

Response ID ANON-P2NN-MA8T-R

Submitted to **Fisheries economic link licence condition in England**

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Introduction

1 What is your name?

Name:

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2 What is your email address?

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3 What is your organisation?

Organisation:

The New Under Ten Fishermen's Association Ltd [NUTFA]

Summary

Purpose

Background

Why do we have an economic link condition?

How the economic link is currently met in England

Proposal

4 Question 1: Do you think that the current economic link licence condition is strong enough?

N/A:

No, and it has never been so.

As the explanatory section of the consultation clearly explains, the net result of the current conditions has not provided the UK in general and the under ten sector in particular with sufficient benefits to offset the impact of these vessels on UK interests.

5 Question 2: Do you agree that the landing target should be increased to 70%?

N/A:

Yes

N/A:

6 Question 3: Do you agree that flexibility is required in the system to allow vessels to continue to land all, or a proportion of, their catch outside the UK?

N/A:

Yes. Table 3 in the information section of the consultation illustrates the impact of landings. What is missing is what happens to fish landed in the UK and therefore what the real economic benefits are. If the majority is merely unloaded from the vessel directly onto transport to Europe then not only is there effectively no meaningful benefit to the UK but in fact a net disbenefit as it serves only to increase traffic on our roads. On the otherhand, if these landings tend to provide raw materials for the processing sector then there is an economic benefit.

It would be helpful for this information to have been provided so that we could make a more informed response to this question.

7 Question 4: Are quota donations the best alternative way for vessels to demonstrate a link to the UK?

N/A:

Yes for obvious reasons [see response to question 6]. According to the information, there is only one of these vessels that meets the crewing requirement. As this provides employment for a number of UK persons, perhaps this requirement should be retained in the revised regulation as it would then not result in job losses for the crews concerned?

8 Question 5: Do you agree that guidance should be put in place to increase the usefulness of donated quota?

N/A:

Yes. As the information highlights, there is a failure of process in relation to the donation of quota. Requiring it to be donated at the appropriate time, or even in the following year to avoid a glut of less than useful quota towards the end of the year would help,

Whilst primarily aimed at supporting the under ten sector, donated quota could be swapped or leased to larger scale vessels if they were able to utilise it where the <10's could not. The net benefit should always be targetted on the <10's but flexibility as suggested would ensure effective take up to the benefit of both sectors.

9 Question 6: Do you agree that some of this quota should be used for new purposes and our suggestions? If applicable, please provide details of new purposes you think would be appropriate.

N/A:

We are not in principle against the new purposes but would stress that the aim of the donations of quota are first and foremost for the benefit of the <10 fleet and should remain so.

Conclusion

Technical Annex: Impact of adjustments to the economic link criteria in England

Existing licence condition

10 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason::

N/A: