

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. The Outer Hebrides Inshore Fisheries Group (OHIFG) considers that it is fair and reasonable to abolish capacity penalties on licence aggregation and to remove this additional cost on industry.

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: A – the OHIFG agrees with the need to simply current licensing arrangements to meet the forthcoming landing obligation, however, no additional entitlements should be given to vessels that do not fish for TAC species, namely nephrops, as the OHIFG considers that species to be fully exploited within their geographical area.

B – the OHIFG supports the introduction of one under 10 metre licence as this will enable vessels to be built which will be fully compliant with their engine sizes and the removal of maximum kilowatts for licence aggregation is welcome.

Concern has been expressed at the ever increasing number of prawn creels appearing on the local inshore grounds and it's of paramount importance that the issue of one licence for the over 10 metre sector does not allow for those without a prawn entitlement to be able to target prawns.

Discussions have already taken place on the merits of a prawn permit or prawn entitlement and those must be introduced to prevent vessels with a current Category C from being eligible to target prawns. The risks being that those vessels will fish with large amounts of prawn creels, causing additional gear conflict with mobile and static gear operators in areas which are already fully exploited. In addition they will over-supply the market and reduce prices for the small vessels that are wholly dependent on the live prawn market.

C – OHIFG agrees that the lowest common denominator principle should apply to licence transfers or aggregations to ensure no increase in effort with either shellfish or scallop entitlements.

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: A – OHIFG agrees with the proposal for removal of the mis-match provisions on dis-aggregated entitlements.

B – OHIFG agrees with the proposed change in the way mis-match provisions will be recorded on the licence.

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: The entitlement validity period should be extended to a 10 year period for all 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: OHIFG agrees with the removal of latent scallop entitlements with a six month period being considered fair for vessels that wish to activate their entitlements.

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: OHIFG fully supports any licensing incentives which Marine Scotland will introduce to attract new entrants into the fishing industry, as elderly skippers make up a high percentage of some segments of the fleet operating in the OHIFG area.

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: Careful consideration and prudent management must be taken to protect and sustain the social and economic fabric of the fragile coastal communities in the Outer Hebrides. The area has an ageing fleet that are dependent on having all year access to West Coast inshore nephrops fishing grounds. Those vessels are not capable of fishing further offshore grounds and provide important local landings to a processing sector in areas where there are no alternative employment

opportunities. Any relaxation or amendments to CRZ eligibility must address and management the risk that might affect the viability of the traditional inshore nephrops trawlers that have fished the West Coast grounds in a sustainable manner for the last 50 years.

OHIFG will leave comments on options A and B to the various fishermen's organisations on the West Coast which have members that could be adversely affected by any changes to the current CRZ eligibility criteria.