



Submission to the Discussion Document:

Review of Sustainability Measures for the Southern Scallops Fishery (SCA7) in 2016-06-28

Submission of the Marlborough Recreational Fishers Association

The Marlborough Recreational Fishers Association (MRFA), under its Chairman Peter Watson, has a large number of members and affiliated members, including the Pelorus Boating Club (PBC) and the Kenepuru and Central Sounds Residents Association (KCSRA). The principal aim of the Association is to work to ensure sustainability of recreational fishing in the Marlborough Sounds. The Association has, for many years, taken a keen interest in the activities of the Challenger Scallop Enhancement Company and its effects on the scallop populations of SCA7, and has sponsored representatives to meet with the Company in its yearly assessment of the harvest potential.

The Committee of the MRFA has met to discuss the options proposed in the Discussion Paper and is unanimously of the opinion that Option 2 is the only acceptable way forward if there is to be a sustainable scallop fishery in the Sounds in future years. We fully endorse the carefully reasoned submission of the KCSRA. Our reasons for doing so are set out below.

1. A careful study of the graphs shown in the Discussion Document (Appendix 1, Figure 1) immediately reveals the problem. In brief, the overall scallop population in the Sounds is in free fall. Over the past fifteen years the overall trend in estimated numbers follows almost exactly an exponential decay curve. Nothing is gained by attempting to apportion blame for this state of affairs, since it is the result of a number of stressors, commercial overfishing, alteration of the seabed by runoff and sedimentation, disturbance of the sea floor by dredging, death of immature scallops caught and returned, and perhaps disease.
2. Regardless of the causes, the net result is that it is clear that dredging for scallops this year will be commercially uneconomic. The extensive surveys carried out for MPI in November of last year made it clear that the density of scallops remaining, in areas suitable for dredging, is very low, with a few exceptions, where there are small areas of moderate to high density. Although it has been argued that this is a misleading picture, since the sampling was carried out at the end of the fishing season, after the annual harvest of allowable fish had been taken, the small numbers of recruits found make it unlikely that a new survey will reveal better news.

3. One of the requirements, indeed the principal one, of the Minister of Primary Industries is to so regulate the exploitation of a marine resource that it is sustainable for future generations to enjoy. It is clear that the rapid decline in the commercial landed meat weight of scallops shows that this is not occurring. The Minister is failing in his duty of care if he does not notice the rapid decline in scallop numbers and infer from them that if the fishing effort continues at its present level there will be no scallops left in SCA7 within two or three years.
4. We argue that Option 1, fishing a small number of selected areas where scallop density appears, from the November survey, to be relatively high, is unacceptable. It is well known from research on related species overseas, and which is intuitively appealing, that a high density of spawning adult fish, scattering their gametes into the environment, is more likely to give rise to a high rate of fertilisation, and hence greater numbers of adults, than if they are widely dispersed. Exploitation of the few areas where there appear to be a high scallop density will accelerate the decline in population numbers. Furthermore, since the areas identified are small, fishing effort will not only destroy recruitment but will not generate sufficient economic return to justify the effort involved, as well as destroying any hope of future recovery of the resource.
5. Option 3, retention of the *status quo ante*, is quite unacceptable to members of the MRFA, and ought to be equally repugnant to MPI, since **a fundamental requirement of the Fisheries Act 1996 is to permit exploitation of a fisheries resource up to a level which guarantees sustainability, and which gives primacy to recreational and customary title.** It is immediately apparent from a study of the records of commercial landed meat weight of scallops from SCA7 that apart from an occasional fillip, this once prolific resource has declined catastrophically, to the point where there is little prospect of a worthwhile return for commercial dredging. There is a small reservoir of fish in areas where commercial dredges cannot be used, or where there is a voluntary agreement with the commercial sector to refrain from dredging. About 10-11 tonnes of scallops are taken annually by recreational fishers, and this has remained steady over time. However as the commercial catch declines, this earlier insignificant take has assumed greater significance, and it is likely that commercial dredging will impact on those sites previously regarded as areas 'reserved' for recreational fishers. MRFA acknowledges that the impact of the recreational catch is likely to be small, but considers that the common interest is best served by a 'fallow' year in which the fishery can grow again. In this regard, it is encouraging that local iwi have also accepted that the fishery needs time to recover and reportedly will suspend the issuing of customary permits for the coming season.
6. **Thus only Option 2 can be seriously considered as a path towards recovery of the fishery.** An undisturbed season will buy time for greater breeding and recruitment and help the population on the road to recovery, as well as offering the opportunity for further investigations into the biology of the scallop. It would be of great

interest to know more about their feeding habits, mobility of the adults, and larval dispersion. In addition the time could be spent in investigating technical improvements in dredge design, so as to minimise disturbance to the benthos. A further area which needs further work is the assumption of an exploitation rate of 22% of the estimated available biomass. It seems that this may be a generous assumption, as judged by the effect on the catches in subsequent years. This figure was chosen when the stock was increasing. When the catch is in decline it would seem more reasonable to chose a more conservative target, say 15%.

The Discussion document also requests comments on the future management of the fishery. MRFA is primarily concerned with the Marlborough Sounds, and is of the opinion that this is an entirely separate issue from the problems of Golden and Tasman Bays, and which are subject to a Memorandum of Understanding between the Challenger Company and MPI. However, both regions are subject to the interests of four parties, the Challenger Company, with a commercial interest, recreational and customary fishers with a personal interest as users of the resource, while MPI oversees the fishery as a whole and provides regulations as well as scientific resources and expertise. It would seem desirable therefore to create a formally constituted management team consisting of representatives of the three interested user groups, commercial, recreational and customary, which could meet as required under the auspices of the Ministry, each group acknowledging that it is in their mutual interest to endure the sustainability of this valuable resource. Such a group could meet as required to study the results of the previous season, the sampling results on which the next season's fishing would be based, and collectively arrive at a plan for a sustainable yield on an annual basis. This is not a perfect solution for a fishery in which there may be large annual fluctuations in abundance, but with goodwill and the recognition that it is in the common interest to sustain the fishery for the future. It would also consider such technical matters as dredge design, opening and closing dates for the season, and methods of maximising reproductive success.

Finally, MRFA, while being strongly supportive of Option 2, is mindful of the fact that a one year moratorium may not be sufficient to allow a substantial regeneration of the fishery, but it will offer the opportunity to tackle some problems and to initiate plans towards the sustainable fishery which we all desire.

Signed

Peter Watson, President, MRFA.