

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** 2017 / 2018 Scallop Season.  
**Date:** Thursday, 11 May 2017 9:32:35 a.m.

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Yes I would like to see the season closed if it will have a positive impact on the future fishery.

# Kenepuru & Central Sounds



Kenepuru & Central Sounds Residents Association Inc.

Inshore Fisheries Management  
**Ministry for Primary Industries**  
P O Box 2526  
Wellington 6011

**Email: FMsubmissions@mpi.govt.nz**

*Ross Withell*

*President KCSRA*

s9(2)(a)

*email:*

*president@kcsra.org.nz*

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30 May 2017

Dear Sir/Madam

## **Submission – MPI Discussion Paper (2017/19) – Temporary Closure of Southern Scallop SCA7 Fishery**

I submit this submission on the above Ministry for Primary Industries (**MPI**) Discussion paper in my capacity as President of the Kenepuru and Central Sounds Residents' Association (**KCSRA**).

### **Introduction**

1. **Who we are:** KCSRA was established in 1991, and currently has around 250 household members whose residents live fulltime or part-time in the Kenepuru and Pelorus Sounds. The KCSRA's objects include, among others, to coordinate dealings with central and local government and promote the interests of residents of Kenepuru Sound and adjacent areas, and to promote and act in the best interests of residents, ratepayers, and persons associated with the Kenepuru and Central Sounds area.
2. **What we do:** Our website ([www.kcsra.org.nz](http://www.kcsra.org.nz)) demonstrates that KCSRA is very busy representing the interests of members in a wide variety of matters. For example, advocating for better and safer roads and provision of public toilets in places of high visitor use, liaison and representations to the local council, and involvement in local environmental/conservation issues.

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### **Kenepuru & Central Sounds Residents Association Inc.**

President	Ross Withell
Vice President	Andrew Caddie
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Treasurer	Stefan Schulz
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## Background

3. **Why we are interested:** In January 2014 KCSRA received notice of a MPI Initial Position Paper entitled “*Review of Sustainability Measures for SCA7*”. The focus of that paper was a review of the Total Allowable Catch (TAC) then set at around 800 tonnes meat weight for SCA7. We were shocked to realise that the TAC bore no relationship to what was actually happening in the fishery (and still does not).
4. It became very clear to KCSRA that the experiment in passing governance of the resource to commercial interests via a Memorandum of Understanding had failed. This is evidenced by the total collapse of the once flourishing Tasman and Golden Bays scallop fisheries due primarily to, in our view, commercial overfishing and governance failure.<sup>1</sup> This failure of governance was also rapidly pushing the Marlborough Sounds fishery to collapse by out of control commercial interests.<sup>2</sup> This was **not acceptable** for a resource that was much treasured by the Sounds community.
5. Accordingly, the committee of KCSRA rapidly inserted representatives into the process who came up to speed with the management and scientific issues. Crucial to our involvement was joining an alliance of local community organisations (Pelorus Boating Club and the Marlborough Recreational Fishers Association). Over the next two years we kept our members informed as we and the Alliance submitted on Industry Harvest Plans, the design and outcomes of biomass surveys, made media releases, attended MPI convened multi-sector working group meetings and wrote to the Minister over our increasing concerns.
6. The continued rapid decline in available scallop biomass in the Sounds was such that by the end of the 2015/16 season the commercial harvest from the Sounds had collapsed to 21 tonnes<sup>3</sup>. This galvanised the Alliance to greater efforts to remove the scales from the eyes of MPI officials and scientists. We were successful in that in June 2016 the Minister announced a complete closure of the Sounds scallop fishery.
7. In the intervening period the Alliance, working with MPI, tried hard to progress the much-needed restructure of the governance arrangements for the Sounds resource. We did not succeed. It is submitted that the Industry (as represented by the Challenger Scallop Enhancement Company – CSEC) achieved this result by being allowed by MPI to effectively use the tactic of refusing to engage. **It is a most unfortunate outcome.**
8. Be that as it may, we are now at the point of reviewing yet another consultation paper from MPI painting a still grim picture of the situation and seeking a response to three proposed “*management options*” – **to close or not to close?**

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<sup>1</sup>Thus for example it is recorded that in parts of TB/GB planned rotational fishing on a 3-year cycle morphed, in fact, into annual fishing over 8 years. See page 21, paragraph 2.3.1 of “A summary of expert opinion to help rebuild shell fish fisheries in Tasman and Golden Bays” – November 2015 NIWA Information Series No 84.

<sup>2</sup>Commercial exploitation rates in the Sounds in 2012 were as high as 40% - page 1126, Volume 3 - MPI Fisheries Assessment Plenary –May 2016 -SCA7. At this point recreational representatives refused to agree to the commercial harvest plan in 2013 sparking the subsequent TAC review referred to in paragraph 3 above..

<sup>3</sup>In 2009 the Commercial take was over 100 tonnes meat weight from the Marlborough Sounds Fishery. Recreational and customary take has been estimated by MPI to be relatively stable at around 11 tonnes from all the SCA 7 fisheries.

## Support for Option Two

9. To be absolutely clear KCSRA strongly supports and **thus submits in favour of Option Two**. For the record we briefly explain in this submission why KCSRA supports Option Two.
10. We also discuss the inclusion of Option 3 and our views on that if, in the unlikely event, the Minister decided upon that option. In the balance of this submission, we then go on to discuss some related matters.

## Why Support Options One or Two?

11. **Option One:** This is the closure of all of SCA7 from recreational and commercial scallop effort for the 2017/18 scallop-season. We note the extension of the closure to all of SCA7 compared to the partial closure implemented in 2016. We draw the reader's attention to the KCSRA 2016 submission<sup>1</sup> where we (along with many other concerned submitters) queried the logic of the (then) proposal to close only part of SCA7.
12. **Option Two:** This differs only from Option One only in that the area to be closed from recreational and commercial scallop fishing effort for the 2017/18-scallop season is extended to cover the Port Underwood area. For some unexplained reason Port Underwood does not form part of SCA7.
13. KCSRA has had some discussion with a sister association based in the Port Underwood area. The general consensus is that for the reasons touched on in the MPI Discussion paper it is appropriate that if SCA7 is to be closed then so too should the Port Underwood area.
14. **Customary Fishers:** KCSRA notes that Option Two makes no reference to customary fishers. We are unclear why this is the case. In last years closure MPI sought and obtained assurances from local iwi that there would be no customary fishing permits issued over the course of the closure. We assume this is again (or will be) the case here. **We seek assurances** from MPI and the Minister that our assumption is correct.
15. KCSRA notes that our support for the closure is advanced on a principled science based best evidence basis. To this end KCSRA (and its Alliance partners) have vigorously participated in all the MPI led discussion and workshops as to the design of the proposed NIWA biomass survey and subsequent review of the draft results/report and KCSRA broadly accepts the same.
16. Following discussion, it is clear to KCSRA (and its Alliance partners) that the NIWA January/February biomass survey and the subsequent analysis and modeling of the data only indicate, **it is submitted**, that the alarming downward plunge of biomass levels in the few remaining viable Sounds beds may, at best, be levelling out.
17. Equally clearly, it **is submitted** that the NIWA report (and as seemingly echoed by MPI in its discussion paper<sup>2</sup>) show that the Sounds resource has yet to recover to a point where a harvest plan can, on an evidentiary basis, be reasonably contemplated.
18. The Sounds resource needs, **it is submitted**, at least another years break to see if these tentative signs of some recovery following removal of fishing effort are, in fact, a trend. This can be best achieved by implementing Option Two. **Thus KCSRA submits in support of Option Two.**

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<sup>1</sup>See paragraph 11 of the KCSRA submission dated 18 June 2016. (Click on [www.kcsra.org.nz](http://www.kcsra.org.nz) then click on "Public Documents" and then locate the submission under the folder entitled "Scallops").

<sup>2</sup>See, for example, section 6.3.1 of the MPI Discussion paper.

## Why is there an Option Three?

19. The MPI Discussion paper acknowledges that the Tasman and Golden Bays fisheries have smashed through any “hard limits” such that a halt to all fishing effort is **very likely** required. The MPI discussion paper suggests that it is **likely** the same point has been reached for the Sounds fishery. MPI agrees that at best the Sounds resource is at the same point (or thereabouts) where it was deemed appropriate to close the fishery in 2016.
20. Accordingly, KCSRA is a little perplexed (and thus somewhat concerned) that MPI has even advanced Option 3 given the heavy weight of scientific evidence to the contrary. Further, there is the express statutory directive placed upon the Minister pursuant to Part 2 of the Fisheries Act 1996 (to sustainably manage the Sounds fishery for future generations) that, in our view, any form of Option 3, threatens.
21. The situation is even more alarming in that the MPI Discussion paper gives no hint as to what if any management constraints would be placed around any form of Option 3 should it come to pass. Accordingly, we are unsure of the motives behind MPI putting forward an Option 3.
22. Nevertheless given that MPI has, KCSRA feels it has no choice but to assume that MPI’s “preliminary view” that Option 3 “*is not a responsible option*”<sup>1</sup> could be subject to change. Accordingly, we briefly submit, in KCSRA’s view, how matters should play out if the Minister is somehow persuaded Option 3 is in some form viable.
23. In this scenario KCSRA believes the Sounds fishery should be opened to **recreational and customary fishers only on a limited basis**.
24. Thus, not all the five remaining viable Sounds beds should be opened (for discussion purposes say just Guards Bank and Ships Cove). This reflects that in order to rebuild the Sounds fishery this requires protecting some of the better spawning areas from fishing (the other three viable beds).
25. If Option 3 was to be pursued **it is submitted** that a recreational/customary harvest of 3 to 4 tonnes<sup>2</sup> should be seen as the maximum sustainable take in the circumstances. To achieve this (and in addition to the measures noted in paragraph 24 above) there could be a truncated season as well as other operational measures. These could be discussed in more detail if the Minister indicates that, somehow, he is persuaded that Option 3 is in fact a real possibility.
26. We **stress again**, for clarity, that even under Option 3 the fishery should be closed to commercial fishers for obvious reasons.

## We are in this Mess due to a failure of Governance

27. KCSRA is strongly of the view that the experiment of delegating effective governance of the management of the fishery to Industry is an overarching root cause as to why we are in this mess. The experiment has clearly failed in that by any objective indicator it has not resulted in the sustainable management of the fishery.
28. As KCSRA (and its Alliance partners) have said repeatedly and loudly over the last three years, matters will not turn around on a sustainable basis unless and until several things happen - most importantly the Memorandum of Understanding between the Crown (MPI) and Industry (CSEC) needs to be restructured so the Sounds Fishery is removed from its ambit. A new advisory group consisting of representatives from all stakeholders needs to be convened

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<sup>1</sup>Paragraph 6.3.1 of the MPI discussion paper.

<sup>2</sup>This is derived using the more, in our evidentiary based view, sustainable Exploitation Rate of 15% and the MPI biomass figures set out at page 9 of the MPI Discussion paper.

at the direction of the Minister. Their task, to develop a set of management objectives and a strategy to implement the same for the Ministers review.

29. To be clear, once the Sounds fishery is scientifically established to be on a sustainable upward growth path **we do see a place** for commercial interests in the decision making as to what is or is not a sustainable harvest plan for all sector groups.
30. However, from our hard won insights into how this fishery has operated and why it is at the perilous state that it is requires the non commercial sector to have a much greater say in the decision making process. Once this fundamental concept has been grasped then the task of the multi sector-working group formulating and submitting to the Minister a package of sensible longer term operational management measures, can proceed more easily.

### **Research Efforts– Misplaced Effort?**

31. KCSRA (and its Alliance partners) have attended various science/research related workshops. It is fair to say we are increasingly frustrated at what we see as a misplaced focus on wanting to allocate scarce research dollars and resource in investigating why the Golden and Tasman Bay scallop fisheries have not responded to the removal of fishing effort.
32. To us it seems quite simple. Poor governance and management options have pushed those two fisheries past the tipping point. Fervently wishing that they bounce back like they did after removal of fishing effort for a couple of seasons back in the 1980's ignores the biological reality. Once through a tipping point the chances of a population's recovery are very low.
33. It thus makes **no rational sense** to ignore, for research purposes, the remaining viable scallop resource. It is submitted that the Sounds resource is where we should direct our research efforts. We know very little.
34. To try and turn this misguided focus around, earlier in May the Alliance partners prepared and circulated a discussion paper identifying what research questions we should be addressing in respect of the Sounds fishery. **We attach** that paper as Appendix One to this submission. We respectfully ask the Minister to direct his officials to turn their focus of scallop research efforts to the Sounds resource and put in place a program of work to address the questions posed in our paper.
35. We also note with concern the references in the MPI discussion paper to the poor condition and presence of *Rickettsia*-like pathogens in certain areas of the Pelorus Sounds. We looked in vain for indications of what steps MPI envisages to take in coming to grips with this situation. This is unfortunate.
36. Finally, we wish to make it clear that, like the CSEC Industry representatives, we view with real concern the efforts of the advocacy arm of MPI in trying to ram through a massive expansion of salmon farming in close proximity to the likes of Ketu and Richmond Bays. The proposed huge increased level of discharges into the water column from these farms pose an existential threat to indigenous threatened shellfish (such as scallops) and other marine species.

## Conclusion

37. For the coming season the best available scientific evidence supports Option 2.
38. However the closure period needs to be constructively used. We urge the Minister to take urgent steps to secure the long-term future of the Sounds resource by directing his officials to initiate a restructuring of the Memorandum of Understanding by separating out the Sounds fishery. Such governance restructuring must give non-commercial interests an equal say in the management of the Sounds resource going forward. This requires, we submit, a Ministerial appointed working group of representatives from all stakeholders. If CSEC continues to frustrate matters by declining to engage then matters should proceed without them.

Yours sincerely

  
Ross Withell

President  
Kenepuru and Central Sounds Residents' Association

# Appendix One

## Suggestions for a Research Effort focussed on the Marlborough Sounds Scallop Fishery.

### Introduction

1. What follows is some constructive comments and suggestions as to areas that a research program needs to be developed for the Marlborough Sounds Scallop Fishery. **We stress** that our primary focus is achieving a restructuring of the current governance arrangements of the fishery via the Memorandum of Understanding. This needs to be done in order to create a much better platform to deliver to all stakeholders, current and future ones, a sustainable management system for the fishery.
2. As previously indicated the Alliance partners have had some difficulty coming to terms with the apparent desire and focus of MPI, Scientists and other stakeholders on expending significant time and effort on developing a research program for the failed Golden and Tasman Bay scallop fisheries (**GB/TB**).
3. We feel this focus is ignoring the very pertinent adage of “ **reinforce success not failure**”. In this context MPI et al seem to be placing excessive and unwarranted emphasis on trying to get to the bottom of the set of circumstances that led to the failure of the GB/TB, once hugely viable, beds and largely ignoring, for research purposes, the few remaining viable beds located in the Sounds.
4. Rather than try and turn the GB/TB ship around we feel it more effective to put on the table some suggestions as to what might be some productive research effort for our remaining viable beds in the Sounds. However, pragmatically, we cannot ignore the preferred GB/TB research focus and we have put some thought into catering for this mind-set.
5. In other words, the Sounds is not without its tragedies in terms of the collapse of once viable scallop beds. We suggest that the more efficient research strategy is, in conjunction with focussed research on the few remaining viable Sounds scallop beds these failed areas could also be gainfully researched on the side.

### Suggestions as to how to efficiently approach the development of a Research Program for the Sounds

6. As we see it the research focus could be neatly and usefully divided into two main headings.
7. **Survey Issues:** For example, improving and reviewing biomass survey methods and equipment.
8. **Habitat Issues:** What are the qualities and attributes associated with the few remaining high quality scallop beds? By contrast what are the qualities and attributes now associated with once viable but now failed or severely degraded beds?
9. **Expert Panel:** As a starter, the proceedings and report of the panel of overseas experts brought into New Zealand by MPI last year should be dusted off and carefully and

dispassionately reviewed for suggestions under these headings. We can assist here. Research insights from MPI and NIWA attendees at the recent significant North American scallop conference also need to be distilled, recorded and acted on.

### More detailed discussion and suggestions

10. **Dredge Efficiency:** Under the heading of **Survey Issues** the basic starting point is the sampling unit – the dredge. What do we know about how dredge efficiency varies by reference to different substrate and depth? How does this impact on reliability?
11. **Extreme Caution Signalled:** The Alliance has noted with **some alarm** and unease a recent push from industry to move from the traditional (for this area) ring dredge to a form of box dredge set up utilising tines. Industry argues improved potential catch productivity from a tine-based method on hard substrates.
12. The Alliance, wearing our guardian ship hat, sees any “productivity gains” translating into rapid **over exploitation** of the few remaining beds and the potential to develop a “loose substrate” as the tines scratch their way through the current hard substrate.
13. We wish to make it **very clear** that any move to a changed dredge system for the Sounds must be carefully trialled and independently scientifically reviewed from both the viewpoint of the pros and cons prior to any larger scale implementation. A contrary unstructured and unsupervised “give it a go” approach will be strongly and publically resisted.
14. **Analyses:** How can we make analytical improvements?
15. **Data Base:** Can the database be re-stratified so data relating to areas that once supported viable scallop beds can be reviewed over time and lessons gleaned? What happens if the relatively crude (and in our view overly generous) **current exploitation rate** is reassessed by collating data into smaller areas and against fishing effort?
16. What steps could be taken in terms of the development and improvement of our database? How useful/efficient would it be to undertake some re-analysis of the database? Is there merit when doing so to divide data into different areas (geographic and/or productivity) and assess if temporal patterns can be shown?
17. **Hard and Soft Limits:** There is also the vexed and troubling area of the (non) use of hard and soft limits let alone how these are or should be developed and calculated for shellfish such as scallops.
18. As the Alliance understands it this concept of setting hard and soft limits comes out of finfish management. The “hard” question that has to be phrased and addressed at an independent scientific level is whether this management approach is transferable to relatively immobile shellfish. If not, is there an alternative to other than taking more of a precautionary approach?
19. Is part of the problem more simply that MPI and too many stakeholders are failing to put the requirements of Section 8 of the Fisheries Act 1996 more firmly in the forefront of their minds when looking to sustainably manage this treasured resource for future generations? Should this aspect be researched and if so how?
20. **Types of survey:** Should we making more use of more expensive but arguably more effective and reliable camera or dive surveys? What are the basic requirements and techniques that need to be thought through and assessed before shifting into such alternative (to dredge) survey methods?

21. **Historical Experiments:** On more than one occasion Alliance members have heard talk of a large scale industry experiment whereby a section of the sea bed was heavily modified (rolled) in the belief that this would encourage and enhance scallop seeding and fishing efforts. We get the impression this experiment failed dismally.
22. Nevertheless **we recommend** some research effort be put into tracking down the credibility or otherwise of these reports. If these reports are proven to be credible, research might be usefully directed at what went wrong or the state of that experimental area today. Given the preferred geographical research focus of many, this suggestion has the added attraction that these large scale experiments were allegedly carried out in GB/TB.
23. Under the **Habitat Issues** heading: clearly the Sounds few remaining high quality beds are the ones both to protect and get to know better. Basic questions include what makes good scallop habitat, why, where is it found?
24. This could be done by a carefully thought out program of seabed mapping identifying the substrate type and degree of seabed development. This can then be compared to the failed Sounds scallop areas such as the Mahau Sound and Tawhitinui area. Under threat areas such as Ketu and Waitata Bays could also be mapped and compared.
25. What happens if fishing effort data is overlaid over these areas?
26. We need further research on and understanding of the required density of scallops to get good survival rates. Sadly, this sort of research can now only be carried out in the Sounds.

### **Enhancement Matters**

27. The careful reader will note we have not mentioned or suggested enhancement for the Sounds. **This is no accident.** Members of the Alliance have a number of real concerns with any proposals for CSEC to extend any enhancement operations/research initiatives into the Sounds and accordingly do not support the same. We are currently seeking further information on these matters from MPI to assist refining our position on this controversial area.

### **Next Steps**

28. We would like this short paper to be circulated to, among others, the rest of the attendees at the meeting of 10 April in due course.

Andrew Caddie

Chair - KCSRA Marine Sub Committee

Kenepuru and Central Sounds Residents' Association.

10 May 2017

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



### Once you have completed this form

Email to: [FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

While we prefer email, you can also post your submission to: Fisheries Management, Ministry for Primary Industries, PO Box 2526, Wellington 6140, New Zealand.

### Submissions must be received no later than 5pm, Wednesday 31 May 2017.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

### Submitter details:

Name of submitter or contact person:	HAMISH KENNEDY
Organisation (if applicable):	N/A
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	other.

### Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

Submission:<sup>1</sup>

Details supporting your views:

I would suggest that by far the largest take of Scallops is Commercial and is in the many tonnes. Recreational take has been prohibited as a result.

I suggest that further closure for commercial take is adopted but that Recreational / Private take should be permitted on a reduced scale of:

1. Quota reduced to 25 per person per day with a maximum of 100 per vessel per day.
2. The season be reduced to (say) 3 months.

The above, due to the stock numbers should apply only to the Marlborough Sounds, with a ban continuing for the other areas.

Please continue on a separate sheet if required.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



### Once you have completed this form

Email to: Resubmission

While we prefer email, you can also post your submission to: Fisheries Management, Ministry for Primary Industries, PO Box 2526, Wellington 6140, New Zealand.

### Submissions must be received no later than 5pm, Wednesday 31 May 2017.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

### Submitter details:

Name of submitter or contact person:	Buzz falconer
Organisation (if applicable):	Private person who has been involved with SCA 7 management since 1973
Email:	
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Cut the length of season to two months starting 1 <sup>st</sup> sept -closing 31 <sup>st</sup> oct.

### Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

I do NOT agree that closing the season will produce more biomass away from the 'hotspots' in MS

I have watched as the inner sounds has slowly deteriorated to wards the outer sounds as a good growing area for scallops. This has occurred over the last 25years –and to expect those areas to 'suddenly' rebuild the biomass is in dreamland! Just look at all the inner sound of P S , Waitata bay, Richmond bay, Horseshoe bay, Brightlands, and now Ketu bay is 50/50 .All used to be good paddocks.

By not taking the large [older scallops] that are availble –and will die of natural mortality—from the hot spots ,is a complete waste to all participants . Highly populated areas create stunted scallops that struggle to reach 90mm, and weaken the biomass ,leaving them very weak to resist disease.

As a current example—why did all the 70 t meatweight biomass –'disappear' [die] in area H between the two surveys?? The scallop life is around 5years maximum—so by the time they reach legal size –there is approx 2 seasons –to take these scallops –NOT a long time .There are many examples of scallops dieing off across all area 7 over the last 40years .

By controlling the yearly length of the season you can easily control the allowable take. Whilst commercial take is known to the last kilo , area by area,–customary and recreational take is unknown . How can you manage a fishery like that ?


Supporting my 2 months season is common sense. From 15<sup>th</sup> july to last week of august the scallops are not worth taking. From 1st sept -31st oct they are building up the roes [and hence whites]. From 1<sup>st</sup> nov till mid dec they spawn [depending on weather etc etc ] so leaving the areas undisturbed for spat settlement ,,to increase biomass ,with particular reference to t/b and g/b makes sense.

I am more than happy to explain many of the vagrancies that have occurred in the management of this complex fishery ,since the 1970s .

I wish to be heard ,as to try and explain reasons , by one finger typing would take days !!

regards ,

Buzz falconer s9(2)(a)

 18/5/17

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Further Temporary Closure to the Southern Scallop Fishery 2017/18  
**Date:** Wednesday, 31 May 2017 10:08:41 a.m.

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I have read the report from Anthony Brett, summarising the current state of the Southern Scallop Fishery. This portrays a sad picture; a further result of over-exploitation of a natural resource, and clearly indicates a marine biological species under extreme stress. I believe this outcome is the combined effect of over-harvesting beyond sustainable levels, and also habitat degradation through both damaging dredging operations, together with sediment deposition from land run-off.

If this situation is to be turned around and the health of this fishery is to be restored, a decisive and determined approach is required.

I am frankly astounded that the seriousness of this situation is being downplayed, and stakeholders are being asked for their opinion as to whether the SCA 7 closure should be extended. In my mind, there is absolutely no other option to closure of this fishery from all harvesting by commercial and recreational fishing, not just for the next 12 months but until accurate monitoring clearly shows a recovery of stocks to levels that indicate a healthy and self-sustaining population of scallops.

Any alternative will drive an already serious situation into a state where recovery is not possible and the scallop mollusc will become locally extinct. I believe we are at this tipping point now, and the situation is dire.

The Port Underwood recreational scallop fishery is also showing signs of stress and must also be closed until a similar demonstration of good recovery is recorded.

In the wider picture, more research is needed on the impact of sedimentation deposition from land runoff. As a resident of coastal Golden Bay, I am distressed by the wide band of heavily discoloured water from soil sediments routinely washed off the neighbouring land after even modestly heavy rain events. For really heavy rainfalls exceeding c. 100mm in a 24 hour period, this discolouration can persist for 2-3 days. This is a massive loss of valuable soil from the land which we cannot afford to lose, but also forms a suffocating blanket over the coastal marine zone, making survival of bivalves problematic.

This combined effect of over-harvesting and excessive sediment deposition will take time and concerted action to overcome. It should be addressed on both fronts as a matter of urgency.

Accordingly I strongly urge continued closure of all scallop fishing in Golden Bay, Tasman Bay, and the Marlborough Sounds, and additionally Port Underwood, currently outside the defined fishery area of SCA 7. I urge that consideration not be given to re-opening fishing of this species until there is clear and sustained evidence of ample recovery of the stocks of this species to healthy levels that will allow carefully controlled harvesting to resume.

Gordon Mather  
BSc. MAud.

I am a property owner at Okiwi Bay in the Marlborough Sounds. I am in total support of another year closure of the above fishery to allow the scallop beds to recover but would like to add that when they are opened some areas are set aside for recreational use only.

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**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Further temporary closure to the Southern Scallop Fishery 2017/18  
**Date:** Wednesday, 31 May 2017 7:19:32 a.m.

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To whom it may concern.

After reading the email from Anthony Brett reporting on the state of the Southern Scallop fishery, I am astounded that stakeholders are being asked for their opinion as to whether the SCA 7 closure should be extended. It is surely obvious that it must be closed to give the scallop beds time to recover. Opening them again would almost certainly lead to total decimation of the beds with little chance of future recovery. What evidence is there to the contrary?

To close Port Underwood recreational fishery seems an extremely sensible plan. If we wish to have a scallop fishery at all, we must manage harvesting pressure now to save this crippled resource from extinction.

Further research is required to discover whether there are other reasons apart from over fishing, for the scallop decline.

I strongly recommend continued closure of scallop fishing in Golden Bay, Tasman Bay and the Marlborough Sounds and in addition, Port Underwood should be added to the closed areas.

Anna Mather

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** FW: Call for submissions on the Southern Scallop fishery  
**Date:** Thursday, 11 May 2017 8:59:44 a.m.

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Hi Tony

I endorse the proposal to close the Marlborough Sounds Scallop fishery for the 2017/2018 season and suggest that closure remain for the 2018/2019 season.

I believe that it would likely take 3 years of closure to start to make a real difference.

Port Underwood should be included in the closure as this small area will not sustain the added pressure.

Further, on opening of the season consideration be given to reduced bag, say 30.

Also there should be no commercial scallop fishing within the sounds including Croisilles, Guards Bay and Port Gore.

We will likely only get one chance to save this important recreational fishery so 3 years without scallops is better than it being fished out of existence.

Regards  
Russell Silcock  
Blenheim

---

**From:** Anthony Brett  
**Sent:** Wednesday, May 10, 2017 3:43 PM  
**To:** Undisclosed recipients:  
**Subject:** Call for submissions on the Southern Scallop fishery

Dear stakeholder

### **Further temporary closure to the Southern Scallop Fishery 2017/18**

The Ministry for Primary Industries (MPI) is seeking feedback and submissions on whether a further temporary closure of the Southern Scallop fishery (SCA 7) should be implemented for the coming scallop season, which starts on 15 July 2017.

MPI also seeks feedback and submissions on whether the small Port Underwood recreational fishery, which is immediately adjacent to (but not part of) SCA 7, should also be closed to protect it from increased harvest pressure.

A survey in January 2017 shows the biomass of scallops across SCA 7 has decreased since the previous survey in November 2015. The stock remains at its lowest recorded level, despite parts of SCA 7 being closed last season.

There has been no recovery in Golden and Tasman Bays. Some scallop beds in the Marlborough Sounds have responded to last season's closure with a small increase in scallop numbers. However, the Marlborough Sounds as a whole remains close to the lowest recorded biomass level and contains the only remaining dense beds of scallops in SCA 7 that are considered critical for the reproductive success of the fishery.

MPI seeks your views on whether a further closure would help safeguard remaining scallops and give the beds an opportunity to rest and contribute to the spawning potential of the fishery without disturbance from fishing. It would reduce utilisation in the short term, however, this would be balanced by improved fishery productivity in the future.

MPI has sought input from tangata whenua and commercial and recreational fishing representatives as part of the process to develop its Discussion Document, and is working with these sectors to identify the causes for the decline and on longer term management measures for the fishery.

The Discussion Document that outlines the proposals can be found on the MPI public consultation webpage at: [www.mpi.govt.nz/news-and-resources/consultations](http://www.mpi.govt.nz/news-and-resources/consultations)

Alternatively, hardcopies of the Discussion Documents may be requested at the email or post addresses provided below.

Should you wish to discuss your submission or have questions about the Discussion Document or the fishery, please contact Tony Brett on (03) 466 3688.

### **Making a submission**

All submissions should be received by **5pm, Friday 31 May 2017**.

Written submissions should be sent directly to:

#### **Email**

FMSubmissions@mpi.govt.nz

#### **Post**

Inshore Fisheries Management  
Ministry for Primary Industries  
PO Box 2526  
Wellington 6140

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This email message and any attachment(s) is intended solely for the addressee(s) named above. The information it contains may be classified and may be legally privileged. Unauthorised use of the message, or the information it contains, may be unlawful. If you have received this message by mistake please call the sender immediately on 64 4 8940100 or notify us by return email and erase the original message and attachments. Thank you.

The Ministry for Primary Industries accepts no responsibility for changes made to this email or to any attachments after transmission from the office.

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**From:** s9(2)  
**To:** [FMSubmissions](#)  
**Subject:** Fw: Submission:- Temporary Closer of the Southern Scallop Fishery  
**Date:** Tuesday, 30 May 2017 5:16:56 p.m.

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Inshore Fisheries Management  
Ministry for Primary Industries  
PO Box 2525  
Wellington 6011.

30th. May 2017

Temporary Closure of the Southern Scallop (SCA 7) Fishery.

Introduction:-

1. My name is Desmond (Des) James Boyce. I am a life member of the Marlborough Recreational Fishers Assn. and Pelorus Boating Club, a foundation member of the CSEC Scallop Consultation Committee and the current MPI Scallop Stakeholders Working Group.

I have attended almost every meeting of the CSEC Consultation Committee since its inception therefore I consider I have sufficient understanding of the Scallop fishery to make this submission.

Background:-

2. During my many years attending the CSEC consultation meetings I along with other recreational representatives have continually called for a more cautious and better management approach for the fishery.

Submission:-

3. I strongly support **Option 2 – Temporary close all of the Southern Scallop fishery (SCA 7) and Port Underwood to commercial and recreational scallop fishing for the 2017-18 scallop season.**

Comment:-

4. Option 1. which excludes Port Underwood was an oversight in the previous MPI consultation process and has resulted in a transfer of fishing effort into the Port Underwood area last season therefore should not be considered.

5. Option 3. *No temporary closer and fishery opens this coming season*, is completely unacceptable because the Figure 2. Graph in the MPI discussion paper clearly shows the state of the remaining scallop biomass.

To allow another open season whilst the current scallop biomass has not yet reached anywhere near a sustainable level would be an irresponsible management decision.

6. Customary Fishers. I note options 1 & 2 make no reference to Customary fishers and I

can only assume that like last year MPI have sought and obtained assurances from local iwi that no customary fishing permits for scallops will be issued.

7. It is comforting to note the recent scallop surveys show that the Marlborough Sounds scallop beds may be reasonably stable and is justification that the recreational representatives action to have MPI more involved in research and management could be having an effect.

New Governance for the Marlborough Sounds:- (defined by MDC MS boundaries)

8. The Marlborough Sounds is an unenhanced fishery therefore to avoid the management, enhancement and harvesting problems that are being experienced in the Tasman, Golden Bays scallop fishery under the current MPI / CSEC MOU agreement I urge the Minister to restructure the current governance arrangement and introduce a separate MPI multi stakeholder management structure and research plan for the Marlborough Sounds **wild** unenhanced scallop fishery.

This needs to be done urgently in order to create a much better platform to deliver to all stakeholders, current and future ones a sustainable management system for the fishery.

Conclusion:-

9. Scallops from the 'top of the South' are a valuable resource, not only for commercial operators but also local recreational and iwi. Stopping the further decline of the scallop population and moving towards a sustainable population is in everyone's interest.

A further temporary closure of the fishery is a necessary first step.

Des Boyce.

Hard copy by post:-

Inshore Fisheries Management

Ministry for Fisheries

PO Box 2526

Wellington 6011.

**From:** s9(2)(a) [REDACTED]  
**To:** [FMSubmissions](#)  
**Subject:** Hi  
**Date:** Wednesday, 17 May 2017 9:58:38 a.m.

---

Hi My submission is that the Fishery should be closed until it recovers fully and Dredging Banned permanently. The damage done to the bottom is unsustainable.

Regards John Butler

# Submission Form

SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



## Once you have completed this form

Email to: [FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

While we prefer email, you can also post your submission to: Fisheries Management, Ministry for Primary Industries, PO Box 2526, Wellington 6140, New Zealand.

## Submissions must be received no later than 5pm, Wednesday 31 May 2017.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

### Submitter details:

Name of submitter  
or contact person:

MICHAEL CONNOLLY

Organisation (if applicable):

PELORUS BOATING CLUB

Email:

s9(2)(a)

Fish stock this submission refers to:

SCA 7

Your preferred option as detailed in  
consultation document (write "other"  
if you do not agree with any of the  
options presented):

OPTION 2

### Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

PELORUS BOATING CLUB IS BASED IN HAELOCK AT THE  
HEAD OF THE PELORUS SOUND. THE CLUB HAS OVER 500  
BOATS REGISTERED TO THE CLUB.

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Keep it open  
**Date:** Tuesday, 23 May 2017 4:22:29 p.m.

---

Dear Sir

My submission on the next scallop season.

I have looked through documents sent on research done.

My 1st question is why survey was not done a few months earlier when scallops are in better condition.

The areas surveyed are mainly commercial areas which have been ploughed on gps. Strip areas one year 50% less next year. Similar to what happened and why season closed. The commercial fishermen got a trade off with flat fish quota. The amateur got shut out.

Why were amateurs shut down last year, where we go, scallops are getting better each year.

We dive inside these areas, areas where commercial can't dredge.

My suggestion is for a closed season for commercial fishermen and remain open for public.

The effect on the business community suffered last season ie camping grounds, motels etc. the earthquake was a blessing for some.

Keep it open.

Yours sincerely  
Brian Ashley.

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Marlborough scallop season  
**Date:** Monday, 29 May 2017 7:22:49 p.m.

---

Hi,

I'd like to see a ban on all dredging, both commercial and recreational. I'd also like to see a new limit set at 25 for all divers.

Cheers Richard Morris

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** marlborough sounds fish  
**Date:** Monday, 22 May 2017 8:05:31 p.m.

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In favour to keep closes but must also stop customary permits was able to get permit to take 1200 scallops from sounds should have one law for all . did not take but was able to . also the closed cod fishery only puts added pressure on other arears . okiwi bay had good bed scallops until closure sounds then everyone went and fished out of okiwi bay because then you could take 3 cod @ no slot rule it only took the 100 plus boats on a fine day to deplete the bed of scallops . one plus for the closing of the scallops is the cod numbers have returned not hard to catch 2 cod each. As to 50 scallops set the limit to 30 each @ have boat limit 150 scallops open season September to end February they not worth taking before September . It's not a hard fix @ keep the commercial boats out worth lot more to local economy than a small few big boys rapping the seabed. Hope this does not fall on deaf ears . mike Gardiner lover of out fishery @ my grandchildren's love of the sounds .

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Marlborough sounds scallop fishery, call for submissions  
**Date:** Tuesday, 30 May 2017 9:02:54 p.m.

---

Kia Ora MPI

I am writing to you in relation to your call for submissions regarding the future of the scallop fishery in our Marlborough sounds.

First off I would like to give you a background on myself, I am a 31 year old engineer living and working in Blenheim, I am a long time padi certified scuba diver, and first came to Marlborough as a bright eyed 18 year old back in 2004. I appreciate that I might not have as much 'skin in the game' as those who were born and will die here, nor those amongst this close knit community whose very livelihoods rely on fishing, however I have had eyes on what has happening beneath the blue surface of our frigid waters for some considerable time and I feel both my own, and the voices of other scuba divers should be heard and considered in any future judgements surrounding this resource.

I have spent my summer open seasons diving the Marlborough Sounds collecting scallops for myself, my friends and family. This has included shore dives as close to home as the previously quite popular Governors Bay scallop bed, to as far as boat dives in the outer sounds bays in Port Gore. In that time I have seen a very marked decline in both scallop numbers, water visibility, and the healthy sandy bottom that supported a population of scallops that would feed this community for a lifetime killed off under a sediment layer of fine silt.

The reasons for the very sharp decline in the fishery over the last decade may not be due primarily to overfishing, by either destructive dredging nor the flotilla of weekend warriors such as myself, but I wish to take it upon myself to put forward my own view that our behaviour as gatherers must be put on hold, albeit temporarily to give this fishery a chance. Reading the supplied NIWA data concerning this fishery, the commercial industries wants in the way of quota, and our recreational behaviour, is not conducive to a sustainable fishery in the long term. Our short-term wants this summer should not outweigh the future of this fishery for our children, and I regretfully throw my weight of opinion behind this fishery once again being closed for the season.

Yours, etc.

Darren Cole

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Marlborough Sounds Scollop fisheries submission  
**Date:** Thursday, 11 May 2017 2:21:46 p.m.

---

Dear sir,

The mere fact that I have to make this submission is proof the fishery is mis managed. We cannot continue without change. Until we have a plan with significant change this fishery must stay closed.

Further more I am vehemently apposed to any more commercial fishing of scollops in the Marlborough sounds. The fishery cannot sustain it and commercial interests cannot be trusted.

Thirdly any form of dredging kills the scallop habitat and contributes to the demise of the fishery. All forms of dredging should be banned.

Please Do not pander to self interested parties and create a set of new rules that apply to all New Zealanders that preserve this fishery.

Thank you for the opportunity to make a submission I hope it makes a difference

Scott Wilson  
Resident of Marlborough

Sent from Scott's iPad

## Gabrielle Mackintosh

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**From:** s9(2)(a)

**Sent:** Wednesday, 17 May 2017 12:06 p.m.

**To:** Nathan Guy Kapiti

**Cc:** Nick 4 Nelson

**Subject:** scallop 7 --personal email

Good morning Minister Nathan Guy . Let me introduce myself . My name is Brian [buzz] Falconer .I have been involved with the scallop 7 fishery since 1973 --when i entered the harvester sector of this fishery . Was the NZFCF representative on the FIB for 11 years ,Member of the FLA , Finishing up as Chairman of the CSECo for 21 years ,since its inception, till retiring 2 years ago .As such was part of the 80/81' boom and bust' closure of this fishery . Now just a recreational fisherman .

I feel that MPI ,in trying to manage this fishery ,have got a tiger by the tail, and taking the easy road by closing the season to parts of the area. As chairman of CSECo the management of the commercial sector stopped with me . Yes we made early mistakes ,but we learnt very quickly that there is no certainty's managing a short term living scallop . At best there is just a two year time frame to take the scallop. The natural mortality increases dramatically once they reach 3years old --sometimes that remains a mystery to us all --area h over the last few months went from 72 tonne to 4t --with little to no fishing pressure . I have seen this happen many times ,in all areas over time . I do not wish to be sidetracked by all the vagrancies that have been delt with over the many years of this fishery --but would be happy to sit down with any of your representatives to t help if required.

My immediate recommendation would be to survey the known ' hot spots' in july this year, allocate takeable tonnages , across all sectors, then open the season on 1st sept and close it on 31st oct . size and daily limits to stay the same --100mm will never work in area 7 scallops--been there,seen that. The reason im promoting this idea of a short season is 1---There were -at a reasonable guess--between 20 to 25t of meatweight scallops that died of natural mortality over 90mm last year . This will happen again as the older scallops reach the end of their natural life . They are lost to everyone . That amount could have been taken ,shared out across the industry - without affecting the biomass totals now shown ! --2--The short season allows you to increase the time allowed to take scallops when they recover . 3---Traditionally the scallop builds up to spawning in nov/dec period, so closing at the end of oct allows for spat to settle and hopefully survive without being disturbed.Between 15th july and 1 st sept the scallops are not worth taking as they are in poor condition . 4---If you allow these small 'hot spots' to over populate [to high a biomass] then the scallop will become stunted and not reach the legal size of 90mm. Example -- Richmond bay , Waitata bay, Horse shoe bay, and also has happened to the recreational hot spot Ketu bay.

Minister in closing, i am know personally to Nick Smith ,who i will copy this to , if you require a check up on my qualifications etc . I realize it is election year and also that at 82 years young im happy to impart any hard earned knowledge on if it can help .

Thanking you

Buzz falconer [retired]

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**From:** Krissy Moreau

**Sent:** Wednesday, 17 May 2017 12:14 p.m.

**To:** s9(2)(a)

**Subject:** RE: scallop 7 --personal email

Dear Buzz

On behalf of Hon Nathan Guy, the Minister for Primary Industries, thank you for your email regarding the Scallop 7 fishery. I will place a hard copy of your email before the Minister, who will reply as soon as possible.

Yours sincerely

**Krissy Moreau** | Private Secretary for Fisheries and Aquaculture

Office of Hon Nathan Guy

Minister for Primary Industries

s9(2)(a)

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**From:** Krissy Moreau [mailto:s9(2)(a)]

**Sent:** Wednesday, 17 May 2017 12:29 p.m.

**To:** Ministerials <s9(2)(a)>

**Subject:** FW: Re[2]: scallop 7 --personal email

Can you also include this in Buzz's Ministerial response package? See below.

**Krissy Moreau** | Private Secretary for Fisheries and Aquaculture

Office of Hon Nathan Guy

Minister for Primary Industries

s9(2)(a)

[seemail]

---

**From:** s9(2)(a)

**Sent:** Wednesday, 17 May 2017 12:24 p.m.

**To:** Krissy Moreau

**Subject:** Re[2]: scallop 7 --personal email

Thanks for the confirmation . My contact details .if required , are s9(2)(a)  
s9(2)(a) . cheers buzz P S You can advise the minister that no one else  
knows of this email .



- \* Dive gear - buy or hire
- \* Dive trips
- \* PADI Dive training
- \* Tank fills & testing
- \* Nitrox by arrangement

29<sup>th</sup> May 2017

Submission on the TEMPORAY CLOSURE OF SCA7

From Stuart Scaife

Waikawa Dive Centre

s9(2)

The scallop season for 2017-2018 SCA7 should proceed but with greater limitations than in previous open seasons.

The method MPI has undertaken to assess the fishery is the very same method that is under scrutiny and is widely considered as a destructive method for the collection of scallops. Year after year the same scallop beds in the SCA7 area are dredged by commercial and recreational fishers alike. Most scallop beds are well known. With the use of GPS, repeated area dredging, I believe dredge sampling is a waste of time. It ruins the beds for years and to sample a dredged scallop bed year after year will deplete scallop numbers as one year is not enough for that bed to recover.

The following taken from MPI paper.....

“The survey used a stratified random sampling allocation design, with sampling conducted using a chartered commercial fishing vessel and ring-bag scallop dredge. The sample extent was directly comparable with that in the May 2015 survey. A total of 202 valid stations (dredge tows) were sampled within the 50 strata. As expected, the highest catches of recruited scallops (90 mm or larger) were from tows within key strata (primarily in Marlborough Sounds, but also in Croisilles Harbour in Tasman Bay) which represent the banks and bays that support the main scallop beds. Catches were very low in other strata.”

The following taken from Review of Dredge Fishing Technologies ISSN1175-1584 commissioned by Ministry of Fisheries.

“2.1.2 Dredge efficiency and incidental mortality Catching efficiency of the New Bedford ring-bag dredge is between 15 and 20% (Caddy 1989) indicating that most scallops that interact with the dredge gear are not caught (Table 1). Using a submersible, Caddy (1973) observed dredge tracks immediately after the dredge had passed, and based on the extent of damage to the scallops, estimated that of the scallops that, are were not retained but were in the path of the dredge, about 1517% were lethally damaged (direct mortality) (Table 1). These estimates may be conservative as no long-term studies were carried out to determine if sublethally damaged scallops incur mortality due to stress and increased susceptibility to predation or disease. Once on deck, the catch is sorted

and culled for large scallops with unwanted discards shovelled overboard. In this process DuPaul et al. (1996) estimated that 7.3% of undersize scallop discards are fatally damaged at the time of landing on the deck (indirect mortality) (Table 1). There may be additional indirect mortality for those scallops that appear to be undamaged after their return to the seafloor, but this was not quantified.

**2.1.3 Non-target catch** Ring-bag dredges have poor selectivity (Bourne 1995) and non-target catch of finfish and invertebrates, as well as juvenile scallops, is common in the northwest Atlantic scallop fishery (Waul et al. 1996, Smolowitz 1998). Increases in minimum ring mesh size from 76.2 mm to 82.6 and then to 88.9 mm resulted in a decrease in the catch of undersize scallops (Waul et al. 1996). Fish non-target catch was equivalent to 70% of U.S. scallop fishery landings between 1991 and 1993 (Waul et al. 1996). These data do not take into account discarded unreported non-target catch some of which incurs a high mortality rate when returned to the sea. The twine top was effective in reducing catch of cod, and haddock but not flatfish.

**2.1.4 Environmental effects** There are conflicting views on the extent to which the dredge bites into the substrate. For example, a New England scallop fisher suggests that the ring-bag scallop dredge skims over the bottom, only digging in when the ground is uneven, and that scallops swim up into the dredge (Kendal 1998), whereas other reports indicate that these dredges dig into the substrate (Rogers et al. 1998). Sidescan sonar studies on Georges Bank support the latter view and have shown that scallop ring-bag dredge marks occur as pairs of 5 m wide swaths on the bottom, and appear to penetrate several centimetres into the sediment (Schmuck et al. 1995). Environmental effects of dredging noted by Caddy (1989) included the accumulation of shell debris from shucking at sea, the removal of epifauna from scallop grounds, repeated disturbance on the sediment unprotected by epifauna, and consequent silting of scallop beds. Anecdotal reports from a dredge fisher who has worked on Georges Bank for 30 years indicate that dredging over prolonged periods has progressively flattened sand hills (Bennett 1998)."

The fishery should be assessed by diving rather than destructive dredging. Scallops are found in more areas than dredgable flats as divers will acknowledge. Slopes, valleys, amongst rocks are all locations scallops can be found, and these areas cannot be dredged. If they cannot be dredged then they are not considered in the results and therefore the true picture of the fishery is not correct. The results given by MPI are the results of dredging and the condition of known areas that are consistently dredged. I agree with these results. Dredged areas are suffering you have proved it.

As a diver and scallop collector the visible destruction of a dredge pass is very noticeable. Often flattening everything it passes. I'm not surprised by the results as it actually proves that dredging is destructive.

There are good numbers of scallops in the Queen Charlotte Sound area. You just have to get wet and go looking where dredges cannot reach. Size and numbers in diving areas to me remain unchanged. During a scallop season we often find new areas where scallops are plentiful. These areas don't feature on the MPI dredged sites.

The season 2017-2018 should proceed in my belief. There should be changes too.

- 1) Season to start later.
- 2) Limits in size and quantities need changing.
- 3) Ban dredging.

4) Stronger enforcement of rules.



5) Scallops that are rechecked on the surface after diving and need to be returned, should be returned to where they were taken.

I'm happy to discuss further.

Regards Stuart Scaife

Operator - Waikawa Dive Centre

s9(2)(a)



# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



### Once you have completed this form

Email to: [FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

While we prefer email, you can also post your submission to: Fisheries Management, Ministry for Primary Industries, PO Box 2526, Wellington 6140, New Zealand.

### Submissions must be received no later than 5pm, Wednesday 31 May 2017.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

### Submitter details:

Name of submitter or contact person:	
Organisation (if applicable):	
Email:	
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	

### Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

**Submission:<sup>1</sup>**

**Details supporting your views:**

Please continue on a separate sheet if required.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



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### Submitter details:

Name of submitter  
or contact person:

Peter W Holder

Organisation (if applicable):

n.a.

Email:

Fish stock this submission refers to:

SCA 7

Your preferred option as detailed in  
consultation document (write "other"  
if you do not agree with any of the  
options presented):

Option 2 - Close all of SCA 7 and Port Underwood to Scallop fishing for the 2017-18 season

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**Submission:<sup>1</sup>**

**Details supporting your views:**

The sounds have clearly been over-fished for years, and current practice is not sustainable. Further, the damage to the physical environment, other fish, and non-target biota from dredging MUST BE minimized if not halted altogether.

While not included in this consultation: So that the resource can be managed holistically, I would also like MPI and/or other government agencies to commission further work so we can adequately calculate the effects of land based activities on the productivity or losses of shell fish farming in the Sounds - including sediment from forestry, leaching and run off from dairy, and urban heavy metal and sewage pollution

Please continue on a separate sheet if required.

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<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



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#### Submitter details:

Name of submitter or contact person:	Rod Stuart
Organisation (if applicable):	Abel Tasman Charters
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Continue the closures until stocks recover

#### Official Information Act 1982

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**Submission:<sup>1</sup>**

**Details supporting your views:**

Please continue on a separate sheet if required.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



### Once you have completed this form

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### Submitter details:

Name of submitter or contact person:	Brian and Susan Denny
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 2. Temporarily close all of SCA 7 and Port Underwood to commercial and recreational scallop fishing for the 2017-18 scallop season. (Option 2)

### Official Information Act 1982

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**Submission:<sup>1</sup>**

**Details supporting your views:**

We have a home in Port Underwood and enjoy an occasional scallop meal, but it is becoming difficult to find any at all.

By leaving the Port open, after closing the other scallop fishery, people from the closed areas will target the Port as they have been doing, and reduce the scallop population to unsustainable levels and probably destroy the fishery altogether.

The consequence will be the loss of that resource to the local residents unless a plan is initiated to compensate by regularly seeding the area with fresh stock.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



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#### Submitter details:

Name of submitter or contact person:	Garth Haylock
Organisation (if applicable):	Base Woodbourne Dive Club
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Other

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**Submission:<sup>1</sup>**

**Details supporting your views:**

Our preferred option is an amendment to Option 2.

Temporary closure of all Dredge scallop fishing within the SCA 7 Area, including Port Underwood.

Allow Scallop Take by Diving (Free Dive and SCUBA) with the allowable daily limit reduced to 20 per diver (as is in many other areas of NZ) and the minimum size raised to 100mm (as is also in many other areas of NZ).

This option will greatly reduce the impact on the seabed, yet still allow some scallop catch.

It will also allow easier monitoring of the fishery, with the ability to conduct surveys and interview people on the water and at boat ramps to determine catch rates, get first hand reports of the health and abundance in many different areas of the fishery.

This could be seen as a positive and measured return to allowing access to this valuable resource. There will be flow on economic benefits to service industries and operators in the region.

The allowed season could be reduced as a further measure, ie July through to November. Most recreational diving occurs during December to February so closing the fishery over this period would reduce the impact.

Please continue on a separate sheet if required.

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#### Submitter details:

Name of submitter or contact person:	Jennifer Bailey
Organisation (if applicable):	Blenheim Dive centre
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Other

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### Submission:<sup>1</sup>

This is a very serious issue that impacts very heavily on two sectors of our society. The first sector – recreational fishers can be monitored and controlled very effectively through regulatory means. The second sector commercial fishers – carries far more serious concerns.

Having been involved for over 30 years in an industry that has very close links to this environmental issue I personally believe that I am in a position where I can offer an informed proposal that will enable our society to not only be in a position to gather scallops for this generation and their children but to maintain a resource for the next 100 years plus. This has to be our goal.

#### Recreational fishers:

- **Ban dredging.** This is an absolute must.

It is unthinkable that in today's educated society that many do not understand the damage that this practise is doing to our sea floor. All the little micro organism are there for a specific purpose and to damage and destroy them impacts heavily on all species of marine life that relies on them for their survival. When dredging was first introduced it was very much a "hit and miss" practice but now today with the introduction of GPS devices it is now systematically destroying our sea bed. This is impacting heavily on all bottom- dwelling fish life.

Many would argue that this is unfair on those people who cannot dive – my answer to that is that ***"I love venison but for me as a 70 year old to be up in the hills with a gun in my hand is unthinkable I would be a danger to all other species in the area. I therefore have to either buy my venison or hope that some kind person shares a little with me"***. Those of our society who cannot dive or snorkel would have to adopt this same attitude for this resource to be still available in 100 plus years. It is a privilege and not a right to gather scallops.

- **Decrease the take to 20** per diver and bring us in line with the rest of NZ – why are we so special that we deserve to take more?
- **Return the take-able size to 100m** so that we are in line with the rest of NZ – why are we so special that we should be able to take scallops at a smaller size?
- **Remove the take for a "safety diver" and boat skipper.** You cannot do this for any other species so why are scallops so special?
- **Remove the accumulation take** for people staying for a week or more. The law that enables a person to bag and date their catch. This would then mean that people who holiday in the sounds are going home with 20 per diver and not 100's or thousands as they currently are. The term "in your possession at any one time" must be strictly adhered to.

#### Commercial fishers:

- **Ban dredging:** This is an absolute must.

Other species are collected by other methods both here in NZ and overseas eg Sea cucumber/slug. Hand gathering is less damaging to both the sea floor and the marine life that relies on it for their survival. This would initially financially impact on commercial fishers but no more so than continually have closed seasons. On a positive note it would offer more employment for our unemployed people.

I have been told either rightly or wrongly, by an ex member of parliament that some commercial fishers have paid for the right to commercially dredge. If this is in fact true then I strongly urge the government to refund the money either in part or fully – I would willing agree for my tax payer dollar to be spent in this way. The first wrong was to allow it to happen whilst the second wrong is to allow it to continue – "two wrongs do not make a right".

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### Submitter details:

Name of submitter or contact person:	Sam Swain
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Other

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**Submission:<sup>1</sup>**

**Details supporting your views:**

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

I have dived for scallops all over NZ and the only place I have seen larger numbers is Paterson Inlet on Stewart Island. I wonder if MPI are just looking at the areas that are being dredged and not the areas that are (or could be) dived. Divers can access all areas (of less than say 25 meters), regardless of terrain, unlike dredging divers can be selective and do no harm to scallops below legal size, most are measured and do not even get put into a catch bag. A diver stirs up silt which generally means they don't take all scallops in one area. A dredge destroys the seafloor. It takes everything and when undersized scallops are returned they are more often than not returned to areas that they were not taken from and often to areas unsuitable for habitation by scallops. Could I suggest your staff return to the Sounds and dive any area that is not dredged, they will find an abundance of scallops, even the poorest of divers can take their and two boat peoples limit (150) on one tank. This is not about knowing good spots, almost any area where scallops are that cannot being dredged has massive numbers of scallop.

Obviously this lead to a major problem, if the shortage of scallops is in areas where dredging occurs, is it over fishing, habitat damage or returning scallops to the wrong area. Can you have a closed season for dredgers and not for divers. May be you can take scallops from the areas where there is a surplus and seed the other areas, will this risk disease being spread.

Another solution is to introduce the same limits as the rest of NZ, 20 scallops of 100mm, if the dredgers stop at 20 per person they may not damage so much seafloor, although they may just go out more often and end up taking the same number of multiple trips. Divers will stop at half a tank or target scallops over 120mm, leaving plenty of scallops to breed.

I truly believe 90% of the Queen Charlotte Sounds have an abundance of Scallops, MPI has been selective about where it measured Scallop numbers (just areas that are traditionally dredged).

On a side note how many Scallops were taken on traditional permits during the closed season, if you close a season for it's protection why then say certain groups can take unlimited numbers of scallops. I accept there would be an outcry if that group was denied their (traditional) right to plunder unlimited numbers of anything, you need buy in from all groups if you are going to protect a species.

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Manatū Ahu Matua



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#### Submitter details:

Name of submitter or contact person:	Katerina Beattie
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Open the beds for divers only

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**Submission:<sup>1</sup>**

**Details supporting your views:**

MPI should open the scallop season to divers only, and decrease the allowance per person to reflect those in the north island of 20 per person. This will give the scallops a chance to still regenerate whilst ensuring the seabed remains undisturbed.

Studies from the UK and US have shown that repetitive dredging, especially in shallower seabeds, has a physical impact during and following the activities, which can spread metres either side of the dredge zone.

People who dredge for scallops are ruining the seabeds for future generations and it seems now the impacts are becoming clearer, with last season being closed to let the scallops regenerate.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

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#### Submitter details:

Name of submitter or contact person:	Steve Crowley
Organisation (if applicable):	Non Applicable
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Other: Option 4

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Good afternoon MPI,

My opinion is that a 4<sup>th</sup> Option should be considered to safe guard the fishery for future generations, based on the below, I believe that this will assist in the recovery of the scallop beds within the Marlborough Sounds.

- Prohibit all commercial scalloping for the 2017-18 Season.
- Prohibit the use of dredging for the 2017-18 Season.
- Increase the size limit from 90mm to 95mm for the 2017-18 Season with an option to review this as a permanent change to the minimum size limit.
- Reduce the daily bag limit from 50 per person to 25 per person, and restrict this to those that directly participate in collecting on either SCUBA or Free Diving.

I have dived various locations throughout the Marlborough Sounds this calendar year, incl East Bay, Ruakaka Bay, Umuwheke Bay, Torea Bay and Kumutoto Bay, I have seen first hand that the scallop beds are in good health and numbers are plentiful. I personally believe the above outcome will create sustainability and provide local businesses with some much needed financial relief.

If you require any further information, please don't hesitate to contact me.

Kind Regards Steve.

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### Submitter details:

Name of submitter or contact person:	Robin Millard
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	other

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**Submission:<sup>1</sup>**

**Details supporting your views:**

Other Option: close Marlborough sounds to Commercial dredging permanently.

Make a recreational activity only, with a maximum dredge size e.g. 600mm or a diving only take.

If you continue to allow commercial dredging in the Marlborough sounds you will destroy this scallop fishery!!!!

There are other areas available to recreational scallopers so you could rotate closed areas in the Marlborough sounds.

a separate sheet if required.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

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### Submitter details:

Name of submitter or contact person:	Anne Bruce
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	other

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**Submission:<sup>1</sup>**

**Details supporting your views:**

Other Option: Close Marlborough sounds to Commercial dredging permanently.  
Commercial Dredging causes more damage to the fishery than domestic users.

Policy could be made to restrict dredge sizes for domestic users

Continuation of Commercial fisheries is destroying the fishery and the shore bed, so there will be no scallops for anyone!

a separate sheet if required.

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#### Submitter details:

Name of submitter or contact person:	Margaret and Geoffrey Allison
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 2: Temporarily close all of the Southern Scallop fishery (SCA7) and Port Underwood to commercial and recreational scallop fishing for the 2017 -2018 scallop season

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**Submission:<sup>1</sup>**

**Details supporting your views:**

**1**

□ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

A one year closure has not been long enough to make a significant difference in the recovery and sustainability of the scallop beds according to data supplied.

Therefore a further year of closure is supported .

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#### Submitter details:

Name of submitter or contact person:	Richard Ford
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	other

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**Submission:<sup>1</sup>**

**Details supporting your views:**

Other Option: close Marlborough sounds to Commercial dredging permanently.

Make a recreational activity only, with a maximum dredge size e.g. 600mm or a diving only take.

If you continue to allow commercial dredging in the Marlborough sounds you will destroy this scallop fishery!!!!

There are other areas available to recreational scallopers so you could rotate closed areas in the Marlborough sounds.

a separate sheet if required.

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### Submitter details:

Name of submitter or contact person:	Brett Walker
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	other

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**Submission:<sup>1</sup>**

**Details supporting your views:**

Other Option:

It's the commercial dredging in the Marlborough sounds that are destroying it for the ones who live in the area.

Close Marlborough sounds to Commercial dredging permanently.

Make it a recreational activity only;

- Recreation dredging only with a maximum dredge size, and
- Diving (scuba or free) only take.
- Make the size 100mm min

It's the commercial dredging in the Marlborough sounds that are destroying it for the ones who live in the area

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

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#### Submitter details:

Name of submitter or contact person:	Jon Mayne
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 2

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**Submission:<sup>1</sup>**

**Details supporting your views:** I support Option 2 for 2017-2018 scallop season to allow further recovery of the stock in Marlborough Sounds. For 2018 onwards the scallop fishery in Marlborough Sounds should be made a NO DREDGE area both for commercial and recreational fishing as this destroys the sea bed habitat and damages large amounts of scallops not caught in the dredge. Hand picked scallops by divers is selective and minimises damage on the surrounding environment.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

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### Submitter details:

Name of submitter or contact person:	Kevin Mead s9(2)(a)
Organisation (if applicable):	Kevs Super Dredge
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	other

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**Submission:<sup>1</sup>**  
**On 3<sup>rd</sup> page**

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

**Details supporting your views:** This is a submission from Kevin Mead in regard to the Southern Scallop Fishery (SCA7).

1. Close the Southern Scallop fishery (SCA7) for another year season start 15 July and incorporate Port Underwood into (SCA7) fishing zone.
2. Change the management structure for areas 7H/7K/7J/7L and Port Underwood. Removing Challenger Scallop enhancement Company Ltd management rights to these areas, they are totally wild natural scallop bed's that have not been reseeded.
3. Set up recreational only area's for scallop fishing e.g. Crosilles Harbour (Okiwi bay) Ketu Bay (Pelorous sounds) Dieffenbach and Bay of Many Coves (Queen Charlotte Sound). Recreational fisherman have already lost two years fishing for Scallops in the Pelorus Sound because of over fishing by Commercial Fishers in 2014/2013/2012.
4. If recreational scallop fishing is allowed this year 2017 the daily recreational quota should be halved to 25 per person per day. The minimum size should be set at 100mm for recreational and commercial fishers, and season shortened to November December 2017 January 2018 for this season only.
5. I am not happy with the survey results of scallops in (SCA7) January 2017. The methods in this survey have been proven historically to be very inaccurate. All the way through the report the words estimated scallops per standard tow are used, that is not acceptable. The dredges used are only picking up 50% at best of the scallops in their path and damaging a lot of juvenile scallop. Better methods are available and would produce more accurate information. The report talks about potentially fishable densities one scallop per 25 square metres, that density is destruction level. A few years ago when Ketu Bay was in a healthy state I was recovering 2 scallops per square meter with my dredge.
6. I would like the commercial quota's to be set in numbers of scallops not meat weight tonnes. The more stress the fishery comes under the smaller the scallops, then more scallops are required per tonne compounding problems with the fishery.
7. I do not agree with MPI when they say that recreational fishers took 11 tonnes of scallop meat weight in the 2015-16 season. At 65 scallops to the kg. that is 715,000 scallops or 14,300 = 66.82 daily recreational quotas per day for everyday of the 214 day season. I was out on the scallop beds several times mid week 2015 and was the only boat to be seen. Every time I went out scalloping in 2015 I came home with less than the allowed quotas I estimate 6 to 7 tonne to be closer to the figure for SCA7 in 2015. 65 Scallops to the kg is probably a little generous, the figure is closer to 80 to the kg making 11 tonnes more unlikely.

Kevin Mead  
s9(2)(a)

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



### Once you have completed this form

Email to: [FMsubmissions@mpi.govt.nz](mailto:FMsubmissions@mpi.govt.nz)

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Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

### Submitter details:

Name of submitter or contact person:	Catherine Kircher
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Temporarily close all of SCA 7 and Port Underwood to commercial and recreational scallop fishing for the 2017-18 scallop season. (Option 2)

### Official Information Act 1982

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**Submission:<sup>1</sup>**

**Details supporting your views:**

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

I am a bach owner in Port Underwood. I believe that closing SCA 7 but not Port Underwood will put more pressure on the stocks in Port Underwood. As this is not a significant stock I believe this will have a negative long term impact on the stock levels. I think the fairest and most sustainable option is to close the entire area.

Please continue on a separate sheet if required.

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### Submitter details:

Name of submitter or contact person:	Peter Juriss
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	OPTION 2 Close all of the Southern Scallop fishery (see Figure 1), as well as Port Underwood (immediately south of reporting area 7L), to scallop fishing until 15 February 2018.

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## Submission:<sup>1</sup>

### Details supporting your views:

1. The biomass has flat-lined as per Figure 2. Graphs showing scallop biomass in SCA 7 provided in the Temporary Closure of the Southern Scallop (SCA 7) Fishery Discussion Document – the biomass has collapsed. We are now in the shameful position of ‘arguing over the dead body’ of the scallop fishery.
2. The direct and attributable cause of the demise has been the excessive allocation to the commercial sector by the Ministry, basically a biomass estimation error, which allowed non-sustainable extraction by the commercial sector, the result of which has been the decimation of the scallop fishery in SCA7. Recreation extraction rates would not, in themselves, have caused the present collapse of the fishery.
3. The Ministry’s, in my opinion, negligence in the SCA 7 area, has caused negative wider downstream social and economic effects which it needs to be more mindful of in its decision making processes.
4. My recommendations to the Ministry, a) adopt a common-sense, responsible, policy to the scallop fishery based on ‘good science’ b) have the courage to resist self interest lobbying based on anecdote and ‘bad science’ c) fast track the research on the fishery and use it to make long term decisions to ensure that another collapse doesn’t occur d) close the Marlborough Sounds area to commercial extraction as the biomass can never support such activity even if it recovers to 2004-10 levels. That area should be a recreational fishery only e) Golden Bay and Tasman Bay should be both commercial and recreational fisheries – if and when the biomass ever recovers to sustainable extraction levels f) as part of the present research investigate other possible environmental factors that may have contributed to the collapse of scallops in SCA 7.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

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## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



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#### Submitter details:

Name of submitter or contact person:	John Scobie
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 2

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**Submission:<sup>1</sup>**

**Details supporting your views:**

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

During my time as a rec diver and HFO I have seen a gradual decline in the scallop beds throughout the Marlborough sounds. I believe that if the Port Underwood fishery is not closed in conjunction with the SCA7 this will see, just as we saw last year, a transfer of fishing effort from the Queen Charlotte / Pelorus area, to the Port Underwood fishery.

The Port Underwood shell fish fishery (all species) is already showing the effects of the extra fishing effort that has transferred to the area due to closures in adjacent areas.

So I firmly believe that both SCA7 and the Scallop beds in the Port Underwood area should be closed for the 17/18 season and this time should be used to set daily bag limits, accumulation limits, and boat limits, that reflect the fragile nature of this fishery, i.e 20 scallops per diver, 20 scallops per person on a boat dredging with a boat limit of 40. All fish to be landed in a measurable state, no possession of shucked SCA below the mean high water mark (in line with PAU regs), an accumulation limit of 2 days catch.

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



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#### Submitter details:

Name of submitter or contact person:	Danny Templeman
Organisation (if applicable):	N/A
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 2

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**Submission:<sup>1</sup>**

**Details supporting your views:**

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

As outlined in the discussion document, the scallop biomass has not increased to sufficient levels to reopen the scallop beds for harvest. To ensure that future generations of fishers have the opportunity to gather scallops I feel the beds should remain closed for at least the 2017/2018 year. Let ensure a long term view is taken here.

Thank you of the opportunity to submit.

Regards

Danny

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



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### Submitter details:

Name of submitter or contact person:	Laurence Christopher Duckworth
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 2

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**Submission:<sup>1</sup>**

**Details supporting your views:**

I wish to have the biomass returned to a healthy sustainable level for recreational fishing.

I believe the beds are too small to sustain commercial operations at any time at the level that is needed to make this viable. I can see a small commercial venture being allowed in the future.

To make the biomass sustainable in the future we need to close the beds for 2017/18 and most probably beyond until we see this reinstated for future generations to enjoy harvesting.

It would be short-sighted to allow a feed today which denies feeds for our mokopuna.

Recovery takes time

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

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Ministry for Primary Industries  
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#### Submitter details:

Name of submitter or contact person:	Colin Smith
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 2 close all SCA7 and port underwood.

#### Official Information Act 1982

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**Submission:<sup>1</sup>**

**Details supporting your views:**

I have been commercial fishing for 30 odd years and believe that the area 7 scallops use to be re seeded by the commercial fisher's scallop program and that was why we had 90mm and 50 per person limits compare with the rest of the country. We need to look after this fishery as it has been great to head out on my little boat and get a feed of scallops for the table, so a small sacrifice now being closed for a year or two then increase the size 100mm and or lower the limit per person would greatly help this fishery. Colin

Please continue on a separate sheet if required.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

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### Submitter details:

Name of submitter or contact person:	Ann McCrone
Organisation (if applicable):	N/A
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Other

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## Submission:<sup>1</sup>

### Details supporting your views:

I consider that the options provided in the discussion document are not sufficient to provide protection and time for the SCA 7 and Port Underwood scallop fisheries to recover and rebuild.

The science and surveys have determined that the biomass of the SCA 7 stock has suffered a significant decline in scallop numbers and is likely to be below the fisheries 'hard limit' with only a small area of productive scallop beds left. And, although the fishery has been closed for a season the scallop stocks remain very low. It is reported that some individual scallop beds may have stabilised, but overall the fishery and extent, including in the Marlborough Sounds, remains close to its lowest recorded stock levels, well below historical extent and levels.

Other variables have the potential to impact the scallop beds, but the immediate and direct impact is fisheries related and management of those fisheries impacts provides the fastest solution to supporting the rebuilding of scallop populations. The risk of fishing damaging the future viability of the stock increases as the biomass and distribution of scallops decreases. The benefits of restricting fishing have been demonstrated with previous fisheries closures.

Although the area has been closed for the 2016/17, one more closed season may not be sufficient to enable stocks to rebuild.

Closures (areas and timeframe) need to be large enough and for the time period long enough to rest the beds and allow what is left of mature scallops to spawn uninterrupted; provide areas for pre-recruitment scallops to settle, and allow juvenile scallops to grow to maturity in order to allow stocks to replenish and benefit all – supporting a healthy functioning ecosystem, customary fishing, recreational fishing and commercial fishing. Previous closures have been multi-year.

Scallops are considered to be a key component of the inshore coastal ecosystem, acting both as consumers of primary producers and as prey for many predators (including fish predators such as snapper, tarakihi, and blue cod); and the scallops themselves can also provide structural habitat for other epifauna. Mobile bottom contact fishing gear, such as dredges, not only takes target species but also non-target bycatch (fish and invertebrates such as gurnard, flounder, octopus, and horse mussels) and has impacts on benthic populations, communities, and their habitats.

Fishing concentrates on high density beds of scallops, which are disproportionately more important for fertilisation success during spawning. It makes sense that some of these important high density beds are protected to provide a sustainable undisturbed source of spat. Fishing disrupts spawning by physically disturbing scallops that are either caught and retained (removal of individuals reducing spawning stock), caught and released (potentially impacting individual survival and spawning), not caught but directly contacted by the dredge, or not caught but indirectly affected by the effects of dredging (e.g. decreasing survival by the impact of suspended sediments).

Scallops exhibit relatively fast growth, high mortality, and variable recruitment. So although while what is left of the juvenile scallops may grow to legal size, there may not be the necessary stock biomass and scallop size limits required to support a sustainable fishery following only one further season closure. The length of closure may not be long enough to insure against the high variability in natural annual recruitment. Scallops mature by the end of their first year, but they contribute little to the spawning pool until the end of their second year. Year 1 scallops contain about 500 000 eggs, whereas year 4 and 5 scallops can contain over 40 million.

A responsible overall management approach – i.e. an integrated multi-species fisheries management and Ecosystem Based Management approach in this area would also include no-take MPAs. Protecting these habitats would support spawning and recruitment of scallops; provide habitat for juvenile fish; and also support the protection of food chains (e.g. shags & other

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predators including little penguin – where a study indicated that the long distances travelled by little penguins highlighted the potential for adverse effects of dredging or seabed mining activities). MPAs can provide effective refugia for scallops (and other species), provided they protect appropriate habitat. Supporting information to determine suitable sites could be found in the report Ecologically Significant Marine Sites in Marlborough, New Zealand (2015) - available from: <http://www.marlborough.govt.nz/Environment/Coastal/Coastal-Ecosystems/Significant-Marine-Sites.aspx>

Work is also required to identify and control other environmental factors that impact on and/or contribute to a healthy aquatic environment in Tasman Bay, the Sounds and beyond.

I recommend:

- 1) Temporarily close all of SCA 7 and Port Underwood to commercial and recreational scallop fishing for the 2017-18 and 2018-19 scallop seasons.
- 2) Restrict any customary take of scallops in SCA 7 and Port Underwood to hand gathering only for the 2017-18 and 2018-19 scallop seasons.
- 3) Identify and implement a network of no-take MPAs in the SCA 7 and Port Underwood that compliments the fisheries.
- 4) Following the conclusion of the temporary closure, prohibit dredge and trawling in the parts of SCA 7 (Golden Bay, Tasman Bay, and Marlborough Sounds) in areas that have been identified as significant sites.
- 5) Implement a programme to identify and seek solutions to environmental impacts and human activities that, over and above fishing activities, are impacting the healthy functioning of the SCA 7 area and the fisheries.

At a minimum, MPI should adopt Option 2 “Temporarily close all of SCA 7 and Port Underwood to commercial and recreational scallop fishing for the 2017-18 scallop season”.

Thank you for the opportunity to comment and for considering my recommendations.

Sources & References used include:

- Bull, M F (1976). Aspects of the biology of the New Zealand scallop, *Pecten novaezelandiae* Reeve 1853, in the Marlborough Sounds. Ph.D thesis, Victoria University of Wellington. 175 p.
- Bull, M.F. 1989 The New Zealand scallop fishery: a brief review of the fishery and its 546 management. Proceedings of the Australasian Scallop Workshop; 1989; Hobart (Australia).
- Marsden, I.D, Bull, M.F. (2006) New Zealand Scallops. In “Scallops: Biology, Ecology and Aquaculture: developments in fisheries science”, 2nd ed. (S.E. Shumway and J. Parsons, eds.) Elsevier, v35, 2006.
- Ministry for Primary Industries (2014) Review of sustainability measures for southern scallops (SCA 7) MPI Discussion Paper No: 2014/07 Prepared for the Ministry for Primary Industries.
- Ministry for Primary Industries (2017) Temporary Closure of the Southern Scallop (SCA 7)

Poupart, T.A., Waugh, S.M., Bost, C., Bost, C-A., Dennis, T., Lane, R., Rogers, K., Sugishita, J., Taylor, G.A., Wilson, K-J., Zhang, J., Arnould, J.P. (2017) Variability in the foraging range of *Eudiptula minor* across breeding sites in central New Zealand. New Zealand Journal of Zoology.

Thrush, S F; Hewitt, J E; Cummings, V J; Dayton, P K (1995). The impact of habitat disturbance by scallop dredging on marine benthic communities: what can be predicted from the results of experiments? Marine Ecology Progress Series 129: 141–150.

Thrush, S F; Hewitt, J E; Cummings, V J; Dayton, P K; Cryer, M; Turner, S J; Funnell, G A; Budd, R G; Milburn, C J; Wilkinson, M R (1998). Disturbance of the marine benthic habitat by commercial fishing - Impacts at the scale of the fishery. Ecological Applications 8: 866–879.

Williams, J.R.; Parkinson, D.P.; Drury, J.; Roberts, C.L.; Bian, R; Tuck, I.D. (2017). Survey of scallops in SCA 7, January 2017. New Zealand Fisheries Assessment Report 2017/23. 67 p.

19. This season, recruited biomass in the Sounds has dropped a further 20% to 102 t. The scallop biomass in the Sounds is likely to be at its lowest level since 1997. This has been reflected in declining catch and biomass (see Figures 1 and 2).

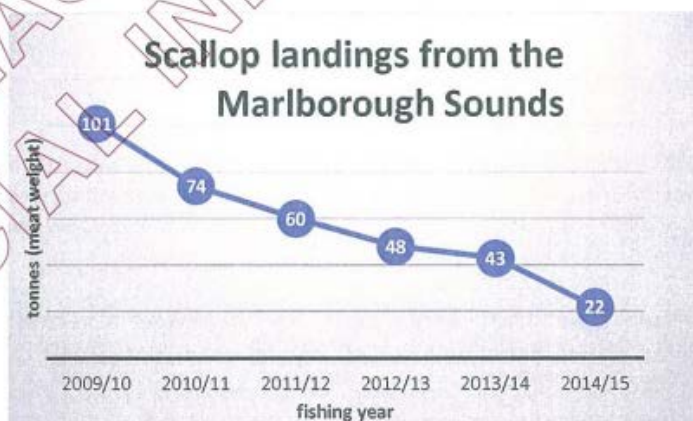


Figure 1: Commercial catch landings of Scallops from the Marlborough Sounds by year.

20. The downward trend in biomass is reflected in the decreased extent of fishable area for scallops in the Marlborough Sounds. For example, the Pelorus Sound, which

Priority – High

Security Level – In Confidence

Distribution
Minister
Minister's Advisor
Minister's Office

Ministry for Primary Industries  
Manatū Ahu Matua



11 September 2015

Document Number: B15-125

## Challenger Scallop Harvest Plan

### Purpose:

To seek your decision on the Challenger Scallop Enhancement Company 2015/16 Harvest Plan for scallops in the Challenger Quota Management Area (SCA-7) fishery.

Minister	Action Required:	Minister's Deadline
Minister for Primary Industries	<b>Note</b> you are required to decide whether to approve the Challenger Scallop Enhancement Company 2015/16 Harvest Plan. <b>Agree</b> to direct MPI to prepare a letter to	As soon as practicable.

Please continue on a separate sheet if required.

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
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### Submitter details:

Name of submitter or contact person:	Kelly Parris
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary closure.

### Official Information Act 1982

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**Submission:<sup>1</sup>**

As the survey that your information is based on was done so long ago it is not a true picture of the fishery.

As the bulk of recreation fishing takes place over the summer months, open the fishery to **BOTH** amateur and commercial fishers at the usual time of September, (or when the fish are in their prime condition).

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

**Option 3. No temporary closure**

As the survey that your information is based on was done so long ago it is not a true picture of the fishery.

As the bulk of recreation fishing takes place over the summer months, open the fishery to **BOTH** amateur and commercial fishers at the usual time of September, (or when the fish are in their prime condition).

**Reduce the amateur catch limit to 20 Scallops per person per day.**

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### Submitter details:

Name of submitter or contact person:	Brent Johnson
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

### Official Information Act 1982

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**Submission:<sup>1</sup>**

**Option 3. No temporary closure**

The survey that your information is based on was done so long ago it is not a true picture of the fishery. More work and results are needed before a decision to close the season is made.

As the bulk of recreation fishing takes place over the summer months, open the fishery to **BOTH** amateur and commercial fishers at the usual time of September, (or when the fish are in their prime condition).

Please continue on a separate sheet if required.

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### Submitter details:

Name of submitter or contact person:	Vicki ParrisWatson
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

### Official Information Act 1982

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**Submission:<sup>1</sup>**

**Option 3. No temporary closure**

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As the bulk of recreation fishing takes place over the summer months, open the fishery to **BOTH** amateur and commercial fishers at the usual time of September, (or when the fish are in their prime condition).

Please continue on a separate sheet if required.

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# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



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### Submitter details:

Name of submitter or contact person:	Jessica Kilbride Parris
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Peter Johnson
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Christine Parris
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

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**Submission:<sup>1</sup>**

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#### Submitter details:

Name of submitter or contact person:	Syd Howarth
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Phillip Greenem
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	David Hartshorne
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

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### Submitter details:

Name of submitter or contact person:	Wendy Hartshorne
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Sue Bennett
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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#### Submitter details:

Name of submitter or contact person:	Tarran Hartshorne
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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### Submitter details:

Name of submitter or contact person:	J WILLIAMS
Organisation (if applicable):	s9(2)(a)
Email:Cell	
Fish stock this submission refers to:	SCA 7
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### Submitter details:

Name of submitter or contact person:	B CHAMBERLAION
Organisation (if applicable):	
Email:Cell	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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### Submitter details:

Name of submitter or contact person:	Colin Hamilton
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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### Submitter details:

Name of submitter or contact person:	M WITTAKER
Organisation (if applicable):	
Email:Cell	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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### Submitter details:

Name of submitter or contact person:	W HUTTON
Organisation (if applicable):	s9(2)(a)
Email:Cell	
Fish stock this submission refers to:	SCA 7
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### Submitter details:

Name of submitter or contact person:	Morgan Parris
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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Please continue on a separate sheet if required.

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# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



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### Submitter details:

Name of submitter or contact person:	S HILLEARD
Organisation (if applicable):	s9(2)(a)
Email:Cell	
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

### Official Information Act 1982

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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Tom Mayo
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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### Submitter details:

Name of submitter or contact person:	Shirley Parris
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Murray Timbs
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Mike Parris
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	David Parris
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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### Submitter details:

Name of submitter or contact person:	Ian Currie
Organisation (if applicable):	s9(2)(a)
Email:	
Fish stock this submission refers to:	SCA 7
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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Graeme Bennett
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Bryce Bennett
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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### Submitter details:

Name of submitter or contact person:	Chris Parris
Organisation (if applicable):	s9(2)(a)
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

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**Submission:<sup>1</sup>**

I strongly support the submission forwarded by Challenger Scallop Enhancement Company (CSEC) supporting option 3 and wish to add these further comments.

At the last science group meeting I attended on 10.04.2017 I described two factors that would contribute towards continuous natural enhancement of Guards Bank and Ketu Bay.

1: Very simply, on the northern edge of Guards Bank is a thick band of red weed totally covering the width west to east of the regularly fished Guards Bank.

MPI gazette notice could close the red weed bed to all dredging, amateur and commercial and the natural scallop amongst the weed are brood stock that supply a huge amount of spat which keeps Guards Bay a regular mature scallop production unit.

2: Commercial vessels fishing scallops north of Ketu may thin the regular over populated spat falls noted in monitoring surveys. By loading up their tray and dredges and unloading/spreading the Ketu spat/fish in the Reach whilst heading for unloading at the Elaine Bay Wharf. Similar efforts may assist on the outer banks going into Richmond, Horseshoe, Waitata, Maud Island north. Calm Bay and possibly the south east corner of Maud Island.

I can only speak for my own commercial operation, but any others owners/crew I have talked with would assist such ideas.

Chris Parris:

Commercial fisherman for 31 years,

Enthusiastic amateur fisherman for 60 years.

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### Submitter details:

Name of submitter or contact person:	Nicole Kilbride
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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### Submitter details:

Name of submitter or contact person:	Greg Watson
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

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Organisation (if applicable):	
Email:Cell	s9(2)(a)
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### Submitter details:

Name of submitter or contact person:	Elva Timbs
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
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### Submitter details:

Name of submitter or contact person:	Lynn Newport	s9(2)(a)
Organisation (if applicable):		
Email:	s9(2)(a)	
Fish stock this submission refers to:	SCA 7	
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As the bulk of recreation fishing takes place over the summer months, open the fishery to **BOTH** amateur and commercial fishers at the usual time of September, (or when the fish are in their prime condition).

Please continue on a separate sheet if required.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



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### Submissions must be received no later than 5pm, Wednesday 31 May 2017.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

### Submitter details:

Name of submitter or contact person:	Barbara Currie
Organisation (if applicable):	s9(2)(a)
Email:	
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

### Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Dawn Howarth
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

### Official Information Act 1982

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**Submission:<sup>1</sup>**

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#### Submitter details:

Name of submitter or contact person:	Mark Krammer
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Kevin Hartshorne
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

### Official Information Act 1982

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**Submission:<sup>1</sup>**

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### Submitter details:

Name of submitter or contact person:	Elva Parris
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

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## Submission:<sup>1</sup>

### **Changes for upcoming season.**

Increase size to 95mm.

### **Reasons:**

Having read the consultation document supplied by MPI, I find that the document is fraught with uncertain estimates, scientific information which suggests, best information suggests, uncertainty of the effectiveness. One would have thought that for MPI to favour the closing of the fishery for another season that the scientific information being used toward this process should have been more specific than is shown to the public in this document

The call for submissions from Anthony Brett states that submissions must be received by FRIDAY 31<sup>st</sup> May 2017?????? All other documentation states Wednesday 31<sup>st</sup> may 2017.

The conclusion of the discussion document refers to the three options as being Option 1: Option2 and Option 2, what happened to the 3<sup>rd</sup> option?

This document is far from something which would provide the public with confidence that MPI is gaining the correct information needed on which to base their base decision, which affects not only the Scallop Fishery but all those who partake or are otherwise affected by it.

The survey mentioned was taken so far out from the commercial fishery being opened would seem ridiculous, given that nature is controlling the fishery and different months and weather patterns all have an impact on the growth rate of everything that nature controls, and here we have science **guessing** at what the fishery will do over the next seven months.

My personal experience is that areas which are heavily marine farmed show less or no scallops as to what have been traditionally produced, but areas such as the Chetwoods, Guards Bank and Long Island are still producing good scallop beds, why does the survey chart the entire sounds and then take an average over the whole area? This also applies to both Golden and Tasman Bays.

**I do not consider that the information supplied to the public in your discussion document is sufficient or conclusive enough to warrant a closure of any part of the fishery.**

Therefore I believe that the 2017/2018 season should be open with the above mentioned changes implemented and then the fishers, both amateur and commercial, will determine if it is in their best interest to fish the season.

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Ministry for Primary Industries  
Manatū Ahu Matua



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#### Submitter details:

Name of submitter or contact person:	Cheryl Hamilton
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

#### Official Information Act 1982

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**Submission:<sup>1</sup>**

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As the bulk of recreation fishing takes place over the summer months, open the fishery to **BOTH** amateur and commercial fishers at the usual time of September, (or when the fish are in their prime condition).

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### Submitter details:

Name of submitter or contact person:	B IRVINE
Organisation (if applicable):	
Email:Cell	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 3: No temporary Closure

### Official Information Act 1982

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**Submission:<sup>1</sup>**

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Please continue on a separate sheet if required.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



### Once you have completed this form

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#### Submitter details:

Name of submitter or contact person:	John Baird
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Options 1 and 2.

#### Official Information Act 1982

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## Submission:<sup>1</sup>

### Details supporting your views:

I support the complete closure of both areas to support the replenishment of the base stock levels pending a review next season. Regionally we have undergone some unprecedentedly geophysical and environmental challenges and it would be naïve to consider these events not to affect other sensitive areas too just because they are under water.

Since our forefathers stepped foot in to New Zealand there has been a litany of environmental disasters, for example:

- Felling Kauri for spars without thought of Kauri's growth rate leading to their near extinction.
- Introducing all manner of rodents and plant pests, e.g. stoats, possums, rats and weasels, pine trees, privet and ivy.

We have enough evidence available that indicates far greater effort is required to preserve what we have left for future generations, not pillage our meagre remaining resources on a she'll be right basis and/or "I don't care because I'll be dead and buried" basis.

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### Submitter details:

Name of submitter or contact person:	Reid Forrest
Organisation (if applicable):	N/A
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 2 or Option 1 if it includes closing Port Underwood as well.

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**Submission:<sup>1</sup>**

**I support the continued closure of SCA7 but am in favour of the closure applying to all areas of SCA7, including all of Tasman and Golden Bays and Port Underwood.**

**Details supporting your views:** Based on the findings of the January 2017 survey overall stock in SCA7 has continued to decline from its already lowest levels on record. The minor increase in mean stock level that appears to have been seen within the Marlborough sounds is within the statistical error range of the previous survey (2015) which was the lowest level on record. Given that the minister closed this fishery based on the low results in 2015 it would make absolutely no sense to re-open any area of the fishery to any take (commercial or recreational) in the 2017/2018 season.

**Continued decline in Tasman Bay, and no improvement in Tasman and Golden Bays** continue to show that whatever combination of factors that has caused these fisheries to collapse is possibly still impacting them. Or the more likely scenario is that the combination of factors decreased the populations to a critical 'tipping-point' from which the scallop population could not, or could not quickly, recover from. It is likely that these factors include such things as;

- commercial dredging for scallops, along with commercial bottom trawling for finfish, have impacted the seabed to such an extent, for such a long period, that there is no living materials like shellfish beds, diatom mats, algae etc., that are able to hold the seabed together or trap fine sediments. Upon any sort of disturbance such as large storm events and waves/swells, or large tidal currents, fine sediments are stirred over and create a near-bottom high-turbidity layer.
- Increased flood protection works around major rivers like the Motueka, Takaka and Aorere has channelled increased amounts of fine sediments into Tasman and Golden Bays. These sediments previously might have been spread over floodplains at the lower reaches of the rivers and not have reached the sea, but increased flood protections to protect human settlements and infrastructure flushes the fine sediments out into the bays at levels that the organisms in the bays have not been evolved to handle.
- increased levels of plantation forestry development and clear-felling have lead to increased fine sediment loads entering the rivers and streams of the major catchments and then being flushed through into Tasman and Golden Bays.

**Factors like these have created an environment that is essentially toxic to scallops, particularly juveniles, where fine sediments choke the scallops stopping them from being able to feed or at times even absorb sufficient levels of oxygen.**

**So with an environment that isn't able to support scallops and continued decline in the stocks to levels that are below the MPI hard limit it makes no sense to have any sort of fishery, either recreational or commercial in these bays.**

**Recreational use of the Marlborough Sounds region has increased hugely over the last decade and with it has come great increases in the pressure on all fish stocks, such as blue cod and scallops. Once abundant beds of scallops in areas such as Blackwood Bay, East Bay, Bay of many coves have been increasingly heavily fished by the recreational divers and dredges and regular divers have seen scallops becoming increasingly less dense and larger areas of open/barren fine sediments (muds and clays). With the collapse of the commercial fishery in Tasman and Golden bays and commercial fishing shifting more and more of its take into the Marlborough sounds this has further pressured the already stressed stock. Well known scallop beds that were previously healthy and able to support both recreational and occasional commercial fisheries, such**

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as Ketu and Waitata Bays, have collapsed in recent years. With these collapses the pressure only increases on the remaining areas where scallops exist in any reasonable densities.

The closure of the SCA7 recreational fishery last season, and hopefully this coming season, will mean that if/when the recreational fishery is reopened then there will likely be a level of pressure on the fishery higher than anything that has previously been seen, due to people wanting to catch scallops after being restricted from being able to do so. So if the fishery is reopened it should occur only with large changes to the catch limits and allowable methods, such as;

- minimum legal size being raised to 100mm
- daily catch limits being reduced from 50 to at maximum 20 per person (preferably lower)
- removal of the loophole whereby a diver can collect catch for a boat-person and an assistant
- Making the entire SCA7 fishery non-dredge and banning any use of dredges in SCA7 (both commercial and recreational).

While the Marlborough sounds did show some increased numbers of sub-recruits and juveniles which were likely surviving recruits from a spawning event in 2015/2016, these scallops will not yet have had a chance to successfully spawn. Closing the SCA7 fishery for at least one more year, preferably 2 more seasons, would give these new recruits several chances to spawn and further add to the Marlborough Sounds stock and hopefully begin to rebuild towards 'healthy' levels. However successful recruitment events are likely to be somewhat inconsistent or 'patchy', and also likely to be influenced by other factors on top of scallop density, such as environmental factors. Similar patchy recruitment of fishery stocks in the top of the south has been seen in recent reviews of the SNA7 fishery.

#### Port Underwood:

The scallop fishery within Port Underwood is small and I have dived it for over a decade so have a reasonable level of knowledge. Scallop densities in this area tend to be relatively low compared with say Croiselles Harbour and the Queen Charlotte Sound. However, mean scallop size in the past has tended to be much larger in Port Underwood compared to these other areas. The fishery was relatively unknown and largely only dived by locals or a few divers who knew where the small isolated beds were found. But in recent years, and especially last season with the closure of the Marlborough Sounds fishery, the number of divers targeting scallops in port Underwood has exponentially increased. The beds were rapidly depleted last season as word spread through social media about where the few beds in Port Underwood were located. The scallop stock within Port Underwood was thought to be largely an enhanced fishery that has been historically kept somewhat artificially topped up as scallop spat has been bought into Port Underwood with mussel spat that was caught in Tasman and Golden bays and moved to Port Underwood for on-growing. As scallop spat grew they dropped off the spat lines and onto the seabed in Port Underwood and were recruited into the stock. Researchers from Victoria University began work looking at genetic similarities of scallop stocks from around New Zealand and were due to begin work looking at similarities between Golden/Tasman Bay stocks and those in Port Underwood, when funding ran out. As adult stocks in Tasman and Golden Bays have crashed in recent years it is highly likely that the amount of scallop spat now being accidentally moved into the port has massively dropped as well. Thus with a small remaining population, little outside spat being deposited and increasing pressure on the area, it would be likely that the Port Underwood stock will be rapidly declining and at high risk of reaching a 'tipping-point' where densities are too low for the small population to sustain itself with any sort of recreational take occurring.

Thus in order to sustain whatever population remains in Port Underwood it should be closed alongside all other areas within SCA7 for at least the next year, if not the next two years.



**Submission: MPI Discussion Paper 2017/19: Temporary Closure of Southern Scallop Fishery SCA7.**

This submission is made on behalf of the Marlborough Recreational Fishers Association (MRFA).

Background. The MRFA is a body of recreational anglers whose principal function is to represent the interests of local recreational fishers. Membership is largely drawn from residents in Blenheim and the Marlborough Sounds.

**Submission: The MRFA strongly supports Option 2 as the only viable avenue towards a sustainable future for the ‘top of the South’ scallop population.** In this we are, in almost all respects, at one with the major propositions of the Kenepuru and Central Sounds Residents Association (KCSRA), and the Pelorus Boating Club, collectively referred to as the Alliance. Option 2 differs from Option 1 solely in the inclusion of Port Underwood, and such inclusion is welcomed by the Port Underwood Association. Allowing continued harvesting from Port Underwood would be likely to place it under heavy pressure from recreational fishers.

Discussion: The substantive reason for supporting the closure of SCA7 is made clear by reference to Figure 2 in the Ministry’s Discussion document, revealing the catastrophic fall in the scallop harvest over the past ten years, to the point where no harvest is possible in the Tasman and Golden Bays, and a minuscule return from a few small areas in the Marlborough Sounds. This lead the Minister, in 2016, to close the fishery for one year, a decision widely supported by the MRFA. Late in 2016, the future of the fishery was discussed by the Scallop Advisory Group, which reached the conclusion that no decision could be reached about the 2017 season until a new survey provided information about the state of the recovery of the scallop beds. This survey was duly

carried out in early 2017, and the results showed clearly that there was no recovery in Tasman and Golden Bays, but there was some evidence for an increase in the population of scallops in the Marlborough Sounds, although this was not statistically significant. This was not altogether surprising, since in SCA7 it is estimated that scallops take at least two years to reach a marketable size. It seems undeniable therefore that a second year of closure is essential. It should be borne in mind that the remaining beds in the Marlborough Sounds, while having a relatively high density of scallops, are small in area and therefore easily susceptible to rapid depletion.

MRFA is somewhat perplexed by the failure of the Discussion Document to include any reference to customary fishing. Iwi generously agreed during the previous closure to refrain from exercising their customary rights. It is to be hoped that the same will apply this season, and it is noted that this support is conditional on research studies to understand the reasons for the decline in abundance and measures taken to remedy this where practicable.

MRFA unequivocally supports the conclusion expressed in the KCSRA submission that the collapse of the scallop fishery is at least partly a consequence of the delegation of management of the fishery to an industrial group. That this is a failed experiment is evidenced by the failure to achieve a sustainable harvest. MRFA is of the opinion that the Memorandum of Understanding between the Crown and industry needs to be restructured. MRFA regards the Sounds fishery (defined as that area defined by the coastal boundary of the Marlborough District Council) as sufficiently separate from the Tasman and Golden Bay regions as to merit a separate management structure involving representatives of all stakeholders. Their function would be to develop a set of management objectives and a strategy to allow a sustainable exploitation of the resource in a way which is acceptable to all interested parties.

Peter Watson, President, MRFA.

## **SUBMISSION FOR SCALLOP SCA7**

### **SCALLOP MANAGEMENT:**

Firstly, I feel I am qualified enough to have a say. I have lived in Marlborough all my life. I started boating with my father at the age of 16. I am still activity involved in both above and below sea activities at over 50years of age. My children now have their own boats and they too love and appreciate all aspects of the Marlborough Sounds.

### **DREDGING:**

I am against a ban on dredging as is disadvantages non-divers. There are only a few bays where dredging is heavily used. Alot of Queen Charlotte Sound is not suitable for dredges anyway. These bays that are heavily dredged still produce.

### **QUOTA:**

I would like to see the quota halved to 25 each Diver and a quota for the boat person.

- A boat limit set, i.e. launch with 10 people max of 200 scallops.
- Dredging is 25 per person involved with dredging and a boat limit as set below.
- Accumulation – no more than two quota in freezer as already is with paua. This has worked well. It would stop the Boaties, Divers and Bach users who are there for one or two weeks just collecting for the freezer.

### **LENGTH OF SEASON:**

July to February is too long. A lot of areas the scallops are not fully developed and are not in best condition. Shorter season say November, December and January.

### **CUSTOMARY RIGHTS:**

If data could be collected for Bays and areas to make sure the easiest accused Bays are not over fished. This could be used for all permits. Then the holder could ensure long term sustainability.

### **SUMMARY:**

The general feeling I have found from Marlborough Sounds users that I know, is they are all prepared and feel the time is right to reduce catches generally in all species, i.e.

- Paua 10 – 6
- Crayfish 6 – 3
- Fin Fish 20 – 10

I look forward to the reform.

Kind regards

Neville Saul

PH: s9(2)(a)

s9(2)(a)

Phil Appleyard  
President  
NZ Sport Fishing Council  
PO Box 207-012 Hunua 2254  
[secretary@nzsportfishing.org.nz](mailto:secretary@nzsportfishing.org.nz)

Fisheries Management – Inshore Fisheries  
Ministry for Primary Industries  
PO Box 2526  
Wellington 6140.  
[FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)



31 May 2017

## **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 10<sup>th</sup> May 2017, with submissions due by 31<sup>st</sup> 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](http://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.

**From:** s9(2)(a)  
**To:** [Anthony Brett](#)  
**Subject:** Re: Call for submissions on the Southern Scallop fishery  
**Date:** Monday, 29 May 2017 9:11:25 p.m.

---

Good evening

I would like to put forth a submission with respect to the closure of the Southern Scallop Fishery SCA7.

Name: Michael Creed

Email: s9(2)(a)

Fishery: SCA7

Preferred Option: No closure of SCA7 for the 2017/2018 scallop season

I am putting forth this submission in opposition to the proposed closure of SCA7 for the 2017/2018 scallop season.

I feel the limited success of the closure highlights the need to review the regulations for the collection of scallops as a whole. The proposal put forward to close the fishery again this year fails to address this. There is little in the way of future regulation changes if and when the fishery reopens. Any closure would also put increased pressure on businesses following the earthquakes; it is frequently reported the increased travel times and vulnerability of roads to the region to closure have led to a decline in visitor numbers to the Marlborough region. A closure of the entire SCA7 fishery in lieu of partial or no closure would exacerbate this issue.

It is apparent upon comparison with regulations in other FMAs that there are much higher TACC and daily bag limits within the Challenger FMA. The discussion document states little proposed change, such as reducing the daily bag limit, TACC or season length or increasing the minimum size which would assist in future enhancement of the fishery.

The document also fails to discuss the detrimental environmental effects of scallop dredging. Despite substantial scientific literature stating the damage this method causes, it appears the Ministry for Primary Industries has failed to take this into account while assessing the state of the fishery at present.

Restrictions on dredging, reducing bag limits and TACC, shortening the season, increasing minimum size and bringing regulations in line with the rest of New Zealand would all assist in helping to develop a sustainable scallop fishery in the Challenger FMA. A closure will achieve little unless further measures are taken to prevent this occurring in the future.

---

**From:** Anthony Brett <s9(2)(a)>  
**Sent:** Wednesday, 10 May 2017 3:43 a.m.  
**Subject:** Call for submissions on the Southern Scallop fishery

Dear stakeholder

### **Further temporary closure to the Southern Scallop Fishery 2017/18**

The Ministry for Primary Industries (MPI) is seeking feedback and submissions on whether a further temporary closure of the Southern Scallop fishery (SCA 7) should be implemented for the coming scallop season, which starts on 15 July 2017.

MPI also seeks feedback and submissions on whether the small Port Underwood recreational fishery, which is immediately adjacent to (but not part of) SCA 7, should also be closed to protect it from increased harvest pressure.

A survey in January 2017 shows the biomass of scallops across SCA 7 has decreased since the previous survey in November 2015. The stock remains at its lowest recorded level, despite parts of SCA 7 being closed last season.

There has been no recovery in Golden and Tasman Bays. Some scallop beds in the Marlborough Sounds have responded to last season's closure with a small increase in scallop numbers. However, the Marlborough Sounds as a whole remains close to the lowest recorded biomass level and contains the only remaining dense beds of scallops in SCA 7 that are considered critical for the reproductive success of the fishery.

MPI seeks your views on whether a further closure would help safeguard remaining scallops and give the beds an opportunity to rest and contribute to the spawning potential of the fishery without disturbance from fishing. It would reduce utilisation in the short term, however, this would be balanced by improved fishery productivity in the future. MPI has sought input from tangata whenua and commercial and recreational fishing representatives as part of the process to develop its Discussion Document, and is working with these sectors to identify the causes for the decline and on longer term management measures for the fishery.

The Discussion Document that outlines the proposals can be found on the MPI public consultation webpage at: [www.mpi.govt.nz/news-and-resources/consultations](http://www.mpi.govt.nz/news-and-resources/consultations)

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### [Consultations | MPI - Ministry for Primary Industries. A ...](http://www.mpi.govt.nz/news-and-resources/consultations)

[www.mpi.govt.nz](http://www.mpi.govt.nz)

Find information about MPI consultations. Choose to see all, or select open, closed, or a topic.

---

Alternatively, hardcopies of the Discussion Documents may be requested at the email or post addresses provided below.

Should you wish to discuss your submission or have questions about the Discussion

Document or the fishery, please contact Tony Brett on (03) 466 3688.

**Making a submission**

All submissions should be received by **5pm, Friday 31 May 2017**.

Written submissions should be sent directly to:

**Email**

[FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

**Post**

Inshore Fisheries Management  
Ministry for Primary Industries  
PO Box 2526  
Wellington 6140

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**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Re: SCA 7 submission  
**Date:** Monday, 15 May 2017 8:38:59 p.m.

---

Hi Tony,

Submission is copied and pasted below.

Option 2:

As a bach owner in Pelorus Sound and a recreational scallop fisherman I support Option 2, to close SCA 7 and Port Underwood to both commercial and recreational scallop fishing. I would like scallop population to increase significantly before reopening. It seems from the discussion document and also from the first hand accounts of locals that the fishery is on the brink of collapse due to overfishing, by both recreational and commercial guys, and a range of other factors which could include forestry and agriculture runoff and aquaculture. I would like to see the entirety of SCA 7 remained closed until there is not only a satisfactory increase but an abundance. Otherwise it seems we will be in a similar predicament in another 10 or 20 years.

In addition, when the fishery is eventually reopened I believe that both catch limit and size need to be changed. Around the rest of the country the legal size is 10mm larger and nowhere in New Zealand, other than SCA 7 are you allowed more than 20 scallops per person. 50 per person seems entirely excessive when compared. I would like to see the limit and size in SCA 7 change drastically.

Lastly I believe that any use of dredges or similar bottom contact methods of scallop harvesting be banned. From what I have read and heard dredges are incredibly detrimental to not only scallop beds but many other forms of sea life as well. Surely something that tears up the sea bed cannot be a sustainable method.

Glad to see that MPI is being so proactive.

Cheers,

Olly

On Thu, May 11, 2017 at 9:28 AM, FMSubmissions <[FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)> wrote:

Hi Olly

Could you please resend your submission as we are unable to open it in the current format which is not compatible with windows

Kind regards

Tony Brett

**From:** Olly Archibald [mailto:s9(2)(a) ]  
**Sent:** Wednesday, 10 May 2017 7:52 p.m.  
**To:** FMSubmissions <[FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)>  
**Subject:** SCA 7 submission

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**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** RE: SCA7 2017  
**Date:** Thursday, 11 May 2017 9:34:26 a.m.

---

Hi Tony; I must have, did not find process userfriendly.  
My submission was Option 2. Thanks Simon.

---

**From:** Anthony Brett [mailto:s9(2)(a)] **On Behalf Of** FMSubmissions  
**Sent:** Thursday, May 11, 2017 9:30 AM  
**To:** Simon Slooten  
**Subject:** RE: SCA7 2017

Hi Simon

I am presuming that you have omitted to attach your submission?

Kind regards

Tony Brett

---

**From:** Simon Slooten [mailto:s9(2)(a)]  
**Sent:** Wednesday, 10 May 2017 4:56 p.m.  
**To:** FMSubmissions <[FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)>  
**Subject:** SCA7 2017

---

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s9(2)(a)

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s9(2)(a)

s9(2)(a)

s9(2)(a)

s9(2)(a)

29 May 2017

**Anthony Brett**

Inshore Fisheries Management

Ministry for Primary Industries

Email to: [FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

Original Couriered – Po Box 2526, Wellington 6140

**Tēnā koe Anthony**

***Call for submissions on the Southern Scallop Fishery (SCA 7) 2017/18***

We have been commercially involved in this Fishery for many years and attended the workshops between MPI, the Quota Holders and the TTI Forum. In addition it is an important source of customary take.

Having studied the survey results and consulted with MPI scientists we are in no doubt that the Fishery is in a perilous state and that drastic action is needed.

We therefore support a further temporary closure of the Southern Scallop Fishery (SCA 7) for the 2017/18 fishing year and for protection, the Port Underwood Recreational Fishery. This closure to be a total ban on all commercial and recreational fishing.

However, we are of the view that this is an interim measure and that this resource needs long term protection and active restorative fisheries management. We therefore ask the Ministry to consider long term measures for consideration of all parties concerned and perhaps a different management model as we believe the current management model to be deficient.

Yours faithfully.



**Richardt Prosch – General Manager**

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** SCA 7 Scallop Season Closure Submissions  
**Date:** Friday, 12 May 2017 10:22:33 a.m.

---

I would like to submit my support for closing the Scallop Season (SCA 7) for another year as I feel that the 12 month closure for 2016/2107 season was not long enough to enable the Scallops to recover from overfishing etc. As I have a Bach in Okiwi Bay and see how many boats per day for the whole season go out to catch scallops. Most boats with 4 people on board. Also I would like to see the catch reduced to 20 per person.

George Sim

s9(2)(a)

Sent from my iPad

**From:** s9(2)  
**To:** [FMSubmissions](#)  
**Subject:** SCA 7 submission  
**Date:** Thursday, 11 May 2017 3:44:22 p.m.

---

To whom it may concern,

I am in favour of implementing either option 1 or option 2 with regards closing the scallop fishery (SCA7 and /or Port Underwood) for the 2017-2018 season.

I am opposed to option 3, Status Quo.

Regards,

Brian Howell

s9(2)(a)  
[Redacted]

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



### Once you have completed this form

Email to: [FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

While we prefer email, you can also post your submission to: Fisheries Management, Ministry for Primary Industries, PO Box 2526, Wellington 6140, New Zealand.

### Submissions must be received no later than 5pm, Wednesday 31 May 2017.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

#### Submitter details:

Name of submitter or contact person:	Gary and Anne Small
Organisation (if applicable):	Individuals (active boaties, fishers and diver)
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 2

#### Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

**Submission:<sup>1</sup>**

**Details supporting your views:**

We have read MPI Discussion Paper No: 2017/19 and conclude that it makes perfect sense to maintain the closure of SCA 7 for a further season and monitor and review the results.

We also agree that Port Underwood will come under extraordinary pressure under Option 1 and therefore should be subject to same closures as SCA 7.

We further think that if and when the scallop fisheries are re-opened the recreational daily take limit should be reduced to 30 per person.

(We have heard rumours that some individuals have been granted special permission to gather scallops despite closure. We do not know if this is true but if it is it should be stopped...Customary Rights?)

---

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Sca7  
**Date:** Wednesday, 10 May 2017 9:35:30 p.m.

---

Matthew Forlong  
Matts rural services ltd

s9(2)(a)

Blenheim local

Change quota from 50 to 20 like most of the north island. Increase the size limit and if possible make the call for no dredging as it damages the sea bed. While stocks are recovering. Also close the sca7 harvest period over the Christmas break which is when the fisheries receive the most pressure.

Sent from my iPhone

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Scallop season closure 2017/ 18  
**Date:** Friday, 12 May 2017 2:33:59 p.m.

---

Hello, I wish to make a submission with regard to the up coming scallop season 2017.

I have no problem with a continued closure for the 2017/2018 season SO LONG AS the season is CLOSED TO ALL FISHERS.

For this recovery to have a full chance of working there should also be **no customary permits issued.**

The idea is that the scallop beds are undisturbed to allow recovery. There have been a number of occasions where an individual has gone out and dredged for 500 and even 1000 scallops. This is wrong. My point is not about race, colour or creed but simple fairness and to look to the future.


I have gathered my scallops in the Crosillies Harbour area for 40 years. I have always taken within my limits.

At the end of the 2016 season I gathered my 100 scallops with no trouble at all. A total of 3 tows was all that was required. When I returned to the boat ramp I was approached by the fisheries inspectors who were surprised by my legal catch and the speed with which I had collected my catch. They advised that some people had towed a dredge around for one & 1/2 hours and come back with 3 scallops.

--

Kind regards Rick Kunzli

s9(2)(a)



Submitter: **Tony Black**

Email: s9(2)(a)

Fish stock ref: **SCA7**

Preferred option: **Option 2**

### **Submission:**

My family has a bach in Waihinau Bay, Pelorus Sound and I have known the local scalloping areas for nearly 60 years. Once there were scallops in Waihinau Bay and I remember the pillage that resulted in the destruction of the scallop fishery in that and nearby bays. That memory leads me to support a risk averse approach to the sustainable management of what remains.

I would like management decisions to have a sound scientific basis and it is encouraging to see there are research projects under way into factors driving the decline in scallop numbers. Until we know what is going on we are just guessing. The variability in the scallop take in recent years and the present near collapse of the fishery underlines the importance of not allowing a dredge-and-hope approach to guide the management of the fishery. The first priority must be to restore and maintain its health.

When, and if, the fishery reopens, I would support a significant reduction (50%?) in the daily quota.

And I am also concerned at the prospect of salmon farms in the vicinity of recovering scallop areas with Ketu Bay and Richmond Bay particularly in mind.

Tony Black  
15 May 2017

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



### Once you have completed this form

Email to: [FMsubmissions@mpi.govt.nz](mailto:FMsubmissions@mpi.govt.nz)

While we prefer email, you can also post your submission to: Fisheries Management, Ministry for Primary Industries, PO Box 2526, Wellington 6140, New Zealand.

### Submissions must be received no later than 5pm, Wednesday 31 May 2017.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

### Submitter details:

Name of submitter or contact person:	Michael Davidson
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Option 2

### Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

**Submission:<sup>1</sup>**

**Details supporting your views:**

It is self evident that we need to close the fishery until it recovers adequately

Please continue on a separate sheet if required.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Scallop Fisheries.  
**Date:** Friday, 12 May 2017 5:04:59 p.m.

---

Attention of the Ministry For Primary Industries

Please accept our submission on the further temporary closure to the Southern Scallop Fishery 2017/2018 season

Yes there should be further closure of the southern scallop fisheries both in SCA7 and the recreational Port Underwood fishery. To be implemented this coming season July 2017

Our fisheries in and around the Marlborough Sounds and Golden Bay are in serious decline by both commercial and recreational fishing. No more commercial fishing and a lesser bag for recreational fishermen should be implemented even after recovery. The government promise was to close commercial fishing in the Sounds and still nothing is happening. Too many interests taking too much when is it going to stop..

Jane and Richard Cawood

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Scallop Fishery Marlborough Sounds  
**Date:** Thursday, 11 May 2017 9:39:50 a.m.

---

I would like to make the following point regarding above topic

1. I believe the season has opened too early in the past , the fish are not ready to harvest in mid July, I think mid August is much more suitable time.
2. I would also be in favour of closing the season earlier say in January, the roes are ripe for reproduction late in the season and this may help to increase the numbers.
3. I would support the catch being reduced to 25pp as it is further north, this would make a huge difference to the stocks.
4. Finally I would support closing the season for 2017/18 in the effort to improve the fishery. Of the above points item 3 would have the greatest impact. This would need to be policed better than in the past!

Regards Charlie Rhodes

s9(2)(a)

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Scallop fishery  
**Date:** Wednesday, 10 May 2017 9:13:58 p.m.

---

Thanks for referring this submission document to me.

I feel very strongly about the depletion of fishing stocks in the Marlborough Sounds.

Both recreational and commercial fishers should be restricted from certain stocks at various times. Flounders have been devastated mainly because of commercial netting in Kenepuru Sound.

500 metre nets are a catch all for every species and each year commercial fishers have probably ruined the fishing in Kenepuru Sound.

I believe they are now banned from fin fishing in the Sounds which is long overdue.

Their treatment of the scallop beds will probably be a similar experience, as their scallop dredges usually crush those scallops not taken.

Surely the Sounds should be sacrosanct from commercial fishing but also recreational fishers should be restricted every now and then to build up the resources.

More marine reserves should be introduced in various areas and they should be rotated regularly.

Thanking you.

Sue Anderson

Sent from my iPhone

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Scallop management , Marlborough sounds  
**Date:** Thursday, 18 May 2017 6:42:11 a.m.

---

To whom it may concern,

Last year I submitted that the top of the south scallop season should be closed. Thank you for listening . At the time I suggested scientific monitoring to evaluate what is going on with scallop biomass. That also appears to be happening . Despite missing my seasonal feeds of scallops , and the great time we have getting them I will happily forgo that pleasure for however long it takes to return the fishery to an abundant level.

As a parent and someone who has a deep affinity with The sounds I want to look after it and pass it on in better health to my and everyones kids.

Please keep the commercial boats out of the scallops. They have a livelihood that is going the way of the dinosaurs and will keep going until the last scallop is caught. The habitat is destroyed for everything by the dredges,

Pick the sustainable way to go, if thats diving only , so be it.

Give it 5 years break, then see .

Regards

Neil Black

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** scallop season closure  
**Date:** Thursday, 18 May 2017 2:25:37 p.m.

---

I agree that the proposal 6.2 is the safest course of action, given that the Port Underwood biomass is untested. Alan Graham. Recreational fisherman and PBC club member.

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Scallop submission  
**Date:** Tuesday, 16 May 2017 4:27:38 p.m.

---

To Whom it may concern.

I operate a small 'Boutique' charter business in the Queen Charlotte Sound, I have been doing so for the past 20 years. I mainly offer overseas guests, out of the exclusive Bay of Many Coves Resort, a Sounds experience many will never forget. One of our treats for the guests (mainly small groups of 2 – 6) was to put our small dredge overboard and to give them the experience of 'hunting and gathering' a small number of Scallops so they can take a few back to the Resort for their chef to prepare. (a maximum of 20)

I would like to make two points: Firstly, I am out on the water for a large percentage of the days the fishery was open over the last twenty years until the fishery was closed and I have observed no noticeable reduction in the amount of Scallops caught.

Secondly, since the closure of the fishery, my business has suffered badly so much so, I'm seriously considering closing down the business. It would be a real pity as there then would be nobody offering overseas guests this sort of experience. I'm not alone as I firmly believe other local businesses have also suffered.

My submission is to re open the fishery but at a reduced take of say, 20 scallops per person per day.

Yours faithfully, Gordon Low

Tel: s9(2)(a)

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



### Once you have completed this form

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While we prefer email, you can also post your submission to: Fisheries Management, Ministry for Primary Industries, PO Box 2526, Wellington 6140, New Zealand.

### Submissions must be received no later than 5pm, Wednesday 31 May 2017.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

### Submitter details:

Name of submitter or contact person:	Steve Dawson
Organisation (if applicable):	
Email:	s9(2)(a)
Fish stock this submission refers to:	SCA 7
Your preferred option as detailed in consultation document (write "other" if you do not agree with any of the options presented):	Options 1 or 2 – further temporary closure. I do not support option 3, reopening the fishery.

### Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

## Submission:<sup>1</sup>

### Details supporting your views:

I support another year of temporary closure of the scallop fishery to further allow the recovery of the fishery.

1) I further recommend including part of this fishery into the proposed Marlborough Sounds Recreational fishing park. I would recommend that:

- all Pelorus Sound inside West Entry Point and East Entry Point be included
- all Queen Charlotte Sound (inside Cape Jackson and Cape Koamaru)

be included in the Recreational Fishing Park, and commercial scalloping be excluded from this area.

This still give extensive beds for commercial fishing (Forsyth Bay, Guards Bay, Chetwoods) and leaves some beds (with reduced current flow) for recreational scalloping.

As a recreational scalloper, I do not trust the commercial fishers. I believe they have raped and pillaged their own fishery – Golden and Tasman bays – and now are responsible for the significant reduction within the Marlborough Sounds. I have personally witnessed a commercial scalloper spending two days dredging Richmond and Ketu bays just after season opening in 2013 (26/7/13). Prior to this, scallops were plentiful in both Horseshoe and Richmond bays, and since then I have not caught any quantity of scallops in these two bays. Ketu has also been harder to get a reasonable quantity.

By separating the areas available for commercial scalloping, they can rape their ground (as they will do again), and it wont affect the recreational scallopers.

Further with the scallop beds recovering, and included in the fishing park, will increase the boating activity and general internal tourism and economic activity of the Marlborough Sounds.

2) I further recommend decreasing the catch limit for recreational scalloping to 20 per person. 20 is enough for a decent feed, given that more than one person is generally involved in the scalloping. This will help maintain the scallop beds.

Please continue on a separate sheet if required.

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** scalloping in Marlborough Sounds  
**Date:** Wednesday, 24 May 2017 9:28:53 p.m.

---

My submission is to close the scallop season again this year and also the Port Underwood site closed as well.

Have you put some thought into what the logging industry is doing to the sounds. At present the inner sounds(Pelorus) water is dirty all of the time. The hills are barren from where the logging has taken place. The run off of sediment is huge and scallops do not like this. The pine needles are toxic and they are all left behind to wash down to the sea. The scallop bed at Okiwi Bay has declined since logging has taken place up Squally

Chris Simpson

s9(2)(a)

Ph s9(2)(a)

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This email has been checked for viruses by Avast antivirus software.  
<https://www.avast.com/antivirus>

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Scallops and closure of issues.  
**Date:** Wednesday, 10 May 2017 7:37:03 p.m.

---

Thank you for the opportunity to comment on the scallop issue.

We believe that the entire Marlborough Sounds should be subject to closure for the taking of scallops for several years for both commercial and recreational fishers.

I have been living in the Sounds since the late 60's and it is incredible how the fish stocks both shell and fin fish have declined.

Commercial fishing in the Sounds should be banned permanently and residential takes also reduced.

Larger marine fish reserves should be introduced i.e. One side of each Sound closed for a stated period and then reversed two yearly.

Thank you

Alan Harris

Sent from my iPhone

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Scallops in the Marlborough Sounds  
**Date:** Thursday, 11 May 2017 1:33:59 p.m.

---

I am in favour of doing everything possible to save and rebuild the scallop numbers.  
I would also like more research into why the scallop and fish numbers are still declining, with action taken to reverse these causes ( eg increased silting of the sea floor and disturbance from fishing and dredging activities).  
I wonder if we could allow limited recreational catches by snorkelling and scuba diving, in certain restricted areas, to keep the sport "alive" and give people a reason to keep visiting the region.

Thanks  
Tony Young  
s9(2)(a)

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Scallops  
**Date:** Monday, 29 May 2017 8:16:13 p.m.

---

Hi,

As a keen diver and recreational fisherman I would love to see the scallop fishery's closed for an additional year or even two for the better of Marlborough. While this is important I believe mpi should be also focusing on creating additional larger marine reserves. We need to focus on obvious options to create sustainability not just data from catch numbers a great large reserve will create a natural fish farm but also create work and an attraction in time to come.

Thank you  
Nate

Sent from my iPhone

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Southern Scallop (SCA 7) Fishery  
**Date:** Thursday, 25 May 2017 2:08:57 p.m.

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## **Submission on the Southern Scallop [SCA7 and Port Underwood SCA7C] Fishery for the season 2017-2018.**

### **Submission of Tony Orman**

Of the three options proposed, the only credible and practical one is Option 2. This would involve temporary closure for a further season of SCA7, with Port Underwood [SAC7C] included.

#### **Comments:**

The saga of the “Top of the South” scallop fishery is a sad one characterised by commercial greed, over-fishing and a failure to recognise early warning signs. The impending decline of Golden and Tasman Bays was evident more than decade ago. Meanwhile the Marlborough Sounds beds showed little or no change in abundance. Scallops from the ‘top of the South’ are a valuable resource, not only for commercial operators, but also for a significant number of local residents and visitors from Christchurch and Wellington. Halting any further decline of the scallop beds and formulating a sensible management structure and policy to ensure sustainability must be paramount. A **temporary** closure of the fishery for 2017-8 is vital as the first [step.is](#) a necessary first step.

This must be a collective measure observed by the three stakeholders - recreational, commercial and customary.

Tony Orman  
Journalist/Editor

s9(2)(a)

s9(2)(a)

Ph. s9(2)(a)

s9(2)(a)



**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Southern Scallop Fishery  
**Date:** Wednesday, 10 May 2017 4:39:58 p.m.

---

To Whom it may concern.

The Southern scallop fishery in the Queen Charlotte Sound, Pelorus Sound, Tasman and Golden Bay has collapsed solely due to dredging the seabed. This ruins the environment for the reproduction of scallops. I could elaborate more but enough said.

The only way forward is to keep all beds, including Port Underwood closed to all scallop harvesting for 5 years. After this time the fishery should be opened to diving only, no dredging privately or commercially.

A new daily bag limit of 25 scallops should be introduced, with a maximum boat limit of 50 scallops. This would prevent one boat with 4 divers "cleaning out" one bay all at once. Minimum size should return to 100mm. The size increase would allow more scallops to spat before the chance of being harvested.

My experience this season in Port Underwood is that we have seen a stunning increase in the number of boats with dive flags around the inner Port. I can only assume they are diving for scallops.

I have done several dives myself around "The Tongue" and feel the biomass of scallops in this fishery to have almost completely collapsed. It has been historically reducing over the past decade in my observation though, I believe mussel farming destroys the scallop fishery. In the 1980's the whole inner Port Underwood was brimming with scallops, now they exist only in a very narrow ribbon within 25metres of the shoreline. Land use run off has probably exacerbated the scallop fishery demise in port Underwood as well, a lot of silt runs out of the Wairau river after any rainfall, as well as runoff from Port Underwood logging operations and the metal roading.

Yours faithfully,

Martin Elliot Loach

s9(2)(a)

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Cc:** s9(2)(a)  
**Subject:** Sthn scallop fishing closure  
**Date:** Wednesday, 31 May 2017 10:08:08 a.m.

---

I have participated before in this scallop closure and want to express my extreme disappointment at any real ecological, scientific or sensible proposals for the restoration of the biodiversity needed for any functioning sustainable fishing industry in Golden Bay especially (as I live here). I am not surprised there has been no increase in scallops. This small Bay is still being constantly dredged, fished and plundered for its benthic species, its plankton and fin fish. Tinkering with one species eg scallops by closing it for such a short time while allowing dredging to continue is ridiculous, and a sop to the industry no doubt. I cannot imagine qualified scientific staff thinking otherwise. I would like to see a well thought out marine management plan for Golden Bay for managing the whole fishing industry along with thought to the other species that need functioning ecosystems eg penguins, migrant waders etc.

Heather Wallace

s9(2)(a) .

Sent from [Mail](#) for Windows 10



Virus-free. [www.avast.com](http://www.avast.com)

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** SUBMISSION Scallop Management Marlborough Sounds  
**Date:** Thursday, 18 May 2017 8:46:06 a.m.

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To whom it may concern,

- Please keep the scallop season **CLOSED** until the beds return to a healthy level for the future generations. If that means closure for the next 5 years then so be it.
- The sounds should be **CLOSED** indefinitely from **COMMERCIAL** scallop take. Due to the long term unsustainable damage from the dredges to the sea floor and seedbeds.
- Research, to check viability of **ALL** scallop quota needing to be taken without dredging, to protect stocks and sea bed. People can still purchase scallops at shops if unable to dive.
- If and when scallop season opens then a maximum daily limit should be placed on each boat to stop overloading of boats. I have witnessed this often with children in open water (risking children's lives to obtain extra scallops) which has significant safety issues. **Say 200 scallops max per vessel.**

Thank you for taking into account submissions and tackling a difficult issue. I wish you luck, there is a lot at stake. Scallops are my favourite sea food so I am saddened to hear how poor a state the industry is in.

Regards Andy Black

# Submission Form

## SCA 7 2017 Consultation

Ministry for Primary Industries  
Manatū Ahu Matua



### Once you have completed this form

Email to: [FMSubmissions@mpi.govt.nz](mailto:FMSubmissions@mpi.govt.nz)

While we prefer email, you can also post your submission to: Fisheries Management, Ministry for Primary Industries, PO Box 2526, Wellington 6140, New Zealand.

### Submissions must be received no later than 5pm, Wednesday 31 May 2017.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

### Submitter details:

Name of submitter  
or contact person:

JOHN REID

Organisation (if applicable):

CHALLENGER SCALLOP ENHANCEMENT CO LTD

Email:

Fish stock this submission refers to: SCA 7

Your preferred option as detailed in  
consultation document (write "other"  
if you do not agree with any of the  
options presented):

OPTION 3

### Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

## Submission



Challenger Scallop  
Enhancement Co Ltd

**From:** John Reid, Challenger Scallop Enhancement Co Ltd

s9(2)(a)

**Date:** 30 May 2017

**Re:** Challenger Scallop Enhancement Company (CSEC) submission on MPI Discussion Document Paper No: 2017/19 dated 10 May 2017, The Temporary closure of the Southern Scallop (SCA7) Fishery.

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### 1. Introduction

The discussion document from MPI refers to a further Temporary Closure of The Southern Scallop (SCA7) Fishery dated 10 May 2017 (#2017/19). It outlines 3 options to be considered,

- 1) Temporarily close all SCA7 to commercial and recreational scallop fishing for the 2017-18 scallop season.
- 2) Temporarily close all SCA7 and Port Underwood to commercial and recreational scallop fishing for the 2017-18 scallop season.
- 3) No temporary closure to SCA7 (status quo).

This submission has the unanimous support of CSEC directors. CSEC does not support Options 1 or 2. **CSEC supports Option 3** with specified management conditions.

#### 1.1 Inconsistencies within Discussion Document

This discussion document is a blunt instrument to future manage scallop stocks in SCA7. Annual *management measures for SCA7 are not unilaterally made through regulations (albeit subject to various forms of consultation)* as is the case in most other fisheries in NZ. The MoU between CSEC and MPI is effective and constitutes an agreement to abide by clear management measures to be implemented by CSEC through contracts signed by both parties. These measures are rigorously and effectively enforced by the Company. There was no discussion directly with CSEC as an MoU partner this year.

CSEC maintains that the further proposed temporary closure to the scallop fishery in respect of Marlborough Sounds (MS) is flawed MPI management dictum.

Changed environment conditions: CSEC accepts that the overall SCA7 biomass is low, but only in the context of the whole Quota Management Area (QMA). The main reason for this is the progressively unsuitable scallop habitat caused by ever advancing siltation build up in Golden Bay and Tasman Bay. The only viable areas within the QMA, are in the MS. Commercial and/or recreational fishing has

minimal impact in these areas. Siltation is widespread in both which severely impacts the scallops and oysters populations.

CSEC enhancement program: CSEC's endeavours to enhance and grow spat for reseeded provides for both utilization and sustainability. This is severely hampered by the now limited benthic conditions that are free from siltation.

CSEC disagrees that SCA7 is no longer an enhanced fishery as expressed in the consultation document<sup>1</sup>. CSEC continues to maintain a level of enhancement through a carefully targeted Enhancement and Re-seeding Programme designed to identify new sites and seeding techniques to meet the environmental challenge now extant in the fishery. This enhancement is being carried out in the fishery to benefit iwi, commercial and recreational stakeholders. Both utilization and sustainability principles as espoused in the Fisheries Act 1996 are adhered to. Of note CSEC this year has re-seed spat in Croiselles Harbour.

Enhancement limitations: The company is restricted in further enhancement within the sounds by some recreational representatives at the multisector forums. The MS sounds as part of a future management strategy would benefit from increased enhancement under robust science managed processes.

More talk? CSEC notes that in the Executive Summary at the bottom of page 3 refers to "increased pressures on the fishery". MPI is suggesting further talks on convening more working groups both science and multisector forms as part of a shared fishery. **Now** is the time for action instead of talking and the **Now for Action** is supported by the Marlborough Sounds Future Management Group.

Operating in false reality: MPI needs to give careful consideration to competing uses of the remaining scallop fishery areas and particularly guard against favouring aquaculture interests within the MS at the expense of the scallop beds. Should some of these proposals succeed, then the scallop harvest footprint is again diminishing for both the commercial and recreational sectors. What is needed to manage this area is an integrated process with all users, government organisation and district councils statutorily charged with the overall management of the Marlborough Sounds

## 1.2 The Marlborough Sounds Scallop beds.

The MS scallop beds (5 healthy bays) are now critically important scallop beds for both recreational and commercial harvests. CSEC agrees that these need protection with a range of management options but promotes measures going well beyond the closures as advocated by MPI in Options 1 and 2.

Scallop biomass has increased in the MS by approximately 30 tonnes<sup>2</sup>. It is stated in the MPI document that this due to absence of fishing. This conclusion is not supported on the facts which show that a large amount of 1+ and 2+ year old scallops were lost to the fishery even without fishing. These losses represent a considerable unjustified economic cost to scallop quota owners. CSEC maintains that there are other natural factors that must also be considered other than the increase due to fishing closures. For example, in the MPI January survey completed by NIWA, there was a very healthy spat fall in the MS, the best for many years and this has been observed by the CSEC survey vessel.

CSEC notes that the January biomass survey was a one off. Traditionally the best available information comes from a time series of surveys going back nearly 20 years was in May/June. CSEC has funded these NIWA surveys to provide for the best available information where there are concentrations of recruited scallops at 90mm. MPI have now initiated their own survey earlier in the year, and based on this single survey undertaken in January 2017, have concluded there is no basis to wait until June to survey the

<sup>1</sup> Temporary Closure of the Southern Scallop (SCA7) Discussion doc #2017/19, Temporary Closure of the Southern Scallop (SCA7) Discussion doc #2017/19, Executive Summary paragraph 7, page 2.paragraph 3, page 2.

<sup>2</sup> Temporary Closure of the Southern Scallop (SCA7) Discussion doc #2017/19, Executive Summary paragraph 4, page 2.

beds. There is common knowledge suggesting scallop growth varies according to many factors and a survey nine months out from harvest is not a good indicator of scallops over 90mm.

Data incomplete: CSEC is unable to comment on the recreational catch in terms of extraction as no limits were applied to that sector and there is uncertainty as to what the scallop mw tons amount to. This is directly due to the unreported activity of the recreational and charter vessels. Any fishery that needs fine scale management, MUST have fine scale data. MPI are severely limited by their own policies of not requiring reporting from the recreational sector and other sectors are now compromised by this policy.

## **2. WHY DOES CSEC FAVOUR OPTION 3.**

Option 3 provides for no temporary closure meaning the fishery opens this coming season. By regulation the season is open from the 15 July to 14 Feb - 18 for both sectors, Recreational and Commercial.

### **2.1 Spat re-generation in the MS.**

The January 2017 MPI survey confirms the abundance of healthy spat numbers with the MS, this is not disputed by CSEC. It is also interesting to note that scallops are serial spawners and they will spawn at least 3 times in the scallop fishing year. The survey detected at least 5 year classes of scallops in the healthy beds that are from 3 to 5 years maturity, are the main prolific spawning scallops generating millions of scallop larvae. After 5 years of age these scallops will die on the beds as they are at the end of their life cycle.

### **2.2 Information principles breached.**

By using information based on an out of sync survey breaches current information principles. Recruitment and growth is highly uncertain and immeasurable using length frequency extrapolations for a commercial season that now commences at the end of September based on CSEC sampling of meat weight and roe condition.

The January survey does not consider harvest levels using a bay by bay approach so informed harvest decision cannot be made on fine scale management. MPI's considerations are a blunt approach to managing what is now requires fine scale management. There is no consideration to the effects of leaving high density scallop cohorts in hotspots that are stunted and will never achieve a 90mm as a legally takeable scallop. These will also die on the beds.

There is not one mention in the Discussion Document that refers to the MoU, instead CSEC has been subjected to management options that lack detail other than the blunt instrument of a continued closure.

### **2.3 CSEC recommends the following as an addition to Option 3.**

1. Variation to the opening season other than closure for the entire year. This can be achieved by a Gazette notice (as has been done in other fisheries that are highly variable, such as altering a MALFIRM figure for accidental marine mammal catches). Due to scallop condition an appropriate date based on mw and roe might be, 1 September to the end of October.
2. Again, using a Notice that provides for a shortened season (possible 2 months). Not the regulated year from July to February the following year. The shorter season would allow for the multiple spawns to occur. This leaves the spat to settle from these spawns.
3. Open up the sounds to enhancement under robust science management.

4. To remove excessive cohorts identified in Richmond Bay, Rams Head and Brightlands. These scallops struggle to reach a 90mm, the reasons for this are unknown but more than likely due increased numbers in the area that cannot support the population.
5. CSEC makes no comment on the closure for recreational take in Port Underwood. It is suffice to say that this small fishery with sparse pockets of scallops is not commercially fished. We are also reluctant to comment on any reduction to recreational bag limits or any variation on the present 90mm regulated size.
6. CSEC will be surveying the 5 beds that are considered to be in good health within the MS. This will be completed early June. Using the best available information principles only informs as a predictor of future biomass. Use of prior information for the whole of SCA7 is inappropriate due to siltation and other environmental effects. CSEC does agree with scientific reviewers that a more appropriate scientific approach is to manage the fishery on best available and improved survey information (*e.g. by improving information on dredge efficiency estimates*) and linking this to rotational harvesting and spatial management measures.
7. There are many other management options that we are willing to discuss with MPI as part of the MoU process.

CSEC remains committed to developing robust management proposals for the upcoming season through the process agreed to under the MoU.

Final decisions on management measures for the commercial sector **should not** and in all reasonableness **cannot** be made until this information is available.



*For and on behalf of the  
Challenger Scallop Enhancement Co Ltd*

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Submission on scallop fishery closure.  
**Date:** Thursday, 11 May 2017 7:51:27 p.m.

---

I strongly support any decision to close the scallop fishery SCA 7 inc Port Underwood rec. fishery for another season to allow stocks to recover.

s9(2)(a)

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Submission on Scallops in Area7  
**Date:** Thursday, 11 May 2017 11:26:18 a.m.

---

Hi Guys!

I believe that it would be extremely detrimental to the overall biomass of scallops in area 7 if it were open for fishing this year 2017.

This includes Marlborough Sounds, Port Underwood and Golden Bay,

Therefore I oppose opening fishery 2017 to any fisher be they recreational or commercial!

Lloyd Hanson

s9(2)(a)

To: Ministry for Primary Industries  
Email: FMSubmissions@mpi.govt.nz

## Submission on Temporary Closure of the Southern Scallop (SCA 7 and Port Underwood SCA 7c) Fishery On behalf of the Port Underwood Association

### Summary

The Port Underwood Association, on behalf of its members, supports option 2 as put forward in the discussion document – *Temporary Closure of the Southern Scallop (SCA 7) Fishery*, i.e. temporary closure of region SCA 7 and SCA 7c (Port Underwood).

### Discussion

The Port Underwood Association Incorporated (PUA) membership is open to people who have a meaningful interest in Port Underwood and includes residents, bach owners and those with commercial interests. The Association acts as a conduit between its members and governing authorities to both dispense information to its members and to advocate for its members on issues of policy.

We will not engage in the discussion of the closure of areas other than Port Underwood as that will be discussed in depth by others but we will concentrate on the Port Underwood area.

While the scallop fishery in Port Underwood is not large it has values that deem it to be worthy of protection and preservation. Values both from an ecosystems perspective (given the functions they provide within that) and as a natural resource for people to enjoy. The fact that it is not a large fishery makes it even more vulnerable to overuse and depletion.

Rationale for extending closure to include Port Underwood:

- The condition of the Port Underwood scallop fishery is not completely known but it had previously been characterised by very large scallops. These are no longer evident.
- Undersized shells in beach/landing areas are commonly found. This implies legal sized scallops are not readily available for harvest.
- Port Underwood has large areas covered in glutinous mud likely from the surrounding land usage and Wairau River run off and hence scallop recruitment and biomass is low. Scallops, like most bivalves, need clean settlement surfaces for recruitment to be successful.
- Evidence of significant fishing effort shifting to Port Underwood following the 2016 closure of SCA 7 and the failure to include Port Underwood in the closure;

- Port Underwood became the only readily accessible area for recreational fishers for scallops in Marlborough.
- Fishers from Nelson accessed the Port Underwood fishery this year which was not previously evident.
- Direct contact with people transferring effort into Port Underwood indicated many had never scallop fished in Port Underwood previously.
- Indirect (anecdotal) information relating to transfer of fishing effort into Port Underwood from Christchurch and Kaikoura as a result of the earthquake.

Given the incomplete knowledge of the state of the Port Underwood scallop fishery characterisation and its' abundance, other than it is small and that the general seabed conditions do not favour a robust scallop productivity nor regeneration, and the unknown (but likely significant) impacts of effort transfer into the area the MPI must adopt a precautionary approach. The closures of the fishery must include Port Underwood and Option 2 will provide for this approach.

We are available to engage in further discussion of this issue if required.

Best Regards,  
Ken Roush, Chairman  
Port Underwood Association

s9(2)(a)

s9(2)(a)

11 May 2017

Inshore Fisheries Management

Ministry of Primary Industries

P O Box 2526

Wellington 6011.

Received  
30/5/2017.  
Via postal mail

Dear Sir. This submission is to express my concerns as to whether the SCA 7 scallop grounds should be closed for the 2017--2018 season.

When and I ask when, is your department going to admit that the scallop grounds will never recover while you are allowing the commercial dredging to continue.

Every bed of scallops that the commercial boats were allowed to dredge over the past few years are dead with very little if no recovery taking place. Ketu and Waitata Bay in the Pelorus Sounds are a prime example.

A number of us divers checked these bays after the commercial boats had finished in the 2016 season. All we found was a ploughed seabed with broken scallop shells and small juvenile scallops broken and littering the bottom.

I have no problem with the 2017-- 2018 season remaining closed to allow the beds to recover but the minute you allow the commercial boats in again you will send the beds back to square one where they are today.

We recreational fishers are aware the commercial fishing industry has certain targets to reach as in the demand for scallops. We know they wield a big stick through various sources with their demands but surely not to the detriment where the scallop beds are today.

We feel your department is hedging around the cause and coming up with all sorts of theories as to why the scallops beds are in the state they are now in. It doesn't take a rocket scientist to work it out.

I would suggest at some stage opening a bed to the recreational boats for a season. Check with divers during and after the season and see what damage is being done to the bed. I think you will be surprised verses letting the commercial operators on to a bed and carry out the same check during and after the season. That will tell you where the problem is coming from.

Yours Sincerely.

Peter Way.



s9(2)(a)

s9(2)(a)

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Support of closure of scallop fisheries for another 12 months.  
**Date:** Wednesday, 10 May 2017 6:13:31 p.m.

---

We wish to support the further closure of the scallop bed in Okiwi Bay for another 12 months, this to include everybody, ie

not allowing Maoris to gather scallops under their supposedly "Maori rights". Would also like to see the season not open until September each year.

Jill & Peter Friend

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Temporary Closure of the SCA7 & Fishery  
**Date:** Sunday, 21 May 2017 8:48:23 p.m.

---

I am recreational diver, living in Blenheim who freedives/dives for scallops 4-5 times per season in the inner Queen Charlotte Sounds.

With regard to the proposed closure of the SCA7 scallop fishery I believe none of the Options 1-3 provide an answer.

The problem is not only with the harvesting of scallops but more importantly with how we are doing it. Dredging causes a great deal of physical damage to the sea floor as well as contributing to silting.

There are a number of methods of harvesting scallops that must be consider;

1. Freediving (ie without UBA, as per Paua) – No damage to the seabed. This will allow a recreational fishery but a negligible biomass take in the 0-18 metre depth range.
2. Diving (with UBA) – No damage to seabed. This will allow a sustainable recreational fishery but a low biomass take in the 0-18 metre depth range and will support a number of local business (those supporting boating and diving).
3. Recreational Dredging. Large impact on seabed and a scallop take 0-50m
4. Commercial Dredging. Large impact on seabed 0-50m.

It is important to remember that Freediving and Diving have no detrimental impact on the seabed.

I propose that for areas such as the Inner Queen Charlotte Sounds where the scallop population is healthy that at least method 1. be considered. The impact on biomass would be minimal and would simply serve to allow a small group of freedivers to enjoy the fishery (impacting only scallops in relatively shallow water). Method 2. would have a relatively low impact on the fishery but a large positive impact on local businesses that support diving and boating.

I repeat, Freediving and Diving have no detrimental impact on the seabed.

Whether dredging should ever be allow in the Marlborough Sounds is a question in itself but in the meantime I would suggest there is biomass available for a sustainable recreation dive fishery.

Regards,

Marcus Wright

s9(2)(a)

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Temporary Closure of the Southern Scallop (SCA 7) Fishery  
**Date:** Wednesday, 10 May 2017 9:07:29 p.m.

---

Thanks for the opportunity to put in a submission.

Given the state of the fishery I don't think there is any choice but to close it for this season also. In my eyes it's short term pain in the hope that in future years the stocks will return. When it does open again I'm of the opinion dredges should be banned and the limited dropped to 20 pppd in order that the fishery be sustainable.

Cheers

Geoff McDonnell  
Wellington

**From:** s9(2)(a) [REDACTED]  
**To:** [FMSubmissions](#)  
**Subject:** Temporary Closure of the Southern Scallop (SCA 7) Fishery  
**Date:** Sunday, 28 May 2017 7:37:13 p.m.

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Hi keep it close for another year or two up it from 90 mil to 100mil 30 instead of 50 do away with one boat boy  
Quota keep commercial out of the Queen Charlotte sounds and alternate the commercial sites yearly re-seed  
Port Underwood and all other sites

Thanks  
Richard Andrell

Sent from my iPad

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Temporary Closure of the Southern Scallop (SCA 7) Fishery  
**Date:** Wednesday, 10 May 2017 4:36:32 p.m.

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I am in favour of continued restrictions on Southern Scallop Fisheries however I would prefer that other options are investigated rather than a blanket ban. I submit the following:

1. Commercial scallop fishing is banned in SCA7.
2. Recreational fishing for scallops is permitted in SCA7 however scallops may only be collected using SCUBA or free diving. Dredging is not allowed.
3. The maximum daily catch limit is reduced to 30 scallops per diver per day and 30 for the boat operator / surface safety person.
4. The size limit is increased to 100mm for scallops in SCA7.
5. Applications for daily catch limit exemptions for cultural events (weddings / Tangis etc) are not permitted in SCA7.

These sort of restrictions could arguably remain in place for several years - reducing fishing pressure on the scallop fishery and allowing some opportunity for regeneration whilst also allowing a sustainable level of recreational catch to be taken.

In the future I believe that all commercial scallop fishing in the Marlborough Sounds should be banned - but that's another argument.

Regards,

Dave Vink

Sent from my iPhone

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Temporary Closure of the Southern Scallop (SCA 7) Fishery  
**Date:** Thursday, 11 May 2017 9:41:08 a.m.

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To Whom it May Concern,

I wish to write in regards to the proposed closure of the Southern Scallop Fishery for the 2017 season.

I fully support the closure to rejuvenate stocks and provide a sustainable future for scallops. It is of my view however that catch numbers needs to be reviewed and dredging. 50 per person is a large quantity each day. I think reducing this and banning dredging would help increase stocks. Add in an increase in size limit as well and this would provide further chances for stocks to increase.

As with all closures there are always those people that are prepared to take risks and ignore closures. Where there is risk people always want high reward so would be taking large numbers. I believe if there was no closure but reduced catch numbers people would be more abiding to this and wont illegally take high numbers of scallops.

Jonathan Coker

s9(2)(a)  
[Redacted]  
[Redacted]

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Temporary Closure of the Southern Scallop (SCA 7) Fishery  
**Date:** Saturday, 13 May 2017 9:30:17 a.m.

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I am a diver that comes once a year to the Sounds for scallops. As much as I missed not being able to do this last year, I support the closure for another year to allow the beds to further recover.

Philip Doomen

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Temporary Closure of the Southern Scallop (SCA 7) Fishery  
**Date:** Tuesday, 23 May 2017 2:22:58 p.m.

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Pat (Duncan Patterson)  
29 Morno Street  
Blenheim  
Marlborough

To Whom it may concern

As a property owner and recreational diver in Queen Charlotte Sound I would like to Support Option 2.

I feel that with the previous seasons closure of the fishery, illustrated by a slight increase in bio mass within the sounds shows the direct influences the mixture of recreational and commercial scalloping has on the population.

By again removing this factor-we are getting one step closer to understanding the decline in scallop numbers.

I would also like the no-take closure to extend to all customary gathering rights from Iwi- if that is not already included in option 2.

In the future I would also encourage the daily bag limit be reduced when the fishery gets to a level that allows it to re-open.

Regards  
Pat

**From:** s9(2)(a)  
**To:** [FMSubmissions](#)  
**Subject:** Zane Mirfin, 11/05/17 Northern South Island Scallop Fishery Management Submission  
**Date:** Thursday, 11 May 2017 10:51:38 a.m.

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Dear MPI, As a recreational fisher and registered commercial vessel operator s9(2)(a), I'd like to see the fishery kept closed for at least another season to see if there is any improvement in scallop density.

Hopefully short term pain for long term gain will see some improvement in the fishery, although I suspect 150 years of riparian land mismanagement, sedimentation, coastal erosion, warming sea levels, and climate change, as well as overfishing, will mean that the fishery is unlikely to recover significantly, although we owe it to future generations to at least try. What other options are there?

Thank you. Zane Mirfin