



Coromandel Scallop Fishermen's Association
112 Wattle Place, Whangamata

Submission

Proposal to review the 2010-11 in-season TAC for the Coromandel scallop fishery

Summary

The Coromandel Scallop Fishermen's Association:

- Supports an increase in ACE to 100 tonnes
- Proposes that the other sources of fishing related mortality should reflect that of the non-commercial catch only, as commercial incidental mortality is already accounted for in the yield estimates
- Proposes that the customary allowance should remain at 7.5 tonnes
- Proposes that the recreational allowance should remain at 7.5 tonnes

Introduction

Thank you for the opportunity to make a submission on the proposal to review the TAC for the Coromandel scallop fishery for 2010-11. This submission has been prepared by the Coromandel Scallop Fishermen's Association (CSFA) which represents all quota owners and ACE holders in the SCA CS fishery. We take the opportunity to set out our opinion on the management of the fishery and then provide our view on the options in the IPP.

Management approach to the fishery

CSFA welcomes the focus of the current government on improving the economic performance of commercial fisheries. CSFA has repeatedly raised in its submissions concerns that the current management approach to the fishery, of a low baseline TACC and in-season increases based on biomass surveys, creates both harvest and market inefficiencies, despite best efforts by the Ministry to mitigate such inefficiencies. The current management approach also results in a high cost framework that erodes fisheries profitability,

CSFA has been pleased in recent months with the constructive engagement with the Ministry to evaluate alternative management approaches or strategies for this fishery that may be more efficient in providing for commercial utilisation. We look forward to working with the Ministry to implement this new management approach at the start of the 2011 scallop season. Last season CSFA clearly demonstrated that it was capable of implementing the reporting framework required to support an alternative management

approach with 100% cooperation across the fishery. This season we are committed to improving the information collection, analysis and management that a CPUE decision framework requires.

Options in the IPP

We note the issue raised in the New Zealand Seafood Council's submission of the unintentional error in the creation of Option 2, based on a misconception of the requested ACE increase for 2009-10 fishing year. We expect that the final advice will contain only Option 1.

Whilst we consider abundance trends to have underlying environmental causes rather than be the consequence of commercial fishing pressure, it is reassuring to note that the survey results indicate a halt in the declining trend in scallop abundance observed in recent years. Notwithstanding, the biomass abundance is still relatively high compared to when the baseline TAC was set in 2002.

CSFA continues to adopt a respectful cautious approach to the fishery. Our requested increase in ACE from 22 tonnes to 100 tonnes recognises that the survey considers only a subset of the total QMA biomass, and the proposed increase in ACE is below CAY (for the areas surveyed). The biomass estimates from the 2010 survey are similar to the biomass estimates from the 2009 survey and therefore it is rational for us to request the same in-season increase in ACE.

Option 1 includes an increase in the allowance for other sources of fishing related mortality to 34 tonnes. This is based on the presumption that 34 scallops are killed for every 100 caught when fishing close to the CAY [para 12]. CSFA has raised its concerns on a number of occasions to the working group and the Ministry as to the derivation of this mortality rate and why they do not consider that it is a plausible estimate. We would like the analysis and final advice to provide clarity as to the source of this estimate and the concerns of the commercial fishers that the "experiment" in their view, went far beyond fishing to CAY.

We support the comments in the SeaFIC submission that in the case of Option 1 a lower percentage of incidental mortality is appropriate as the TACC will be below CAY (i.e. a catch limit less than the yield estimate). We further support the comment that as the yield estimate calculated from the biomass already takes incidental mortality into account it is unnecessary to add it back in for the purpose of making up the TAC. Any increase in the allowance should be limited to that anticipated from any change to the non-commercial harvest levels.

We do not support the assumption that an increase in abundance will result in an increase in customary catch [para 47]. Only an increase in the volumes authorized by customary permits will result in an increase in customary harvest (as defined under the Customary Regulations). Whilst the recreational bag limits remain at high levels we consider that iwi will continue to harvest under the recreational regulations as evident from the absence of reported catches authorized by customary permits. We do not support an increase in customary allowances to 10 tonnes, particularly when it is clear that the allowance of 7.5 tonnes far exceeds current customary harvest levels.

CSFA considers there is inadequate monitoring of the non-commercial scallop fishing areas in order to determine whether the abundance of scallops is expected to be higher. Individual scallop beds display a high degree of inter-annual variation in recruitment and abundance. In the absence of information on biomass estimates from non-commercial areas, which are largely separated from the commercial fishery, it seems inappropriate for the Ministry to propose any increase to the recreational allowance. CSFA continues to emphasise the need for improved catch reporting from, and monitoring of, the customary and recreational sectors.

Please do not hesitate to contact me should you require any further information.

Coromandel Scallop Fishermen's Association

Peter Sopp
Chairman