

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 we agree that the penalties 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: (A) Yes
(B) Yes
(C) No

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) Yes – Agree
(B) Yes – Agree

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: Yes

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: *No, as in Question 4, if a 10 year period is acceptable then existing Scallop Entitlement holders should be given a further three years to activate their entitlement to fall in line with the proposed 10 year period.*

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: At this moment in time we have to disagree with the licence incentives, as there is no clear plan as to how this is physically possible in the real business world. However, should the government provide a clear plan as to how it would introduce this new scheme with no detrimental effects to existing businesses, then it would promote a change of view.

Our proposals for introducing new entrants into the fishing industry would be for existing fishing businesses to be in a more stable, stronger and successful position which in turn would attract new entrants into the fishing 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: (A) No.

(B) Yes and we also think that the allocation method that presently exists should remain. Any updated reference period would need to be given clarification as to what effect this may have on 'parked licence' allocations.