

Allan Frazer
Ministry of Fisheries
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Dear Alan

Re Submission to the IPP Coromandel Scallops (SCACS) FOR THE 2010 SEASON
Whangamata Seafoods has been a Coromandel Scallop Commercial stakeholder for 33 years

As a stake holder I would like to recommend that the TACof 100 tons
This is based on the survey results and a cautious approach which represents less than 1 % risk that catch at the proposed level of 100 tons might exceed the true CAY for that proportion of the fishery which was surveyed .I therefore support the proposed increase in ACE to 100 tons even though the CAY estimates available indicate the potential for a much higher in season estimate that is been sought

History

The Coromandel scallop beds were commercially discovered in the late 1960s During this time there were aprox 80 boats working the beds with no limits to the amount of scallops landed .The ministry of Fisheries brought in a Controlled Fisheries Licenses that cut the number of fishing vessels into the industry down to 22 licensees with 22 boats and brought dally limits to catch

The Qms (Quota Management System) was brought in for the industry With this system there is to day seven fishing vessels working the Coromandel grounds to catch their Quota that has been recommended by the yearly NIWA survey .We are sure that over the past years since Quota has been introduced the commercial and industry have always taken a careful look at the annual entitlement and have even during the season reduced this by voluntary stopping fishing to ensure the next seasons catch is not put into detriment

We have also done this at the beginning of the season waiting for the meat weight recovery rates to improve so not to take more scallops out of the fishery than necessary We have also put in place rules to manage our Ace along with in house rules to add teeth to manage our fishery

Sustainability

Surveys for scallop s were carried out in the Coromandel Dredge Fishery in May 2010 as with previous surveys in all areas closed to commercial fishing are excluded .There for there is no scientific information provided to support any Bio mass estimate in these areas I am in support of option **ONE** of the proposal where there should be no increase in non commercial allowances due to the lake of quantitive information even though there has been so called ramp surveys these are not like the rules and regulation along with auditable facts which the ministry has in place for commercial

Recreational

Several decisions made by past ministers of Fisheries have recently improved recreational access to the Coromandel Fishery. The Primary taker of the scallop bag limit can take on behalf of the safety person (up to Two people) on board their daily catch during a dive. The recreational fisher is also allowed to shuck and open and eat their catch on board if staying out at sea. This alone doubles the recreational take. The timing of the recreational season between Cape Runaway and North Cape without any scientific information has allowed the increase of the recreational take by changing the season to warmer weather. Yet this has not changed for commercial fishers even though all the reasons given to the minister. If this was such a good reason why did he not change the Commercial season?

Re The Statements

We would like the statements that are banded around that we kill some thing like 34 escallops for every 100, We would like these statements to be not used > This was taken in a situation when we were try to get the 90 mm size limit brought in and was done in a controlled situation and is not what happens in a real situation of daily fishing if this was so we would have no fishery. The Recreational fisher along with some green groups put this into the wrong text

Commercial View

The commercial sector is made accountable for all its moves i.e. NIWA's survey the areas for the industry gathering scientific information to allow the stake holders a view on what is available there is no way of telling what recreational fishers take out of the sea, as they do not have to keep written record as do those in the industry

We have been taking conservative amounts well below the amount that science has indicated out there for our TAC increase even this year we have opted for a lower figure than was the lowest according to NIWA in their reports of 100 tons with such a low risk i.e. less than .001%

Not every one can go out diving or dredging for his own scallops. The Coromandel Scallop industry sells scallops to the local sheds for processing on the Coromandel in doing this provides employment for locals in our case we will have a staff of 32 locals providing a huge boost to the local economy let alone other associated trades during the winter months

They are then sold on the local New Zealand markets so every body in our country can enjoy them. This is done with only seven fishing vessels that are involved in the commercial Scallop industry. We must have proved over the past few years that we have been self managing our own industry. With this year putting more rules emplace with teeth showing our self motivation i.e. lower meat weights or size they then move to another area we have broken up the fishery into a lot more smaller sub areas having soft closures and hard closers put into rules. All these and other rules reducing the amount of scallops taken leaving more scallops on the sea floor as the second year running we have not started fishing on the 15 July the legal starting date

The scallop fishery is really becoming two separate identities as the commercial catch is primary taken from beds that are hardly used by recreational fishers they have closed off all the shallow areas of the fishery to commercial fishers these recreational areas produce

fatter scallops due to the depth that they are found as in, As the two fisheries is very unlike many other fisheries as they are spatially separated

The commercial fishers have gone from seven days per week down to five days and have had fishing hours put in place and are always making sure that their equipment used on their vessels is in top order

NIWA have done a survey on three different dredge designs to compare and analysis which was more efficient for the areas fished. The fishers are always constantly fine tuning their dredges to allow for the constantly changing floor to enable top catch rates unlike the dredges used in the south island fisheries, our dredges will float to the surface if it becomes full before the crew has cleared the last catch stopping the catch in the dredges from being squashed and damaged

We also note the comments in the past by the Coromandel Scallop Fishermen's association submission regarding the economic inefficiencies the current management approach creates for commercial utilization of the Coromandel Scallop fishery. Whangamata Seafoods support the initiatives undertaken by the association to explore more efficient and less costly management frameworks for the fishery as known to the Shell fish working group

Because of the relatively short commercial season and to reduce economic inefficiencies we **emphasizes 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

Whangamata Seafoods recognizes the efforts of the ministry to prepare and complete the statutory consultation on this TAC variation in a timely manner

The three options proposed in the IPP. We recommend that we run with option one and support option one 100 tons with no increases to recreational or customary allowances and also disagree wholeheartedly with other sources of fishing related mortality

1/ There is no base to assume that the stock has increased on recreational beds in the same way as to commercial beds

2/ The TACC increase is based on the profit though stock assessments and there is no similar survey of recreational beds to support any rational basis for an increase in the allowances

3/ There is inadequate monitoring of non commercial scallop fishing we would be concerned that the incentives to improve the area were undermined by uninformed change to recreational fishing allowances

4/ we would also be concerned as to the recreational fisher's ability to stop fishing before any fishing (slowing Down) decreasing change or condition i.e. decreased meat to shell weight recovery

Conclusion

With the help of our scientific information it is our opinion that we can safely use option one for our 2010 TAC increase

Please do not hesitate to contact me should you require any clarification on my proposal contained in this letter and we support both TOKM's and SEAFIC's proposal

Yours Faithfully

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