

MANA AQUATIC DIVERS Inc.

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**RE: MANA AQUATIC DIVERS SUBMISSION FOR
2016 REVIEW OF SOUTHERN SCALLOP FISHERY (SCA7)**

Dear Sir,

Further to the release of discussion document, *Review of Sustainability Measures for the Southern Scallop Fishery (SCA7) in 2016*, as recreational stakeholders in this region, we submit the following views and position of our membership:

Our understanding the current situation:

1. The November 2017 SCA7 survey confirmed the fishery abundance at its lowest recorded level.
2. Area 7H scallop fishery has been decimated by the commercial sector, and that their scallop enhancement program has failed. That the SCA7 quota is caught via dredging which is a method internationally recognised as destructive to marine habitats.
3. There is now pressure from SCA7 quota holders to relocate their take to the Marlborough Sounds region using the same destructive and indiscriminate harvesting techniques that have decimated the area 7H scallop fishery.
4. Stock assessment, ie: "Recruited scallop biomass (meat weight), pre 2000 to 2015 show severe depletion in the heavily commercial fished areas of Golden and Tasman Bay while Marlborough Sounds abundance, which is primarily a recreational fishery, has been significantly less affected.
5. MPI have proposed 3 options, Option 1 closes all of area 7h and parts of Marlborough Sounds; Option 2 closes the entire recreational and commercial SCA7 fishery for the 2016 - 17 season, Option 3 being Status Quo.

Views of our membership:

1. We object to MPI's 16 working day consultation time table. This time line ensures minimal stake holder take up of the consultation process. Recreational stake holders do not have the resources necessary to respond adequately within the time frame provided. Given our organisations interaction with the considerably more effective consultation process MPI provided over the Blue Cod fishery management, the current requirement to respond to the SCA7 fishery, coupled with no response to our OIA request for the MoU, is disquieting. A logical inference is that the Challenger Scallop Enhancement Company Ltd's financial investment in outcomes will influence decisions resulting in an unsustainable outcome.
2. The Blue Cod Management Group process science revealed how fragile the Marlborough Sounds marine habitat is. Overseas research referred to in appendix 1 below confirm how damaging bottom trawling, and particularly SCA7 scallop dredging technology, is to marine environments. Given the wealth of international research readily available it is reasonable to consider the area H7 fishery collapse is directly related to the combination of unsustainable quota levels and poor recovery from the supporting habitat damaged by bottom dredging.
3. The MPI proposed 3 options for SCA7 fishery management during the 2016/17 season do not provide long term strategies enabling adequate recovery of the fishery and prevention of future depletion.
4. The marine environment in Marlborough Sounds is fragile and important habitat for many species as well as Blue Cod which has been already been acknowledged by MPI as an important recreational fishery. There already existing habitat damage from forestry run off, marine farming and limited recreational and commercial dredging and increased commercial dredging activity would quickly reduce scallop abundance to the levels observed in 2015 survey.

Our Recommendations:

1. All SCA7 commercial fishing must cease immediately until further science can define sustainable catch limits and methods.
2. All bottom dredging catch methods of SCA7 must cease immediately for both commercial and recreation sectors.
3. MPI create a stake holder fishery management group similar to the Blue Cod Management Group, and work with this group to develop long term strategic model for rebuilding a sustainable fishery for customary, commercial and recreational use.

Yours faithfully

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Appendix 1.

Documents supporting the effect of scallop dredging on marine habitat:

- Scottish Marine and Freshwater Science Volume 3 Number 3: Clyde Ecosystem Review
<http://www.gov.scot/Publications/2012/06/7562/6>
- Principles for the Management of Inshore Scallop - Fisheries around the United Kingdom
https://www.researchgate.net/profile/Bryce_Beukers-Stewart/publication/260898429_Principles_for_the_Management_of_Inshore_Scallop_Fisheries_around_the_United_Kingdom/links/0f3175329cdc26836a000000.pdf
- A quantitative analysis of fishing impacts on shelf-sea benthos
<http://onlinelibrary.wiley.com/doi/10.1046/j.1365-2656.2000.00434.x/full>