

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: *The SFF would agree that capacity penalties are an unnecessary burden on industry, can see no need for them and fully supports removal.*

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: *With regard to A & B, the SFF can see that implementation of the Landing Obligation must inevitably lead to changes in the structure of the current licensing regime.*

With regard to C, SFF can agree with continuing to operate the Lowest Common Denominator, while it clearly refers to shellfish and scallop entitlements, as spelt out in para 3.2.3 of the consultation, and not any others.

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 – The SFF can see that if capacity penalties are to be done away with there is no need for mis-match provisions.*

B – The SFF is content with this proposal.

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 SFF has consistently sought the eradication of the validity period and can see no need for any expiry date.*

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: *None*

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: The SFF believes that there is more benefit to be gained for new entrants to have to work to achieve a viable fishing business, rather than being simply gifted everything by government. To this end, SFF, where headroom exists, may be supportive of some kind of time-limited use of incentives, to allow experience and capital to be gained prior to entering into the normal business regime, where assets must be purchased in the normal way.

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: The SFF sees great difficulty in accepting the risks described in the two proposals posited in the paper. Given that, there is a need to have cohesive discussion on the subject of CRZ eligibility and options for reference periods.