

## 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 – should be removed.*

### 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: *B) New discard regulations will force the issue*

### 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: *I can't understand how anyone in the scallop sector can say that opportunities are seriously diminishing when one can read in the Fishing News about the super scallop vessels that have been fitted out over the last two years or so.*

*These are also vessels which never stop, which doesn't help the markets, which have not been the best these last few years.*

*Why should our scallop entitlement be removed because we have not fished scallops for maybe x years? We, and others I know, have not fished scallops because prawn fishing has given a good return in the last few years. 2013, as you*

*will know, was a disaster in the North Sea. Should this be repeated in 2014 we will have to revert to scallop fishing. As I wrote earlier, we don't have the option of going to the West Coast because of our Cat C licence.*

*Some years ago, quite a few large white fish vessels rigged for prawn fishing because of problems in that sector. Why is their white fish entitlement not to be removed? Same sort of situation to a point.*

*I object most strongly to the possibility of our scallop entitlement being removed.*

### **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: *This is a must for the survival of the Scottish industry.*

### **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:**

*Chapter 1, para 1.5: ...ensure management arrangements maintain proper controls that are light touch, effective and business-friendly:- how can this be business-friendly if it removes half my catching capability with the removal of our scallop entitlement of a Cat C vessel?*

*Chapter 2, para 2.2.1: the first sentence states much the same as 1.5. Second sentence:- importantly, they are designed to maximise opportunities for individual Scottish fishers and the fishing fleet collectively. How does removing the scallop entitlement from vessels maximise opportunities for individual Scottish fishers?*

*Chapter 2, para. 2.4.1: It is envisaged that the proposals will involve minimal, if any, new public expenditure, or operational costs to the industry. Taking away scallop entitlement will devalue our and many other vessels. We are Cat C so have no prawns in West Coast. If prawns are scarce again in the North Sea and scallop entitlement removed, what are our options? Little or none.*

*Chapter 3, para 3.5.6: It should be noted that Marine Scotland is committed to reviewing and releasing additional scallop entitlement in the future should such action be required. In 3.5.3 entitlement may be removed, which will restrict our ability and devalue our boat. In 3.5.6 entitlement may be given out to whoever if the need arises. To remove with one hand, to give away with the other, I struggle to understand.*

*I will finish, but there is still so much that could be said against these proposals.*

