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29 July 2015

Hon Nathan Guy
Minister for Primary Industries
Executive Wing
Parliament Buildings
Wellington

Dear Mr Guy

Marlborough Sounds Scallops – SCA7 – Proposed Harvest Plan from Challenger Scallop Enhancement Co. Ltd. (“CSEC”)

1. This is a letter of concern from four organisations:
 - Pelorus Boating Club Inc.
 - Marlborough Recreational Fishers Association Inc.
 - Kenepuru and Central Sounds Residents’ Association Inc.
 - Tennyson Inlet Boat Club Inc.
2. Our concerns relate to the 2015 proposed harvest plan from CSEC for the Marlborough Sounds Scallop Fishery.
3. By way of background, we note that our organisations represent diverse local and regional interests. We have become increasingly concerned at the decline of the Marlborough Sounds scallop fishery under the current management structure. Nevertheless we have persisted in our efforts to advocate for the sustainable management of the fishery in accordance with the purpose of the Fisheries Act 1996.
4. As in previous years representatives of our organisations attended the presentation by NIWA in Nelson in late June of the latest annual scallop biomass survey. Suffice to say, NIWA confirmed that biomass in the Marlborough Sounds is now at an historic low and trending down. Notwithstanding this state of affairs NIWA put on the table for consideration

by CSEC what we considered to be an overly optimistic suggestion as to the level of take possibly available to commercial scallop fishers across the Marlborough Sounds.

5. Accordingly, you can appreciate our alarm and disappointment when at the subsequent presentation by CSEC in Nelson as to what industry considered to be an appropriate commercial harvest plan for the Sounds, the proposed take was 50% higher than the optimistic and generous NIWA figure. In passing we note that the CSEC proposal makes no mention of or allowance for recreational scallop fishers or areas to be closed to commercial operations. For the avoidance of doubt we advocate recreational access to Guards Bay and Ships Cove take precedence over commercial fishers.
6. As per the process, our respective organisations made strong submissions to CSEC urging them to reconsider. For your information, we **attach** copies of those submissions.
7. We have now been informed by the recreational representative on the Board of CSEC that these submissions and the scientific evidence behind them have been roundly rejected by the industry who intend to push ahead with their unsustainable proposed harvest plan for the Marlborough Sounds.
8. From informal conversation with MPI officials we understand that they too share our concerns. Accordingly, we request that you act in accordance with logic, the evidence and the purpose of the Fisheries Act and reject the CSEC proposal.
9. **Minister**; stepping back it seems to us that the current management system for the Marlborough Sounds scallop fishery vesting a high degree of effective decision making in CSEC is not working. Arguably, rather than ensure the sustainability of the fishery for all stakeholders, the outcome is that, sadly, all we are doing is recording with some precision the demise of the Marlborough Sounds scallop fishery.
10. Accordingly, we respectfully suggest that the time is nigh for a more sophisticated management structure to be developed and implemented as soon as possible. We are familiar with the detail of and history behind the MOU between CSEC and the Crown for the management of SCA 7. Inclusion of the Marlborough Sounds fishery was always an afterthought and never part of the CSEC enhancement program. Accordingly, we believe that the Sounds scallop fishery should be removed from the ambit of the MOU and a more effective and sustainable management structure created.
11. We would be happy to engage with you and your officials on such an alternative structure.
12. We look forward to your urgent response.

Yours sincerely



Andrew Caddie
Vice President
Kenepuru and Central Sounds Residents' Association

For and on behalf of:

Pelorus Boating Club Inc.
Marlborough Recreational Fishers Association Inc.
Kenepuru and Central Sounds Residents' Association Inc
Tennyson Inlet Boat Club Inc.

For the purposes of this correspondence, all care of

The Commodore
Pelorus Boating Club Inc.
12 A The Cliffs
Nelson 7010

Cc Ministry for Primary Industries Attention Mr Anthony Brett
Cc Stuart Smith MP for Kaikoura