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Submission Form (Form 5)

Submission on Proposed Plan Change 1: Regional Coastal Plan: Kermadec and Subantarctic Islands

[Form 5](#) Submissions on a Publicly Notified Proposed Regional Coastal Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991.

Return your signed submission by 5pm 22 October 2025 via:

Email: planchange1@doc.govt.nz with subject line: Proposed Plan Change 1: Regional Coastal Plan: Kermadec and Subantarctic Islands

Post: Department of Conservation, Private Bag 3072, Hamilton 3240
Attention: Jesse Gooding, RSP Resource Management Team

All sections of this form need to be completed for your submission to be accepted. Your submission will be checked for completeness, and you may be contacted to fill in any missing information.

Full name: Chloe Ann Barker

Phone: [REDACTED]

Organisation: New Zealand Sea Lion Trust
(*the organisation that this submission is made on behalf of)

Email: legal@sealiontrust.org.nz

Postal address: [REDACTED]

Postcode: [REDACTED]

Address for service: name, email and postal address (if different from above):

Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

☒

I could not gain an advantage in trade competition through this submission; or

☐

I **could** gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

☐

I am directly affected by an effect of the subject matter of the submission

☐

I **am not** directly affected by an effect of the subject matter of the submission

Hearing Submissions [select appropriate box]:

☐ I wish to be heard in support of my submission.

X I do not wish to be heard in support of my submission.

☐ If others make a similar submission, I will consider presenting a joint case with them at a hearing.

☐ If others make a similar submission, I will not consider presenting a joint case with them at a hearing.

- *In accordance with clause 7 of Schedule 1 of the RMA, the Council will make a summary of your submission publicly available. The contact details you provide will also be made publicly available, because under clause 8A of Schedule 1 of the RMA any further submission supporting or opposing your submission must be forwarded to you by the submitter (as well as being sent to Council).*
- *Section 352 of the RMA allows you to choose your email to be your address for service. If you select this option, you can also request your postal address be withheld from being publicly available. To choose this option please tick the relevant boxes below.*

X I would like my address for service to be my email.

X I have selected email as my address for service, and I would also like my postal address withheld from being publicly available.



Signature: Chloe Ann Barker as trustee of the New Zealand Sea Lion Trust

Date: 21/10/2025

(Signature of person making submission or person authorised to sign on behalf of person making the submission – unless you are providing your submission by email).

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The New Zealand Sea Lion Trust (NZSLT) is a charitable trust which promotes within New Zealand (including the Kermadec and Subantarctic Islands) the conservation, protection and benefit of pakake/New Zealand sea lions and all pinnipeds. Pakake are one of the rarest sea lions in the world and are only found in New Zealand. They are nationally endangered.

We welcome the opportunity to submit on Proposed Plan Change 1 – Regional Coastal Plan: Kermadec and Subantarctic Islands (Proposed Plan). The Kermadec and Subantarctic Islands are critical for pinnipeds including the New Zealand sea lion /pakake, as key areas for breeding and foraging.

(1) The specific provisions of the Proposed Plan Change that my submission relates to are:		(2) My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)</i>		(3) I seek the following decisions from the Minister of Conservation. <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Chapter/Appendix/ Schedule/Maps	objective/policy/rule/ standard/overlay	Oppose/support (in part or full)	Reasons	
Table 1 Appendix 4 Appendix 5 Appendix 6 Appendix 7	Vessel hull and niche area inspection – requirements method and forms	Support	NZSLT supports the new inspection requirements contained in the Proposed Plan to reduce the risk of introducing marine pests in vessel hull biofouling. The reduction of the introduction of marine pests which could alter the functioning of local ecosystems, limit prey availability, and/or introduce disease is key in these remote areas.	Accept all proposed amendments to Table 1, Appendix 4, Appendix 5, Appendix 6, Appendix 7.

Rules – Provisions specific to Vessel length	Rule 47A – Access and anchoring, within Perseverance Harbour, Campbell Island/ Motu Ihupuku up to 0.16nm (300m) of MHWS, by vessels longer than 125m in length.	Oppose	NZSLT opposes allowing operators of vessels longer than 125 m to apply for a resource consent (a coastal permit) to access Perseverance Harbour on Campbell Island/Motu Ihupuku, and supports the current prohibition continuing. Perseverance Harbour is a difficult harbour to navigate due to the reefs present. Larger vessels visiting more frequently will increase the risk of accidents and, with them, the risk of environmentally disastrous side effects, such as oil spills and leakages. Vessels of over 125 m in Perseverance Harbour will require more space to anchor, presenting increased impacts on the sea floor due to the larger size of anchors and amount of anchor chain required. Larger vessels also catch the wind more and require greater speed to maintain steerage. Any accidents will detrimentally impact upon local wildlife, including sea lions and other pinnipeds. There is evidence of previous incidents involving larger vessels when permitted in the Subantarctic, e.g. L'Austral 2017. In addition, generally, allowing access by larger vessels (and with them, increased numbers of people) into ecologically vulnerable areas increases the risk of negative impacts on wildlife and biosecurity. Larger, newer vessels will also have more deck lights as this is required under maritime law. Such lighting will increase disturbance to local wildlife populations. There are a number of New Zealand sea lions (over 1000 individuals) using	Delete amendments to Rule 47. Delete new Rule 47A.
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			Perseverance Harbour and allowing operators of vessels longer than 125 m to use the harbour will increase the risk of disturbance to the sea lions due to noise, physical impacts of both the vessel and wake, oil spillages, and possible injury and death from boat strike. NZSLT would like to see the coastal plan align with similar areas such as Macquarie Island and the rules for vessels heading to Antarctica under IAATO-International Association of Antarctic Tour Operators. These rules also include limits on passenger numbers on vessels and limits of 200 people permitted for landings.	
Control of Surface Water Activities (Access and Anchoring)	Policy 13 Rules 40, 56	Oppose	NZSLT opposes restricting ancillary craft (such as zodiacs) to a 1000m proximity from the main ship. If this restriction is imposed and visits to Campbell Island are to continue then larger vessels will need to be allowed into Perseverance Harbour which NZSLT opposes due to reasons given above NZSLT supports increases to the safety of vessels, and their passengers, operating in these regions but believes it can be achieved in other ways such as restricting the operation of ancillary craft to occur in pairs so all vessels have a support craft.	
Access and anchoring within the coastal marine area of the Subantarctic Islands	Table 2 Note 7 Rules 34, 37, 40, 41, 42, 43, 46, 49	Support	NZSLT supports tightening restrictions on vessels accessing Port Ross in the Auckland Islands during the winter months when the tohorā/southern right whales are present in large and increasing numbers. This is to reduce risk of collision, pollution of the environment and injury to the whales. NZSLT supports the protection of tohorā/southern right whales as part of the ecosystem of the	Accept proposed amendments to Table 2, Note 7, Rules 34, 37, 40, 41, 42, 43, 46, 49

			Kermadec and Subantarctic ecosystem.	
Access and anchoring within the coastal marine area of the Subantarctic Islands	Rule 42	Support in part	NZSLT supports in part providing more safe anchorage options for small vessels, including the Southern Ocean scampi fleet vessels for sheltering from bad weather in Carnley Harbour of Auckland Island subject to (1) those locations strictly being available for shelter during bad weather events only; and (2) any safe anchorage options excluding the area surrounding Figure of 8 Island.	Accept amendments to Rule 42, Condition C with further amendments to note that (1) those locations are strictly available for shelter during bad weather events only; and (2) excluding the area surrounding Figure of 8 Island.
Issues, Objectives, Policies and Methods of Implementations	Issue 1 – Natural Character	Support	NZSLT supports the technical change to the Plan that describes issues to be managed to clarify that all the coastal marine area of both groups of islands is of an outstanding natural character.	Accept all proposed amendments to Issues, Objectives, Policies and Methods of Implementations, Issue 1 – Natural Character regarding coastal marine areas of both groups of islands being of outstanding natural character.

Add further pages as required – please initial any additional pages