

Kenepuru & Central Sounds



Kenepuru & Central Sounds Residents Association Inc.

Chief Executive Officer

Challenger Scallop Enhancement Co. Ltd

PO Box 175

Nelson 7010

Ross Withell

President KCSRA

2725 Kenepuru Road

RD 2

Picton 7282

email: president@kcsra.org.nz

WWW: kcsra.org.nz

16 July 2015

Dear Mr Reid

Kenepuru and Central Sounds Residents' Association Submission on CSEC 2015 Proposed Harvest Plan for SCA7

Introduction

1. The Association was established in 1991, and currently has approximately 200 household members whose residents live fulltime or part-time in the Kenepuru and Pelorus Sounds. The Association'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. For many of our members, their families and friends scalloping in the Marlborough Sounds is a much loved and cherished activity.

Background

3. In early January 2014, the Association was alerted to an MPI discussion paper reviewing sustainability measures for southern scallops (SCA7). Upon review we were alarmed by the state of the remaining scallop fishery – the Marlborough Sounds. Following our submissions we have continued to research matters further obtaining research papers under the Official Information Act, reviewing the appropriate fishery stock assessment plenary documents, reviewing the memorandum of understanding by which the Minister and CSEC agreed SCA7 and in particular the Marlborough Sounds scallop fishery would be managed and generally building up our technical and scientific understanding of the Marlborough Sounds scallop fishery.

Kenepuru & Central Sounds Residents Association Inc.

President	Ross Withell
Vice President	Andrew Caddie
Secretary	Brenda Sutton
Treasurer	Stefan Schulz
Chairman Rooding Committee	Robin Bowron

president@kcsra.org.nz
vicepresident@kcsra.org.nz
secretary@kcsra.org.nz
treasurer@kcsra.org.nz
rooding@kcsra.org.nz

4. This year (and last year) we attended the presentation by NIWA of the results of the annual SCA7 biomass survey and have carefully considered the latest information against previous NIWA reports.

Comment

5. The situation as we see it is dire. Put simply; in 2009/10 the commercial take from the Marlborough Sounds fishery was 101 tonnes, in 2010/11 it was 74 tonnes, in 2011/12 it was 60 tonnes, in 2012/13 it was 48 tonnes, in 2013/14 it was 43 tonnes, in 2014/15 it was 21.5 tonnes. From the latest biomass survey, NIWA has confirmed that in the Marlborough Sounds scallop fishery the surveyed biomass is at an historic low and trending down.
6. Further, you would have heard our representative at the NIWA presentation point out that the figure NIWA put on the table of 23 tonnes is in stark contradiction to the 2014 take of 21.5 tonnes and a biomass that is trending down and at an historic low. Accordingly we were flabbergasted at the effrontery of CSEC to now propose a commercial take from the Marlborough Sounds fishery of 34.7 tonnes.
7. Our concern was compounded when we realised CSEC was now rejecting the 0.22 exploitation rate recommended by NIWA and was instead using an ER of 0.47 to 0.5. Surely the Directors and Shareholders of CSEC must realise that this outrageous drive to collapse the fishery is something that would be easily and readily grasped by both the media and the general public.
8. In our view this shows an industry ignoring the basic premise behind the management of any New Zealand fishery, namely that it must achieve the purpose of the Fisheries Act 1996. In other words, to provide for the sustainable continuity of the fishery for future generations.

The Alternatives

9. On the above basis, the best outcome for the Marlborough Sounds scallop industry is that it be closed to commercial operations for the 2015 season. In light of the industry's seemingly ingrained intransience, this is our preferred position.
10. However, reluctantly, we appreciate the reality of the above option may be too stark (albeit brought upon the industry by its own actions). After some soul searching, as a compromise, we propose the following Harvest Plan calculated from the figures supplied by CSES in slide 22 of your 13 July presentation but using an ER of 0.15. Research shows that this is the ER figure used in managing sustainable scallop fisheries overseas. It also better reflects the dire situation confronting us. On this basis, the MS Harvest Plan would be:

Ships Cove/Long Island	3.0 tonnes
Guards/Titirangi	4.4 tonnes
Dieffenback	1.0 tonne
Rest of Sounds (surveyed areas only)	4.2 tonnes
Total	12.6 tonnes

11. Given the pressure that this take will place on the fishery, we accept that the impact of the recreational take must also be considered. We would be prepared to discuss with the Minister/MPI/CSEC a reduced recreational season and a reduced catch limit per person per boat.

Tasman Bay – Sector H

12. For completeness sake, we note the CSEC harvest proposal for that part of Tasman Bay designated by NIWA in its survey as Sector H. Again we are stunned by the wilfulness of the industry in proposing a take of some 15.5 tonnes from a selected area of Sector H. Can the industry not grasp that Sector H is just starting to show signs of recovery. Responsible managers would be waiting for a further 1-2 years to establish if a sustainable base exists. We believe this premature proposal by CSEC is highly likely to destroy that possibility.

Conclusion

13. We urge the Directors and Shareholders to drastically and urgently reconsider their foolhardy proposed Harvest Plan for the Marlborough Sounds scallop fishery in the 2015 season

Yours sincerely



Andrew Caddie

Chair – Marine Sub Committee
Kenepuru and Central Sounds Residents' Association

Email: vicepresident@kcsra.org.nz

Cc Erin Breen, Ministry for Primary Industries, Napier
Email: Erin.Breen@mpi.govt.nz