



Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

**Proposals to temporarily close parts of the
fishery until 14 February 2017**

Appendix 1: Copies of Submission Part One

MPI Information Paper No: 2016/21

ISBN No: 978-1-77665-323-2 (online)

ISSN No: 2253-394X (online)

July 2016

From: Debora Hall s 9(2)(a)
Sent: Monday, 13 June 2016 10:39 p.m.
To: FMSubmissions
Subject: Submissions Regarding MPI Scollap proposal

Kia Ora,

It is time to stop commercial fishing in the Marlborough sounds and nelson Tasman areas. This would solve all the issues!

Now you want to close the only scallop bed available to us in our region and you want submissions on our opinions.

I see you reasons but feel it is not necessary to totally close the scallop fishing totally for everyone. Shell fish are a very important source of local's diets and maybe only Marlborough sounds residents /ratepayers should be given the opportunity to collect scallops for their own use.

When local IWI or any IWI for that matter take all and anything they want each time they want to have a party ,(with a consent from council) means it could be restricted to ratepayers in the local residents areas also.

My option would have to be OPTION 3
**NO NEW SCALLOP FISHING CLOSURES ARE IMPLEMENTED FOR
2016-2017 SCALLOP SEASON**

SUGGESTIONS:

**I DO THINK COMMERCIAL FISHING SHOULD BE STOPPED IN THESE
AREAS FOR 1 SEASON (TRIAL) TO SEE THE DIFFERNECE & I FEEL THAT
THE LIMIT COULD BE ADJUSTED FOR SCALLOP QUOTERS PER PERSON.**

CHANGING THE AMOUNT PER PERSON FROM 50 TO 35 SCALLOPS A DAY could also benefit the beds.

Debora Hall

s 6(a)

From: Debora Hall s 9(2)(a)
Sent: Monday, 13 June 2016 10:40 p.m.
To: FMSubmissions
Subject: My Husbands Vote

Option #3

No closures for 2016-2017 scallop fishing season

Stop commercial dredging in the areas concerned

s 9(2)(a)

From: Jacqui and Ian Bilbrough s 9(2)(a)
Sent: Monday, 13 June 2016 2:42 p.m.
To: FMSubmissions
Subject: Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Dear Sir / Madam

I am recreational fisher and support option 2 of this proposal.

Regards

Ian Bilbrough

Tory Channel

s 9(2)(a)

From: Alex Foley s 9(2)(a)
Sent: Monday, 13 June 2016 11:10 a.m.
To: FMSubmissions
Subject: Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Hello,

Thank you for the opportunity to comment on this consultation document and the options for the coming season. Separate to the options proposed I would be supportive of an option which disallowed commercial and recreational dredging, but continued to allow diving - with a reduced quota.

Where dredging can damage the sea floor and indiscriminately inflict damage upon juvenile scallops, diving does not cause such harm and a reduced quota would ensure that beds are not overharvested and are able to rejuvenate.

Kind regards,
Alex Foley
s 9(2)(a)

From: Jon Maynes 9(2)(a)

Sent: Monday, 13 June 2016 10:32 a.m.

To: FMSubmissions

Subject: Temporary closures to parts of the Southern Scallop Fishery for 2016/17

Hi

I'm a recreational fisherman / diver and I usually try to make at least 4 trips a year across the Cook Strait from Wellington to the Marlborough Sounds mainly to gather scallops and enjoy an overnight stay in the Sounds. I have been diving for scallops in the Sounds for over 7 years and over the last 2 seasons I have noticed how depleted the beds have become, therefore I'm in favour of a 'Complete' Closure for 2016/2017 season to help with stock recovery.

I have read the MPI submission document regarding the Temporary closures to parts of the Southern Scallop Fishery for 2016/17 and I would prefer option 2 out of the 3 proposed options from MPI.

Option 2

Temporarily close all of the Marlborough Sounds and area 7H in Tasman Bay to scallop fishing for the 2016-17 scallop season.

However I would also be keen to see bottom dredging for scallops in the Marlborough Sounds both commercially and recreationally banned for good due to the destructive nature to the sea bed environment. I do not believe partial bed closures within the Marlborough Sounds would be practicable because:

1. It would be too hard for the average recreational gatherer to identify specific areas that are closed
2. It would be too difficult for the closed areas to be policed by MPI with the limited resources they have in enforcement.
3. There would be too much pressure on the 'Open' scallop beds.

Going forward I believe scallop dredging within the Sounds should be banned totally because of its destructive nature to the sea bed environment that is an important part of the ecosystem not just for scallops but for juvenile fish and crustaceans. The recreational limit of 50 scallops per day should be reduced to 20 as per the rest of the country and all Commercial Scallop fishing within the Marlborough Sounds should cease (this could be inline with the proposed Recreational only park).

Regards

Jon Mayne

My details

Jonathan Mayne

s 9(2)(a)

s 9(2)(a)

From: s 9(2)(a)
Sent: Friday, 10 June 2016 6:44 p.m.
To: FMSubmissions
Subject: Re: Scollop submission form

Many thanks for that info,

My view, is to go with Option 1, as there is still good sized scollops, around the Sounds area. I can certainly agree with closing "Ships Cove" area, as poor quality (meat weight), for the shell size. Especially for commercial vessels, where they are after meat weight, (ie. having to catch double the number, to get that weight) ??? But I feel that good conditioned scollops should be harvested, in other area's.

Many thanks for the opportunity to participate, PHIL..

From: [FMSubmissions](#)
Sent: Friday, June 10, 2016 3:14 PM
To: s 9(2)(a)
Subject: RE: Scollop submission form

Good afternoon Phil,

There is no submission template or form for the scallop consultation.

You are free to submit your views on the proposals in any format – via email (as a reply or attached document) to this address or by hardcopy to:

Fisheries Management
Ministry for Primary Industries
PO Box 2526
Wellington 6140

Kind regards,

Fisheries Management
Ministry for Primary Industries

From: s 9(2)(a)
Sent: Thursday, 9 June 2016 8:14 p.m.
To: FMSubmissions <FMSubmissions@mpi.govt.nz>
Subject: Scollop submission form

Good morning there, as I am not able to bring up a scollop submission form, would you be so kind to email me a copy. Many thanks for that, PHIL..

s 9(2)(a)

From: Alan Harris S
Sent: Sunday, 12 June 2016 2:47 p.m.
To: FMSubmissions
Subject: Scallop resource

Dear Sir/Madam

We have reviewed your recent documented study relating to scallops in the Marlborough Sounds and Tasman area.

I wish to advise we support **OPTION 2**.

Unless there is a concentrated effort by all (Commercial and non commercial fishers) to save the scallop population, other species (such as snapper in particular) will not be interested in breeding etc in the Sounds. Scallops are well known as being the staple diet of snapper.

Hopefully **OPTION 2** will be implemented by the Minister for the 2016/2017 season.

Yours faithfully

A Harris

s 9(2)(a)

From: rainandron <s 9(2)(a)>
Sent: Sunday, 12 June 2016 4:22 p.m.
To: FMSubmissions
Subject: Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7) in 2016

I have lived at s 9(2)(a) for 9 years and my wife and I have dredged for scallops in and about Ketu bay in that time every open season. I find the setting and retrieval of my dredge gets more difficult every year as I age but I have never noticed a decline in the quantity of scallops. I accept that overall the SCA7 zone is heavily fished for scallops and although I am concerned that any closure may result in a permanent or longer term closure that will outpace my aging process, I endorse the proposal

And vote for option 2 in the review.

I am a committee member of the Kenepuru and Central Sounds Residents Association. I have been informed of the process through this association.

I would have preferred a closure to commercial scalloping along the lines of the proposed recreational fishing reserve and a reduction to 20 scallops a day per person for recreational fishers, but I realise this would have been impossible to implement this season. Please note my views for when and if the proposed closure or status quo is applied.

Thank you for the opportunity to submit.

Ron and Lorraine Rolston

s 9(2)(a)



Virus-free. www.avast.com

s 9(2)(a)

From: Del & Paul s 9(2)(a)
Sent: Sunday, 12 June 2016 5:47 p.m.
To: FMSubmissions
Subject: Marlborough Sounds Scallop Submission

To whom it may concern

I would like to make the submission that all scallop fishing in the Marlborough Sounds should cease for a full year, including commercial & recreational, to ensure the continued survival of the scallop fishery.

Also I suggest the number of scallops allowed per person should be cut dramatically to also assist in the recovery of this valuable fishery, and furthermore I also believe commercial fishermen should be closely monitored as they cannot be trusted to put the fishery before their profits, which I have personally witnessed in the past when they have filled the bay with commercial boats who just trawled & trawled until nothing was left.

Please choose your "option 2", to close the fishery for at least one full season, to all fishers.

Yours sincerely

s 9(2)(a)

s 9(2)(a)

From: Sue Anderson s 9(2)(a)
Sent: Sunday, 12 June 2016 5:57 p.m.
To: FMSubmissions
Subject: Scallop study

Dear Sir or Madam

In respect of the current study conducted by MPI we would like to submit that OPTION 2 is the most acceptable. Commercial and non commercial scallop should rest the scallop grounds in the Marlborough Sounds for at least the coming season and perhaps 2017/2018. Thank you

Sue Anderson

Sent from my iPhone

s 9(2)(a)

From: Dan Foley s 9(2)(a)
Sent: Friday, 10 June 2016 12:51 p.m.
To: FMSubmissions
Subject: Southern Scallop Fishery (SCA7) Submission

Thank you for the opportunity to provide a submission on the Southern Scallop Fishery 2016-2017 season.

I would like to offer an alternative to the three options posed. That only recreational divers be allowed to take scallops from this area, at a rate of 20 scallops per day. No commercial or recreational dredging take place. The accuracy of modern GPS units are not allowing any areas of sea bed to be left un-dredged.

Thank you for your time and consideration on this matter.

Regards,

Dan Foley
s 9(2)(a)

s 9(2)(a)

From: Butler Marine <info@butlermarine.co.nz>
Sent: Friday, 10 June 2016 10:30 a.m.
To: FMSubmissions
Subject: Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

David Perano

s 9(2)(a)

I am very concerned that there is a perceived problem with scallop catches especially in the Ship Cove area, I fished many times over the last season and had no problem getting my quota every time for example on Saturday 6th Feb 2016 we put our dredge down for 15 mins and myself & friends could not lift it back into our boat it was that full, we had over 120 scallops over 95mm, our next dredge over 8mins produced a further 80 scallops which filled our quota for the four on board. On Sunday 7th I again dredged for 8mins and achieved a haul of 75 over 95mm, my last dredge of 8mins produced a further 50 way over my quota of 100.

I can't speak for other areas but do not believe there is any problem with Ship Cove. In saying that I do not think commercial fishermen should be able to fish this area

Kind Regards

Dave Perano

s 9(2)(a)

From: Peter / Diana s 9(2)(a)
Sent: Friday, 10 June 2016 10:07 a.m.
To: FMSubmissions

Re Scollop 7 Closures,

Ban all dredging in all areas. The constant turning over the bottom has destroyed the composition needed for scollop survival and growth.

I am currently doing my own private bottom survey in key areas of the sounds to alert the public using FB. The local Govt knows our sounds (in particular the Pelorus) is systematically being destroyed from over marine farming, siltation and bottom dredging. Silt has been recorded and publicised to the MDC last Oct as being 7 m deep in places and they still sit on their hands not having the bravery to make the hard calls needed to save the environment. You dredge this silt and marine farm waste into the mix of the sea floor and it becomes a barren wasteland. We know it has been scientifically proven that 1 hectare of marine farming produces between 250 and 400 tonne of waste per year.

If you dive using scuba anywhere in the sounds where scollops are known to grow that the dredging cannot take place due to marine farms or steepness of the bottom slope there is an over abundance of healthy scollops. Sort of tells the whole story there!!

How MPI and in the past Ministry of Fisheries has allowed commercial scollop dredging to continue is beyond belief. 100's of tonnes down to 12 tonne TAC is unbelievable. Perhaps if we took the bullying by Talleys out of it we could have had a resolution earlier that favoured the environment.

Pete Watson
Vortex Marine & Outdoors
6 Dodson st
Blenheim
03 5785720
vortexmarine@xtra.co.nz

s 9(2)(a)

From: Caleb Bloxham s 9(2)(a)
Sent: Friday, 10 June 2016 9:15 a.m.
To: FMSubmissions
Subject: Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

To whom it may concern.

I support **Option 2**, if the evidence suggests the fishery is at Hard Limit then it should be closed. However I would prefer to see an option that still allowed free diving and tank diving methods to be used as these have far less impact on the fishery while still allowing some harvesting.

Caleb Bloxham

s 9(2)(a)

s 9(2)(a)

From: Brent & Gina Brooks s 9(2)(a)
Sent: Thursday, 23 June 2016 7:13 p.m.
To: FMSubmissions
Subject: Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Brent and Gina Brooks

s 9(2)(a)

We would like to submit option 2 for the 2016 / 2017 season please.

Thank you
Brent and Gina Brooks.

s 9(2)(a)

From: Simon Slooten s 9(2)(a)
Sent: Thursday, 23 June 2016 5:58 p.m.
To: FMSubmissions
Subject: Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Hi there,

Simon Slooten
s 9(2)(a)

As a recreational fisher operating from Penzance Bay/Tennyson Inlet I would like to make the following Submissions.

1; Close all of the Marlborough Sounds Scallop beds to Commercial fishing

2; Allow Recreational fishing but introduce a Boat Limit of 150 Scallops per Boat per Day. Regardless of how many people on that boat.

Thank you, Simon.

SUBMISSION ON PROPOSED CLOSURE OPTIONS FOR SCALLOP FISHERY IN MARLBOROUGH SOUNDS

The Southern Scallop fishery has had a very chequered past history. In 1981, following a disastrously low harvest of 40.1tonnes the previous year the fishery was closed for 2 years to allow for some recovery which indeed did take place. Before the closure, up to 200 boats might be engaged in dredging for the delicacy and following the closure a number of decisions were taken to reduce the impact of a resumed harvesting.

A strict 3 year rotational seeding and harvesting regime was introduced whereby scallop spat was allowed to settle on equipment designed to facilitate settlement, on-grown for a short period and prepared for seeding out.

Both Tasman and Golden bay were divided into sectors and harvested rotationally in each bay each year.

Following harvesting the on-grown spat was seeded out into the harvested sector and left to grow to recruitment size before being harvested. This rotational system saw a gradual but sustained growth in the annual harvest, with minor fluctuations until 2001 when 716tonnes was harvested.

At the same time as introducing the rotational regime the number of harvesting boats was reduced.

From then on the harvest showed a slight decline and to compensate, rotational harvesting was abandoned and biomass surveys used to indicate the areas to harvest each year. The seeding out of spat also continued in the harvested areas.

It became apparent that this random harvesting and seeding was not resulting in any recovery or stabilisation of the annual harvest total. Since then the harvest has declined and 8 years ago Tasman Bay was closed for commercial harvesting followed by Golden Bay in 2013. Neither bay has shown sufficient recovery to enable harvesting to resume.

Since their closure harvesting has centred on the Marlborough Sounds where good recruitment in some bays seemed to be maintained until finally they too could not sustain the harvesting and recruitment declined to the point that these closure proposals are before us.

Considering the aforementioned history it appears that a lengthy closed period is no guarantee of a scallop recovery, particularly if recreational fishers are allowed unfettered access to the entire fishery. Claims have been made that the damage to seabed from recreational dredges is inconsequential. Nothing could be further from the truth.

Conclusion

I believe the entire fishery should be closed, including for all recreational fishers, until annual biomass surveys indicate limited harvesting on a rotational basis with areas known

for good natural settlement remaining closed to allow for increased natural spat production and release. At a later date the specific spat collection sites can be used again for rotational seeding.

The maximum quota needs to be reduced to no more than 350tonnes and the ACE adjusted each year based on the biomass survey. Should the survey show sufficient for only a total below 100tonnes then no harvest should be made.

Alan Vaughan (Registered Stakeholder)

s 9(2)(a)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21/06/2016

F MSubmissions@mpi.govt.nz

Dear Sir.

I am writing in this submission in lue of the scallop season being considered for closure during the 2016-- 2017 scallop season.

Having dived and dredged with a recreational dredge in all parts of the Marlborough Sounds for many years, I would like to express a number of concerns that I see which I feel are due to the decline in scallop numbers in many bays throughout the sounds.

Last scallop season I made a point of diving and using my recreational dredge in the following number of bays.

Queen Charlotte Sounds: Ships Cove, Little Waikawa, Dieffenbach, East Bay. The Pelorus: Richmond Bay, Ketu Bay, Waitata, and Port Gore. The reason why I checked these bays out was to see if any recovery was taking place from the dredging of commercial boats in these bays over the last few years. And to my disappointment there was very little.

In the 2014 season the commercial boats dredged the whole of Ketu Bay and last season all you could find was broken shells and a few under size scallops. We dived to check the bottom and all we could find was a ploughed mess and damage to the seabed. The same applies in Waitata Bay where they dredged the previous year, and the same damage done.

There was a good bed of scallops in Little Waikawa but the commercial boats dredged that in the 2014-2015 season and now you can hardly find a scallop in that bay. Once again the bottom was ripped and ploughed by the big dredges.

Where they didn't dredge during the 2014-2015 season such as Anakoha, Annies Bay, and Ships-Cove between Motuara and Long Island there were still plenty of good size scallops right up to the end of the season.

East Bay numbers have diminished due to a continual flow of north Island boats coming across the strait for easy pickings in East Bay. Some days you can find up to 5 boats fishing there from the North Island.

The recreational fisherman is not the cause for the scallop numbers diminishing. The small dredges they use either have a chain in the front or small tines 30mm long(1inch) which do no harm to the seabed and don't smash up the juvenile scallops left.

It is clear that the big commercial dredges with their big tines are ploughing the bottom and damaging the scallops left behind to grow.

So why should the recreational fisherman be penalized for the damage left by the commercial fishermen. As long as they are allowed to rape and plough the bottom no recovery will take place. The evidence is clear as to what's happened in Okiwi Bay and Tasman Bay. NO SCALLOPS.

Could I just conclude by saying, don't penalise the recreational fisherman, he's not the problem. stop the commercial fishing for a year or two and the beds will begin to recover.

And Mr Eric Jorgensen doesn't speak and represent me.

Yours Sincerely,

Local Marlborough Fisherman for 60 years.

Peter Way. email s 9(2)(a)

s 9(2)(a)

From: John Broomfield s 9(2)(a)
Sent: Wednesday, 22 June 2016 4:24 p.m.
To: FMSubmissions
Subject: Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

I am in favour of Option 2, the closure of 7H in Tasman Bay and all the Sounds. I have lived on Outer Pelorus Sound for 21 years. I am a fisherman and a conservationist, in this period I have experienced a spectacular decline in the marine life of the area, along with an equally severe decline of all the birds dependent on marine and foreshore food sources. As one who has dredged recreationally for scallops each year, I have observed that it has become increasingly difficult to get scallops of legal size.

A closure of scallop fishing as proposed in option 2 is essential in my view.

~~~~~  
Dr. John Broomfield  
s 9(2)(a)

s 9(2)(a)

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**From:** Paul Cooney s 9(2)(a)  
**Sent:** Wednesday, 22 June 2016 3:27 p.m.  
**To:** FMSubmissions  
**Subject:** Scallops in the Marlborough sounds.

Hello i am writing this email to you as i am concerned about the declining numbers of scallops in the Marlborough Sounds. As a keen diver and fisherman i am finding that in places the scallops are defiently harder to find. Weather it be commercial or recreational pressure we must find a way to sustain the fisherie. As i prodominantly dive in the queen charlotte sound for my scallops i have defiently found numbers declining. East Bay for example you could go there two years ago and get 100 big scallops relatively easy now with more bigger boats that can access East Bay it is definently harder to get good numbers i am not sure weather this is due to habitat or diver numbers. A change i would like to see would be a lower limit maybe 20 scallops per diver. Commercial dredging must have an effect on the scallops habitat. The majority of them tow two big heavy dredges that do not bounce like recreational ones and harvest the bottom as good as a ploughed farm paddock due to advanced technology. They pick up everything and return small damaged scallops. But typical New Zealand let them keep going till its wrecked. I would also like to see a boat limit put in place for recreational dredges as some just keep dredging because they can. We should have a limit that will give everyone a feed, we should not be fishing for the freezer.

Thankyou for reading this.

Paul Cooney

Sent from Samsung tablet

s 9(2)(a)

**From:** Kev & Paula s 9(2)(a)  
**Sent:** Wednesday, 22 June 2016 2:30 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

I have gathered scallops in Squally Cove every year for the last 25 years. During this period I have noted the following :

1. Numbers are high when the season opens in July. I would average approx 50 to 70 scallops ( takers above 90mm ) per 15 minute run.
2. By February numbers have dropped. I would average approx 20 scallops ( takers above 90mm ) per 15 minute run.
3. I am always amazed by the increase in numbers by July. For sure some scallops will have grown a little and have become takers. But I am convinced that during the season when they are under pressure, scallops move out of Squally Cove in considerable numbers. When things settle down ( March to June ) they move back into Squally Cove.

I can see no difference in the patterns I have observed over the last 25 years so I think Squally Cove should remain open. This fishery is not in trouble so why close it ?

Instead I would look at changing some of the conditions for all areas, as follows :

1. The season should run from 1 October to 28 February for both recreational and commercial ( cutting the season from 7 months to 5 months for recreational fishermen ).
2. Scallop width should be 95mm plus. Introduce a limit of 30 scallops per person per day.

These measures will have, in my opinion, quite an effect on the scallop fishery. I don't see why the implementation of these sorts of changes needs to take long. Announce the changes, erect signage, create pamphlets, organise news releases and monitor the sites.

Trial these options. Survey over time to establish whether the scallop beds are showing signs of recovery. Every year share the results of all surveys with the recreational and commercial sector. Communicate and keep everyone informed. At some time in the future adjust, if necessary, the season length and/or the size and/or the limit per day.

Kevin Holder  
 s 9(2)(a)

## SUBMISSION ON PROPOSED CLOSURE OPTIONS FOR SCALLOP FISHERY IN MARLBOROUGH SOUNDS

The Southern Scallop fishery has had a very chequered past history. In 1981, following a disastrously low harvest of 40.1tonnes the previous year the fishery was closed for 2 years to allow for some recovery which indeed did take place. Before the closure, up to 200 boats might be engaged in dredging for the delicacy and following the closure a number of decisions were taken to reduce the impact of a resumed harvesting.

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At the same time as introducing the rotational regime the number of harvesting boats was reduced.

From then on the harvest showed a slight decline and to compensate, rotational harvesting was abandoned and biomass surveys used to indicate the areas to harvest each year. The seeding out of spat also continued in the harvested areas.

It became apparent that this random harvesting and seeding was not resulting in any recovery or stabilisation of the annual harvest total. Since then the harvest has declined and 8 years ago Tasman Bay was closed for commercial harvesting followed by Golden Bay in 2013. Neither bay has shown sufficient recovery to enable harvesting to resume.

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Considering the aforementioned history it appears that a lengthy closed period is no guarantee of a scallop recovery, particularly if recreational fishers are allowed unfettered access to the entire fishery. Claims have been made that the damage to seabed from recreational dredges is inconsequential. Nothing could be further from the truth.

### Conclusion

I believe the entire fishery should be closed, including for all recreational fishers, until annual biomass surveys indicate limited harvesting on a rotational basis with areas known

for good natural settlement remaining closed to allow for increased natural spat production and release. At a later date the specific spat collection sites can be used again for rotational seeding.

The maximum quota needs to be reduced to no more than 350tonnes and the ACE adjusted each year based on the biomass survey. Should the survey show sufficient for only a total below 100tonnes then no harvest should be made.

Alan Vaughan (Registered Stakeholder)

s 9(2)(a)

s 9(2)(a)

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**From:** Margaret Allison s 9(2)(a)  
**Sent:** Wednesday, 22 June 2016 1:24 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for (SCA7) Southern Scallop Fishery

- We favour temporary closure of all of the Marlborough Sounds and area 7H in Tasman Bay to scallop fishing for the 2016-17 scallop season. This eliminates any confusion for recreational fishers of what is or isn't closed and should be easier for MPI to enforce.
- Closure should include commercial and recreational scallop fishing

We would recommend in any reopening plans for recreational fishing to

1. start the recreational scallop fishing season from September 1 each year. Early season scallops are never in good condition.
2. reduce the bag limit /person/day to 25 scallops.
3. recreational catch be limited to divers only ie no dredging

Margaret and Geoffrey Allison

s 9(2)(a)

s 9(2)(a)

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**From:** Garden Property Services 9(2)(a)  
**Sent:** Tuesday, 21 June 2016 10:04 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Graham smith  
From NELSON

In my opinion the whole sector should be closed to both recreation and commercial fishing for scollops.

I also believe catch limits should be reduced and catch size should be increased as they have done up in Auckland.

Sent from my iPhone



s 9(2)(a)

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**From:** Katie Terry s 9(2)(a)  
**Sent:** Thursday, 23 June 2016 2:15 p.m.  
**To:** FMSubmissions  
**Subject:** Review of sustainability measures for the Southern Scallop Fishery (SCA 7)

Hi,

I would like to put forward my suggestion for the Review of sustainability measures for the Southern Scallop Fishery (SCA 7)

I think Option 1 (Partial closure) would be the best option

I am a scuba diver and see first hand the destruction that trawling does to the ocean bed and have seen the decline in scallops and the size especially in Croisilles Harbour and the Tasman areas

Regards

Katie Terry  
s 9(2)(a)  
[Redacted]

s 9(2)(a)

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**From:** Glenis s 9(2)(a)  
**Sent:** Thursday, 23 June 2016 7:34 p.m.  
**To:** FMSubmissions  
**Subject:** Scallop

Band Dredging altogether for scallops  
Diving only  
Follow the lead of other countries  
DIVING ONLY  
Many thanks  
John & Glenis Phillips

Sent from my iPhone

To whom it may concern,

I was at the Blenheim information evening on the scallop and snapper fisheries last week. Looking at the available information and talking to the different groups represented there it confirmed my own observations over the last decade that the scallop resource in the Marlborough Sounds has been depleted to the point of total collapse.

The management of the fishery would seem to be the main reason for this situation.

I have heard environmental factors quoted adding to the decline.

The overall management should take those factors into account when they set the catch limit and maintain a healthy biomass to mitigate those affects.

In my opinion the only sensible option going forward from here is a total closure of the scallop fisheries (option 2).

The scallop beds should be able to be left alone in order to rebalance the depletion that has occurred. That process could take some years.

When impartial study shows the fishery to be in good health i.e. able to handle a sustainable take perhaps we can look at opening it up again then

I think dredging commercially should end, previous experiences letting them manage the resource has got us where we are today chasing an ever disappearing quota with ever improving technology. I believe that they will fish themselves out of business eventually due to unsustainable harvest methods. Better to stop now while there is a chance of recovering a little of what we had.

If the scalloping resumes eventually for amateurs, divers and dredgers should have separate areas set aside. Perhaps a study of the two methods can lead to changes to future rules for the best results

Perhaps reduced bag limit, i.e. 20 per diver, (limit of 60 able to be taken for boatman and spotter, (20 each). Also 20 per person for dredgers up to a max of 120 per boatload regardless of numbers aboard.

I have enjoyed 35 summers catching scallops for friends and family in the Marlborough Sounds. I look forward to every opening when we can go and catch a feed, for us it is one of life's great pleasures to enjoy this privilege.

I'm prepared to forgo this to try and do the right thing for our kids

Please close the scallop season until things get better.

Regards  
Neil Black

s 9(2)(a)

**From:** Martin Loach s 9(2)(a)  
**Sent:** Monday, 27 June 2016 3:23 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

I would like to make a submission on the Scallop fishery.

We have all witnessed the demise of this fishery. Different user groups have blamed a variety of reasons, but the truth remains clear as day. Scallop dredging by commercial fishing ruins the seabed for the regeneration of Scallops, and upsets the environment for supporting species. Infant scallops require seagrass to adhere to above the seabed to remain viable. As they grow larger they drop down to the seafloor. They will survive unless the water is too turbid, or the bottom too soft. A sandy, light gravelly surface is the best environment from my studies. If the seabed is disrupted by dredging the bottom loses what I describe as a delicate "crust". The floor is then soft and muddy and clearly the species will not regenerate. I also think amateur dredges have an adverse effect on the seabed. I have been a recreational scallop diver since 1982, completing on average 10- 20 scallop dives per season for the past 33+ years in locations all around the Marlborough Sounds, as well as Golden Bay and Port Underwood. In the areas where there has been no dredging, i.e. close to rocky shorelines, and in the Grove Arm and Port Underwood I have been able to collect scallops from the exact same locations year after year after year. I have dived out from Ship cove prior to commercial fishing of this area with similar results. I have dived the area out there the day after the commercial dredges have been through and it makes my heart break to witness the total devastation. Smashed corals, smashed kina, ripped out weed and sponges, injured fish. Total devastation. This is criminal and it is only natural the Scallops are in trouble. My submission is for a permanent ban on all scallop dredging, including recreational and commercial dredges. This must also cover the "Maori permit" situation. The recreational collecting of scallops should be by diving only, and drop the daily allowance to 40 scallops per diver, with a boat total daily maximum of 120 scallops regardless of fisher and helper numbers. There should be some quota made available to commercial fishers, provided they also collect scallops by diving only.

Diving does not damage the seabed, allowing the small scallops to remain viable and grow. Dredges kill everything in their path. I accept that farm run off and forestry practices have an impact on the scallop fishery, but these issues do not explain the collapse of all the fishery in the Sounds, the collapse has only occurred due to and as a consequence of dredging operations, as there is no dirty rivers discharging in these areas, and no recent forestry logging either.

In Port Underwood we have commercial logging sending sediment into the sea, plus a lot of dirty water coming in from the Wairau. Yet the scallops present in bays not destroyed by the Mussel farms still maintain healthy scallop populations as there is no commercial scallop dredging. So this proves to me it is not all about siltation as the commercial fishing lobby will have us believe.

Yours faithfully,

Martin Elliot Loach

s 6(a)

s 9(2)(a)

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**From:** BJ Howell s 9(2)(a)  
**Sent:** Monday, 27 June 2016 2:48 p.m.  
**To:** FMSubmissions  
**Subject:** SCA7 submission

Having read the document, "Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7) in 2016", I would like to forward my support for Option 2 of that document, ie total closure to commercial and recreational fishers of areas: 7H, 7J, 7K, 7L.

Regards,  
Brian Howell

s 9(2)  
(a)

s 9(2)(a)

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**From:** Charlie & Nancy Rhodes s 9(2)(a)  
**Sent:** Saturday, 25 June 2016 5:20 p.m.  
**To:** FMSubmissions  
**Subject:** Southern Scallop Fishery ( Marlborough Sounds and Tasman & Golden Bay )

I here submit my submission on the above from a recreationable fishers prospective.

I support the total closure of the fishery for the coming season 15/07/16 -15/02/17. I believe this would give the fishery a chance to recover a little. It is plainly obvious that the remaining areas fishable are reducing and the number of fishers is increasing hence greater pressure on the fishery.

In addition to above I firmly believe the season opens two months sooner than it should. The condition of the scallops is nowhere near ready to harvest in July. By reducing the season by two months will also take some pressure off the fishery.

Another way would be to reduce the size of the recreational catch.

I make these observations from 25 years experience of fishing mainly in the Okiwi Bay Croisilles Harbour area.

Charles R Rhodes

s 9(2)(a)

s 9(2)(a)

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**From:** Piero and Barbara s 9(2)(a)  
**Sent:** Saturday, 25 June 2016 2:56 p.m.  
**To:** FMSubmissions  
**Subject:** Review of sustainability measures for the Southern Scallop Fishery (SCA 7)

From:  
Piero Rocco  
s 9(2)(a)

The Marlborough Sounds is a nursery ground for post-larva blue cod whose habitat is destroyed by dredging. All dredges, commercial, recreational and customary, should be prohibited. On the other hand, diving for scallops, i.e. hand-harvesting, causes no damage. Also, divers fish in areas which are difficult for dredges and where scallops are abundant.

I therefore support option 2, closing the scallop fishery completely, but amending it to allow divers to hand harvest. My next preference would be option 1, but I am totally opposed to option 3, the status quo.

Many thanks for the opportunity to make a submission,

Piero Rocco



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

# Submission towards the proposed changes to the Southern Scallop Fishery SCA 7..

June 24<sup>rd</sup> 2016

On behalf of Waikawa Dive Centre. Picton.

Personal back ground.

My wife and I operate a dive business in Waikawa Bay, Picton, and have done so for 4 years. We offer diver training and trips, gear sales and servicing and air fills. We run a Dive Club also, and cater for both locals and visitors alike. During the scallop season we do offer to club members regular scallop diving trips and to visitors they have options, which some are scallop diving.

Scallop divers would account for 70 – 75 percent of our customers during the summer season.

I have been diving since 1986 but have only dived in the Marlborough Sounds since 1999.

Previous scallop seasons have seen familiar pattern. Beginning of the season the scallops are in poor condition. Good sized scallops of average 100mm are common. They seem to come to their best around November to February. Size becomes harder to obtain.

It is around this time November to February we see many diver groups visit the area collecting scallops. Most spend a long weekend in the area and spend each day on the water aiming for the scallop limit. Most will come from south of the area and we usually see them four or more times during the season diving for scallops.

We hear their dive stories and locations, their plans and the catch details.

Another diver group that appear to frequent the shop are those gathering with customary rights. Scallops feature the most with these rights and crayfish second. I cannot recall another species targeted with these rights.

My diving observation. Queen Charlotte Sound.

Last two years the water temp has been higher than normal. Some bays reaching surface temperatures of 21 degrees Celsius. This has seen the water turning a deep green and sometimes this goes right to the sea bed at 18 meters. Only recently, end of May, has it come right, the algae growth in the water has been bad. I found a lot of dead scallops randomly about the sea bed. Mostly these appeared to be scallops of take able size. I don't believe these to be harvested scallops shucked and returned to the sea as they are scattered evenly about and both upper and lower shells attached together and intact.

At the beginning of each season there are a lot of scallops just under 90mm and then at the end of the season there are less total numbers of scallops.

Dredging does take place in the bays of Queen Charlotte sound.



Port Gore.

Scallop diving in this area, it appears to me the fishery is remaining pretty static. Scallops are not as numerous but are larger and with better meat quality. Diving pressure in this area is not high.

My opinion for a course of action.

I agree that measures should be introduced to protect the Marlborough Sounds scallop fishery. It is noticeable the reduction in numbers and in quality. A limit of decline needs to be established so in future the fishery is not found wanting for last minute drastic measures. MPI admits lack of sound investigation into all aspects that could affect the scallop fishery and offers three options.

I favor none of these 3 options but suggest the "longer term" package be implemented. I believe any combination or just one of the below would have a positive result.

- Scallops are not in their best condition at the beginning of the season and a later start date would benefit the scallops as their condition will improve and waste (in scallop rejection), harvesting poor condition scallops will reduce.
- Divers will try to reach a bag limit. This should be reduced to 25 per diver, PER DAY, with no boat person allowance.
- Increase size limit to 100mm.
- Dredging to be done in specific areas.
- Customary Right permits to have limits of 50 per diver, PER DAY, with no boat person allowance.
- Enforcement to increase. At present it is easy to bypass officers, particularly at ramps and marinas. We have never been inspected when we return to our marina berth ( Waikawa Marina), and yet when the survey was being conducted this year were regularly met at our berth for a "measure up" by a survey person. At the ramp it would appear if you return after 5.00pm officers have gone home.
- Sort and size the catch over the scallop bed and not while cruising. Returning the scallops in an area that sustains them.
- 

Having attended the meeting held in Blenheim 23<sup>rd</sup> June, I realize to make any changes takes time, and the "longer term package" is heading in the right direction.

#### 1<sup>st</sup> Preferred Option

Of the three options available the "Status Quo" is preferred. However the enforcement of the Fisheries rules should be increased. The infrastructure is already in place, so no changes to make but the Fisheries officers need to have a longer presence at the boat ramps and move into the marinas to inspect marina tenants. To follow on from this, the "long term package" as above in the following year. Using this season 2016 -2017, as an opportunity to gather useful data from collectors, study scallop health due the environment, study collector's habits and make an informed, concise, measured move in the following year.

## 2<sup>nd</sup> Preferred option

The option to close two areas in the Queen Charlotte Sound where predominately dredging takes place is most likely going to move those whom dredge into other areas. My belief, as I've seen its effects when diving, is that dredging does cause great harm to the sea bed, the habitat in which scallops live, and this takes a long time to recover. It could be a better idea to ban recreational dredging for a season.

## 3<sup>rd</sup> Preferred option.

To ban collecting of scallops for one season could see divers not continue to dive as many only dive for the scallop season. From my experience in our other business of boat repair, we noticed when fuel prices jumped over \$2.00/liter many stopped boating. When the cod restriction's came into force, many made the comment "it's not worth boating now". From just these two events, boat numbers declined and have taken 3-4 years to come back. I believe you will see an increase in scallop numbers due to a ban but also in later years as the scallop collectors will be fewer. Businesses like ours, accommodation places, tourism, and food outlets could all see a decline in custom from those that come into the area for the scallop season.

To close the fishery in the Marlborough Sounds would impact heavily on our business. We rely upon a good summers diving season to survive the slow winter months. If the season was to be terminated I would have to consider staffing and other changes to my business. When the scallop season starts, and most noticeably finishes, the diving starts and stops with it, despite great diving conditions continuing. It is like a tap on and off.

\*\*\*\*\*

As a concerned diver and with support from our diving community I'm sure I could muster divers that would be keen to help in any survey work. This could be organized dives collecting data or just a place in the dive shop where they could record their catch.

Please contact me if you would like to discuss anything further.

Regards Stuart Scaife.

Waikawa Dive Centre

Unit 2 Waikawa Marina

PICTON

03 573 5939

Email waikawadive@xtra.co.nz

Postal address

Waikawa Dive Centre

P.O.Box 511

Picton 7250

s 9(2)(a)

**From:** Okiwi Bay Holiday Park & Lodge <info@okiwi.co.nz>  
**Sent:** Friday, 24 June 2016 3:35 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)  
**Importance:** High

Please find our submissions relating to the southern scallop fishery (SCA-7)

\* The economic impact of closing the scallop fishery to recreational fishers will be significant for the Marlborough region's tourism industry, and other measures may be more effective in managing the fishery.

\* If the closures are to take place, then the closure must be for all areas in the (SCA-7) area, as otherwise extreme catch pressure will be put on the remaining open areas. This is what happened to the Croisilles Harbour

scallop area when no significant scallop catches could be found in Golden & Tasman Bays and after the Sounds scallop fishery had been heavily targeted by the commercial fleet. This resulted an unusually large number of scallop fishers even mid week in the Croisilles area.

\* Longer term there needs to be a significant change to the management structures for the scallop fisheries in all areas and also for the entire inshore fishery to make it more quickly reactive to changes in the biomass,

The fishery needs changes in the Act to allow micro management, or some other change to allow more local control of the inshore fishery.

\* We believe that a change in the scallop season to start on the 1st of September each Year and finish on the following 1st of March, plus an accumulation limit of 3 days catch per person would help in the

recovery and sustainability of the scallop fishery. This will only be of benefit to recreational fishers if areas are set aside as recreational only scallop fisheries. i.e. Croisilles Harbour, an area

in Golden Bay near Pohara, in Tasman Bay near Nelson, and 2 > 4 areas within the Marlborough Sounds.

\* It may be possible to make the entire inshore fishery a series of Mataitai that can be micro managed by local interests for all fishers, Recreational, Commercial, & Customary, who can react quickly to changes and not have to wait for changes to the Act to manage the rules.

Regards

Ian & Pam Montgomery  
 Hotspot Promotion (NZ) Limited, T/a  
 Okiwi Bay Holiday Park & Lodge  
 Okiwi Bay "On the Spot" Convenience store Okiwi Bay Scuba Fill Station

s 9(2)(a)

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s 9(2)(a)

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**From:** Mark Sowman s 9(2)(a)  
**Sent:** Friday, 24 June 2016 11:31 a.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Temporary closures to parts of the Southern Scallop Fishery for 2016/2017.

I have some major concerns about the rapid decline to the Scallop beds in the Marlborough Sounds. As a long time resident in the Queen Charlotte Sound, I see first hand the over fishing and excessive dredging of the beds.

My Submission to MPI proposal would be option 2 : *Temporarily close all of the Marlborough Sounds and area 7H in Tasman Bay to Scallop fishing for the year 2016/2017.*

Hopefully this would give the beds a rest and hopefully rebuild fish stocks, also when the time comes to reopen the fishery, we hopefully have come up with a management plan that does not include the use of Commercial and Recreational dredging which is destroying the seabed.

Regards  
Mark Sowman  
s 9(2)(a)  
[Redacted]  
[Redacted]

s 9(2)(a)

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**From:** John Wood s 9(2)(a)  
**Sent:** Sunday, 26 June 2016 11:22 a.m.  
**To:** FMSubmissions  
**Cc:** Jo Wood; John  
**Subject:** Scallop submission Marlborough sounds area

Dear sir /madam, we support Option 2 that the whole Marlborough sounds be declared a non scallop collecting area for the 2016/17 scallop season. A finite time period.

Our specific reasoning is based on the information within the document MPI has provided. Specifically that the data collected on numbers of scallops within the whole area specified is at its lowest point ever. This report strongly indicates to us that it is in the best long term interests of the scallop fishery ( commercial and recreational) that the closure for the up coming season be implemented to protect this valuable Taronga and resource for future gathering.

If initially option 1 or option 3 are supported by the majority of respondents we strongly believe that the daily available count of 50 per person should be decreased by half to 25 across the whole 'Marlborough Sounds. If option 2 is selected by most respondents this decrease in gathered scallops per day could be implemented for the 2017/18 season as an additional protection following a closure. This decrease could have a significant positive effect on the scallop population and is a known method for protecting species within fisheries.

Regards John and Josephine Wood, s 9(2)(a)

Sent from my iPad

s 9(2)(a)

**From:** diane/dave taylor s 9(2)(a)  
**Sent:** Sunday, 26 June 2016 12:01 p.m.  
**To:** FMSubmissions  
**Subject:** Top of the south scallop fishery

This is a submission on the top of the south scallop fishery.

From David Taylor s 9(2)(a)

When fisheries management under MAF decided to get into scallop enhancement Alex Johnston was sent to Japan to find out if an enhancement programme would be successful in the Nelson area. An advisor from Japan came to Nelson and worked with Alex Johnston and after a few seasons the enhancement trials proved successful and a healthy fishery was established. Alex Johnston moved from MAF to the Scallop Enhancement Company and continued to manage the programme. Some years produced lower scallop spat collection but a sustainable fishery was maintained.

In the last few years three major floods in Tasman and Golden Bays have resulted in more mud being deposited further into the bays and suffocating the scallop beds. At the same time no new areas have been established for scallop spat collection. The scallop beds in the Marlborough Sounds have been well fished and need a clean up and reseeded. Both Ketu and Richmond Bays have a lot of dead shell on the seabed and that shell needs to be removed so the scallops can grow without competing for space. Waitata Bay has had plenty of scallops but they fail to grow past 85mm. Waitata scallop beds need to be thinned out and the scallops transferred to Ketu and Richmond Bays and monitored to see if the transfer is successful. At the same time dead shell needs to be removed from Waitata Bay.

New spat catching areas need to be established in Pelorus and Queen Charlotte Sounds. Ketu Bay-Waitata Bay-Guards Bay and Long Island are areas that have scallops and should be developed as spat catching areas. The scallop spat collected can then be distributed in the sounds and into Tasman and Golden Bays. This will cost money and now is the time for the Government to inject funds into the enhancement programme to give it another kick start.

I would suggest one million dollars over three years-500-300-200 with IWI contributing twenty percent. If IWI don't contribute funds they should forfeit their quota back to the Crown.

Marlborough District Council need to come on board and rubber stamp any application for new spat catching areas. No public consultation. If it makes common sense just do it.

This year open the scallop season at the same time as the cod fishery-December 19th and close at the normal date of February 14th. No IWI customary permits to be issued outside those dates.

Monitor the scallop beds on a regular basis and build up a data base of growth and numbers.

Alex Johnston was a very good friend of mine and it's a pity that his forward thinking ideas did not come to fruition.

David Taylor

s 9(2)(a)

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**From:** Maurice Carter s 9(2)(a)  
**Sent:** Sunday, 26 June 2016 1:40 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Southern Scallop Fishery (SCA 7)

Good Afternoon

Obviously something needs to be done and the best option seems Option 2, to close for a year. However you could allow gathering by diving with a reduced limit and increased size - say 20 at 100mm. This would at least keep the dive industry going and help alleviate the effects on the tourist industry.

Option 1 would be a disaster and would simply move more dredging to the inner bays and destroy more seabed and eco-systems.

Option 3 would be putting ones head in the sand like an Ostrich. The situation must be addressed as soon as possible

For the long term I would like to suggest the following be considered:

Address the total and ridiculous imbalance between the commercial TAC and actual catch.

Ban all dredging. This is a destructive way of fishing and has a detrimental effect on all life in the area. If this is thought not possible then limit dredging to specific areas e.g. Ship Cove and Dieffenbach Point which probably have a totally destroyed sea bottom already.

Reduce the recreational take in line with most other areas ie 20 scallops and 100mm limit.

Move the season forward by at least a month. July is too early and about 50% of scallop caught at this time are in poor condition and many discarded. This again would be in line with other areas.

Regards

Maurice Carter  
s 9(2)(a)

s 9(2)(a)

**From:** Jim & Wendy s 9(2)(a)  
**Sent:** Sunday, 26 June 2016 8:56 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Good Morning,

I wish to submit my thoughts toward the Scallop sustainability here in Marlborough,

My name is Jim Dixon, I'm a local recreational scuba diver, Fisherman and a Volunteer for MPI (HFO), I also belong to a local scuba diving club of which we have approximately 50 members.

The short version of my story is quiet simple, everybody agrees Scallops are getting harder to find and the size limit harder to achieve, We all want fish of every species available for future generations Bla Bla Bla Talks Cheap!...

unfortunately greed takes over

"we" are not only harvesting more than they can reproduce we are destroying their environment. (not just the poor Bivalve mollusks either)

I'm not sure on the life span of a scallop but I think it may be somewhat naturally limited, so with that in mind here are my solutions,

CLOSED FOR 2016 / 2017 . . . . TO ALL HARVESTING !!!

Then

1. Increase to size limit to 100mm. . . . . a larger scallop spawns considerably more,
2. Reduce the limit to 30 for 2017/18 . . . . . review each season but never exceed the maximum of 50
3. eliminate one boat persons limit. . . . . One safety person is all that is required, same daily limit as a diver
4. Two days accumulation limit. . . . . prevent batch owners etc over stocking freezers (Okiwi bay)
5. Ban ALL dredging . . . . . If it were to come back in then a shorter season and restricted areas only.

This will also eliminate the 1 dredge 6 people on-board all collecting

their bag limit situation

It will also help stop the destruction of the sea floor.

I understand there is more than to blame than poor harvesting for the decline in numbers and fully support any project aimed at protecting this valuable member of our ocean.

Thank you for making it possible to contribute my thoughts.

Regards

Jim Dixon

s 6(a)



s 9(2)(a)

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**From:** Kay Calders s 9(2)(a)  
**Sent:** Monday, 20 June 2016 10:53 a.m.  
**To:** FMSubmissions  
**Subject:** Southern Scallop fishery

We are ratepayers at Okiwi Bay which comes within 7H in the SCA7 area. We have noticed a decline in the scallop beds over at least the past two seasons.

We are divers and therefore are able to view the scallop beds. We believe that part of the problem may be dredging as we have observed damage to the scallop beds which appears to be caused by dredges.

We support a closure of area 7H for at least the 2017-17 season.

Justin and Kay Calder

s 9(2)(a)

**From:** Russell Smart <s 9(2)(a)>  
**Sent:** Wednesday, 22 June 2016 6:41 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures,for the Southern Scallop Fishery,(SCA 7) in 2016

To whom it may concern,

In regards to the proposed options for the scallop fishery in Tasman Bay and the Marlborough Sounds I am of the opinion that Option 2 is the most viable option for the chance of recovery in the fishery.

As a regular diver in the Marlborough Sounds and a collector of scallops by means of diving I believe that the results of the survey carried out for MPI are a reflection of the situation that can be seen in Croiselles Harbour and Queen Charlotte Sound. Over the last few years there appears to be a year on year decrease in the number of scallops that are available to be taken. In particular the areas of Queen Charlotte Sound that are not suitable for dredging have declined steadily in scallop numbers along with those areas that can be dredged perhaps due to a lesser volume of spat being available to repopulate the various areas that they used to be found in good numbers. Whether this decline is due to over fishing or environmental factors I can not determine. Possibly it is a mixture of both but regardless of the cause, taking positive action now will increase the chances of a reversal of the current situation rather than waiting until it is too late. Both commercial interests and recreational have much too gain from a healthy fish stock level but equally everyone will miss out and suffer if the fishery is not given the chance to recover.

In regards to Option 1 I believe the concerns of MPI that closing some areas will only increase pressure on the remaining areas that are left open are real and that this will be the result with the longer term health of the fishery suffering.

Option 2 - To Close areas 7H and the Marlboroughs Sounds for the 2016 -2017 season will give the fishery a chance to rehabilitate and improve for future seasons. This is my preferred option.

Option 3 To continue with the status quo will only lead to longer term damage and lack of sustainability in the fishery.

Yours Sincerely

Russell Smart

s 6(a)

s 9(2)(a)

**From:** Michael Creed s 9(2)(a)  
**Sent:** Monday, 27 June 2016 10:13 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7) in 2016

M J Creed

s 9(2)(a)

I wish to make a formal submission on the proposals in the document above. From my experience as a scallop diver in the SCA 7 area, as well as tertiary education in ecology- including marine- I feel many of these measures are insufficient in addressing fundamental causes of the decline in scallop *Pecten novaezelandiae* densities in the Challenger area. My decisions to support or oppose measures and the reasons for them are listed below.

#### **Option 1: Closing parts of Tasman Bay and the Marlborough Sounds to Scallop Fishing Temporarily**

I am in support of the proposed measure. However I do not support the proposed closure of Pelorus Sound. I also feel increased closed area is required in Queen Charlotte Sound. My reason for this is concern reducing the overall area available to fishing will significantly increase pressure on open beds. If we wish to rebuild our fishery, this cannot happen.

#### **Option 2: Closing parts of Tasman Bay and all of Marlborough Sounds to Scallop Fishing Temporarily**

I do not support this measure. I feel this will displace both recreational and commercial fishermen and place significantly more pressure on the rest of Tasman Bay and the already declining Golden Bay beds. Although it potentially offers the most effect, I am also concerned about economic impacts on commercial fishermen, as well as indirect economic effects in areas near beds such as Picton and Havelock.

#### **Option 3: Status Quo**

It is apparent this is ineffective in rebuilding scallop fisheries. I support this measure in no way.

While closures of fisheries may have some effect in their recovery, there are also other factors- economic, social and environmental- which must be considered. Commercial fishermen are reliant on fisheries for their source of income; their closure will only displace them to the detriment of both them and the areas they have previously occupied. Recreational and customary fishermen are also affected. After careful consideration of this document, I believe the most practical solutions are listed below:

#### **Temporary Closure of parts of Tasman Bay and parts of the Marlborough Sounds**

Although the current proposed option 1 raises concerns about displacement of fishing pressure, it also offers the best balance between recovery of the fishery and continued commercial fishing employment within the FMA. I do feel, however that a complete closure of Pelorus Sound will cause excessive displacement of fishermen and other areas to reach their hard limits. This was discussed in the review and I feel both public consultation as well as further investigation is required to achieve the best solution.

#### **Bringing Longer Term Measures Forward**

I believe these need to be implemented as soon as possible. A shortened season-commercial, recreational or both- will no doubt alleviate pressure on the area's scallop beds, as will a change to daily bag limits and a reduction in quota.

However, my primary concern regards the methods used to collect scallops. Scallop dredging is an economically viable method for commercial fishermen. It also allows recreational fishermen to gather shellfish should hand collection not be possible. However this method is incredibly destructive to benthic areas. It also results in large numbers of undersized scallops being needlessly damaged, as well as resulting in a high level of by catch. This problem is not exclusive to SCA 7, it is a global issue and must be considered should we wish to restore scallop populations (1, 2).

In sensitive areas not prone to frequent natural disturbance, I propose the Ministry consider restricting the use of dredges. Areas such as the inner Marlborough Sounds are not significantly affected by large ocean swells and in comparison to other beds in SCA 7 are very sheltered from severe weather. Therefore, the effects of anthropogenic disturbance are heavily exacerbated (2). Selective hand collection remains the most sustainable method for scallop fishing. It should therefore be the only method permitted in these areas. Robust, up to date and widespread reports and studies highlight the significant effects of scallop dredging on the ecosystems in which scallops are found; further disturbance only inhibits the recovery of these areas and thus the scallop populations within them.

From the information contained within this review and that which I have read in relation to it, I feel a number of key solutions need to be addressed. These are as follows:

- Temporary closure of areas to allow for ecosystem and scallop population recovery.
- A review of recreational regulations and TACC.
- Introducing restrictions on where scallop dredges may be used and where dredging is prohibited.

Thank you for taking the time to review this document. Do not hesitate to contact me should you have any queries.

Michael Creed

## References

1. <http://icesjms.oxfordjournals.org/content/early/2014/01/03/icesjms.fst197.full>
2. <http://daytonlab.ucsd.edu/Publications/Thrushetal02.pdf>

s 9(2)(a)

**From:** Peter Gray & Ellen Bailey s 9(2)(a)  
**Sent:** Monday, 27 June 2016 8:38 p.m.  
**To:** FMSubmissions  
**Subject:** Southern Scallop Fishery submission

I am a recreational fisher, love scallops and actively fish for them (but only say 3-5 days per year) using a small dredge usually in the Guards Bank area at the top of Pelorus Sound or Ships Cove.

**I support Option 2 (Temporary closure of all of the Marlborough Sounds and area 7H in Tasman Bay for fishing for the 2016-17 scallop season)**

My view is that the fishery is highly compromised with a very low biomass, and only a major closure will provide any chance for breeding and the numbers to increase.

It is very much a case of biting the bullet now to ensure we might have a fishery in the future.

I would also support a closure for up to 5 years -if the science and knowledge can display that action is the most likely to work. During that period further research could take place to better understand, consult and implement any other long term options that will ensure a healthy well managed fishery will be available for future generations.

Longer term actions that I also believe need to be considered:

Reducing the catch limit from 50 per person per day to say 25 (and perhaps a boat maximum per day as well).

Reducing the season length, perhaps from early October through to late February (these times would still allow for fishing during the peak holiday periods)

Setting some areas up as dive take only -no dredges.

Considering rolling area closures during future years (say Queen Charlotte Sound only opens every 2nd year)

Regards  
 Peter Gray

s 9(2)(a)

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**From:** s 9(2)(a)  
**Sent:** Monday, 27 June 2016 7:59 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

We choose option 1: close all of the areas to all fishermen (recreational and commercial) for at least one season. The scallops are in very poor shape and need to have time to replenish and let them grow. The seabed needs time to revert to it's natural state. This will not happen with continuous dredging.

Brian & Andrea Fensom  
Members of Dawnbreakers Fishing Club  
Nelson



s 9(2)(a)

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**From:** Anne Sim s 9(2)(a)  
**Sent:** Monday, 27 June 2016 6:38 p.m.  
**To:** FMSubmissions  
**Subject:** Scallop Closure Option

My submission is for Option 2.

Temporarily close all of the Marlborough Sounds and area 7H in Tasman Bay to scallop fishing for the 2016-17 scallop season.

I would like to see the season opening later, suggest September, as the scallops in Squally Cove, Croisilles Harbour are not in good condition when opening in July the roes are not bright orange.

I also suggest leave 90 mm but drop the limit to 30 per person or raise to 100 mm and keep 50 per person.

I have counted approximately 16 boats on the bed at one time and with 4 persons on board.

Having a Bach in Okiwi Bay on the foreshore and down there during the week, it is surprising to see how many boats come down to go out to the scallop beds in this time.

I oppose having a dive only area as this would cause great conflict and favouritism.

It would not work to close only one area and leave another open as people would still travel to the open sites to get their scallops.

It happened when the Marlborough Sounds was closed to Cod fishing. They came to fish Croisilles Harbour during the Cod closure as I counted up to 120 boat trailers in the trailer park.

George Sim

s 9(2)(a)

[Redacted signature block]

s 9(2)(a)

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**From:** Andre Jaworski s 9(2)(a)  
**Sent:** Tuesday, 28 June 2016 9:31 a.m.  
**To:** FMSubmissions  
**Cc:** Phil Hyatt  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA7) in 2016

Dear Sir,

I would like to make a submission regarding the Review of Sustainability Measures for the Southern Scallop Fishery (SCA7) in 2016.

As a recreational fisherman who frequents SCA7 I see how the biomass has been affected here over the last 5 years and agree something needs to be done. I understand a complete closure of SCA7 and the Marlborough Sounds would probably be the most effective way to increase the biomass in the shortest possible time but I feel strongly that dredging is the main issue here. I also feel that recreational quota is too high.

I would like to see your longer term proposals implemented in the near term (this season) while additionally banning all dredging (Commercial and Recreational) in SCA7 and the Marlborough Sounds.

More specifically

1. Ban all dredging for the next 3 seasons with a review 2019 that includes dredge design.
2. Reduce quota to 25 per person per day indefinitely.
3. Additional 25 per person per day for one safety person on the boat indefinitely.
4. Season dates remain unchanged.

I believe this will go a long way to restoring biomass while still allowing recreational users to utilise this resource as a food source.

Regards

Andre Jaworski

s 9(2)(a)



s 9(2)(a)

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**From:** Kenneth robert Fenwick S  
**Sent:** Tuesday, 28 June 2016 9:56 a.m.  
**To:** FMSubmissions  
**Subject:** Marlborough Sounds

We note your proposal to increase Snapper quota for the Nelson and West Coast area.

As we have always been super keen fishermen and have knowledge of the fishery we are extremely concerned. We have seen the Tasman Bay area almost completely ruined by pair trawling in the 70's. It is sad to think that after taking nearly 40 years to recover to a lesser extent that anyone could even consider allowing such exploitation again.

I would like also to say that we have fished the Marlborough Sounds for Snapper for 20 years and in the last 5-10 years have seen a huge reduction of fish, so much so that we have just recently decided to sell our holiday home as the fishing is basically ruined, as is the Scallop fishery in the Sounds. It has become hopeless!!! We urge you to close all Scallop fishing in the Sounds indefinitely. As I have had first hand experience in the region for years I feel there is a lot of misinformation about fish stocks. It is in my mind extremely fragile and in decline.

Please don't bend to commercial pressure or listen to poor information. A bad decision now will finish this magnificent area for my generation and the next.

Ken & Roxane Fenwick

s 9(2)(a)

**From:** FransGM | Ngati Tama s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 11:57 a.m.  
**To:** FMSubmissions  
**Subject:** Review of sustainability measures for the Southern Scallop Fishery (SCA 7)

Tena koe

Ngati Tama wish to be heard on this topic and are requesting to provide our korero, kanohi ki te kanohi.

This korero will cover the process undertaken to arrive at biomass prediction, as well as other issues such as the requirement of the Crown to be a co-kaitiaki of the fisheries' ecosystem with wider on-land responsibilities.

We look forward to a confirmation of the details, date and time to provide our submission.

Nga mihi



Frans van Boekhout  
General Manager  
Ngāti Tama Ki Te Waipounamu Trust  
P O Box 914  
Nelson 7040  
s 9(2)(a)  
[www.ngati-tama.iwi.nz](http://www.ngati-tama.iwi.nz)

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s 9(2)(a)

**From:** Geoff Rowling s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 11:55 a.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Submission on SCA7.

For many years non commercial fishers have gained significant benefit from management of this fishery by CSEC. Although I think CSEC haven't got it all right in recent years generally speaking the harvest volumes resulting from their fishery surveys have been very accurate. It is unfortunate the economic biomass of scallops has declined, although the unrecruited biomass has remained high, especially in the Marlborough Sounds. everyone is aware of large volumes of sub legal fish in bays that used to produce excellent scallops. So is closing the fishery going to fix whatever ails it, I doubt it. It's a shame the relationship between all participants, and I include MPI, in the fishery cannot focus on the real problems and work on the solution.

If the result of closure of the fishery is the demise of CSEC then any opportunity to work towards collaborative stakeholder management of any fishery in this country will be set back years. A command and control mentality by MPI will result in a poor management structure in the future where either the entire fishery is open or the whole lot is closed. The convoluted and cumbersome regulatory framework available to MPI pales in comparison with the fine scale management model developed by CSEC. I predict if CSEC goes we will see reduced availability for non commercial users and a reduced bag limit applied in some forlorn attempt to fix things. This will be promoted by those with large boats and holiday bachs close to the scallop beds, essentially blocking access for the general public and creating an elite fishery.

I have spent many years involved in the scallop fishery and understand the wild fluctuations in abundance. If we get the right conditions it will boom again and if the bag limit has been cut we won't be able to take advantage of this. Thus any closure or change to any other regulation needs to die each year and be renewed if needed.

I believe MPI are being rather sneaky in seeking to close some parts of the fishery whilst leaving others open. Either it is a sustainability issue or it isn't. There are small beds in Tasman and Golden bays and if the closure is to increase the biomass of breeding scallops then why is only the Marlborough Sounds being put up for closure? Why wasn't it made clear to CSEC, or anyone else, the CSEC annual survey needed to be done as usual and the information used to assist this process? As it is old information gathered just after the closure of the commercial season last year is being used.

This whole process looks like a political plot to regain a bit of ground lost by the Government when they over-ruled the MDC coastal plan and shoved a few extra Marine Farms in for the Salmon farmer from overseas. We all know it pissed the locals off and cost them a lot of money. They haven't had a win for so long what with the Blue Cod debacle and the salmon farming stuff following close behind, perhaps MPI have been directed to cut them a bit of slack given there is a general election next year.

I submit the fishery should be closed from 15 July until 15th September 2016 to all.

I submit that a re-evaluation of this decision takes place once the information from the CSEC survey is available. If the survey results predict a lower available recruited catch than last years CSEC survey, the fishery remains closed. If an increase is found then open the season to all 16th September to December 20th 2016 then close it and let the scallops spawn in peace.

I submit research funds are made available to find the real reason for the recent declines in scallop health in the face of good spawn/spat years. Why is the survival rate low in some sections of the fishery while in others large numbers survive but struggle to grow.

Geoff Rowling  
 Long Suffering Concerned Fisher.

s 9(2)(a)

**From:** Graham Caradus s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 11:12 a.m.  
**To:** FMSubmissions  
**Subject:** Submission on "Review of sustainability measures for the Southern Scallop Fishery (SCA7)"

Good morning MPI

I wish to submit in favour of Option 3 (the status quo) for recreational fishermen in area 7H. I express no opinion in relation to an option for commercial fishing.

I have fished recreationally in area 7H for several decades and have noted the variations that occur in scallop populations at various locations. The discussion document makes it clear that there may be a number of reasons for the decline in scallop numbers, but is neither conclusive nor definitive. My view is that there are still plenty of scallops in a number of locations within area 7H for recreational fishermen, provided one knows where to look, and one is moderate in expectation and the number of scallops taken.

Your policy advisers appear to have missed to opportunity to take a more measured approach to solving the current problem of a declining scallop fishery in some areas. It is remiss that the usual conservation approach in relation to recreational take, that has been successfully employed with other species such as Blue Cod, of reducing the allowable take per person has not been considered as an option in this review. In other parts of NZ, the daily recreational take for scallops is 20 per person, but in this region we have been able to take 50 for a decade or so. I make the point that 20 scallops per person as a temporary measure until numbers recover will still allow recreational fishermen to take a generous meal, but is most likely to substantially reduce the overall recreational take. Whilst recreational fishers do not have the same impact as commercial fishers, both in terms of allowable take and in terms of damage to the sea floor with dredging equipment, it appears that the review has not attempted to consider separating out recreational and commercial take. Two of the options proposed are particularly draconian, and it is incredibly unfortunate that some moderation could not have been considered in relation to these factors.

Graham Caradus

s 9(2)(a)

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Submission to the Discussion Document

## Review of Sustainability Measures for the Southern Scallops Fishery (SCA7) in 2016.

Submission of: John Leader, s 9(2)(a)

My full name is John Peter Leader. I am an Honorary Associate Professor at the University of Otago. I am a biologist, with the degrees of BA (Hons) (Cambridge) and PhD (Bristol). I have taken part in the round-table discussions with the Challenger Company as a representative of the Marlborough Recreational Fishers Association. It is my considered opinion that, of the options presented, only Option 2 affords any hope of achieving a sustainable harvest in the future, which is the desired satisfactory outcome. My reasons for this are set out below.

1. A glance at the graphs presented in the Discussion Document (Appendix 1, Figure 1) illustrates the problem unequivocally. Over the past 15 years the estimated abundance of scallops in Golden and Tasman Bays, matched by the annual take, has declined exponentially to near zero, and certainly to a level where it is uneconomic to fish for them. In the Marlborough Sounds the overall decline has been more gradual but is nonetheless showing the same downward trend. There appear to be several reasons for this, in addition to overfishing; disturbance of the sea bed by dredging, death of immature scallops caught and returned, disease and alteration of the seabed by sedimentation from other activities.
2. Regardless of the cause, it seems clear that it will be uneconomic to dredge for scallops this year. The extensive surveys carried out for MPI in November made it clear that there are no extensive beds of scallops remaining, although there are small areas of relatively high density. Although the CSEC argue that this sampling was carried out at the end of the fishing season, the small numbers of recruits found make it unlikely that a new survey will locate any larger numbers.
3. One of the requirements, indeed the principal one, of the Minister for Primary Industries is to so regulate the exploitation of a resource in a sustainable way. It is clear that the catastrophic decline in landed weight of scallops indicates that this is not happening. Extrapolation of the catch records suggests that if the fishing effort continues at its present level then there will be no scallops left in the South Island within two or three years.
4. There are a few areas remaining where there is a relatively high density of scallops, and it has been suggested that these could be exploited in the coming season. However, it is clear from overseas work that successful spawning requires a high density of adults, enabling successful coordinated release of gametes and a high rate of fertilisation. Thus dredging of these areas may well accelerate the total destruction of this valuable resource.
5. For the reasons stated above, it seems clear that Option 1 is unacceptable. It will, besides removing the few areas of high density populations, which will effectively destroy

recruitment, but in addition will not generate a sufficient return to justify the effort involved. It is likely to lead to an undesirable transfer of fishing effort. Furthermore it will be difficult to ensure compliance, since areas of high abundance are small.

6. Option 3, retention of the status quo, is quite unacceptable, in that a requirement of the Fisheries Act 1996 is to allow use of the resource while ensuring sustainability. It is manifest that the abundance of scallops has steadily decreased over the past fifteen years, and regardless of the cause, is rapidly progressing to a nil return for commercial dredging. A small but unknown reservoir of fish is available to recreational fishers in areas where commercial dredges cannot be used, or where there is a voluntary agreement. It is estimated that in the recent past about 8-10 tonnes of scallops are taken annually by recreational fishers. Until recently this was insignificant compared to the large tonnage taken commercially but as the commercial catch has fallen it is likely that recreational fishers may be excluded from their usual sites.

7. Thus only Option 2 can be seriously considered as a plan for the recovery of the fishery. It will give a breathing space for an undisturbed season, and by allowing the possibility of greater breeding success and recruitment, set the populations on the road to recovery. This interval may additionally allow more investigation into the biology of the scallops. It would be useful to know more about their feeding habits, dispersion, mobility of the adults. In addition the interval gained could be used to investigate the design of dredges which were less damaging to the substrate but which were still effective. In addition it is apparent that the choice of an exploitation rate of 22% of the available biomass is probably excessive, as judged by its effect on the catch in subsequent years. This figure was chosen when the stocks were increasing. When the stock is in rapid decline it would seem better to choose a more conservative target, say 15-18%.

8. The Discussion document also requests comments on the future management of the fishery. It seems to me that there are four parties with an interest in the sustainability of the scallop resource, the Challenger company, with its commercial interest, recreational fishers and customary fishers as users of the resource, while MPI oversees the fishery as a whole and provides scientific expertise and control. It is complicated by the fact that in general recreational and commercial fishers are divided between those with an interest in the resources in the Marlborough Sounds, and those in the Golden Bay and Tasman areas, who are subject to the Memorandum of Understanding between the Challenger Company and MPI, which has perhaps outlived its usefulness.

9 My attention has been drawn to a potential cause of friction arising from the intention of the Challenger Company to minimise the findings of the November 2015 survey, and carry out its own survey this year. Should this purport to find economically viable scallop populations, the Company could, within the terms of the MOU, carry out a fishing programme regardless. If in the meantime the Minister had determined that Option 2 was desirable, it could lead to an outcome where recreational (and customary) fishers were subject to a ban

on taking scallops while the Company continued. I hope that common sense will prevail, since such a selfish action is not in the long term interest of anyone.

10. It would seem desirable therefore to formally create for the future a management team consisting of representatives of the three groups, recreational commercial and customary, which would meet as required under the auspices of the Ministry, each group acknowledging that it is in their mutual interest to ensure the sustainability of this valuable resource.. Such a group could meet as required to consider the results of the previous season, the sampling results for the next season, and collectively arrive at a plan for the sustainable yield on an annual basis. Discussions this year have been amicable and largely constructive, although progress was in my opinion hampered by the fact that we did not all come to the same table. Separate discussions with individual stakeholder groups created delays and misunderstandings.

11. In summary, I am fully supportive of Option 2. I am mindful of the fact that a one year moratorium may not be adequate to rejuvenate the fishery, but it will offer the chance to tackle a few problems and light a path towards a sustainable solution.

Signed.....John P. Leader

Date.29th June, 2016



Inshore Fisheries Management  
 Ministry for Primary Industries  
 PO Box 2526  
 Wellington 6011

22<sup>nd</sup> June 2016

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

## Submission – MPI Review of Sustainability Measures for the Southern Scallop Fishery for (SCA7) in 2016

### 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 CSEC Consultation Committee and current MPI Scallop Stakeholders Working Group on which I represent recreational interests.

I have attended almost every CSEC Consultation Committee meeting since its inception and consider that 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 reduced commercial harvest rates and for a more cautious management approach.

3. In 2013 the recreational stakeholders representatives became extremely frustrated with the failure of CSEC to take action to halt or at least mitigate the obvious continual annual decline of the commercial Scallop fishery which would inevitably impact on the public's access to the fishery.

4. The recreational stakeholders decided to take the unprecedented step to not endorse CSEC's 2013 annual harvest plan resulting in the Minister carrying out a review and conducting his own abundance surveys, the results vindicating the recreational stakeholders action and confirming their worst fears that the fishery is in a very poor state.

5. Fortunately MPI recognized the recreational stakeholders' concerns and committed to further surveys, science reports and to set up a multi stakeholder advisory group to help them prepare this MPI Discussion Paper.

### Comment :-

6. The graphs shown on page 13 in the Discussion Document (Appendix 1, Figure 1. ) clearly illustrate the problem and reasons we are now having to have this somewhat late discussion. If these trends are allowed to continue without MPI intervention then there will be no protection of the non-commercial stakeholders share in the fishery.



7. The decline in abundance and demise of the CSEC seeding program over the previous 15 years in the Tasman and Golden Bays scallop beds has led to a transfer of effort onto the “wild” Marlborough Sounds scallop beds by both commercial and recreation fishers.
8. The extensive surveys carried out for MPI in November confirmed there are no extensive beds of scallops remaining, although there are small areas of relatively high densities of young stock mainly in the Marlborough Sounds. This young stock needs to be allowed to grow through to spawn and benefit other existing beds. Overseas studies confirm that successful spawning requires a high density of adults. Dredging these beds whilst stressed will lead to their speedy demise.
9. Reading the latest survey results and science reports clearly indicate that allowing the current commercial exploitation rate (22%) to continue will be unsustainable and will endanger the recreational harvest estimated at 8 to 10 tonne. A more conservative exploitation rate of 15% has been recommended to MPI by the recreation representatives.
10. Under the Fisheries Act. 1996 the Minister is required to manage a sustainable Scallop Fishery and to protect the public's share. The fishery at this present time requires his urgent intervention.

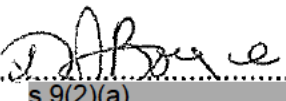
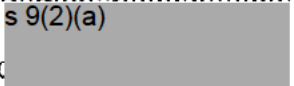
Options :-

11. Option 1, is unacceptable, it will lead to an undesirable transfer of fishing effort by both recreational and commercial (should they decide to fish) and reduce remaining spawning stock.
12. Option 3, is unacceptable, there is enough information provided in the Discussion Paper to suggest to the Minister, under the Fisheries Act 1996 , he would be failing in his duty to sustainably manage this fishery.
13. **Option 2, I strongly support this option 2.** It will give a breathing space for an undisturbed breeding season and successful recruitment, whilst the Scallop Management Group work on a new management plan for the fishery.
14. **Future Management :-** The Discussion Document requests comments on the future management of the fishery. The fishery has four main parties with an interest in the management of the fishery, the Challenger Scallop Enhancement Company, Recreational fishers and Customary fishers all are users of the resource, while MPI oversees the fishery as a whole and provides scientific expertise and control. All of this is complicated by interpretation of the Memorandum of Understanding (MOU) between MPI and CSEC as it relates to the management between Tasman and Golden Bays fishery and the Marlborough Sounds “wild” fishery. This can cause un-necessary friction between those that have an interest in the Marlborough Sounds. It is time for a review of the MOU.
15. **User Advisory Group :-** A future management group should consist of representatives from the three stakeholder groups, commercial, recreation and customary and meet as required

under the auspices of the Minister. Each group should acknowledge that it is in their mutual interest to ensure the sustainability of this valuable resource. Partnership finding should be sought for research into the mortality and disease now entering the stock. The Marlborough Sounds fishery should be managed under a separate fishery plan.

16. Conclusion:-

Based on the extensive surveys carried out by MPI still showing a declining abundance and science reports advising caution then considering the three options I have no hesitation in supporting **Option 2**.

Signed .....  ..... 22nd June 2016  
s 9(2)(a)  
D J Boyce c 

## Submission to review of sustainability measures of the southern scallop fishery (SCA 7) in 2016

I am in favour of a *modified* Option 3 (see below) for the following reasons:

1. Overfishing by commercial interests have depleted stocks in the Tasman/Golden Bay area to a non-sustainable level.
2. The commercial fleet now looks to do the same in the Marlborough Sounds.
3. The FSR-2016-01- Scallop review. Sect.4 Stock Status Determination notes that completely closing beds will not necessarily lead to stock recovery.
4. The time frame of notification is insufficient especially in light of the time the ministry has been aware of the current trends.
5. Temporary closures often tend to go on for extended periods.

Suggested alternatives to the 3 proposed options are:

1. Close SCA7 J,K,L to commercial fishing.
2. All shell be returned to the catch vicinity to assist breeding ground formation.
3. Toothed dredges be replaced with skid/tickler chain type to reduce habitat damage.
4. Recreational fishing incur

a reduced season – 1<sup>st</sup> Sept to 1<sup>st</sup> April

a reduced catch – 30 per person

an increased size limit – 100mm.

More detailed surveying of recreational fishers to obtain better data is required.

ie. In 57 years of all types of sea fishing in the Northland, Auckland Coromandal, East and West Coasts, Marlborough, Nelson and Kaikoura regions, I have never been asked for a catch report on numbers, species etc.

Implementation of the above report recommendations need to happen.

R J Wall

s 9(2)(a)

s 9(2)(a)

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**From:** Glen Russell s 6(a)  
**Sent:** Tuesday, 28 June 2016 2:32 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7) in 2016

Glen Russell

s 9(2)(a)

To whom it may concern.

As a recreational diver of the Marlborough Sounds I would prefer an intermediate response to the issue (option 1), with increased surveying to determine the extent of the problem. I believe that doing nothing (option 3) is not appropriate, as it is apparent that numbers are declining. I also believe rushing into a full scale closure is not appropriate (option 2), as that would be based off incomplete data and mismanagement of the fishery in the years leading up to the 2016-17 season. I hope that some long term measures are investigated and implemented, such as gear restrictions, decreased quotas and increased minimum sizes to ensure long term viability of the fishery.

Regards, Glen.

s 9(2)(a)

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**From:** Gedson, Harley <s 9(2)(a)>  
**Sent:** Tuesday, 28 June 2016 1:23 p.m.  
**To:** FMSubmissions  
**Subject:** review of sustainability measures for southern scallop fishery (SCA7) in 2016

To whom it may concern.

I am making a submission in regards to sustainability measures for the southern scallop fishery (SCA7) in 2016

I agree that a total ban on harvesting would be the fastest way to increase numbers in the shortest amount of time but I also believe that a lower quota for recreational fishermen, while also banning the use of dredges for commercial and recreational fishermen (or altering dredges to be less harmful to the seabed) would be a more reasonable response to declining numbers of shellfish. I believe banning dredging for the next 2-3 seasons may be necessary to improve immediate numbers but a review should be done in that time to evaluate the numbers for possible reintroduction of dredging. Reducing quota to 25 per person per day and 25 for 1 safety person on the boat per day should be introduced indefinitely. An approach to increasing numbers this way will make it sustainable for future generations without punishing the recreation fisherman who use scallops as a food source.

Thanks for your consideration

Harley Gedson

s 6(a)

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## **Submission relating to Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7) in 2016**

**To:**

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

**From:**

J S Hellstrom B.VSc, PhD, ONZM  
J P Hellstrom BA, B.App.Sci, PGDipSSER

We have been recreational fishers in the Marlborough Sounds for over 40 years, and permanent residents in Endeavour Inlet, Queen Charlotte Sound, for almost 20 years. We support Option 2 as outlined within the Discussion Document (2016/19), that is, to temporarily close all of the Marlborough Sounds and area 7H in Tasman Bay to scallop fishing for the 2016-17 scallop season.

Our primary reasons for supporting this option are:

- that there is evidence of significant reduction in scallop biomass and closure for a period will potentially allow for some recovery of scallop beds;
- that there is evidence of significant damage to the benthic environment in parts of the Marlborough Sounds, to which dredging is attributed as a partial cause<sup>1</sup>
- that a partial closure within the Marlborough Sounds will put greater recreational fishing pressure on areas that are currently not subject to commercial harvest.

We emphasise that the value of closure of the scallop beds, to both commercial and recreational fishing, will potentially allow scallop beds to recover, but more importantly may halt or slow the continuing loss of biogenic habitat in the Marlborough Sounds, as described below:

"A recent report by Davidson and Richards (2015)<sup>2</sup> shows significant marine ecosystems in the Marlborough Sounds are being degraded or lost at an alarming rate since monitoring began in 2010. More than 1431 hectares of biogenic habitat, the size of Blenheim and its suburbs, had disappeared in the Sounds since the late 1980s (Simpson 2015a). Nine sites, ranked as significant because of their biological values, had decreased in area by 71 per cent." (MDC, 2016).

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<sup>1</sup> MDC (March 2016). History of benthic change in Queen Charlotte Sound/Totaranui, Marlborough

<sup>2</sup> DavidsonRJ, Richards LA 2015. Significant marine site survey and monitoring programme: Summary 2014-2015. Prepared by Davidson Environmental Limited for Marlborough District Council.

The report *History of benthic change in Queen Charlotte Sound/Totaranui, Marlborough* (MDC, 2016) provides further discussion about the causes of loss of habitat for scallops. The following quotation from that report indicates that loss of suitable habitat for scallops is an environmental issue that must be addressed before full recovery of the scallop fishery is likely. It is very unlikely that this can occur within one season.

“Bull (1976) reported that scallops, which attach themselves as larvae using byssal threads, were formerly found in areas of the Pelorus Sound attached to brown alga *Cystophora retroflexa*, red algae attached to horse mussels *Atrina zelandica*, and drifting seagrass *Zostera* debris, with spat not colonising mud and broken shell. The loss of species that once provided settlement surfaces for mussels and scallops was likely driven by siltation, the concomitant loss of water clarity for photosynthesis in deeper water, and bottom-contact fishing methods (Handley & Brown 2012; Handley et al. 2014)” (MDC, 2016).

We recommend, following a closure of the scallop beds for the 2016-17 season, that there be a further closure of the fishery for at least another year. This will allow time for MPI to consult with tangata whenua and other stakeholders about ongoing sustainability measures. We support the option of amending commercial and recreational dredge requirements to reduce incidental mortality and the impacts of dredging, particularly in those sites where dredging is known to have been one cause of significant benthic damage. We also support the reduction of recreational bag limits and/or boat limits.

J S and J P Hellstrom  
27/06/16

s 9(2)(a)

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**From:** Sue SMITH-s 9(2)(a)  
**Sent:** Tuesday, 28 June 2016 10:30 a.m.  
**To:** FMSubmissions  
**Subject:** Submission for proposed Scallop season closure for 2016/17

Dear Sir/Madam

The Okiwi Bay Ratepayers Association Incorporated would like to make a submission on the proposed closure of the Scallop season for 2016/2017 in the Nelson/ Marlborough Sound areas.

We think Option 2 is the best of the three options given but believe that the best option to take would be to close the whole of Tasman Bay Golden Bay and the Marlborough Sounds areas for the 2016/2017 season.

We also feel that the scallop size should go back to 100mm for both recreational and commercial fishermen and that the limit be 30 scallops per person (recreational.)

Yours faithfully



Sue Smith  
OBRA Secretary

s 9(2)(a)

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**From:** Richard Ford-5035 <s 9(2)(a)>  
**Sent:** Tuesday, 28 June 2016 10:18 a.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Dear MPI, you have given the public very little time to make an informed decision on the scallop fishery.  
My view is that there should be no commercial dredging in the Marlborough sounds at all!  
You look at the damage that large dredges do and it's a no brainer that the scallops have been declining every year. Leave the small sheltered bays to recreational scalloping only.  
If you continue to let commercial dredging happen in the Marlborough sounds the scallops will collapse totally.  
I support option 4.  
Option 4. NO commercial take of scallops in the Marlborough sounds

Regards

**Richard Ford**  
**Instrument Technician/Industrial Electrician**



**MARLBOROUGH  
DISTRICT COUNCIL**



s  
9(2)  
(a)

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s 9(2)(a)

**From:** Yvonne Mead s 9(2)(a)  
**Sent:** Tuesday, 28 June 2016 4:51 p.m.  
**To:** FMSubmissions  
**Subject:** Scallops

As a owner of a Scallop Dredge engineering Business and Manager of a holiday accommodation rentals in the French pass area I find lack of communication re the proposed closure of the scallop fishery from the MPI outrages.

We have spent the last off season preparing for the start of the Scallop season in which we have done for the last 22 years only to hear that there is a possibly of complete closure this season about 5 weeks ago.

At know stage has anyone from MPI rung me and discussed the impact this is going to have on our business but it is very clear talks have been carried out with Commercial fisherman.

I was discussed to read in the Nelson evening mail that the snapper quota may be increased as if you take something i.e. Scallop meat weight or closure they will have increased snapper weight.

My question is how are we going to be compensated if the closure goes ahead

I fully agree something needs to be done!!!! This has been obvious for years but no one would listen.

Keep the Commercial Scallop fisher out of the Sounds (they destroy the scallop beds which has been proven as to how long it has taken for Waitata Bay to try and recover after they destroyed the bed over 15 years ago.

When the Cod fishery was closed in this area the night bed rate in Holiday accommodation crashed, it is very slowly picking up. Close the scallop fishery and the same will happen again.

Our Scallop dredge Business will crash over night, BUT the commercial fisher will just move onto another species and destroy that as well.

- 1) I recommend separate the Commercial fisher from the recreational fisher. (and see who is destroying the beds)
- 2) Increase the size of the scallop to 100mm Commercial and recreational
- 3) Decrease the quota to 25 per person
- 4) Be more vigilant to the size of the scallop the commercial fisher takes.
- 5) Be able to access the commercial shell dumping grounds so audit sizing can be done
- 6) All commercial shell be put back in the water (Calcium carbonate comes from this)

Yvonne Mead

s 6(a)

## Submission to review of sustainability measures of the southern scallop fishery (SCA 7) in 2016

I am in favour of a *modified* Option 3 (see below) for the following reasons:

1. Overfishing by commercial interests have depleted stocks in the Tasman/Golden Bay area to a non-sustainable level.
2. The commercial fleet now looks to do the same in the Marlborough Sounds.
3. The FSR-2016-01- Scallop review. Sect.4 Stock Status Determination notes that completely closing beds will not necessarily lead to stock recovery.
4. The time frame of notification is insufficient especially in light of the time the ministry has been aware of the current trends.
5. Temporary closures often tend to go on for extended periods.

Suggested alternatives to the 3 proposed options are:

1. Close SCA7 J,K,L to commercial fishing.
2. All shell be returned to the catch vicinity to assist breeding ground formation.
3. Toothed dredges be replaced with skid/tickler chain type to reduce habitat damage.
4. Recreational fishing incur  
a reduced season – 1<sup>st</sup> Sept to 1<sup>st</sup> April  
a reduced catch – 30 per person  
an increased size limit – 100mm.

More detailed surveying of recreational fishers to obtain better data is required.

ie. In 57 years of all types of sea fishing in the Northland, Auckland Coromandal, East and West Coasts, Marlborough, Nelson and Kaikoura regions, I have never been asked for a catch report on numbers, species etc.

Implementation of the above report recommendations need to happen.

R J Wall

s 6(a)

s 9(2)(a)

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**From:** yvonne mead s 9(2)(a)  
**Sent:** Tuesday, 28 June 2016 4:10 p.m.  
**To:** FMSubmissions  
**Subject:** scallop beds

I can't accept or agree with option 1-2-3

Why should recreational fisherman once again be punished for the actions of Commercial fisherman and the Ministry for Primary Industries.

I do not agree with the figure of 11 Tonnes (meat weight) recreational harvest. I calculate between 7.5 and 8 Tonnes. Even at 11 tonnes if you halved the recreational quota for this season the fishery would improve.

When I read the MPI discussion paper No 2016/18 I become alarmed at some aspects of the paper eg. 1 scallop per 25 square meter. If that is your or the Industries bass level no wonder the fishery is in trouble.

The general feeling within the community is that the Ministry for Primary Industries are only interested in Commercial fishing interests. I believe the ministries action to date to prove this to be true.

The Marlborough sounds scallop fishery is a wild fishery, there fore there should only be recreational fishing the Sounds this season.

The daily recreational quota should be reduced this season to 25 scallops per person and the size shifted from 90mm to 100mm minimum size.

K B Mead  
Kevs super dredge  
s 9(2)(a)

s 9(2)(a)

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**From:** Mike Barrett <s 9(2)(a)>  
**Sent:** Wednesday, 29 June 2016 3:41 p.m.  
**To:** FMSubmissions  
**Subject:** Scallop proposals.  
  
**Importance:** High

I feel after all the years I have been scalloping in Okiwi Bay as well as Nelson/Tasman. , the season is far too long. I feel that if the season started mid Sept. Till end on December. The scallops will be of better quality and numbers without constant dredging and gathering which in turn disturbs the growing area. Also another option could be to have a licence to gather scallops . That way every body has a sense of responsibility to maintain the beds etc. The licence fee per boat per season would help the cost of MAF to monitor the fishing and also could stop the double dipping per day that sometimes happens. I feel another reason for the lack of scallops in the Okiwi Bay bed is that there are no scallops in the Nelson / Tasman and Golden Bay zones and this has lead to a heap of outside vessels in one small area.

Thank you for allowing us to put in a submission on this topic. I don't think closing the area is the awnser. I think controlling it would be a better option. I would like your response to this via reply email.

Thanks, Mike Barrett, Resident oh Okiwi Bay.

s 9(2)(a)

s 9(2)(a)

**From:** John Scobie s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 4:16 p.m.  
**To:** FMSubmissions  
**Subject:** Submission SCA 7 Review

There is absolutely no question in my mind that the problems facing the Scallop fishery within the Marlborough sounds area of SCA 7 is down to the recreational fishing pressure from both dredges and divers this is exacerbated by commercial dredging and environmental factors such as water quality caused by plantation forestry both growing and harvesting.

I believe the following measures should be taken to enable the fishery time to recover.

1. Close the entire fishery to both recreational and commercial fishers for a period of 2 years.

When the fishery reopens implement the following for recreational fishing.

1. Reduce the limit to 20 scallops per gatherer
2. Remove the bag for "Safety persons" for diving operations. This would be consistent with both Cray and Paua diving, and I would contend that scallop diving is no more hazardous than cray diving and significantly less hazardous than Paua diving where SCUBA is not allowed.
3. Introduce a boat limit for dredging operations of so that any vessel may only have a maximum 3 fishers per boat.
4. Remove the defence to possession of scallops in an immeasurable state below the high water mark for immediate consumption. This results in double dipping and to believe otherwise is to believe in the tooth fairy.
5. Remove the ability to accumulate more than 1 days catch. Rationale as per 4.

Kind regards

John Scobie

s 9(2)(a)

s 9(2)(a)

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**From:** K-M-Felstead s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 4:35 p.m.  
**To:** FMSubmissions  
**Subject:** Submission: Temporary Closure to Parts of the Southern Scallop Fishery for 2016/17

"I wish to make a submission with respect to the above proposed closures.

- Firstly I applaud the Ministry for seeking to improve the rebuild of the abundance of scallops in the Marlborough Sounds.
- I have been fortunate enough to be able to go scalloping in the Marlborough Sounds once or twice a year for the past five or six years, with varying success at getting the quota provided for.
- The success of our catch has largely depended on the timing of our visit in relation to the timing of the visit of the commercial trawlers. Our observation is that the commercial trawlers basically "clean out" the bay of scallops in one visit, leaving little for the recreational fishers.
- I firmly believe that the aim of the season ban would easily be achieved by banning the commercial trawlers for the season but still allowing the recreational fishers to continue (with a stricter quota if deemed necessary).
- I have no doubt that I am not the only recreational fisher that plans an annual holiday in the sounds to do a little scallop dredging and some cod fishing with very little or no impact on the scallop/fish numbers and the health of the industry. Banning people like me for a season with no likely benefit to improving the scallop numbers appears to be extremely unfair and unreasonable.

Thank you for considering my submission.

Kevin Felstead

s 9(2)(a)



s 9(2)(a)

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**From:** catchbag s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 1:55 p.m.  
**To:** FMSubmissions  
**Subject:** scallop submission

I am president of the Underwater Section Marlborough club in Blenheim  
my submission is as follows:

- 1) start the scallop season one month later (August instead of July)
- 2) BAN ALL DREDGING FOR SCALLOPS
- 3) abolish the scallop quota for the two safety people when diving for scallops; one safety person is quite adequate ; and cut the safety persons share from 50 to 25
- 4) DO NOT CHANGE THE SIZE from 90ml to 100ml this season. As an experienced Diver, I know there are very few 100ml in size in the marlborough sounds. Perhaps relook at this in a couple of years (or when the dredging ban is lifted)

Thanks, Dean Garbett s 9(2)(a)

s 9(2)(a)

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**From:** Bruce Reid <s 9(2)(a)>  
**Sent:** Wednesday, 29 June 2016 5:17 p.m.  
**To:** FMSubmissions  
**Subject:** SCA7 submissions

I wish to support Option 2 but I want it to include all areas of SCA 7. In other words a total temporary closure of the whole scallop fishery in SCA 7.

Bruce Reid

## Scallop Fishery

In relation to the discussion document I would suggest that the closing of the fishery from July 2016 to February 2017 is a positive move and I fully endorse it with the following provisions

1. Closure is to all including the customary quota
2. It includes all methods of harvesting scallops.

When the fishery opens again the bag limit must be reviewed the present limit of 50 scallops per person is too great; a limit of 20 per person and a limit of about 100 per vessel would be appropriate Consideration should also be given to the length of the season, the present 7 months is too long. The scallops in the Marlborough area are generally in poor condition until around October which to me would be a good time to open the season and leave the closing date as it is

Rod Mckenzie

s 9(2)(a)

**From:** Abel Tasman Charters s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 5:01 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Hi

I would like to support option 2.

Other thoughts for after this closure;

We should bring the daily bag limit into line with other parts of the country at 25pp at least until stocks have fully recovered.

Lift the size back to 100mm to raise the amount of spat released by more mature scallops.

I also support the creation of permanent no dredge, or diver only, areas where bottom structure and habitat can recover. Regeneration could be further encouraged with placement of manmade structure or reefs. These areas could hugely increase the amount of spat available to the whole fishery with a population of older more fecund scallops. Commercial and recreational wet fishing could still take place in these areas but with no bottom trawling.

Other factors such as sedimentation and temperature are probably as or more important than fishing effort but the above measures would be able to be quickly put in place with little loss to either the recreational or commercial sectors who may both gain in the future with a stronger scallop fishery outside the reserves.

Cheers  
Rod

Rod Stuart

s [REDACTED]  
Freephone: 0800 22 35 22  
[www.abeltasmancharters.com](http://www.abeltasmancharters.com)



s 9(2)(a)

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**From:** Geoff Caradus s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 12:14 p.m.  
**To:** FMSubmissions  
**Subject:** Submission on "Review of sustainability measures for the Southern Scallop Fishery (SCA7)"

Hello MPI,

I have fished recreationally in area 7H for several decades and I wish to submit in favour of Option 3 (the status quo) for recreational fishermen in area 7H. I do so not because I believe that this is necessarily the best course of action, but because I believe it is the best of a number of poor options put forward for consideration.

In particular, I was quite surprised to see that reducing the daily allowable take (to, say, 20 consistent with other areas of the country) or increasing the size limit for scallops (to, say, 10mm consistent with other areas of the country) were not put forward as an option for consideration. MPI appears to have put forward three "all or nothing" options for submitters to consider which is surprising given the approach it takes to other species (where I understand reductions in take and increases in size limits are regularly employed as means of improving stocks).

Happy to discuss in further detail if you would like.

Kind regards,

Geoff Caradus

s 9(2)(a)

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s 9(2)(a)

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**From:** Geoff Lingard s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 6:11 p.m.  
**To:** FMSubmissions  
**Subject:** Submission on "Review of sustainability measures for the Southern Scallop Fishery (SCA7"

Dear MPI

I support option 3 in your proposal. My comments apply to the recreational scallop fishery only.

The other options in your proposal seem to reflect a scattergun approach to what has been a sustainable recreational fishery for many years. Currently there does not appear to be any evidenced based research to indicate fishery is in dire straits – which closing suggests it is. However, given the concern expressed in your consultation document, would it not be more appropriate to, instead of a closure , reduce the recreational catch from 50 per day to 20 on a temporary basis. This would allow recreational fishes to enjoy a meal of scallops without taking excess.

In summary

- evidence with regard to the state of the scallop beds is lacking and therefore it is not appropriate to close the beds.
- Consider reducing the catch on a temporary basis to 20 per day
- MPI undertake research and from that a more evidenced based management plan can be developed .

Thank you

Yours sincerely

Geoff Lingard  
s 9(2)(a)

s 9(2)(a)

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**From:** Peter Johnson <s 9(2)(a)>  
**Sent:** Wednesday, 29 June 2016 9:14 a.m.  
**To:** FMSubmissions  
**Subject:** Submission-Southern Scallop Fishery 2016/17

Having read all the documentation regarding the Southern Scallop Fishery and considered the three options I submit the following submission.

Option 1, in my opinion, is not a viable option. To close part of the fishery will only place further, and excessive, pressure on the fishing areas remaining.

Option 3. Status Quo. Likewise this is not a viable option. It is clear to anyone who has an interest in the sustainability of fishing that the scallop fishery is in serious decline for a number of reasons and foremost among them is fishing pressure.

Option 2. My submission supports the option of a temporary closure of all the Marlborough Sounds and area 7H in Tasman Bay for the 2016/17 season. Clearly a temporary closure will give the fishery a chance of recovery.

I add the following points in support of this submission.

- The statistics are very dramatic in terms of the breeding potential of Scallops as they mature. One year will assist recovery but two years, in my opinion, would be of far greater significance in establishing a viable ongoing population.
- There is no doubt that when the temporary closure ends the fishing pressure will be intense. To assist in the recovery and viability of the fishery I would suggest that the allowable catch be reduced to 25 per person with comparative reductions to commercial take and recreational boat take.

Peter Johnson

s 9(2)(a)

s 9(2)(a)

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**From:** Phil Hyatt s 9(2)(a)  
**Sent:** Tuesday, 28 June 2016 9:05 p.m.  
**To:** FMSubmissions  
**Subject:** Scallop fishery SCA7

Dear Sir

I would like to make a submission on the review of Southern Scallop Fishery SCA7 in 2016 Something needs to be done / changed in the scallop management to get a sustainable future the status quo. is not working I have harvested Scallops for over 40 years, mainly as a diver and have observed the damage that is done to the seabed even with a small recreation dredge.

What is happening, as one area is overfished / or the scallops disappear the other remaining areas get more pressure.

Now we have no good areas left

What needs to be done

- 1 Reduce the recreational quota from 50 per person to 25
- 2 Season start date to be delayed one month
- 3 Ban all dredging for 2 years with a review on dredging including dredge design.

Kind Regards

s 9(2)(a)

[Redacted signature block]



s 9(2)(a)

**From:** Reid Forrest s 9(2)(a)  
**Sent:** Tuesday, 28 June 2016 8:52 p.m.  
**To:** FMSubmissions  
**Subject:** SCA 7 Submission

6/28/2016

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Reid Forrest

s 9(2)(a)

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

Review of sustainability measures for southern scallops (SCA 7) in 2016.

**To Whom it may concern,**

As a marine biologist with over 10 years of experience working in Tasman Bay and having grown up boating, diving and fishing in the Marlborough I have had a lot of experience with the region and seen a large number of changes over the past 30 years.

I was part of the Motueka River Integrated Catchment Management Program during my time at the Cawthron institute. Part of the research that we undertook sought to monitor and later attempt to map the presence of a near-bottom high turbidity layer that was became present in Tasman bay for longer and longer periods through spring and summer. This high-turbidity layer would extend anything from 5cm to several metres from the seabed up into the water column, beginning in the shallow subtidal area and at times extending as far out as the 30m depth contour. The suspended sediments within the highly turbid water was found to clog the gills and feeding structures of scallops, particularly juveniles, and its extended presence meant that scallops grew only very slowly, or not at all, and there was very poor survival of juveniles. The cause of the near-bottom high turbidity layer was likely caused by a number of factors including;

- Decades of dredging and trawling in Tasman and Golden bays that has de-stabilised the seabed leaving it very poorly consolidated, soft muds with no structures or organisms holding particles together or promoting sediment settling.
- Increased flood protection works on major rivers like the Motueka and Takaka mean that fine sediments that once settled over larger flood plains during flood events are now channelled directly out to sea. Increased volumes of fine sediment that now enter the catchments due to activities like forestry also contribute to greater volumes of sediment entering Tasman Bay.

Almost two decades of diving in Ketu Bay and Guards Bay in the outer Pelorus Sound has seen seabed conditions within these areas over the last 5 years begin to resemble those in Tasman Bay. The increased amounts of dredging

pressure from both commercial and recreational fisherman has caused damage that is no longer able to recover between seasons as fine sediments are now highly mobile and very easily disturbed by strong currents and storm events.

The only areas of Tasman Bay to show any recovery of the seabed, and greater survival of scallops has been those areas within the offshore marine farming areas. Dredging and trawling activities have been excluded from these areas by the presence of the mussel lines and combined with the drop-off of some mussel shell material to the seabed means the sediment has become more cohesive, coarser grainsize and more diverse infauna and epifauna communities.

The current recreational allowable catch I believe is a massive under-estimate of the true recreational catch. There has been a dramatic and rapid increase in the number of boats and people utilising the marine environment at the top of the south island over the past 10 years, as evidenced by the huge increase in demand for marina berths and launching/parking facilities at all harbour areas. There are now dramatically higher numbers of people both dredging and diving for scallops as vessels and dive equipment have become cheaper and more reliable. Added to this have been the huge advancements in marine electronics that allow users to find and return to the exact same scallop beds. All of these mean scallop beds are targeted more often, by more people and in the same places, quickly leading to the depletion of existing, well known scallop beds. The Okiwi Bay/Croiselles Harbour scallop beds are a prime example as huge increases in mainly recreational take has dramatically decreased the area of the scallop beds in the bay and changed the benthic environment. What used to be productive healthy scallops beds on sandy shell-hash seabed with some mud, small algae and bryozoans, has now been replaced by bare, largely mud sediments with lots of empty shells (scallop and other), few or no scallops, and at times incredibly high abundances of starfish. These impacts are largely the result of excessive recreational dredging and shows the severe impacts that dredging is having on the benthic environment.

If we are to continue to have any healthy scallop fishery within the Marlborough sounds, Tasman and Golden Bays then I concur with the option to halt all scallop fishing in these areas for at least a year, and upon re-opening the fishery there needs to be much tighter restrictions placed upon it. It would be further beneficial to keep it closed for longer than one year. The closed area should cover the entire SCA7 area including all of Tasman and Golden Bays, and all of the Marlborough Sounds including Port Underwood and Okiwi bay/Croiselles harbour.

Upon re-opening of the fishery all commercial scallop fishing should be excluded from the Marlborough Sounds area (all areas east of Durville Island and including Okiwi Bay/Croiselles).

Thought should be put into making the entire scallop fishery by diving only, that is no-dredging at all to save the benthic environments that are continuing to deteriorate with overfishing and ever increasing pressure from the increasing number of users in the marine environment.

Daily bag limits for recreational fisherman should be dropped to 20 per person per day, with a maximum of 4 limits per boat, and no accumulation of daily bag limits for multi-day trips.

Minimum legal size limit for the Challenger area should be raised back to 100mm.

The current allowance for a diver to collect their daily recreational bag limit for both a boat person and their assistant needs to be removed, particularly if the daily bag limit is not going to be dropped from 50 to at maximum 20 per person, per day.

Commercial fishing parties who have worked the top of the south area for many decades, such as challenger and talleys, have shown a disregard for the impacts their dredges have on the benthic environment, an unwillingness to change their thinking, and they refuse to get involved with good science on monitoring the health of the seabed in existing or recovering scallop beds. Given the terrible state that they have been largely responsible for sending the

scallop fishery in Tasman and Golden Bay into, it would be hugely negligent to allow them to continue fishing, and totally wrong to give them any increases in quota until the fishery has made a complete rebuild.

If significant changes are not made to the SCA7 fishery now to allow the fishery to rebuild then there will likely be no fishery left within only a few years.

Regards

Reid Forrest

## Reid Forrest

Associate

SLR Consulting NZ Limited



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To whom it may concern,

I was at the Blenheim information evening on the scallop and snapper fisheries last week. Looking at the available information and talking to the different groups represented there it confirmed my own observations over the last decade that the scallop resource in the Marlborough Sounds has been depleted to the point of total collapse.

The management of the fishery would seem to be the main reason for this situation.

I have heard environmental factors quoted adding to the decline.

The overall management should take those factors into account when they set the catch limit and maintain a healthy biomass to mitigate those affects.

In my opinion the only sensible option going forward from here is a total closure of the scallop fisheries (option 2).

The scallop beds should be able to be left alone in order to rebalance the depletion that has occurred. That process could take some years.

When impartial study shows the fishery to be in good health i.e. able to handle a sustainable take perhaps we can look at opening it up again then

I think dredging commercially should end, previous experiences letting them manage the resource has got us where we are today chasing an ever disappearing quota with ever improving technology. I believe that they will fish themselves out of business eventually due to unsustainable harvest methods. Better to stop now while there is a chance of recovering a little of what we had.

If the scalloping resumes eventually for amateurs, divers and dredgers should have separate areas set aside. Perhaps a study of the two methods can lead to changes to future rules for the best results

Perhaps reduced bag limit, i.e. 20 per diver, (limit of 60 able to be taken for boatman and spotter, (20 each). Also 20 per person for dredgers up to a max of 120 per boatload regardless of numbers aboard.

I have enjoyed 35 summers catching scallops for friends and family in the Marlborough Sounds. I look forward to every opening when we can go and catch a feed, for us it is one of life's great pleasures to enjoy this privilege.

I'm prepared to forgo this to try and do the right thing for our kids

Please close the scallop season until things get better.

Regards  
Neil Black

s 9(2)(a)

**From:** Elva <s 9(2)(a)>  
**Sent:** Thursday, 30 June 2016 1:03 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7) in 2016

To Whom it may Concern.

My submission is in support of Option 3.

My reasons are as follows:

1. Memorandum of understanding (MOU) CSEC management treated survey as guidance and worked with fishery facts.
2. Surveys recognize fishery opportunity but cannot and never have provided reliable information other than recognizing a Commercial fish harvest looks sensible and that you must make space for the growing crop already visible.
3. To have a strong percentage of dying mature fish among young fish is a recipe for disaster, equally an over populated starving crop will cause a disaster (Ketu example).
4. Density of 2014 spat seen in 2015 harvest season, with strong 2 year old volumes also that will measure up for harvest in 2016 season, means no harvesting this year will see no growing space for 2014/2015 spat.
5. 2015/2016 spat will only be recognized in July 2016 survey.
6. If this scallop fishery was 100 percent visible and measurable on land, overstocking and starvation would bring ridicule and prosecution.

**Yesterday:** We cannot change it, but we can learn from it.

**Today:** Put all details on the table, assess their validity and weigh the influences.

**Tomorrow:** Work with established facts and verifiable forecasts driven from facts, not theory's.

Plot logical change for improvement and weigh all determinations with the awareness that to date Commercial Operators have born all cost to run and enhance the Southern Scallop fishery. All surveys are conducted in similar time frames annually to provide honest comparable information and have always included the most recent growing season and spat-fall statistics to guide future harvesting decisions. A November survey time frame is a waste of public money.

There are many relevant topics for serious discussion and if a working group is to be assembled I would welcome the opportunity to further guide the security of the fishery going forward.

Chris Parris

s 9(2)(a)

Former member and Chairman of Area 7 Quota Allocation Committee.  
 Member of Ministers Scallop Advisory Panel, challenger Area.  
 Director CSEC since formation.  
 Sole arbitrator in dispute settlement process.  
 Commercial scallop and long line fisherman for past 30 years.  
 Enthusiastic amateur fisherman for past 60 years.

Have provided scallop enhancement contract vessel for Ministry of Fisheries, CSEC and Niwa on oyster enhancement.

Currently working on Scallop catching gear improvement.

s 9(2)(a)

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**From:** Diana Connolly <s 9(2)(a)>  
**Sent:** Thursday, 30 June 2016 9:57 a.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Pelorus Boating Club

s 9(2)(a)

Michael Connolly Commodore

Dear Sir,

Pelorus Boating Club is based in Havelock at the head of the Pelorus Sound.

We have 503 Boat registered to the Club which represents approximately 1500 members. The members come from Havelock, Nelson, Waikawa, Picton, Mana, Wellington, Christchurch, Golden Bay and Motueka .

A large majority of these members scallop in both the Sounds and the Tasman Bay areas.

The Club has been involved in the Scallop consultation meetings for many years.

We support OPTION 2.

Comments: We believe the whole of the Scallop 7 area should be closed.

To Leave areas open is going to be a compliance issue.

Yours Sincerley Michael Connolly  
Commodore Pelorus Boating Club.



s 9(2)(a)

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**From:** Victor Allen s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 9:33 p.m.  
**To:** FMSubmissions  
**Subject:** Southern Scallop Fishery

I agree with you that something drastic needs to be done to save the scallop beds in and around the sounds

While I have only been fishing in the sounds for a few years, there has been a drop in the number and size of scallops. I am only able to go out dredging a limited number of time each year. The last couple of years I haven't did any scallop fishing, the catch's have been too small for the work involved and i didn't want to be the one that caught the last scallop.

3 years ago i went out and did a very short dredge in Keto bay, got a full net, keeping about 40 ( my tea and breakfast). the next morning i was up early and having a cup of tea. Was watching the commercial boats working the bay, don't believe they missed any of the sea bed. That afternoon I did three long hard dredges and only got about 35, that was the last time I was able to get a decent catch in Keto Bay.

I fully agree with closing the season for a year.  
if the numbers come up then have a 50 to 60 % reduction for recreational fishing,also have a shorten season to a month or 3 weeks,until the numbers reach a substantial level.

Closed season to commercial fishing till the number come up to support and protect the scallops in the inter and outer sounds

Thank you for the opportunity to present my submission

Victor Allen  
s 9(2)(a)



s 9(2)(a)

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**From:** Kane Fawcett s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 8:23 p.m.  
**To:** FMSubmissions  
**Subject:** Re: Submissions Marlborough Sounds Scallop Changes

To Who it May Concern

In regards to the proposed changes to the scallop fishery in the Marlborough Sounds area.

We, the Fawcett Family, of Cockle Cove, Bay of Many Coves would like to see all commercial scalloping halted for a season. We also propose lowering the daily catch limits for recreational scallopers for a season.

We want to see the numbers recover, but do not see that recreational fisherman should be completely without a scallop season, when commercial fishermen have just recently been allowed into the area, and now numbers are really struggling.

No more commercial scalloping in the Marlborough Sounds, and reduced bag limits for recreational fisherman.

Please keep me informed of any new information regarding this matter.

Sincerely,

Kane Fawcett

s 9(2)(a)

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<http://www.fastmail.com> - Faster than the air-speed velocity of an  
unladen european swallow

s 9(2)(a)

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**From:** Rebecca Greaney s 9(2)(a)  
**Sent:** Wednesday, 29 June 2016 8:12 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Steve Greaney,  
Motueka

I personally would like option 2, hopefully mite help scallop numbers, fairly doubt it tho, probably needs 5years to be of any effect...

Also would be a great idea to return scallop shell back to the ocean as this will help young scallop get the calcium they need to grow, many years of removing shell has created a huge imbalance to calcium levels in tasman bay, in my view has had an effect on scallop recovery.

The commercial sector also has had a roll to play as their dredges take everything in there path, any left behind are smashed, gps so they accurately cover every spare inch of a bed, there should be limitations on where and how they fish, reduce quota would be a good start as i understand they cannot reach their current quota as it stands..... Sum thing up there in my view...

Thanks

Sent from my iPad

s 9(2)(a)

**From:** Brendon Robertson-5476 <s 9(2)(a)>  
**Sent:** Thursday, 30 June 2016 5:21 p.m.  
**To:** FMSubmissions  
**Subject:** Sustainability Measures for the Southern Scallop Fishery (SCA 7)

I am a recreational diver and fisher in the Marlborough Sounds. I have dive instructed for several years as well as commercially dived in Australia for sea slugs. I would usually do between 30-50 dives on average a year in the Sounds.

I have been diving for scallops since 1990 when I obtained my open water dive course mainly in the Queen Charlotte Sound and Okiwi Bay.

Since this time in the area I dive I believe the scallop numbers have been consistent other than where dredging has occurred. The main areas I dive which has been dredged is Okiwi Bay. This area is heavily dredged by recreational sector and it is clearly visible on the bottom where it has been dredged. There is evident as there are numerous broken scallop, clams and oyster shells on the bottom. Also what little sponges survive are severally damaged. This is in direct contrast to the Queen Charlotte Sounds where I dive and it is only dredged occasionally such as areas at Blackwood and Kumototo Bay. These areas are usually only dived and the sea bottom and scallop numbers are high.

I would be interested to know where the biomass surveys were taking from as my unscientific findings it appears that the biomass for scallops has only been reduced where they are dredged both commercially and recreationally. Those bay which are only dived I have not seen a decrease in scallop numbers

Many people blame the commercial sector but my feelings that the recreational dredges also cause mass damage due to the length of the season and people dredging where unique and fragile ecosystems occur which are easily damaged. It is disheartening when diving to see dredge marks going through horseshoe mussel beds which have killed the mussels where the dredge has broken the exposed mussels. I have found this several times. When going back to these spots several months later the mussels have not recovered.

Even though I don't believe the scallop numbers have reduced where I dive. My preferences would be to reduce the legal daily limit to 20 per person, increase the size to 100mm, ban all commercial and recreational dredging and possibly lesson the length of the season to opening in September as more often than not the scallops are not ready until then. Also a maximum take per boat. Maybe maximum 100 per boat.

If dredging were to be allowed commercially and recreationally, not my preference, it should be kept to certain areas only and the areas assessed and managed from year to year. At the present recreational dredging is for seven months of the year and includes all areas in the sounds. Some days at Okiwi Bay there are up to 50 recreational boats in the small scallop bed area.

I hope you take my comments and consider them before making any decisions.

I will be happy to answer any questions or assist you in any decision making process.

Regards

**Brendon Robertson**  
**Senior Building Control Officer**

s 9(2)

(a)

15 Seymour Street, PO Box 443  
Blenheim 7240, New Zealand

s 9(2)(a)

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

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Chris Brown

s 9(2)(a)

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Inshore Fisheries Management  
Ministry Of Primary Industries  
Po Box 2526  
Wellington 6011

### Submission on Scallop Fishery

Went to your drop in display at the Marlborough Convention Centre, it was very well done with a lot of very useful information.

What I don't understand is that Dieffenbach, ships cove and Guards Bank scallop beds are booming and seem to thrive on dredging. This year being the best year I have ever seen at Dieffenbach getting a hundred or more of size scallops from the beginning to the very end of the season. The bed has been almost continually dredged the whole season by many boats being so close to Picton. No need even to go to ships cove that is fishing even better and Guards Bank even better again because they are much larger scallops.

Where the hell is this science coming from. It would seem that when action is needed such as the paua or blue cod nothing effective is done and when a fishery is booming dramatic action required to close the fishery down. It would appear that somebody has got something very very wrong, unless I am missing something that I don't understand. I would suggest the status quo be kept in place for this coming season to see exactly what does happen. Does it boom through out the whole season again or decline, then make a decision on solid evidence. The recreational scallop fishery in these areas has bounced back from decline.

We have pristine conditions in the Sounds at the moment other than the inner Pelorus and a higher water temperature the food life and bait fish in the sounds is amazing, everything is having a ball including the scallops.

Dairying is the main cause of sea bed pollution, you only have to look where that is and everything that lives on or feeds on the sea bed is not. You cant put that much muck in the rivers during heavy flooding without some dire consequences.

As regard to the blue cod fishery you are willing to close a large area off to dredging but not to line fishing to save the Blue cod and now going to make the whole area into a fishing park, come one come all and wipe out the rest of the blue cod

1000 lines in the water killing 10 blue cod a day each, to take two home or none.

Makes no difference you are still killing 10,000 cod a day nothing will stand that.

Why have you not closed large areas of the sounds off to all line fishing to save the blue cod like most agree to including Peter Watson President of the recreational fishers ass. It is the only logical answer there is no such thing as catch and return.

As regard to the commercial paua fishery that is about to get another heavy cut.

I ran the paua industry totally in this area for 18 years before it was quoted.

We harvested 300 tonnes of paua every year for those 18 years with 12 divers.

That was the sustainable yield until the Ministry quoted it.

Before long there was 100 divers in the water plundering the recourse for the cheapest price to the quota owners. We would measure on the bottom and average 1% undersize coming to the surface. Unfit divers took 50% undersize to the surface and killed them by just throwng them over the side. The really bad ones sold all the undersize on the black market. Do you realize that this is orchestrated fisheries destruction not fisheries management, similar to the blue cod recreational fisheries management.

All you could do is sell your paua quota and run, get out of the industry

If you are not looking after the undersize breeding stock that are coming on to size there is no future.

With scallops taking all to the surface and throwing under size over the side over the scallop bed does not cause mortality and the beds seem to thrive on it, as seems to be the case in the areas I have mentioned.

You have closed down the recreational net fishing and now only four months of the year south of Cape Jackson while commercial fishermen carry on with far more net in the water. With no history in the last 100 years of a dolphin being caught in a net set out from the shore. Now how dumb is that.

There have been some terrible mistakes made by fisheries management in the past that I have predicted and the results of which we can all see. This will continue to happen without proper across the floor debate with all parties involved and consensus reached.

Not the ministry running off and doing things that have been predicted to be so wrong.

*Chris Bram*

s 9(2)(a)

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**From:** Richmond Cars and Commercials <s 9(2)(a)>  
**Sent:** Thursday, 30 June 2016 2:22 p.m.  
**To:** FMSubmissions  
**Subject:** Submission

Hi,

I would like to see the option of all the Sounds and Tasman bay kept shut this season for scallops, to allow a rest period for the fishery.

Thanks  
s 9(2)(a)

s 9(2)(a)

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**From:** Don Mead s 9(2)(a)  
**Sent:** Friday, 1 July 2016 9:00 a.m.  
**To:** FMSubmissions  
**Subject:** Southern Scallop Fishery/Snapper 7 fishery

I live in Golden Bay and take a great deal of interest in the state of Golden Bay waters. I am deeply concerned that the scallop fishery has collapsed in the Bay and elsewhere in the SCA 7 fishery. It is clear that the collapse of scallops is linked with both dredging and bottom trawling for fish, including snapper, as well as sedimentation.

It is vital that the fishery be given time to recover and therefore the whole of the area, including Golden Bay, should be closed to all scallop fishers. I would also like a ban on any bottom trawling in Golden Bay. With regard to snapper, I would be happy to a greater take, as proposed, provided that any increase is not through trawling. I would also urge MPI and the commercial fishers to commit to move completely away from bottom trawling. Many recreational fishers for snapper get a great deal of pleasure from this activity but they do not use trawling so pose little threat to the benthos.

Don Mead

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s 9(2)(a)



s 9(2)(a)

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**From:** Tony & Jude s 9(2)(a)  
**Sent:** Thursday, 30 June 2016 10:11 p.m.  
**To:** FMSubmissions  
**Subject:** submission on voluntary ban on scallops

#### Fisheries Management

Following a meeting with MPI staff on Wednesday 29<sup>th</sup> June 2016 at the Takaka Fire Station, we, the attendees, wish to put in a submission on the closure options for the Challenger Scallop Area 7. The MPI staff confirmed that the Golden Bay scallop fishery is in a very bad state, and the recreational fishermen named below, also agreed that the fishery is just about non existent. Therefore we would like to submit a voluntary ban for the 2016 - 2017 scallop season in Area 7 A, B and C. We hope that the seabeds and scallop fishery will recover for viable recreational quotas in the future. Recreational fishing is part of the lure of coming to Golden Bay, especially for holiday makers. To be denied this past time because of falling fish/scallop stocks will affect the economy and the livelihoods of a huge number of local businesses. Thus putting a voluntary ban on the scallop take for a season makes sense to secure everyone's future.

Signed : Tony Mackay  
Kevin Steel  
Doug Collis  
Michael O'Connor  
Frank Sparks  
Roland Toder  
Nick Hansen  
Brent Clarke  
Herb McBride  
Darren Olliver

s 9(2)(a)

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**From:** Tim Greenhough s 9(2)(a)  
**Sent:** Thursday, 30 June 2016 9:17 p.m.  
**To:** FMSubmissions  
**Subject:** Scallops

#### Submission on Southern scallop area SCA7

I am Tim Greenhough I live at s 9(2)(a) and also own a holiday home at s 9(2)(a)

I favour option 2 as the best of a poor bunch. I feel that you should also close all of Tasman bay and Golden Bay as well. As it will only move the pressure of fishing from the sounds to the other areas if you only close part of the fishery.

#### In the longer term

The season should not start until September when the scallops are in better condition.  
The size limit should be raised to 100 mm for both commercial and recreational fishers.  
Reduce the recreational catch to 30 per person.

Thank You

s 9(2)(a)

s 9(2)(a)

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**From:** Mary Gibson s 9(2)(a)  
**Sent:** Thursday, 30 June 2016 3:18 p.m.  
**To:** FMSubmissions  
**Subject:** Marlborough Sounds Scallop.

Our submission to Marlborough Sounds Scallop catch review 2016

To allow rebuild increased breeding biomass.

A nil scallop take for the 2016/17 season --closed to all Recreation, commercial and customary.

The 2017/18 open season to be January, February March only. To increase the spawning potential at 20 scallops p.p. per day.

Alister and Mary Gibson

s 9(2)(a)

s 9(2)(a)

**From:** Vicky s 9(2)(a)  
**Sent:** Thursday, 30 June 2016 2:58 p.m.  
**To:** FMSubmissions  
**Subject:** Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

Thursday 30 July 2016

## **Submission Southern Scallop Fishery (SCA 7)**

**By Brian Appleby and Vicky Maitland**  
**Affinity Charters Ltd t/a Affinity Cruises**

We own and operate the 20 metre vessel Affinity in the Marlborough Sounds and have done so since February 1996, and our clientele is the 50+ years New Zealand domestic market. Co-owner and Skipper/Captain Brian Appleby has been scalloping by dredge in and around the sounds throughout this time.

In 2012 we developed a cruise dedicated on scallops as per request from past cruising clients this has been very popular and all the people that come onboard really appreciated the fact that they were able to dredge and participate in the gathering of scallops as they were not able to or the ability to dive for them.

I don't believe the Ship Cove area scallops are under stress. As on the last week of the last 3 seasons we have managed to get our limit or very close to it with very little trouble each season.

### **Dredging**

There has been a lot of comment by interested parties that dredging for scallops should be banned because of the damage it does to the sea floor.

The area of the sounds that scallops cover would be less than 1% of the total sea floor of the sounds and these areas have been dredged by vessels ever since motors were put into vessels with the rest of the sounds surviving ok. If dredging is banned a lot of older people will be denied the opportunity to gather fresh scallops owing to their age and being unable to dive for scallops.

We would also like to see more evidence on the individual areas that are said to be effected.

Kind regards

Vicky

Vicky Maitland | Manager | Affinity Cruises  
 PO Box 54, Renwick, 7243, Marlborough

s 9(2)(a)

**Web:** [www.affinitycruises.co.nz](http://www.affinitycruises.co.nz)

**Please note:** My work hours are Monday to Thursday 9 am to 3 pm

## SUSTAINABILITY MEASURES FOR THE SOUTHERN SCALLOP FISHERY

I have been a recreational diver since the late 60's and during that time I have represented divers and recreational fishers at both National and local Levels, including scallops. During this time I have also noticed the rapid Siltation of the sounds especially the Pelorus Sound and Port Underwood. What ever the reason I believe that dredging the sea floor does nothing to Help the sea floor environment, which once destroyed does not recover Over night. Unfortunately the commercial catch of scallops has been in Decline for a number of years yet in spite of request by recreational groups To reduce catches this has been listened to, we are now faced with these Last minute options {with only 15 days until season opens} yet the problem for commercial Has been obvious for a number of years yet all parties have sat on their hands and Done little to nothing to protect this fishery; giving me little faith in the management.

### Proposal

Close the entire fishery to commercial dredging until a management is set up Which is not profit or commercial neither driven nor politically driven. It is not recreational people that has caused this problem but commercial  
Note Marlborough Sounds area is a wild scallop area with no seeding done

Yet commercial continue to harvest from this area as all other areas Including seeding has failed.

## OPTION 1

This option does not give any consideration or possibilities that commercial Dredging will not take place in other areas even more sensitive to the damage Done. Last year dredges operating just outside Motura Island destroyed large Coral areas flattening the much of the evidence being discarded around Ship cove. This option also makes it difficult to police recreational, MPI has enough problems Now we do not need to add to them.

## OPTION 2

Possibly the only variable option.  
Yet once again recreational pay for commercial greed

## OPTION 3

This option is favourable to all but it does little to solve the problem  
I would support this option

## REASONS

Gives Challenger Scallop Enhancement Company time to get act together and  
Come up with boundaries for dredging for a rotational program  
To ban dredging completely through out SCA7  
Dredge only areas  
MPI to take over and manage the fishery

BRUCE WALTON

s 9(2)(a)

# Golden Bay Community Board



C/- Tasman District Council

P.O. Box 74

Takaka 7142

Phone s 9(2)(a)

Email Carolyn: s 9(2)(a) or Laura: s 9(2)

## Review of Sustainability Measures for the Southern Scallop Fishery (SCA 7)

From  
Golden Bay Community Board,  
C/- Tasman District Council Service Centre  
14 Junction Street,  
Takaka

Golden Bay people have a special relationship with the Marine environment of the Bay and place a high intrinsic value on the precious fishing resource.

There has been huge disappointment that the, previously abundant, scallop fishery stocks have been allowed to diminish and finally collapse.

We therefore support MPI with the complete closure for both Commercial and Recreational scallop fishing for the 2016-17 seasons.

Furthermore, we ask that a precautionary principle is adopted so this fishery remains closed to both recreational and commercial interests for the foreseeable future, until there is scientific evidence that this resource is in recovery and there are plentiful stocks measured and recorded in the scallop beds.

Even then, any return to scallop fishing will need to be managed extremely carefully, with limits significantly reduced for recreational fishing. The Golden Bay Community Board would initially advocate for no commercial dredging within the Golden Bay waters.

Carolyn McLellan

On behalf of Golden Bay Community Board

30th June 2016



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



Inshore Fisheries Management  
 Ministry for Primary Industries  
 PO Box 2526  
 Wellington 6011  
[FMsubmissions@mpi.govt.nz](mailto:FMsubmissions@mpi.govt.nz)

1 July 2016

## **NZ Sport Fishing Council submission on the review of management measures for the Southern Scallop Fishery (SCA7) in 2016**

### **Recommendations**

1. The SCA 7 fishery is closed to all fishing until such time as the abundance surveys indicate a surplus yield is available.
2. When the stock has recovered to a level where there is surplus yield available, 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.
3. The Ministry for Primary Industries work with stakeholders to develop a long-term plan and package of measures to both rebuild and sustain the SCA7 fishery.

### **NZ Sport Fishing Council - LEGASEA**

1. The New Zealand Sport Fishing Council and our outreach LegaSea (the submitters) appreciate the opportunity to submit on the review of management measures for the Southern Scallop fishery (SCA7). The Ministry for Primary Industries (MPI) released their Discussion Paper on 9 June 2016 with submissions due by 1 July. Any changes will apply from 15 July 2016.
2. The NZ Sport Fishing Council is a national sports organisation with over 32,000 affiliated members from 57 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. The submitters 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. The submitters continue to object to the Ministry’s tight consultation timetable, in this instance, 16 working days. In our view this timeframe does not allow for adequate consultation, it is particularly offensive for non-commercial organisations such as ours that need to consult with a range of interests and volunteers. While we understand the urgency to make and apply a decision before the



start of the upcoming scallop season, the Ministry and commercial interests have had the abundance survey results since November 2015.

5. 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.

### Stock status

6. The most recent survey, carried out in November 2015, reveals abundance in SCA7 is at its lowest recorded level.
7. The SCA7 stock continues to decline.
8. Recruited biomass is estimated to be around 211 tonnes meat weight. Future recruitment is uncertain.

### Proposed management options

9. MPI has proposed three options for the management of SCA7 for the 2016/17 fishing season, they are -

|                                  |                                                                                                                                                                                                                                                                                         |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Option 1</b>                  | Temporarily close all of area 7H in Tasman Bay, and some or all of the following parts of the Marlborough Sounds to scallop fishing for the 2016-17 season (until 15 February 2017): <i>Wynens Bank, Guards Bank, Ships Cove, Pelorus Sound and Dieffenbach Point (refer Figure 2).</i> |
| <b>Option 2</b>                  | Temporarily close all of the Marlborough Sounds and area 7H in Tasman Bay to scallop fishing for the 2016-17 scallop season.                                                                                                                                                            |
| <b>Option 3<br/>(Status quo)</b> | No new scallop fishing closures are implemented for the 2016-17 scallop season.                                                                                                                                                                                                         |

### Future management

10. The submitters support the Ministry's stated goal to provide more certainty that a rebuild will occur in SCA7.
11. We do not believe any of the Ministry's three proposed options will achieve the goal of abundance because there is no strategy that conveys certainty for rebuilding.
12. Any rebuilding will occur via improved recruitment success that requires viable spat and appropriate settlement surfaces that remain undisturbed through to recruitment. The only part of the rebuilding matrix that MPI can manage is to leave the scallop populations undisturbed, the rest is in the hands of the scallops themselves.
13. **Scallop 7 is a collapsed fishery**, not a fishery in need of tinkering and inconsequential interventions.
14. The three options listed in the Discussion Document are incongruent with the long-term rebuilding of scallop populations. None achieve the only tangible intervention available, which is to **close the fishery entirely**.
15. A casual glance at the relative abundance plots (Appendix One) confirms closing the fishery is the only rational response.
16. The last review was in 2014, a mere two years ago. The 2014 proposals also contained options that failed to address the real and confirmed state of nature. At that time we submitted that all

commercial dredging cease, and a residual small catch allowance for customary and public use be retained<sup>1</sup>. It appeared the only rational response then, and is now confirmed by the latest crisis.

17. **There is no rationale for allowing any commercial harvest anywhere in SCA7**, and to do so disregards the statutory duties of the Minister and leaves him liable for review.
18. This issue is not about what to allocate to whom, it is about the reasonable and lawful response to a collapsed stock. At some point in time MPI are going to have to accept the challenge - to manage depleted and collapsed stocks, without simply giving in to commercial demands as clearly happened in 2014.
19. If SCA7 is not immediately closed, then we can see no point in having a Fisheries Act or stock reviews. If all that happens when stocks collapse is that MPI searches for interventions that have the least effect on quota shareholders, while avoiding the Total Allowable Commercial Catch (TACC) reductions that are obviously needed, then non-commercial interests will need to take a more litigious approach to advocacy.

## Appendix One

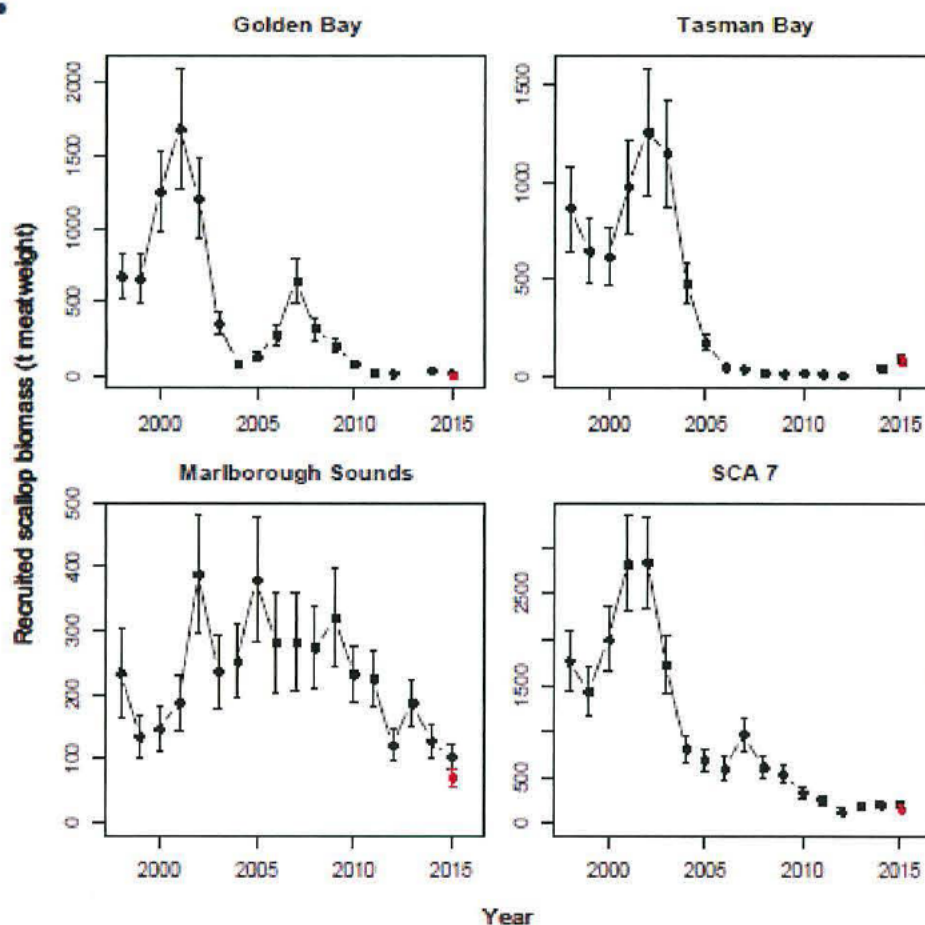


Figure 1. Plots of relative abundance generated by MPI abundance survey

<sup>1</sup> <http://goo.gl/NXhzm5>



s 9(2)(a)

**From:** Gordon Mather s 9(2)(a)  
**Sent:** Friday, 1 July 2016 11:10 a.m.  
**To:** FMSubmissions  
**Subject:** Submission on Temporary Closure of the Southern Scallop Fishery for 2016/2017

I am a resident of Golden Bay, a keen outdoors person involved in tramping and mountain activities, and boating pursuits including sailing and fishing. I also have a background as a biological science graduate, and knowledge and experience in conservation projects and efforts across a broad spectrum in this country. I am also a passionate advocate for evidence-based science to guide responsible, cautious and publicly acceptable decision making in the management of our natural resources, especially our biota.

Notwithstanding the effectiveness and general acknowledgement of the value of the quota management system for determining the allowable catch of marine species, overfishing and over-exploitation of many of our fish species has been a recurrent theme in fishing practises in this country for too long. It is no accident that the Parliamentary Commissioner for the Environment, Dr Jan Wright has recently released a report arguing strongly for greatly increased expansion of the marine reserves around our extensive coastline, based on the overwhelming evidence of the value of these in providing spawning grounds and reservoirs of stocks for vulnerable species. There is still much we have to learn about the timeframes of the lifecycles and biology of many of our commercially targeted species and what constitutes sustainable harvesting of these species.

It is not disputed that stocks of both scallops and snapper have declined markedly in the Challenger Fishery which includes the Golden Bay area. Golden Bay is characterised by shallow sheltered waters that make it particularly vulnerable to overfishing. Surveys have shown a substantial loss of biomass over recent years. Collected data over the last 12 years for scallops shows a dramatic decline from a healthy, productive fishery to the present state where it is difficult to find adult harvestable individuals. The impact of dredging and its capacity to severely disrupt the benthos has been grossly underestimated. This practice in turn is almost certainly having a negative impact on the capacity of species such as snapper to spawn and replenish their stocks. The contemporaneous decline in stocks of these two important commercial species is almost certainly linked, and even if not established without doubt, prudence demands a very conservative approach now, to prevent the total collapse of these species in this region.

The urgent need is for a complete cessation of any fishing for these two species for a minimum of two years over a significant area of the Challenger Fishery to allow for more thorough, scientifically robust evaluation of the stocks and their capacity to regenerate. The first two options proposed are for a too limited area and do not include any of the areas 7A to 7C covering Golden Bay. I have spoken with recreational fishermen in the Golden Bay community and there is widespread acceptance that the scallop fishery especially but also the snapper fishery is in poor shape and that urgent action is needed to prevent further decline and potential collapse. I believe that a more substantial part of the present fishery area needs to be set aside as a no-take area to allow a robust and detailed analysis of the present situation and regeneration rates to be undertaken. I believe that this approach would find acceptance among recreational fishers. Given the greater capacity for negative impact from commercial fishing, I argue for a complete ban on inshore dredging by commercial fishing interests for scallops and much restricted fishing to long lining only for snapper with a significantly reduced allowable quota.

These two high value species are not the only species under threat, but the focus on these arises from current proposals for their management. Neither Option 1 or Option 2 in the MPI Discussion Document No. 2016/19 goes far enough to provide the required protection in my view. Option 3 to do nothing, is nothing short of dereliction of duty to conserve scallop stocks (and likely impact on snapper stocks also) for future generations. I argue strongly that these species need a much higher degree of protection for their survival

and health, and that such restriction is more urgently required than the minimal protection that is proposed. As a minimum, I want to see Option 2 extended to include areas 7A to 7C in Golden Bay, and for a period of two years: the 2016/17 and 2017/18 seasons.

Gordon Mather

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