

11 October 2015

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

Dear Mr Guy

Marlborough Sounds Scallops – SCA7 – Implementation of Approved 2015 Harvest Plan.

1. We refer to our earlier correspondence on this matter and note the following represents the views of:
 - Pelorus Boating Club Inc.
 - Marlborough Recreational Fishers Association Inc.
 - Kenepuru and Central Sounds Residents' Association Inc.
2. 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.
3. It is fair to say we were more than a little disappointed with your decision as to the 2015 commercial scallop harvest plan for SCA7 and in particular the Marlborough Sounds fishery.
4. You agreed to a take of 25 tonnes from the Sounds and a further 15 tonnes from the "new find" located in Sector H of Tasman Bay. When we drilled into the Sounds sub catch allocations we were extremely alarmed that your officials had apparently agreed to exploitation rates in excess of 43% for the 2 remaining areas in the Sounds – Guards Bay and Ship Cove. This is twice what even NIWA was suggesting was an appropriate ER.

5. In terms of Sector H it was obvious to us from the data that the industries enthusiasm for the potential of this area was over cooked on a density approach. Accordingly it comes as no surprise to hear that after less than 2 days effort the commercial fleet has come to the same realisation and after a combined take of, we understand, less than 1 tonne (v's the 15 tonne allocated) they have decided to move on into the Sounds.
6. We also noted with a degree of scepticism your public assurances/belief that the harvesting effort would be conducted with strict oversight from MPI with assurances from industry that fine grained catch data would be supplied ASAP on request from MPI. We have various urgent OIA requests in with the Ministry for Primary Industries to ascertain just exactly what formal process and procedures they have put in place as well as the results to date.
7. Unfortunately Minister given the tiny size of the scallop resource remaining in the Sounds from a commercial perspective and the fact the commercial fleet is 9 boats strong things are moving at a very fast clip. We have real concerns that your officials will be left flat footed in terms of applying any real oversight.
8. Minister we accept that the Sounds marine ecosystem is under real pressure from a wide variety of sources **but stress** that the Scallop fishery has been driven down to a state where we firmly believe continued excessive commercial pressure as currently contemplated will tip it not only into a state of collapse but into one in which the usual remedy of closing it from commercial pressure for a few years may not do the trick. In this regard we point to Tasman Bay (shut for 9 years) and Golden Bay (effectively shut for 5 years). From informal conversation with MPI officials we understand that they too share our concerns.
9. **Minister**; we reiterate our call that 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 again 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 industry and the Crown for the management of SCA 7. Inclusion of the Marlborough Sounds fishery was always an afterthought and never part of the industry enhancement program. Accordingly, we urge that the Sounds scallop fishery be removed from the ambit of the MOU (and this could be easily done) 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