Response ID ANON-1KCH-1RJH-V

Submitted to Fish stocks: allocation of additional quota
Submitted on 2024-01-10 20:48:28

Option 1 - Historic Track Record (HTR) (of landings)

1 Should AQ be awarded on the basis of landings by individual vessels?

No

Please provide reasoning for your answer:

Allocation of additional quota (AQ) is an opportunity to incentivise fishing activities that have lower environmental impact and that broaden social and economic opportunities within the fishing sector. In principle, distributing AQ to individual vessels is positive in that it is related to incentivising the activities of individual vessels which would be more likely to have wider reach across the fishing industry than if AQ is provided to a producer organisation. However, the proposal to use historic track records does not provide opportunities for new entrants to fisheries to be eligible for AQ nor to those who currently have no access to quota, nor does it directly incentivise lower impact fishing/fisheries. Overall, it is unclear how criteria relating to environmental, social and economic factors as described in the 'Guiding principles and statutory obligations' section of the consultation document are being applied to this and other options proposed.

2 Should the reference period for assessing an active vessel's HTR be fixed (2015-19), another period, or should it move to a rolling five-year period?

Rolling five-year period

Please provide reasoning for your answer:

As we have responded in relation to Qu 1, we do not support the use of historical track record as a principal means of distributing AQ. Use of a fixed period does not comply with duties under the UK Fisheries Act (Section 25(3)) nor the Joint Fisheries Statement as it does not prioritise incentivising selective fishing methods with lower environmental impact.
If it is decided that a time period of some sort will be applied to the allocation of AQ, a following 5 year period would provide opportunities for new entrants to fisheries to be eligible.

3 Should the provision to enable vessel owners to retain an HTR between the original and subsequent replacement vessel be continued?

Not Answered

Please provide reasoning for your answer:

Option 2 - Special allocations for the non-sector groups

4 Should Special Allocations of AQ be awarded to the non-sector?

No

Please provide reasoning for your answer:

Allocation of AQ needs to prioritise incentivising fishing methods that are selective and have a lower environmental impact in line with duties under the UK Fisheries Act and Joint Fisheries Statement. Distribution of AQ to non-sector vessels needs to be through a mechanism and criteria that ensures that AQ is allocated to those vessels that can best meet these requirements, and not just non sector vessels on mass.

5 Should these Special Allocations be focused on the 10 metre and under non-sector vessels?

No

Please provide reasoning for your answer:

Please see our response to Qu 4

6 What stocks should we award to the non-sector?

Please provide reasoning for your answer:

7 Should any of the previous Special Allocations (see Information Box) be increased/decreased?

Not Answered

Please provide reasoning for your answer:

8 Should the Special Allocation be a fixed tonnage (no year-to-year change in the tonnage available to these groups) or a fixed percentage (delivers an output commensurate to the Scotland's share)?

Not Answered

Please provide reasoning for your answer:

9 Should the Scottish Government have the capacity to vary the tonnages available to the non-sector from year to year, so as to increase tonnages for stocks where there is clear demand and vice-versa?

Not Answered

Please provide reasoning for your answer:

Option 3 - Allocation of fishing opportunities equally between all vessels or a section of vessels

10 Should AQ fishing opportunities be distributed on an equal basis between all active commercial fishing vessels?

No

Please provide reasoning for your answer:

This is not an approach that will comply with duties under the UK Fisheries Act (Section 25(3)) nor the Joint Fisheries Statement; it is not an approach that incorporates criteria relating to environmental, social and economic factors and is not an approach that seeks to incentivise the use of selective fishing gear and the use of fishing methods that have a reduced impact on the environment. Neither will it help ensure that the correct environmental protections are in place to address the twin crises of climate change and biodiversity loss.

11 Should pelagic AQ fishing opportunities be distributed equally between the recognised pelagic fleet (as set out above)?

No

Please provide reasoning for your answer:

Please see our response to Qu 10

Option 4 - Landings into Scottish ports

12 Should landings into Scotland be used as a basis for allocating AQ?

No

Please provide reasoning for your answer:

While we acknowledge that application of quota in favour of landings being made into Scotland is likely to deliver economic benefits for Scotland, pursuing this as an option on its own does not comply with duties under the UK Fisheries Act (Section 25(3)) nor the Joint Fisheries Statement; it is not an approach that incorporates criteria relating to environmental, social and economic factors and is not an approach that seeks to incentivise the use of selective fishing gear and the use of fishing methods that have a reduced impact on the environment. This option should be one of the criteria that is considered in decisions regarding allocation of AQ, but not in isolation from a more comprehensive approach that addresses the issues of principle and statutory obligation identified in the consultation document.

13 Should AQ for those species covered by economic link licence conditions be excluded from this allocation criterion?

Not Answered

Please provide reasoning for your answer:

14 Are there any stocks which should be excluded from this provision and if so, why do you think this should be the case (for example, if there is only a limited domestic market)?

Not Answered

Please provide reasoning for your answer:

15 Over what time period should vessels' landings into Scotland be a reference for this allocation method?

Please provide reasoning for your answer:

16 Should there be a minimum qualifying percentage of landings for individual stocks into Scotland?

Not Answered

What percentage of landings of an individual stock into Scotland would be required to be eligible for a share of AQ?:

Option 5 - Access to additional quota for vessels with independent accreditation

17 Should allocation of AQ be linked to the welfare of the crew in all fishing operations, or the manner in which fishing operations are carried out (as set out above)?

Not Answered

Please provide reasoning for your answer:

In terms of social criteria, crew welfare on fishing vessels is a relevant consideration. But it is not clear what exactly this question is asking and what 'the manner in which fishing operations are carried out (as set above)' is actually referring to.

18 Should this eligibility criterion be for pelagic vessels only initially?

No

Please provide reasoning for your answer:

In terms of social criteria, crew welfare on fishing vessels is a relevant and important consideration. However, there needs to be consideration of the requirements of accreditation schemes as they apply to vessels of different sizes and in different sectors of the fishing fleet overall to ensure that such schemes to not discriminate against smaller vessels and their accessibility to quota.

19 Should this be considered for demersal and Nephrops vessels in the future?

Yes

Please provide reasoning for your answer:

Please see our response to Qu 18

20 Which standards or accreditations could be used as a basis for the allocation of AQ?

Please provide reasoning for your answer:

Option 6 - Exceptionally providing AQ as a result of lost fishing opportunities

21 Should the option be available for vessels to potentially have access to AQ fishing opportunities where action by the Scottish Government has removed well-established fishing opportunities with no ready alternative (on an exceptional basis)?

No

Please provide reasoning for your answer:

Decisions about allocation of AQ need to be on the basis of criteria relating to environmental, social and economic factors and whether an option seeks to incentivise the use of selective fishing gear and the use of fishing techniques that have a reduced impact on the environment.

Option 7 - Applications from sectoral groups on environmental criteria

22 Should a portion of AQ be retained and Sectoral Groups invited to bid for quota on behalf of some or all of the Scottish vessels they administer, (as set out above)?

No

Please provide reasoning for your answer:

This provides an unfair advantage to vessels that are part of Sectoral Groups and discriminates against those that aren't.

23 What fish species in particular should be set aside and what quantities?

Please provide reasoning for your answer:

N/A as we do not support this option for allocation of AQ

Incentivised selectivity

24 Please provide any general, or specific, comments/views you may have on utilising AQ to allow for increased selectivity in fishing operations in line with the Future Catching Policy and FMAC.

Please provide comments:

There need to be a suite of criteria established that are applied in determining the allocation of AQ that help contribute to increased selectivity in fishing operations in line with the Future Catching Policy and FMAC. These could then be applied to the allocation of AQ. Such criteria could include the type of gear a vessel is using and whether and how this contributes to increased selectivity in fishing operations, or whether a vessel is operating Remote Electronic Monitoring, for example.

25 If you have any comments on the benefits/costs arising from such a potential scheme, please provide them.

Please provide comments:

Increasing selectivity in fishing operations will provide a beneficial contribution to achieving legislative and policy obligations (e.g. with sections of the UK Fisheries Act, the Joint Fisheries Statement, contributing to achieving indicators of Good Environmental Status), and reducing environmental impacts through reduced bycatch and discards.

Community quota schemes

26 Please provide any general, or specific, comments/views you may have on the potential for using a portion of Additional Quota to manage 'Community Quotas'.

Please provide comments:

Establishing a mechanism for some form of 'Community Quota' for allocation of AQ could be beneficial. Many small-scale fishing operators do not have a strong voice in fisheries decision-making and are marginalised from centralised decision-making about fisheries management that favours larger industry bodies. Some form of 'community quota' scheme could go some way to address this and provide greater parity for small-scale fishing businesses, but such schemes need to be established with transparency, inclusiveness and accessibility to individual fishers of place and enable wider community engagement and accountability.

27 If you have any comments on the benefits/costs arising from such potential schemes, please prove them.

Please provide comments:

Diversification of fishing opportunities

28 Please provide any general, or specific comments, in relation to allowing for diversification of fishing opportunities through inviting applications for AQ.

Please provide comments:

As with all options, such an approach needs to prioritise incentivising fishing methods that allow for increased selectivity and have a lower environmental impact. Focussing opportunities on non-sector small scale fisheries, alongside spatial fisheries measures could provide diversification opportunities as well as addressing gear conflict issues in the inshore.

29 If you have any comments on the benefits/costs arising from such potential schemes, please provide them

Please provide comments:

History of Regulatory requirements relating to fishing

30 Please provide your views on whether this option should, or should not, be developed by the Scottish Government.

Should

Please provide reasoning for your answer:

To incentivise compliance with regulatory requirements relating to fishing.

31 Specifically, what type of fishery-related breaches should result in a vessel becoming ineligible for an allocation of Additional Quota and over what period?

Please provide details:

Alternative suggestions

32 Please provide details on any alternative suggestions for the distribution of AQ not explored in this consultation document.

Please provide details:

There needs to be clarity over the environmental, social and economic criteria that are being applied to assessment of options for allocation of AQ in order to provide an objective basis for assessment of options, and if and how they comply with the requirements of the Fisheries Action 2020 and Joint

Fisheries Statement. Alongside application of transparent and objective criteria, options for allocation of AQ need to incentivise fishing techniques that are selective and have a reduced impact on the environment.

Despite these requirements being set out in the consultation document under the section 'Guiding Principals and Statutory Obligations' the options presented in the document do not explain, nor make any reference to how these requirements have been considered or assessed in relation to the different options proposed.

If a suite of environmental, social and economic criteria were established, that incorporate, amongst other things, incentivising selectivity and reducing impact on the environment, allocation of AQ could be on the basis of applications from individual vessels that are then assessed on the basis of how well these criteria are met. This could provide a much stronger and justifiable framework for allocation of AQ that complies with legislative and policy requirements and makes a positive contribution in relation to national and international fisheries and environmental obligations.

33 If you have any comments on the benefits/costs arising from such potential schemes, please provide them.

Please provide comments:

Please see our response to Qu 32

About you

34 What is your name?

Name:
Lucy Kay

35 Are you responding as an individual or an organisation?

Organisation

36 What is your organisation?

Organisation:
Community of Arran Seabed Trust (COAST)

37 Further information about your organisation's response

Please add any additional context:

38 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

39 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

40 What is your email address?

Email:
email@arrancoast.com

41 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

42 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:
Very dissatisfied

Please enter comments here.:

This consultation would have been much more productive if the proposed options had been framed within the context of environmental, social and economic criteria that meet the requirements of the Fisheries Act 2020 and Joint Fisheries Statement including incentivising more selective fishing gear and fishing methods with reduced environmental impact. These are set out as guiding principles and statutory obligations in the consultation document but have not been used in any way to assess the options presented in the document.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:
Slightly dissatisfied

Please enter comments here.:

The multiple section approach to the consultation is helpful in dividing the responses into sections for responding, but it is cumbersome to review the online response as a whole before submitting.