



**SEAFOODINDUSTRY
COUNCIL**

The New Zealand Seafood Industry Council Ltd

Submission

**Proposed in-season review of the total allowable
catch for the Coromandel scallop fishery (SCACS) for
2010-2011**

July 2010

1. Thank you for the opportunity to make comment on the proposed in-season increase in TAC for the Coromandel scallop fishery (SCACS). This submission is made by the New Zealand Seafood Industry Council (SeaFIC) on behalf of the commercial seafood industry. The following comments reflect the views of SeaFIC and have been made following discussions with the Coromandel Scallop Fishermen's Association Inc (CSFA).
2. We support the use of an in-season ACE increase to allow utilisation of high scallop abundance in SCACS following the recent survey of several commercial fishing beds. Because of the short commercial fishing season and to reduce economic inefficiencies we emphasise the importance of a quick decision from the Minister of any in-season variation so that the additional ACE becomes available in a timely manner. SeaFIC acknowledges the efforts of the Ministry to prepare and complete the statutory consultation on this TAC variation in a timely manner.
3. We have brought to the Ministry's attention that the ACE increase requested by CSFA in 2009 and the ACE approved by the Minister in 2009 was 100 tonnes and not the erroneous 95 tonnes in the IPP. We recognise that this was an unintended error and based on our discussions with the Ministry expect that the Final Advice Paper will be amended to remove Option 2 from consideration by the Minister.
4. It is entirely inappropriate for the IPP to state (para 3) that "the survey indicates in-season increase options ... as follows". The survey yields biomass estimates, which in turn can be used to produce yield estimates. The "options" however, come from the Ministry, and, in particular, options below the survey yield estimates are presented following consultation with commercial fishers. Furthermore, the survey only provides information from that part of SCA CS open to commercial fishing, and only those parts of that area "expected to contain commercial densities of scallops and be amenable to fishing in 2010".
5. SeaFIC note that CSFA have requested a cautious increase in ACE to 100 tonnes based on the outcomes of the 2010 biomass survey. Because the requested 100 tonnes is less than the conservative CAY (+indirect) estimate of 117 tonnes meatweight for the commercial areas that were surveyed, we do not consider it necessary to discuss the relative merits of the two CAY estimates. Were the Ministry really proposing to implement a pure CAY strategy, then this issue would obviously be more important.
6. The survey analysis has indicated that the biomass estimates for the start of the fishing season are comparable to the results from the 2009 survey. An increase of ACE to 100 tonnes therefore appears consistent with the previous in-season TAC decision.
7. CSFA may not, for economic or market reasons remove the full increase in ACE, as seen in previous seasons. However as this scallop fishery is dynamic and variable within and between seasons, commercial fishers should be granted the opportunity for utilisation through the increase in ACE requested.

8. Para 31 is confusing. Essentially the survey yield estimates should be compared with the TACC and not the TAC because:
 - a) Incidental mortality has already been accounted for
 - b) The recreational and customary fisheries are largely separated from the commercial fishery and only the commercial area is surveyed.
9. The source of the estimate (para. 12) that “when fishing close to the CAY about 34 scallops are killed for every 100 caught” is unclear. Irrespective of the actual fishing mortality when harvesting at the CAY, it will not be the same fraction for yields below CAY. So, if 34% were appropriate when fishing at CAY, a lower percentage would be appropriate for a lower fishing mortality rate (i.e. for catch limit less than the yield estimate, as is proposed).
10. However, the main issue for SeaFIC is that the derivation of a proposed allowance for other sources of fishing mortality is convoluted. Given that the yield estimate calculated from the survey biomass already takes incidental mortality into account, it seems entirely unnecessary to add this back in for the purpose of making up a TAC. This additional mortality has been allowed for, albeit silently in terms of the absolute quantum.
11. Logically it is only necessary to allow for other sources of mortality when making decisions in the pure sense envisaged by the Fisheries Act, where the TAC represents the true available yield and this must be allocated. In the present case the available yield estimates represent yield from the surveyed parts of the areas open to commercial fishing, having already taken additional fishing mortality into account. It seems unnecessary to make up allowances simply for forms sake. If the Ministry considers that a specified allowance is necessary, then these should be calculated properly along with the yield estimates, and reviewed by the shellfish working group. Applying a fixed and potentially inappropriate multiplier to the yield estimates post hoc is inappropriate.
12. We note that the proposal includes an increase in recreational and customary allowances of 2.5 tonnes respectively. SeaFIC reiterates its concerns that there is inadequate monitoring of non-commercial scallop fishing in this fishery upon which to make such recommendations.
13. Research to look at the correlation between abundance in recreational areas and in the survey area has not been completed (contrary to para 30). Even in the commercial areas, different beds do not have completely correlated biomass trends. The IPP is unclear (para 49) as to why the results of a pilot study are a suitable basis for proposing an increase in the recreational allowance.
14. We do not support the “logic” that increase in abundance will result in increase in customary catch (para 47). Customary catch needs to be authorised by a permit. The IPP is silent on the amount of scallop harvest in the QMA that has been authorised by a customary permit. We anticipate it to be very low, primarily because harvesting the very generous recreational allowances adequately provide for customary needs. There appears to be no need to adjust the customary allowance.

15. If the customary allowance is inflated to reflect a potential future shift away from traditional harvest needs being met under the amateur regulations, then it is logical that the recreational allowance should be reduced by a corresponding amount.