

CONSULTATION QUESTIONS

Question 1: Capacity Penalties

Do you agree that capacity penalties on licence aggregations bring unnecessary costs to industry and should therefore be removed?

Comments: Yes

Question 2: Licence categories

A) In light of the forthcoming landing obligation, do you agree that there is a need to change the current licensing structure?

B) Do you agree with a proposal to have only one 10m & Under Licence and one Over 10m Licence?

C) Do you agree that the lowest common denominator (see section 3.2.3) should apply when transferring or aggregating a licence within Scotland?

Comments: *We consider that where management of fleet capacity should be through the landings of quota and with the coming landing obligation, there is the need to amend the licensing regulations.*

We agree with the proposal to introduce a single but separate licence to the under 10m and over 10m fleet.

We agree with that existing arrangements applying the lowest common denominator should continue in respect of scallops and shellfish.

Question 3: Mismatches

A) Do you agree to the removal of the mis-match provisions on transactions involving the use of dis-aggregated entitlements?

B) Do you agree to the proposed change in the way mis-match provisions will be recorded on the licence?

Comments: Yes

Question 4: The validity period for unattached licence entitlements (shelf life)

Do you believe the entitlement validity period should be extended to a 10 year period?

Comments: *We agree for an extension of entitlement validity to 10 years. It should be noted that our preference would have been to remove altogether the validity period for over 10m vessels.*

Question 5: Scallop and Shellfish Entitlements

Do you agree with the Scottish Government's proposal for the removal of scallop entitlements that have not been used within the last seven years i.e. entitlements that have not been placed on board a vessel that is rigged and operational within the fishery?

Comments: Yes

Question 6: New Entrants

Do you agree with the concept of licensing incentives to support and promote a new entrants scheme to the Scottish fishing industry?

Comments: New entrants into the industry must be strictly regulated and where incentives in which any form are to be provided by Central Government the impact on the existing industry must be fully assessed. Government should not underestimate the financial capital cost of entering the industry, an industry which is currently heavily indebted to the main clearing banks. Many vessels are experiencing considerable financial constraints and in many case severe difficulties in their dealing with the banks.

Question 7: Days at Sea/Effort Eligibility

A) Do you agree with the removal of CRZ eligibility completely?

Or

B) Do you agree that CRZ eligibility should be kept, with an updated reference period that will roll forward annually?

Comments: As this does not affect our members we will refrain from commenting on either option.