from sediment and nutrient run off. (1)
- SP16: Add action to "provide support for local organisations applying for international sources of funding to cover operational costs & research projects". (1)

### **Other comments**

Other major comments on theme 4 included:

- Essential cause of decline of South Island hoiho is mismanagement of terrestrial habitat by DOC & YEPT. (1)
- Work with hoiho rather than on hoiho; current fragmented nature of their habitat is denying many of them the opportunity to demonstrate full range of behaviours. (1)
- Hoiho are present on public and private land - encourage a collaborative approach with landowners to develop positive conservation solutions. (1)
- Habitats are still too small and isolated - ensure tracks kept open during non-breeding part of year. (1)
- Management of habitat must consider natural behaviour of penguins (e.g. socialising on open ground). (1)



## 2.9 THEME 5: Working together

### Strategic priorities

Fifty submitters agreed with the strategic priorities, 7 disagreed and 48 did not comment specifically.

Reasons for disagreement with priorities for theme 5 included:

- Unclear where real responsibility lies. (2)
- Fishing industry not involved enough. (1)
- Not specific or measurable. (1)
- Well-coordinated and strategic research should not mean restricted. (1)
- Need more urgency. (2)
- Unclear what is meant by Mātauraka Māori perspectives. (2)

Thirteen submitters suggested additional strategic priorities.

Other suggested strategic priorities for theme 5 included:

- All data should be transparent and publicly accessible. (5)
- Include every organization that is actively involved in hoiho conservation. (3)
- Raise public awareness, educate and encourage public debate to convey urgency. (3)
- Governance and management decisions (including by private groups) are accountable and transparent. (1)
- Ensure all researchers are engaged in decision-making. (1)
- Ensure data, research and offers of assistance from international experts is used and implemented. (1)
- Research data is available promptly. (1)
- Enlist the help and knowledge of people who care for penguins in captivity. (1)
- Recognise the potential of citizen science. (1)
- Provide support mechanisms for personnel working with hoiho. (1)

### Actions

Thirty-nine submitters agreed with the actions, 7 disagreed and 58 did not comment specifically.

Reasons for disagreement with the actions for theme 5 included:

- Fails to recognise all groups working on hoiho conservation such as rehab and research groups. (2)
- Not urgent enough. (1)
- Leadership unclear. (1)
- Unclear how Kāi Tahu mātauraka and tikaka are expected to contribute to research findings and to guide management practices. (1)
- Object to actions about creating employment and research opportunities for Kāi Tahu. (1)
- Actions and priorities are unclear. (1)

Fourteen submitters suggested additional actions.

Other suggested actions for theme 5 included:

- Include actions relating to education and advocacy (e.g. fishers, dog owners). (4)
- Use the YEP database as the priority dataset to be managed by DOC as a neutral party. (1)

- Establish a fee for anyone using hoiho as advertising, with money fed directly into conservation. (1)
- Develop and implement a research plan early within the timeframe of the action plan. (1)
- Establish a clear central point for people outside the Governance Group to go to. (1)
- Ensure permitting process for research is transparent, streamlined, informed and objective. (1)
- Establish a streamlined communication network between all stakeholders, including consultation and distribution of information, such as online portal. (1)
- Establish a centralized single database as a repository for all data. (1)
- Fund tertiary scholarships on hoiho research. (1)
- Actions about volunteers to acknowledge their contribution and support their mental wellbeing. (1)
- Form an emergency board to accelerate all actions, with power to effect immediate actions. (1)
- Kāi Tahu should get tougher on own fishing fleet. (1)
- Clearer leadership. DOC should lead by coordinating groups. (1)
- Enforce provisions of Wildlife Act legislation to protect hoiho. (1)
- Require fee to be paid by those using hoiho for advertising purposes. (1)
- Establish a more positive relationship with the fishing industry. (1)
- Local authorities need to be involved. (1)
- Workshop involving all parties directly involved in implementation of actions (submission has details of workshop format, representatives and timing). (1)

### **Other comments**

Other major comments on theme 5 included:

- Ensure structures are in place to ensure all relevant stakeholders contribute to implementation of the plan and 5 year review. (2)
- Ensure resources in place to fund required work. (1)
- Remove reoccurring theme of fund raising and job allocations scattered through the documents. (1)
- Researchers need to be included in the preparation of these documents and plans. (1)
- Important that working together doesn't slow or prevent action. (1)
- Governance group has intrinsic conflicts of interest that need to be managed carefully. (1)
- Need ability or channel to advocate for hoiho in other fora. (1)
- Funding is key to the implementation of this plan. (1)
- Consider the positive role that district and regional councils, QEII National Trust, Heritage Fund and others could play in implementing recovery of hoiho. (1)
- SP20: must include fisheries bycatch info. (1)

## 2.10 ADDITIONAL ACTIONS AND COMMENTS

Thirteen submitters recommended additional actions.

Additional actions included:

- Urgency and strong, detailed enforceable actions agreed. (5)
- Strategic exposure & communication about the peril of hoiho. (2)
- Further analysis of economics to inform decision making between conflicting resource uses. (1)
- Investigate viability of captive breeding and re-introduction into protected areas (1).
- Fishing industry must be held accountable for their impact on Hoiho and marine species.(1)
- Involve local bodies. (1)
- Education about overfishing & benefits of Marine Reserves. (1)
- Climate change must be listed as the number one threat. (1)
- Additional SP: develop tactical action plans for immediate implementation of hoiho conservation (1)
- Additional theme: increasing food basket for hoiho focused on stopping degradation of marine habitats, understanding and addressing hoiho nutrition / resilience, and creating marine protection. (1)
- Prioritise themes: 1. Marine threats, 2. Increasing Hoiho's food basket, 3. Health and monitoring, 4. Terrestrial habitat, 5. Human disturbance, 6. Working together (1)

Additional comments included:

- Urgency and crisis situation – immediate action. (14)
- Marine-based protection and impact of fishing should be prioritised (5)
- Transparency / accountability are essential (e.g. publicly available annual report, or other platform to ensure that groups regularly engage & feedback on progress on plan/strategy). (5)
- Collaboration is required (e.g. internationally, between NGO's). (4)
- Resource allocation and support. (3)
- Guiding principles provide foundation for the strategy; Kāi Tahu's involvement underpins these (2).
- Applying actions to Rakiura is crucial to saving northern population, but logistically challenging. (2)
- Many actions are not relevant to Rakiura (e.g. stock, mustelids, dog attacks, habitat loss). Concern that halting the mainland decline will be seen as 'success' even if the Rakiura population (c.30% of northern population) disappeared. Consider treating Rakiura and outliers as a separate management unit. (1)
- Reduce waste and save money (e.g. no printed documents, e-meetings) (2)
- Page 8 "extinct by 2060 on parts of the mainland" is too complacent. (1)
- Consider captive management. (1)
- Underlying problems within DOC & YEPT prevent effective rehab, research, & monitoring of hoiho. Constant battle between groups and individuals prevents if not negatively affects protection of hoiho; based on personal conflicts, manipulation, and non-transparency between these organizations. (1)
- Research is identified as problematic rather than essential and important for conservation. (1)
- Documents should be published entirely in English so clear understanding of what is intended. (1)
- Management model chosen is flawed. Action needs to come before consensus. (1)
- Education of community required to facilitate immediate change. (1)
- Question about how we will deal with predation by NZ sea lions. (1)
- Include a guiding principle to ensure that hoiho rebuild, recover and move to a non-threatened state. (1)

- Priorities should be: marine threats, human disturbance, terrestrial habitat, and in particular strategic priorities 6, 7, 10 and 13. (1)
- Yr1: organise workshop with all organisations to develop tactical action plan. Yrs 2-5: organise two workshops annually (start & end of breeding season). (1)
- Remove qualifying words from actions (e.g. encourage, further) as they lack conviction. (1)
- Agree with guiding principles with addition of "We will be open and transparent in our decision making, accountable for our actions and sharing in our matauranga knowledge and data." (1)
- Seek clarity that "guided by kawa & tikaka" includes Matauranga Māori and scientific knowledge. (1)
- Data should be shared & easily accessible - establish a commons database. (1)
- Support Conservation through communication. (1)