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To: Peter Todd
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Re: Coromandel Scallops

The New Zealand Recreational Fishing Council thanks you for the opportunity to input on this proposal.

First we must ask why no survey was carried out on the commercial closed areas and known prime recreational harvest areas. The unavailability of data on amateur catch levels and the status of the recreational beds and those closed areas adjacent to the commercial fishing areas, makes it difficult to assess the whole fishery and make meaningful submissions. We also recognise that the commercial fishers have had some restructuring since the fishery came into the QMS. We support the current system and preseason baseline.

In making our comments we are still mindful of the history of this fishery and the fact that prior to 1968 this was a recreational or non-commercial fishery only. Whilst not wishing to labour old problems we also need to remember that it was the commercial industry who fished this fishery down to a level where it has bordered on collapse in recent years even when environmental conditions have been considered. In the past 10 to 15 years commercial catch levels were only able to be maintained by the industry finding new deep water beds. 12 years ago Jim Willisroft raised the first concerns on behalf of industry about the high incidental mortality associated with the commercial harvest. For every scallop taken they were killing two on the seabed. This led to the now separate 90mm harvest regime for this fishery. In the past 5 years the industry has fished down the commercial fishery from 100mm to 90mm and even taking into consideration various environmental events during this time any gains in the reduction of incidental mortality from harvest methods by not having to rake and re-rake the

beds has now ceased due to the fishery reaching this new reduced size of the bio-mass. In saying this it would now appear that the management plans put in place in recent years is starting to work as we see for the first time a significant rebuild.

Even today it would appear that there really is no sound scientific way to approach this given that we know so little of what drives scallop recruitment. In the end, it's going to have to be a balance between the costs of surveys, the likelihood of some thing dramatic going wrong in the commercial fishery, and the likelihood of problems in the commercial fishery affecting other users.

Equally we are unsure of how much reliance the recreational areas and the new commercial closed areas have on the deeper water beds for reseedling and spat fall. Given this it is hard to know how fishing one area affects other areas, especially if they are "close".

Scallop larvae spend quite a time in the plankton, and it's likely that some of the known beds support recruitment for others, though exactly which beds export larvae and which import spat might vary from year to year as feed, weather, and sea conditions vary.

Costs are always an immediate incentive (to have a high baseline and few surveys), whereas risks are always "down the track" and sometimes "nebulous" (like environmental risk). We think all users should have a realistic input into the level of risk-aversion in the management of their resource.

It would be precautionary to assume that all the beds are inter-linked to an extent. There's at least a chance that stuffing one area will stuff things up for other areas (and people) too.

We believe the "conservative baseline" approach is quite a good one, potentially avoiding a lot of unnecessary costs but, in the absence of guiding knowledge or research, the onus is on the Ministry to be darn sure that the baseline is indeed conservative. If it's not, you're simply allowing unrestrained fishing in bad times.

Therefore it is essential to set a conservative TAC which allows for the best estimates of the current non-commercial harvest and then the allowance for incidental mortality needs to be set at a level which allows for the worse situation in harvest methods, prior to setting the allowance for the TACC.

Commercial dredges.

The dredge method continues to concerns us, but it's hard to see a realistic alternative. The management group did have a look at two other dredge designs, and they both turned out to be either more damaging to or less efficient for harvesting the stocks than the current adap-ted Victorian box dredge. That's not to say that the box dredge can't and shouldn't be improved, because it should. Fishermen in the past have been reluctant to spend money on dredge

development and have had little encouragement to be a bit more proactive in seeking to better their individual dredge performance. Fishing "style" probably affects efficiency (and damage) as much as the dredge itself. Some people like to fish "hard and fast" and trade off efficiency on each square metre of ground against covering more ground. Others fish more slow and careful, making the opposite trade-off. In the end, what a fisherman sees is scallops on the tray per hour, not efficiency, nor how many other scallops have been killed. Thus, the "better fishermen" who catch more may or may not be doing most damage.

We note that "yield estimates for the 2004 season vary widely depending on assumptions about dredge efficiency, growth between survey and season, exclusion of areas of low scallop density, and, for estimates in meatweight, recovery of meat from greenweight. The most pessimistic estimates suggest a meatweight yield of about 50tonne, but assuming average values for important assumed variables increases this to about 300t. Incorporating habitat effects on juvenile mortality reduces the CAY estimates to about 200t meatweight".

Given the availability of your recently released information this Council recommends a precautionary approach be maintained and that this seasons TACC is restricted to no more than 100 meat weight tonnes.

We support the current management measures of commercial exclusion zones, bag limits and open/closed seasons, as appropriate for non-commercial allocation in this fishery. But wish to revisit the bag limits.

We propose that ongoing stock assessment surveys are a requirement for the sustainable management of the commercial exclusion zones and should be implemented forthwith.

In presenting this submission we are mindful that the public has shared in the pain of past mistakes in this fishery and its future rebuild. Therefore it is our submission that the amateur bag limit be managed much along the lines of the commercial catch. This means we start with the pre season surveys and a base line bag limit of 20 scallops per person. However as the scallops rebuild and the TAC and TACC is increased for that season we believe the amateur bag limit should also be increased reflecting the shared use of this fishery, then returning to the baseline for the next pre-season review. If we are to manage this fishery to the benefit of all stakeholders, it is important that we be seen to share the rewards fairly and not ignore the needs and aspirations of recreational harvesters.

We also believe that it is now time for all stakeholders in this fishery to get together with a view to develop a long term fishery management plan for this fishery in an effort to prevent the boom bust events of past years.

We look forward to discussing this submission further with you.

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