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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: Aaron Irving

Phone: [REDACTED]

Organisation:

Seafood New Zealand | Deepwater Council

*(*the organisation that this submission is made on behalf of)*

Email:

Aaron.Irving@seafood.org.nz; Ben.Steele-Mortimer@seafood.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.

☐ 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.*

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

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

Signature:



Date: 22/10/2025

(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.*

(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	
Rules 29A and B(b) (relating to Performance Standards 1-4)	Vessel hull and niche area biofouling inspection and compliance	Oppose (in part)	• SNZ questions how the imposition of the MPI Craft Risk Management Standard (CRMS) Vessels 2023 on domestic vessels in the Sub-Antarctic is “<i>giving better effect to New Zealand Coastal Policy Statement (NZCPS) 2010.</i>” • The CRMS represents the ratification of IMO 2023 guidelines (Resolution MEPC.378 (80), Annex 17) by MPI, which is applied to international vessels and not vessels undertaking domestic voyages (e.g., scampi vessels) as minimise/mitigate the incursion invasive aquatic species on those international vessels. • As such the application of international vessel standards (outlined in Craft Risk Management Standard (CRMS) Vessels 2023) to domestic operators (undertaking activities in adjacent waters) is unnecessary and arguably over-reach. • The current regime already meets and exceeds IMO 2023 standards and includes rigorous inspections, niche area management, and contingency pathways. SNZ asks where is the risk that supports the imposition of these proposed changes which are unnecessary and disproportionately burdensome for domestic scampi vessels (e.g. international vessels rarely enter Sub-	Domestic vessels to be exempt from the new inspection protocols (Forms 1 and 2 of Appendix 4) Domestic vessels should maintain requirements under the current Regional Coastal Plan (2017) due to the lower risk profile.

			Antarctic waters, Scampi vessels undertake frequent voyages. It is SNZ's submission that the imposition Rules 29A and B(b) (relating to Performance Standards 1-4) add additional compliance costs, and operational burden without improving biosecurity outcomes.	
Appendix 4	Inspection protocols and evidence requirements	Oppose (all changes)	- The requirement for additional documentation, including photo/video evidence, is excessive for domestic vessels (and even more so for those vessels working within adjacent waters). - Scampi vessels already undergo frequent inspections due to regular returns to port. - The proposed changes duplicate existing requirements and impose unnecessary administrative and cost burdens. - DOC does not provide any evidence as to why the current process under the Operative Plan for the scampi fleet is inadequate. - Correspondence obtained from operators demonstrates strong engagement and adherence to the current requirements. Information that we have at hand indicates that authorisation for access to the Auckland Islands based on the current operative plan has never been denied. - SNZ questions the rationale behind the implementation of duplicate, disproportionate and unduly burdensome inspection requirements. DOC staff and authorised inspectors has been positive under the current process, and not indicative of any change of a process which (by all	Domestic vessels to be exempt from the new inspection protocols (Forms 1 and 2 of Appendix 4) Domestic vessels should maintain requirements under the current Regional Coastal Plan (2017) due to the lower risk profile.

			accounts) is working well.	
Appendix 5	Removal of Approved inspectors	Oppose	• SNZ questions what appears to be another disproportionate change undertaken in the absence of any rationale. The scampi vessel operators have built trusted relationships with approved inspectors in several ports around the country. Inspectors have become familiar with vessels and inspection scheduling. This appears to be an effective process. • Several risks have been identified with the removal of improved inspectors, including: ○ Reduced assurance of adequate inspections and cleaning ○ Increased administrative burden for operators and DOC ○ Operational uncertainty for industry (i.e., the scampi vessel operating in adjacent waters)	Retain minister approved inspectors
Rule 34B, 37B, 38, 39 40, 41B, 42B, 43B, 46B, Note 7	Access to Port Ross during whale season (1 April–31 October)	Oppose	• SNZ questions the rationale behind this disproportional measure that risks vessel safety, to reduce entanglement risk to whales in the harbour, of which no entanglements or interactions been observed or reported. • The harbour in the vicinity of Port Ross is deep, sheltered, and ringed with hills – and as such is one of the few safe anchorages in the Sub-Antarctic and is a critical refuge for vessels during poor weather. • A full seasonal closure would remove this safety option during the most hazardous	We request that commercial fishing vessels are permitted to access Port Ross for safe anchorage (particularly during the winter months: 1 April to 31 October) under the conditions which currently apply, with the addition of: • Requirement to use chain/wire anchor cables • Speed restrictions where practical to keep steerage It is SNZ's submission that permitted access to Port Ross for safe anchorage in adverse weather conditions is critical. To these ends SNZ requests that express provision is made in the plan for 'sheltering vessels' (e.g. to rules 38, 40, 41, 42, 43, and 46)

			time of year. • Scampi vessels use steel anchor chains, which hang rather than float and pose minimal entanglement risk to whales. • There is no history of whale entanglements in the scampi fishery, nor with scampi vessels seeking shelter at Auckland Island. • While it is not clear if MPI Observers are specifically instructed to report compliance with the Regional Coastal Plans, they are required to report on protected species risk management more generally (Vessel Management Plan Audits and Operational Procedures) and are required to report protected species captures, including entanglements. Based on observer records and Non-Fish or Protected Species reports, there has never been a whale entanglement involving scampi vessels and adherence to protected species risk management has been high over recent years (Deepwater Annual Review Report 2022/23). • The Sub-Antarctic is recognised as having some of the most extreme weather conditions, and the exclusion of safe anchorage in the North of the Island away from the southerlies and easterlies is risking scampi vessels and the lives crew. • SNZ is surprised that the proposed plan makes provision in Port Ross for vessels undertaking management activities and/or research for DOC, including vessels of the New Zealand Navy, but excludes other vessels seeking shelter (e.g., scampi vessels) – who under the plan must transit	
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			in adverse conditions to the south of Island, unless they have applied for and have been granted <i>Discretionary Resource Consent</i>. It is SNZ's strong submission that a plan written by DOC that provides for permitted anchorage for DOC's own vessels in adverse weather, but excludes other vessels (e.g., commercial scampi vessels) subject to their having consent is unconscionable. Safety of the lives of crew in times of distress should never require consent or a permit!	
Performance Standards 5 & 6 (Table 2)	Whale protection measures during winter	Oppose (in part)	While supporting whale protection, the proposed restrictions are disproportionate to the actual risk posed by scampi vessels (which use steel anchor chains).	As above
Rule 42C	Anchorage at Round Point and Crab Bay (Carnley Harbour)	Support	- These new anchorages provide essential shelter from hazardous north-easterly winds. Their inclusion improves safety and operational continuity for the fleet. - However, additional anchorages are still needed to address prevailing south-westerly conditions and congestion during adverse weather, particularly up <i>North Arm</i>.	(support as is)
Tucker Point Anchorage (Port Ross)	Request for additional anchorage	Oppose	- SNZ strongly submits that this anchorage is needed for shelter from southerly and easterly winds. - DOC rejected its inclusion citing lack of rationale, but the same safety logic used for Carnley Harbour applies here. - The inclusion of Tucker Point provides vessel safety during adverse conditions.	We request that the Minister includes Tucker Point anchorage in Rule 42C. As below Vessels may access and/or anchor at the following locations together with those locations listed in Rule 43 which the captain of the vessel considers appropriate: (a) Sandy Bay (in Port Ross), Auckland Island – but no closer than the 10 metre contour (<i>chartlet 3</i>) (b) Tucker Point (in Port Ross), Auckland Island

				(<i>chartlet 3</i>) (c) Musgrave Harbour (North) (in Carnley Harbour), Auckland Island (<i>chartlet 8</i>) (d) Musgrave Harbour (South) (in Carnley Harbour), Auckland Island (<i>chartlet 8</i>) (e) Round Point (in Carnley Harbour), Auckland Island (<i>chartlet 9A</i>) (f) Crab Bay (in Carnley Harbour), Auckland Island (<i>chartlet 9B</i>)
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Add further pages as required – please initial any additional pages

22 October 2025

Jesse Gooding
RSP Resource Management Team
Department of Conservation
Email: planchange1@doc.govt.nz

Deepwater Council
Level 12
36 Kitchener Street
CBD Auckland 1010
PO Box 297
Wellington 6140

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

Dear Jesse,

Further to the recent public notice, issued pursuant to Clause 5 of the First Schedule of the Resource Management Act 1991, Seafood New Zealand Deepwater Council (SNZ) welcomes the opportunity to submit on the Department of Conservation (DOC) Proposed Plan Change 1 to the Regional Coastal Plan: Kermadec and Subantarctic Islands.

SNZ represents deepwater commercial fishing interests, including operators in the scampi fisheries which operate adjacent to the Auckland Islands (SCI 6A). These vessels rely on safe anchorage and operational certainty in the Sub-Antarctic region.

The New Zealand scampi fleet does not plan or conduct voyages to visit the Subantarctic Islands, instead they conduct voyages to the southern fishing grounds and utilise the Subantarctic Islands for shelter when unsafe sea conditions arise in the fishing grounds.

Based on the information available in the Section 32 Report and supporting information, the risk level at the Auckland Island hasn't changed, since the current Plan (Regional Coastal Plan 2017) was established.

As responsible operators who are dependent on the health of the marine environment, we support the overarching goals of environmental protection and biosecurity. We appreciate the need to review and update the Plan in light of evolving risk and best practice. However, we question DOC's basis for the significant and vast scope of changes to a document that was developed very recently at great cost and effort. The plan in its current form has proved to be fit for purpose. The evolution of best practice and the environment factors specific to the Subantarctic Islands has not changed proportionally and in line with what DOC have proposed.

We wish to raise several concerns regarding the proposed changes, particularly where they lack supporting evidence and rationale, and may disproportionately affect domestic scampi operators without a commensurate environmental benefit.

We respectfully submit the following key points for consideration.

1. Vessel Hull Inspection Requirements – Biofouling Risk Management

We strongly oppose that the New Zealand scampi fleet should have to adhere to the proposed changes to the biofouling rules as outlined in Plan Change 1. Notwithstanding that there is no evidence presented demonstrating that the proposed changes to the biofouling risk management regime are in response to increased risk or will provide a great benefit, these changes are unnecessary, inappropriate, and disproportionately burdensome for domestic scampi vessels, which already meet a very high standard of hull and niche area maintenance under the current regulatory framework.

SNZ notes that in terms of change drivers to support the intensification of the Biofouling Risk Management regime in the proposed Plan, the only rationale available was the comment on p19 that the proposed changes “[give] better effect to New Zealand Coastal Policy Statement (NZCPS) 2010.”

This submission addresses the proposed amendments to the vessel biofouling provisions under Plan Change 1. The submission argues that the current biofouling and hull cleaning regime is already fully aligned with the International Maritime Organization (IMO) 2023 Biofouling Guidelines. As such, further amendments—particularly those affecting domestic vessels—are unnecessary and risk imposing disproportionate compliance costs without delivering additional biosecurity benefit.

Adequacy of the Current Regime

The current regime was developed in consultation with NIWA and DOC biosecurity experts and incorporates all key elements of the IMO framework. These include:

- The use of appropriate anti-fouling systems and risk based framework
- rigorous inspection protocols,
- niche area management,
- contingency pathways,
- documentation of standards.

The current Plan requires vessels to submit documentation at least one week prior to arrival, demonstrating that an anti-fouling system has been applied in accordance with manufacturer specifications and is suitable for the vessel and operating environment. Maintenance records must cover all components, including niche areas such as sea chests and anodes—mirroring the IMO’s emphasis on proactive system maintenance.

Certified diver inspections are required every 3-6 months (depending on when the most recent anti-fouling has been applied). Vessels must be free of all visible organisms (with specified exemptions) after these inspections. This threshold is identical to the Level 1 standard in the IMO 2023 Guidelines and MPI’s CRMS for International Vessels 2023.

The Plan also addresses niche areas, requiring inspection of all accessible spaces and allowing for risk assessment where inspection is impractical. If a vessel fails inspection and cleaning is not viable, the Plan provides a clear contingency pathway through an

independent risk assessment and coastal permit application, processed within 24 hours—consistent with IMO’s risk-based approach.

SNZ submits that correspondence obtained from operators demonstrates the strong engagement and adherence to the current requirements by scampi vessel operators. What is more, from the information that we have at hand there is no record that any authorisation for Access to the Auckland Islands has ever been denied. Any biofouling identified by the inspectors, is cleaned on site to ensure that the vessel meets the standards.

In addition, the correspondence with respect to biofouling risk management between operators, DOC staff and authorised inspectors has been positive under the current process with no incident or issue ever being raised, which raises the question as to why a process which is working well is being changed and intensified.

Domestic vs international

The proposed Plan references and essentially implements the MPI Craft Risk Management Standard (CRMS) Vessels, notwithstanding that these Standards are intended to ratify the IMO 2023 Guidelines with respect to the management of vessels transiting into New Zealand from international waters. It is SNZ’s submission that the IMO 2023 Guidelines are also explicit that for vessels operating in the same waters in which biofouling accumulated these international measures (which mitigate/minimise the transfer of invasive aquatic from international locations) “may not be relevant”.

Therefore, while the CRMS for Vessels 2023 which is referenced in the Section 32 Report as a benchmark, it is designed specifically for international vessels entering New Zealand’s territorial waters. It should not apply to domestic vessels operating solely within New Zealand, and even more so in adjacent waters, such as the Southern Ocean scampi fleet.

Applying the same level of documentation and inspection detail to these vessels is disproportionate to the low levels of risk these domestic vessels pose and imposes unnecessary and significant compliance costs. The additional report writing and photo / video footage requirements outlined in Appendix 4 of the Proposed Plan Change 1, is excessive for the domestic scampi fleet. These vessels are already required to undertake these inspections far more frequently than international vessels due to their frequency of transit to and from the mainland.

The current regime already provides a robust framework for managing biofouling risk from domestic vessels, and there is no evidence to suggest that it has been ineffective in practice, and no evident policy basis to intensify Risk Management measures for commercial scampi vessels operating in the Sub-Antarctic.

Recommendation

The current biofouling regime meets and exceeds the standards set by the IMO 2023 Guidelines and is already consistent with the intent of the CRMS for Vessels 2023. It is tailored to New Zealand’s unique marine environments and enforced through a robust, risk-

based framework. For domestic vessels with proven compliance records, the proposed changes in Plan Change 1 would duplicate existing requirements, increase compliance costs, and offer no additional biosecurity benefit. We therefore respectfully submit that no changes should be made to the biofouling rules for domestic operators.

2. Access to Port Ross During Whale Season (1 April – 31 October)

The scampi fishing fleet does not plan or conduct voyages to visit the Subantarctic Islands, instead they conduct voyages to the southern fishing grounds and utilize the Subantarctic Islands for shelter when unsafe sea conditions arise in those fishing grounds.

Port Ross harbour is deep, sheltered, and ringed with hills – and as such is one of the few safe anchorages in the Sub-Antarctic and is a critical refuge for vessels during poor weather (especially from southerly winds). Port Ross also serves as a critical anchorage during transit between New Zealand and the Auckland Islands fisheries. Scampi vessels anchor in Port Ross under poor weather conditions, when continuing at sea would pose a risk to vessel integrity and crew safety.

A winter closure would effectively remove this vital refuge during the very season when it is most needed, potentially forcing vessels to remain at sea in unsafe conditions or transit through unsafe and extreme weather to the south of the island to what could be less suitable anchorages (e.g., in southerlies and easterlies).

SNZ notes that the proposed plan restricts access to Port Ross to vessels undertaking “*management activities and/or research for the Department of Conservation, including vessels of the New Zealand Navy*” with requirements for those vessels to transit slowly through the area with a continuous bow watch for whales. The plan proposes to exclude other vessels from access (even when in need of a safe anchorage) unless they have applied for and have been granted *Discretionary Resource Consent*.

It is SNZ’s strong submission that a plan written by DOC that provides for permitted anchorage for DOC’s own vessels in adverse weather, but excludes other vessels (e.g., commercial scampi vessels) subject to their having consent is unconscionable. Safety of the lives of crew in times of distress should never require discretionary resource consent or the grant of a discretionary permit!

The proposed winter closure of Port Ross, intended to reduce the risk of whale interactions, must be carefully weighed against the operational realities and safety considerations of the scampi fishery.

It is SNZ’s submission that the plan be amended to explicitly provide for the access and anchoring to Port Ross for vessels “involved in management activities and/or research for the Department of Conservation, including vessels of the New Zealand Navy,” and those vessels seeking shelter. Such an amendment would recognise the paramount importance of vessel and crew safety.

Whale risk from scampi vessels

While the presence of southern right whales in the area during winter is well documented, it is important to note that there has never been a recorded whale entanglement involving scampi vessels in Port Ross or elsewhere in the New Zealand scampi fishery.

While it is not clear if MPI Observers are specifically instructed to report compliance with the Regional Coastal Plans, they are required to report on protected species risk management more generally (Vessel Management Plan Audits) and are required to report protected species captures, including entanglements.

Based on observer records and Non-Fish or Protected Species reports, there has never been a whale entanglement involving scampi vessels and adherence to protected species risk management has been high in recent years ([Deepwater Annual Review Report 2022-23](#)).

Furthermore, scampi vessels employ steel anchor chains rather than rope-based systems. Steel chains hang down and rest on the seafloor and do not pose the same entanglement risk as floating or slack rope, which is known to be a primary cause of whale entanglements with other vessels. This, along with the required measures within the current operative Plan means the risk profile of scampi operations in Port Ross is inherently low.

With Research and Management vessels permitted to access Port Ross during the winter period, whilst implementing precautionary measures, there is no logical reason why sheltering fishing vessels should not also be a permitted activity.

It is SNZ's submission that Permitted Access to Port Ross for safety of vessels and crew should sit higher on the importance scale than research and maintenance.

Recommendation

Given the absence of historical whale interactions, the low-risk gear types, and the essential safety function Port Ross provides, it is SNZ's profound submission that a full seasonal closure of this port is not only unconscionable, but also disproportionate to the actual risk.

A more balanced approach would involve permitting access to Port Ross during the winter months, under the current provisions with the addition of:

- Use of chain/wire anchor cables
- Speed restrictions where practical to keep steerage

Such measures would allow for continued safe use of Port Ross while maintaining strong protections for marine mammals.

3. Support for Additional Anchorage Options in Carnley Harbour (and the Case for Port Ross)

Carnley Harbour

We strongly support the inclusion of new anchorage sites in Carnley Harbour at Round Point and Crab Bay, as these provide much-needed shelter from rare but hazardous north-easterly wind events. However, further anchorage options are still required within Carnley Harbour to accommodate prevailing south-westerly conditions, which are more frequent and often more severe.

We also point out that access to safe anchorage is a vessels legal right under law and a Captain has a right to access safe anchorages if he alone determines a need.

Ensuring the safety of vessels and crew must remain the highest priority in anchorage planning. The subantarctic environment is highly dynamic, with rapidly changing weather and limited safe havens. It is vital that vessels have access to safe anchorages that provide protection from severe conditions, and where the anchorages match the conditions. The ability to access appropriate shelter in response to prevailing conditions is essential to avoid damage to vessels, injury to crew and maintain operational continuity.

While we are fully supportive of the proposed additions, there is still a limited number of anchorages in Carnley Harbour to protect vessels from the prevailing and often strong south-westerlies. Carnley Harbour can also become congested during adverse weather, when multiple vessels seek shelter simultaneously, which may compromise safety and force vessels to anchor in less preferable areas.

Furthermore, the seabed in the proposed Carnley Harbour anchorages drops off steeply, making anchoring technically challenging, especially in south-westerly conditions, where the creation of a close lee shore anchoring situation makes the anchorage unsafe for both vessel and environment.

Tucker Point (Port Ross)

Industry has long requested access to additional anchorage locations to be allocated as permitted anchorages (e.g., Tucker Point (or Lookout Point) on the southern side of Port Ross). In the Plan Change 1 (Section 32 Report, pp 42-43). DOC states that the fishing industry did not provide any rationale for requesting the Tucker Point anchorage.

It is SNZ's submission that the same rationale that applies to the Carnley Harbour anchorages also applies to Tucker Point – safe anchorages for vessels and crew that accord with the conditions (i.e.' the need to shelter from north-easterly winds (in this case more easterly)).

SNZ maintains the view that this anchorage is needed for safe sheltering (Appendix 1).

Recommendation

SNZ supports the ongoing conversations between the seafood industry and DOC on the provision of additional anchorages at Auckland Islands, including support for the inclusion of Tucker Point as an additional anchorage in Port Ross.

3. Conclusion

SNZ appreciates the opportunity to engage constructively with the DOC on Proposed Plan Change 1.

While SNZ supports the overarching goals of environmental protection and biosecurity, we urge DOC to consider the operational realities and proven compliance record of the domestic scampi fleet. As well as ensuring the Plan is aligned with international law and right of free passage, and especially the ability to keep a vessel and its crew safe.

Several proposed changes – particularly those relating to biofouling inspections and seasonal access restrictions – risk imposing disproportionate burdens on scampi operators without demonstrating additional environmental risk and delivering commensurate and demonstrable environmental benefits.

SNZ advocates for a more balanced, risk-based approach that maintains strong protections for the marine environment while ensuring the safety and viability of domestic fishing operations.

We welcome continued dialogue to refine the Plan in a way that supports both conservation and sustainable industry practice.

Yours sincerely,



Aaron Irving
General Manager – Deepwater
Seafood New Zealand Ltd

Appendix 1:

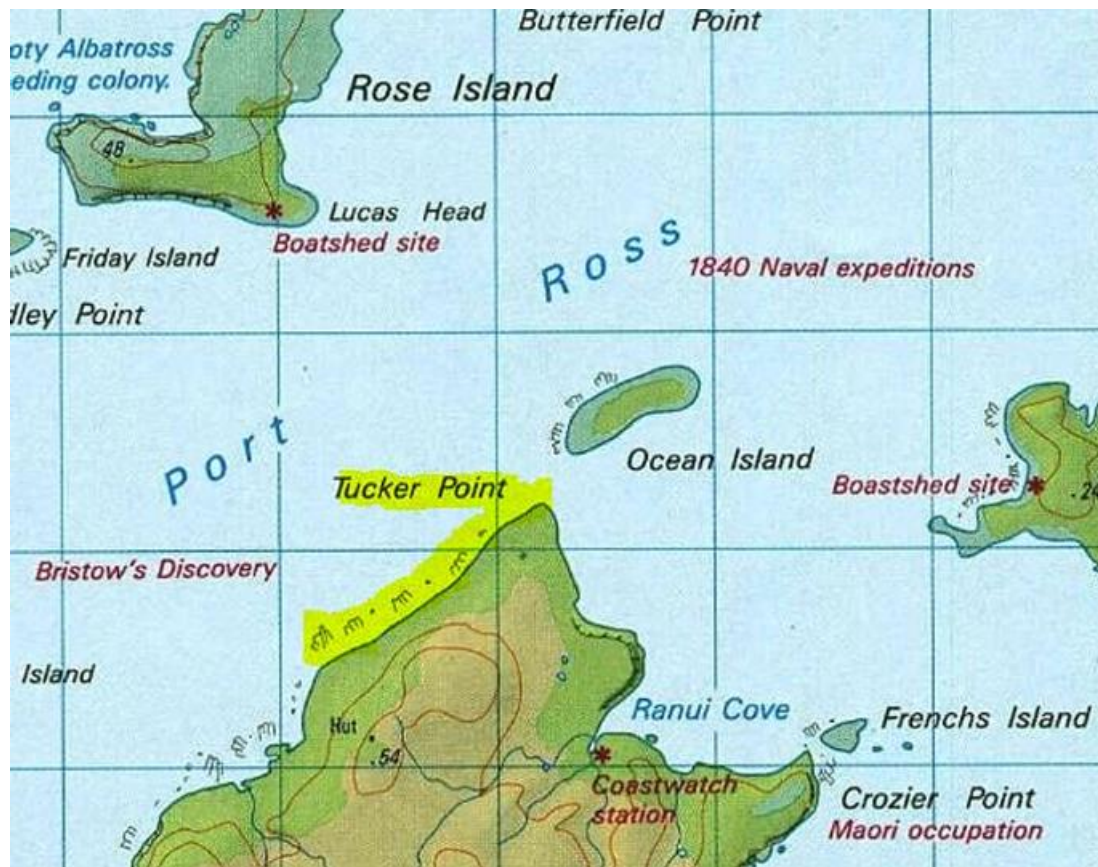


Figure 1: Location of the DWC proposed additional Port Ross.