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NZ Sport Fishing Council submission on Proposed Temporary Closure of the Southern Scallop (SCA 7) Fishery

Recommendations

1. The New Zealand Sport Fishing Council submit in support of **Option 2 - Close all of SCA 7 and Port Underwood** to scallop fishing for the 2017-18 season
 - a. This option is the most likely to ensure the survival of the stock and minimise the risk of further decline.
2. The NZSFC reiterate the need for SCA7 to remain closed to all harvesting until abundance surveys indicate a surplus yield is available for harvest -
 - a. When the stock has recovered to that level of abundance, the Minister ought to allow a staged resumption of scallop harvest, for non-commercial use first, then commercial use when more yield is available to sustain both non-commercial and commercial exploitation.
 - b. Initially non-bottom contact methods of collection (hand gathering) should be the only allowed methods until such a time the full effect of bottom contact methods are understood and consequences mitigated.
3. NZSFC request a position on the Working Group formed to review possible management options.

NZ Sport Fishing Council - LegaSea

1. The New Zealand Sport Fishing Council (NZSFC) appreciates the opportunity to submit on the Proposed Temporary Closure of the Southern Scallop (SCA 7) Fishery. MPI notified the opening of consultation on 10th May 2017, with submissions due by 31st May 2017.
2. The NZ Sport Fishing Council is a national sports organisation with over 34,000 affiliated members from 56 clubs 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.
3. We 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]

4. NZSFC 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 Dave Lockwood, secretary@nzsportfishing.org.nz.

Submission

5. The submitters support the proposed **Option 2** - Temporary Closure of the Southern Scallop (SCA 7) Fishery and Port Underwood to commercial and recreational scallop fishing for the 2017-18 scallop season.
6. The stocks are assumed to be below 10% of the unfished biomass, the hard limit for the fishery. This low stock level is a major concern. The submitters believe that nothing less than a full closure of SCA 7 and Port Underwood is acceptable.
7. The consultation document noted the Challenger Scallop Enhancement Company (CSEC) has not shown support for a closure -
 - a. The submitters do not share CSEC's views that a harvest plan would "ensure sustainability and meet the needs of all sectors". Such measures have patently failed to achieve these objectives and are likely to be a major cause of the fishery's decline.
 - b. The submitters do not share CSEC's concerns about the validity of the survey regarding the timing in which it was undertaken. The Minister must consider the 'best available information' in order to make a decision before the commencement of the scallop season, this survey meets this requirement.
8. In **Option 1** Port Underwood is excluded from any closure. This exclusion means Port Underwood may be subjected to undue pressure, this may cause the depletion or destruction of this fishery. To not include this in the closure would be an unnecessary risk.
9. If the SCA 7 fishery is to rebuild to abundant levels further research into the cause of the decline and possible mitigation measures must be planned and implemented before reopening. This work on long term management of the fishery should include:
 - a. A review of the effects of dredging on scallop population, larval settlement and mortality of juvenile scallops.
 - b. A review of commercial and recreational regulatory controls
 - c. The feasibility of commercially hand gathering scallops.
 - d. An assessment of scallop densities in diver only areas open to recreational fishers.
10. The submitters request the opportunity to take part in the working group which will be formed to conduct the review of management options.
11. The submitters note the MPI discussion document fails to address customary fishing. Iwi generously agreed to refrain from exercising their customary rights during the previous closure on the condition of research being undertaken to address the decline.
12. The submitters support the points raised by the Marlborough Recreational Fishing Association and John Leader.
 - a. We also feel that the delegation of SCA7 management to a stakeholder group dominated by commercial interests is a failed exercise. In order to properly restore this fishery, the Ministry must take back this control and manage the fishery

primarily in the national interest, in the interests of the local community and the wider public who visit the area.