

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: *No comment*

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) Yes. We agree that there needs to be a change in the licensing structure given the landing obligations that are forthcoming.*

B) From a Manx perspective we see no problem with having one under 10 metre and over 10 metre licence.

C) Under the current circumstances, the lowest common denominator should apply to ensure that there is no increase in effort through aggregation.

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: *No comment*

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: *No comment*

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. We agree with the view that latent effort in some fisheries is too problematic not to be addressed especially if there is some scientific evidence that the target species is being overexploited and that the target species has no quota levels.*

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: *No comment*

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: *No comment*

Other Comments:

I should point out that this whole consultation proposal will be difficult if it is followed up given that we are still working under the auspices of the United Kingdom fisheries. Secondly, licensing should be fluid since fishing opportunities fluctuate. We believe that opportunities should be made available to fish if there is enough scientific evidence to support it and that a fishery should not necessarily be curtailed by a licence condition that might not be fit for purpose.