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# Joint recreational submission to the review of catch levels for Northland scallops (SCA 1) for 2020/21

## Submission summary

1. We submit in support of the Minister reducing the Total Allowable Catch (TAC) by 60% and Total Allowable Commercial Catch (TACC) by 75% on the basis that commercial dredging in inshore waters is reviewed and that commercial hand gathering and other low impact methods of harvesting scallops is permitted in selected areas.

2. We submit that managing the scallop fishery by output controls such as a TACC is inappropriate, and that a mix of input controls such as effort, area and catch limits is more appropriate.

3. We submit in support of the FNZ proposal to retain the allowances currently set aside for Maori customary and recreational fishing interests.

## The submitters

4. The submitters appreciate the opportunity to submit on the review of catch levels for Northland scallops (SCA 1) for 2020-21. Fisheries New Zealand (FNZ) advice of consultation was received on 13 December 2019, with submissions due by 5 February 2020.

5. The NZ Sport Fishing Council (NZSFC) is a recognised national sports organisation of 55 member clubs with over 36,200 affiliated members nationwide. The Council has initiated LegaSea to generate widespread awareness and support for the need to restore abundance in our inshore marine environment. Also, to broaden NZSFC involvement in marine management advocacy, research, education and alignment on behalf of our members and LegaSea supporters. www.legasea.co.nz.

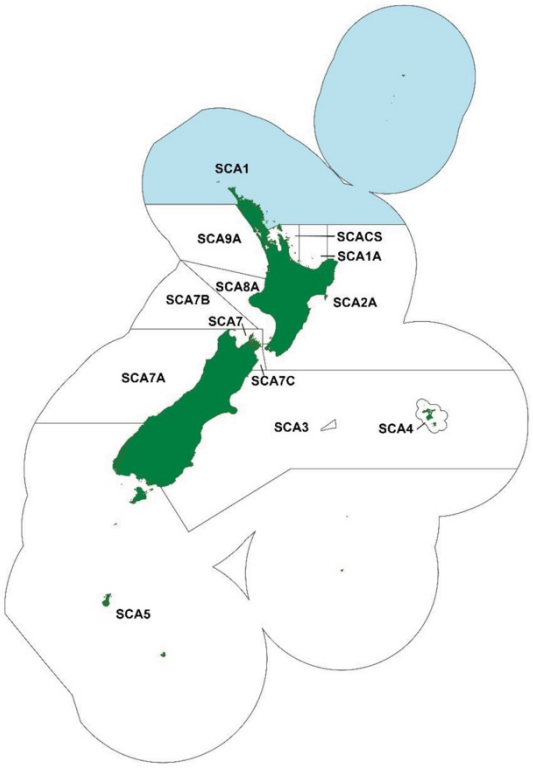
6. The New Zealand Angling and Casting Association (NZACA) is the representative body for its 35 member clubs throughout the country. The Association promotes recreational fishing and

the camaraderie of enjoying the activity with fellow fishers. The NZACA is committed to protecting fish stocks and representing its members' right to fish.

7. Collectively we are '*the submitters*'. The submitters are committed to ensuring that sustainability measures and environmental management controls are designed and implemented to achieve the Purpose and Principles of the Fisheries Act 1996, including "maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations…" [s8(2)(a) Fisheries Act 1996].

8. Our representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this review and would like to be kept informed of future developments. Our contact is Helen Pastor, secretary@nzsportfishing.org.nz

## Background




9. There is little information on the growth and natural mortality of scallops in SCA 1. A few tag returns from Northland indicate that growth rates in Bream Bay are similar to those in the Coromandel fishery (SCA CS).

10. All commercial scalloping in SCA 1 is by box dredge. Scallops in box dredge fisheries have shown modest reductions in growth rates compared to scallops collected by divers, and relatively high (20-30%) mortality rates for scallops returned to the water. The Total Allowable Commercial Catch (TACC) for SCA 1 is 40 tonnes (t) and the allowance set aside for mortality caused by fishing is 20 t.

11. The Northland commercial scallop season runs from 15 July to 14 February. The commercial minimum legal size is 100mm. Recreational fishers target scallops by diving or dredging. Since 2007 the recreational scallop season extends from 1 September to 31 March. Fishers can take up to 20 scallops per person, 100mm or bigger. Divers may take a daily limit for up to two safety persons aboard their fishing vessel. The most recent survey estimates recreational harvest is around 2.5 t annually. There is limited data available on the level of customary harvest. Known harvest is likely to be an underestimate of customary interests in the scallop fishery.

12. Between 1981 and 2010 commercial landings varied more than 10-fold, from 80 t to over 1600 t greenweight. There was a gradual decline in landings from 68 t meatweight in 2006 to only 1 and 2 t in 2011 and 2012. There was no fishing in 2013 and only 2 t of meatweight was landed in 2015. Over the last 4 years annual landings have been 16, 7, 6 and 8 tonnes. Commercial effort is mainly focused on beds off Bream Bay, East Northland.

13. SCA 1 is on the Second Schedule of the Fisheries Act 1996 which means a base Total Allowable Commercial Catch (TACC) of 40 t is set, with in-season increases provided for by increasing the available Annual Catch Entitlement (ACE). The last ACE increases occurred in 2006 and 2007, supported by estimates of biomass derived from annual surveys. The last comprehensive stock survey was undertaken in 2007.

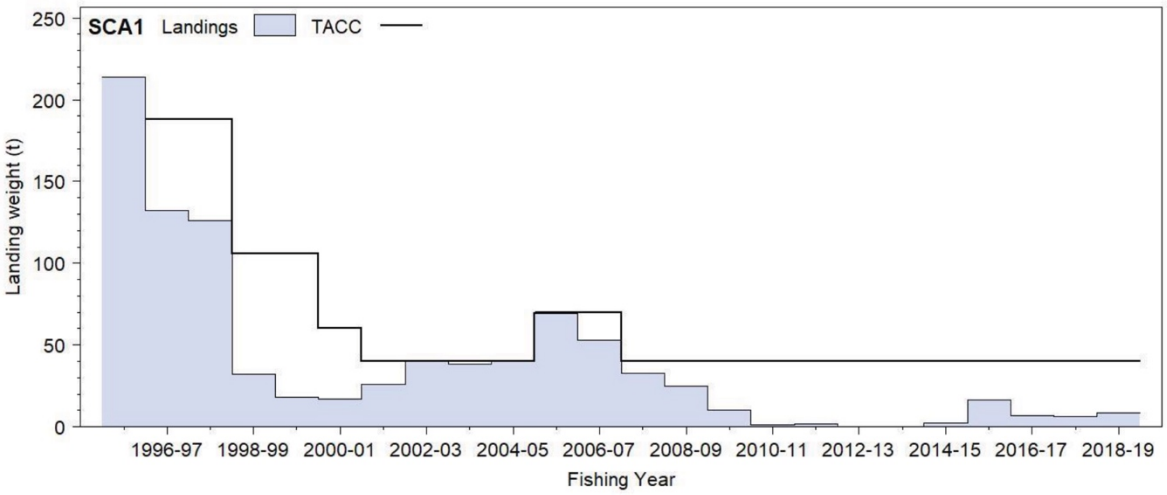



**Figure 1:** Reported commercial landings and catch limits for SCA 1 (Northland) since 1995-96.

## Submission

14. Since 2017 the New Zealand Sport Fishing Council and LegaSea have promoted a Fisheries Manifesto which outlines the policies required to restore inshore fisheries to abundant levels and return the marine environment to a more productive ecosystem. One of the five policies is to "Remove industrial fishing methods such as trawling, seining and dredging from the inshore zone". This submission is guided by this policy.

## Scallop dredging

15. Scallops are a valuable species for fishing, environmental and cultural reasons. They are a taonga [treasure] for Maori. Yet we continue to allow dredges to be used to gather the remaining remnants of a once-prolific fishery. Shameful management of this taonga.

16. Now Fisheries New Zealand (FNZ) propose to reduce the Total Allowable Catch (TAC) by 60% and the Total Allowable Commercial Catch (TACC) by 75%, to "better reflect the current state of the fishery and provide for closer management to address sustainability risks". What does this actually mean? Stock status in SCA 1 is unknown. Catches in the last three years are less than 5% of what they were in the 1990s, and the proposed reductions will not constrain commercial effort.

17. We submit that if FNZ are serious about reflecting "the current state of the fishery" they would be advocating for either a total closure to commercial harvest, or to reduce the sustainability risks by banning the use of dredges from some inshore areas. There are areas on the northeast coast that are not suitable for dredging on an industrial scale therefore we advocate that FNZ ought to permit the hand gathering of harvesting scallops for commercial purposes in specified areas.

18. The submitters recognise that dredging has been the default harvesting method for many years however, as we learn more about the stressors affecting the marine environment we must consider how we can mitigate the impacts from bottom contact fishing methods. The NZSFC will be discussing a specific policy around dredging at the September 2020 Annual General Meeting.

19. We note that mana whenua in Northland have expressed concerns about the impacts of dredges on scallop beds. These concerns have been known yet not addressed for many years.

20. The commercial scallop fishery has a history of serial depletion, as one bed is exhausted fishers move on, find another, exploit that then move again. Over time those beds become less productive even when left fallow for a time.

21. Another risk factor to take into account is the cumulative effects of the change to the recreational harvest season for scallops. Since 1973 the season for commercial and recreational scallop harvesting in SCA 1 was 15 July to 14 February. In 2006 the New Zealand Recreational Fishing Council successfully lobbied to have the recreational season changed to 1 September to 31 March inclusive. The submitters objected at the time, asking for a more nuanced approach and that more consultation was required.

22. We submit that given the available information to inform this process, now is the appropriate time for the Minister to review the use of dredges to target scallops, with a view to limiting their use to selected deeper water areas that are suitable for dredging.

23. We submit the Minister ought to encourage and permit the commercial hand gathering and other low impact methods of harvesting scallops in selected areas because it would deliver a higher quality product attracting premium prices, while protecting the environment from ongoing damage. A rebuild of benthic communities would help enhance overall productivity of the area.

24. There seems to be only one economically viable bed now available to commercial harvesters, in Bream Bay, East Northland. This would be a prime area to test the viability of hand gathering, and to monitor any changes to the benthic environment. This would require regular monitoring with costs shared between quota shareholders and the Crown.

25. **We submit in support of the Minister reducing the TAC by 60% and TACC by 75%** on the basis that commercial dredging in inshore waters is reviewed and that commercial hand gathering and other low impact methods of harvesting scallops is permitted in selected areas only, to avoid any potential spatial conflicts.

## Stock management

26. Virgin biomass (Bo), and the biomass that will support the maximum sustainable yield (BMSY) is unknown in SCA 1. The level of fishing mortality in recent years is unknown because of the lack of surveys to estimate biomass. There is no known stock-recruitment relationship for SCA 1. The submitters accept that managing highly variable stocks is complex. However, the uncertainties surrounding the management of scallops demands more conservative management than has historically and currently being applied in SCA 1.

27. The submitters agree that Catch Per Unit of Effort (CPUE) is not a reliable index of abundance for scallop fisheries. Changes in dredge efficiency and the targeting of different areas clearly disqualifies trends in CPUE over time as a reasonable measure of availability and abundance in SCA 1.

28. The November 2019 Plenary report notes that there has been an increase in abundance of pre-recruit size scallops (< 100 mm) since 2013, “but this has not resulted in substantive

increases in recruited scallops (100 mm or larger), suggesting relatively slow growth and/or high mortality of these scallops has occurred in recent years. The relatively high commercial landings in 2015 (16t meatweight, about 36% of the estimated total recruited biomass) in particular may explain why the recruited biomass at the time of the surveys has not increased markedly in response to increasing recruitment. Incidental mortality of undersized scallops caused by dredging may have also contributed"[1].

29. The boom and bust cycle in scallop fisheries is not new, we only have to look at the Coromandel (SCA CS) and SCA 7 (Golden, Tasman Bays) scenarios to see the outcome of over exploitation. An exploitation rate of 36% in 2015 from SCA 1, a fishery that had only been closed to fishing two years earlier, is sheer folly.

30. We submit that the TACC is not an effective management tool, and that a mix of input controls such as effort, area and catch limits is more appropriate.

31. Significant declines in scallop abundance over the years has been noted in areas not targeted by commercial fishers. The causes are unknown but suspected to be a result of environmental changes, the effects of land run-off affecting water quality, and variable recruitment.

32. Anecdotal reports suggest there is currently an abundance of scallops within the Whangarei Harbour. Locals are enjoying access to good quality scallops. Residents of harbours further north are not so lucky, including those in the Bay of Islands and Whangaroa.

33. **We submit in support of the FNZ proposal to retain the allowances currently set aside for Maori customary and recreational fishing interests.** Scallop abundance can be highly variable so in good years people harvest scallops and in poor years few are taken.

34. SCA 1 is another important fishery that is dependent on commercial fishers to conduct stock surveys. If there is no money to be made from harvesting scallops then no resources are made available to support a comprehensive survey. Innovative fisheries independent surveys of the main scallop areas are required if we are to reduce the risks of over-exploitation and reach world class standards of modern management.

[1] Fisheries New Zealand (2019). Fisheries Assessment Plenary, November 2019: stock assessments and stock status. Compiled by the Fisheries Science and Information Group, Fisheries New Zealand, Wellington, New Zealand. 579pp.