

Summary of responses to the consultation on domestic fisheries management reform in England

November 2011



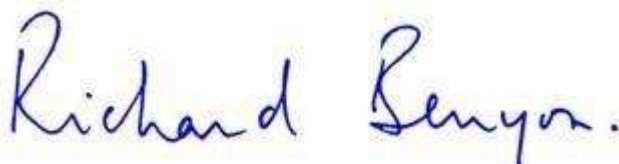
Ministerial Foreword

I am pleased to be able to publish this response to the consultation on proposals for fisheries management reform in England.

As can be seen in the summary of responses, views were very mixed. But what came across strongly was the desire to trial alternative management approaches before making wide reaching changes to the current system. We have taken this on board, and are aiming to launch a number of pilot schemes next year. This way, we will be able to gather more information on how alternative management systems will work and use this information to form the basis for any future reforms. I recognise that this presents a further period of uncertainty but it is equally important that we get this right. The pilots will be voluntary and we will continue to run the under 10m and non-sector pools for those fishermen that choose not to participate in pilot schemes.

There remain significant challenges to overcome if we are to secure a more sustainable and profitable future for the fleet. I remain committed to working with industry to find the best solutions, but there are some difficult decisions ahead that will need compromise from all sides. In coordination, I will continue to push an ambitious agenda in Europe for Common Fisheries Reform. It is only by being bold, and working in partnership with all parts of industry and the many other people with an interest in fisheries, that we will secure a sustainable future for our fishing industry and the seas on which it depends.

I would like to thank everyone who took the time to take part in this consultation. Your views are important to us, and I hope you will continue to engage as we take forward this work.

A handwritten signature in blue ink that reads "Richard Benyon." The signature is written in a cursive style with a period at the end.

RICHARD BENYON

Summary of responses to the consultation on domestic fisheries management reform in England

INDEX

Introduction – a background to the consultation.....	3
Summary of responses to the consultation on domestic fisheries management reform	6
2.1 Allocation of Fixed Quota Allocations (FQAs) for quota species and user-rights for some shellfish species	6
2.2 Return of individual FQAs to non-sector fishermen and dissolving of the non-sector pool	11
2.3 Establish a network of Community Quota Schemes in England	12
2.4 Timescale for introduction of proposals	14
2.5 Redistribution of Quota to the under 10m Pool.....	16
2.6 Trading, Safeguards and Transparency.....	18
2.7 Other Comments.....	19
Government Response to Consultation Responses - the way forward	21
3.1 The Way Forward	21
3.2 Next Steps	23
3.3 How to get involved in the pilots	26
Annex A- list of questions asked through the consultation.....	28
Annex B - A list of all responding organisations and individuals to the consultation	30

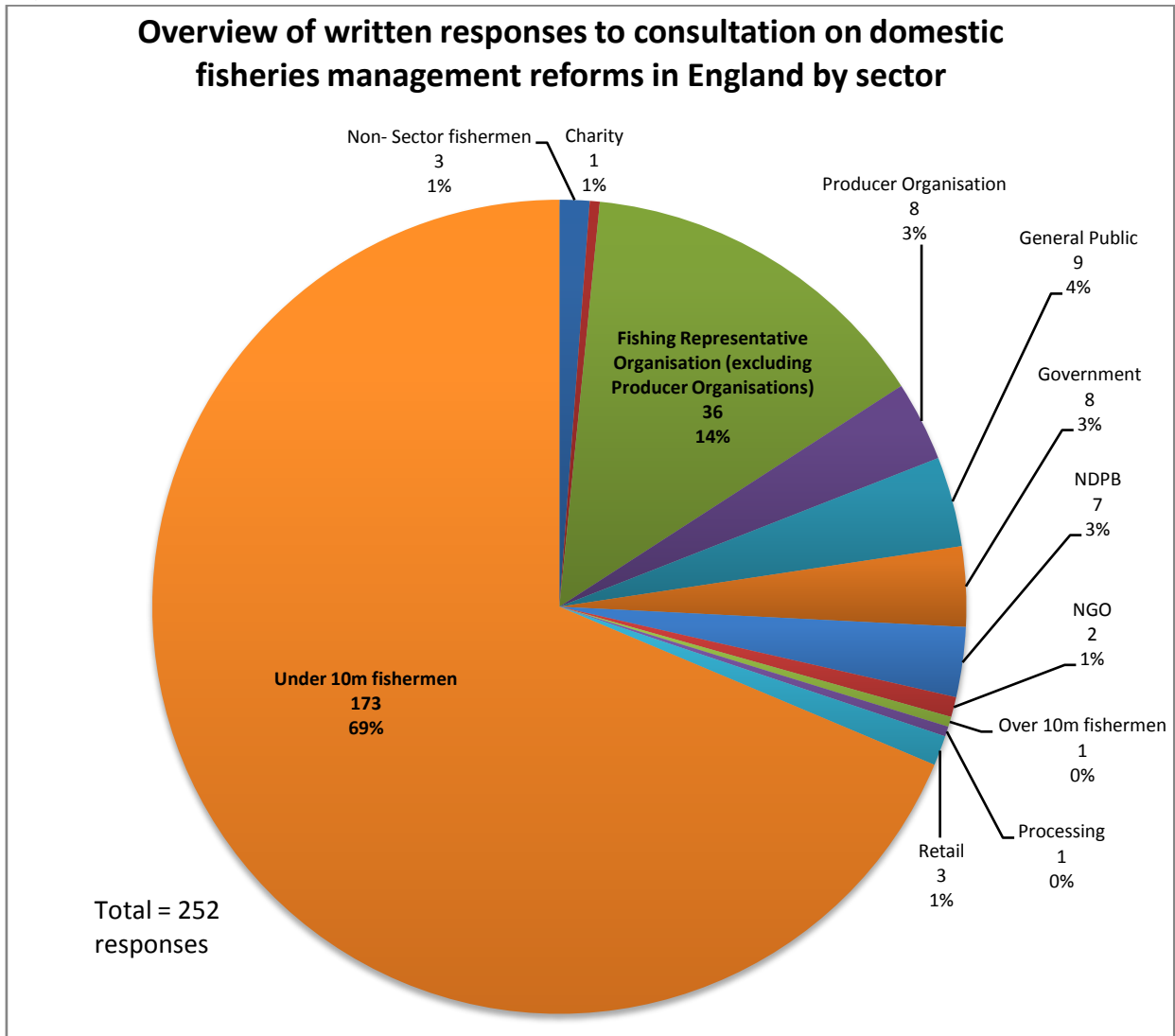
Summary of responses to the consultation on domestic fisheries management reform in England

Introduction – a background to the consultation

- 1.1 Fisheries play an important role in providing food, jobs, wealth and social/cultural benefits, particularly in some coastal communities. The small scale (under 10m) fleet has failed to thrive under successive management regimes, and it faces major challenges. Specifically, the current regime has encouraged an imbalance between capacity and fishing opportunities, putting pressure on smaller businesses and contributing to overcapacity, overcapitalisation and low profitability across the fleet.
- 1.2 Without Government intervention, further decline is likely, reducing the viability of the surrounding infrastructure and communities. Social, cultural and economic benefits may be lost. The costs to Government associated with centrally managed quota pools for parts of the fleet are likely to rise and the effectiveness of this administration will reduce.
- 1.3 Defra launched a 12 week consultation detailing proposals for domestic fisheries management reform on 5th April 2011. The proposals were developed through discussions with a wide range of stakeholders and aimed to secure a more profitable, sustainable and unified fishing industry in the long term.
- 1.4 The proposals set out details for a new management system designed to empower fishermen to take control of their businesses, plan for the future and make best use of fishing opportunities. This would bring greater economic reward for fishermen and the wider fishing industry, and allow them a greater focus on environmental and social objectives. There would be no arbitrary divisions mandated by Government, such as the 'under 10m/over-10m' divide. The whole English fleet would have clearer individual entitlements to fish, giving all fishermen freedom to take greater control and responsibility for their businesses.
- 1.5 The consultation was split into three major sections. In summary, the proposals included:
 - Allocating **individual fisheries access rights**:
 - For quota stocks – allocating Fixed Quota Allocations (FQAs) to all English under 10m fishing licences based on a proportion of under-10m pool landings in the period 2007-10 and returning FQAs to English non-sector vessels. The current pool arrangements for these fleets would be dissolved.

- For some important non-quota species (e.g. brown crab and lobsters) - user-rights introduced across the English fleet
 - **Establishing a network of community quota groups** in England, focussed on safeguarding and maximising the benefits associated with small-scale fishing fleets and fishing communities;
 - Facilitating the restructure of the fleet with some additional quota for under 10m vessels, secured through a **limited realignment of consistently under-used quota and some redistribution of FQAs** within the English fleet.
- 1.6 A total of 24 questions were listed within the consultation documents to help consultees structure their responses, but they were also invited to comment generally on the proposed approach to reform. The questions posed are set out at Annex A to this summary.
- 1.7 Throughout the consultation, Government sought views from all those with a stake in fisheries, including catchers, buyers, processors, consumers and members of the communities where fishing operates, along with those linked with community level work. During the consultation period, full access to the consultation documents was possible via the Defra website or through the House of Commons library. Respondents were able to provide their views in hard copy, by email or through a series of coastal road shows attended by officials.
- 1.8 A total of 249 organisations and individuals provided written responses by the deadline of 30th June 2011. A further three responses were received after the deadline and these responses have also been considered. Where numbers of respondents are mentioned later in this document, the late responses have been included. Approximately 480 individuals also fed in their views to the consultation through the coastal road shows, hosted by the New Under Ten Fishermen's Association (NUTFA), the Marine Management Organisation (MMO) and Defra. The majority of attendees at these events were representing the under 10m sector, with additional attendees from Inshore Fisheries and Conservation Authorities (IFCAs), the MMO, Producer Organisations (POs), fish buyers, Members of Parliament, County and local Councillors and other representative bodies for the fishing industry.
- 1.9 A breakdown of the written responses by sector is shown in Figure 1. A list of all responding organisations and individuals can be found at Annex B.

Figure 1.



1.10 Defra is grateful to all who responded and has made every effort to reflect the feedback received in considering the next steps for the reform.

Summary of responses to the consultation on domestic fisheries management reform

2.1 Allocation of Fixed Quota Allocations (FQAs) for quota species and user-rights for some shellfish species

Proposals

2.1.1 One of the main proposals set out in this consultation was the allocation of FQAs to individual under 10m fishermen based on licence track record, using Registration of Buyers and Sellers (RBS) data from 2007-2010 inclusive. It was also proposed to introduce user-rights for some important non-quota species, starting with brown crab and lobsters to all shellfish entitlement holders (over and under 10m fishermen).

2.1.2 It was suggested that through the allocation of FQAs and user rights, the whole English fleet would have clearer individual entitlements to fish, giving all fishermen freedom to take greater control and responsibility for their businesses. In particular they would have more flexibility through trading and scope to focus on minimising costs and maximising revenues.

Responses to the proposals

2.1.3 The majority of responses were against the introduction of FQAs for under 10m vessels. Of those that specifically answered the question regarding the introduction of FQA for under 10m vessels, 55% of them were under 10m. Out of the negative responses received, 34% were from under 10m vessels, 19% were from fishing representative organisations, 2% from POs, 4% from the general public, and 4% from Non Departmental Public Bodies (NDPBs) and 2% from Government Organisations such as local councils. A further 35% of responses were in support for the introduction of FQAs for under 10m vessels.

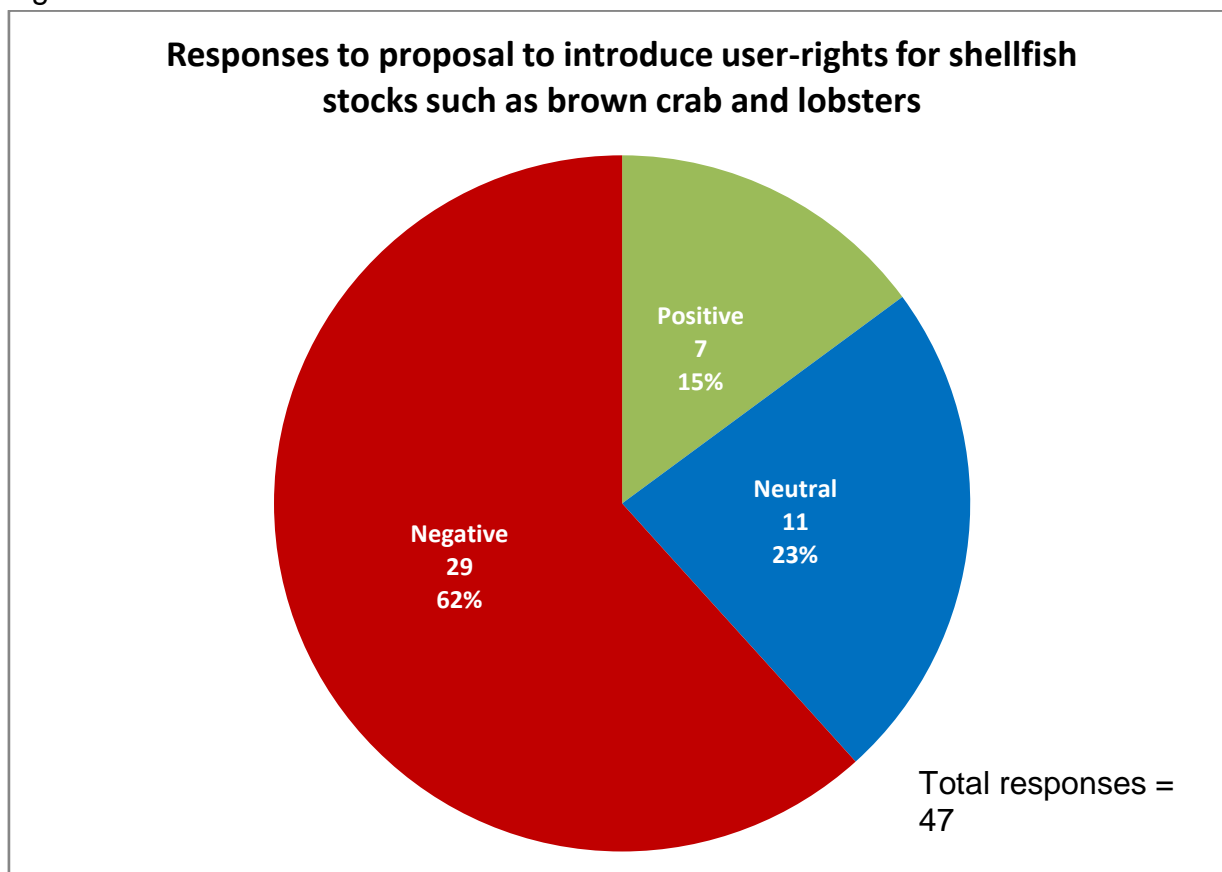
2.1.4 Of those that responded negatively, there was concern expressed about the proposed reference period for determining track record as a basis for FQA allocations. Many suggested that the reference period of 2007-2010 was not indicative of levels of fishing that the under 10m sector was capable of, nor was it sufficient quota for many to be able to make a living from. This period coincided with the capping of licences and the introduction of monthly catch limits. The accuracy of RBS data was also questioned with suggestions that a mechanism would be needed to allow landings that may not have been registered under RBS to count against track record. An example of this would be sales of fish under 25kgs direct to the public, which do not need to be reported under RBS regulations currently (this will shortly be raised to 30kg to bring it in line with what is currently stated in the Control Regulations under the Common Fisheries Policy).

2.1.5 Many were also opposed to the allocation of FQAs because it would be based on the initial (opening) allocation to the current under 10m pool. In recent years, the pool has been supplemented by swaps, sometimes securing significant amounts of additional quota for the under 10m fleet.

Fishermen were concerned about the possible effect of this on their ability to access sufficient quota.

- 2.1.6 Of those that supported the proposal for the introduction of FQAs for under 10m vessels (35%), 20% were under 10m vessels, 4% were fishing representative organisations, 5% were from POs, 4% from NDPBs and 2% from Government Organisations. In summary, the majority of under 10m fishermen were not in support of the introduction of FQAs, however the majority of PO members were in support. The general feeling of the coastal road shows was similar, in that the majority of attendees (who were largely under 10m fishermen) were opposed.
- 2.1.7 There was some support for the introduction of FQAs, with these respondents liking the increased flexibility that it would give them, compared to monthly catch limits that are set currently by the MMO. They explained that having the flexibility of being able to choose when to catch their allocations was advantageous to small businesses, as this could help keep operating costs down and allow them to fish when market prices were higher.
- 2.1.8 There was also some support for the allocation of user-rights for some important shellfish species, predominantly from those participating in these fisheries on a full time basis. Though there was more support for the limiting of effort, for example, through pot limitations or closed areas. These options were thought to be more effective mechanisms to cap effort for these fisheries occurring within the inshore area. See Figure 2 for a breakdown of support for the introduction of user-rights for important shellfish species. There were concerns that management of the shellfisheries could go the same way as the finfish if lessons are not learnt from the current quota system.

Figure 2.



2.1.9 When specifically asked whether they would support the introduction of a rights based system with an associated time limit to those allocations, such as that which had been introduced by the Danish Government, there were 23 responses (13 from under 10m fishermen, 5 from POs, 1 from a member of the general public, 2 from Government and 2 from NDPBs). Of these 11 supported the introduction of some kind of rights based management system, as they saw the increased certainty of access to quota as a benefit (of these 1 response was from a PO, and 5 were from under 10m fishermen). They also supported the reopening of user rights after a given period of time, allowing for the redistribution of quota amongst the entire fleet if any imbalance was evident.

2.1.10 Of those that were not supportive of a rights based system, there were a number of reasons outlined, including that systems introduced by Denmark and Iceland were perceived to have failed their inshore fleet, and that we should not be changing the access, but rather concentrating on getting access to more quota. Some said that the introduction of rights based management often resulted in the aggregation of quota with larger vessels.

2.1.11 A large number of respondents cited the need for a suitable appeals process, if FQAs were to be introduced for the under 10m fleet, to account for mitigating circumstances that had prevented fishermen from establishing a track record during the reference period. Examples given of reasons for such appeals included new entrants, those that had built/bought new vessels/licences and illness during the reference period. There was some

support for provisions for new entrants to the industry to aid them in establishing themselves. Equally some felt that there were already too many boats and not enough quota, so new entrants should not be encouraged to join.

- 2.1.12 There was a general consensus for the need to maintain the flexibility that the current pool system provides for the under 10m fleet. Fears were expressed that this flexibility would be lost as a result of the allocation of FQAs/user rights because fishermen could then only catch those fish for which they had FQAs/user rights and also that the proposed approach would not take account of the changing nature of fish populations in the inshore area. Many respondents noted their need to be able to target the species which are on their doorstep and highlighted the restrictions small boats face in fishing further afield due to weather.
- 2.1.13 Increased discards was another concern. For example, currently under 10m boats with a capped licence are allocated a nominal amount (300kgs quota species) for by-catch, to reduce levels of discards. With the introduction of FQAs based on track record, this allowance for by-catch would in some cases be removed.
- 2.1.14 The lack of clarity about individual allocations at the time of the consultation was a cause of major concern for many of the respondents. Many fishermen stated that they could not respond fully to the consultation and give their views without first having the details of how many FQAs would be allocated to them. Many expressed opposition to what they saw as the privatisation of a public resource.
- 2.1.15 There were mixed views regarding the removal of latent/dormant capacity within the under 10m fleet and shellfish sector. Some supported this, stating that those not fishing should not be given access to quota/user-rights that could be better used by those that are actively fishing. Others suggested that Government should not take away rights to fish a certain stock just because a vessel has not targeted it during the reference period. A large proportion of fishermen not currently fully participating in the important shellfisheries indicated that they had invested in shellfish entitlements to secure their future in the event of further reductions of Total Allowable Catches (TACs) for quota stocks. These fishermen were not supportive of the notion that this flexibility would be removed, especially after paying more for a shellfish entitlement on their licence following the introduction of the restrictive shellfish licensing scheme. Most full time shellfishermen, who have already seen their licences capped with respect to quota species, tended to support the removal of latent capacity.
- 2.1.16 Some concerns were expressed about FQAs/user-rights acquiring a monetary value, which would in turn price out the smaller vessel owners, as they would not be able to buy sufficient FQAs/user-rights to sustain their businesses. In contrast, some could see the benefit of this where fishermen that wished to retire could then sell their FQAs/user-rights on to others. Concerns were also raised over the potential impact on licence values and vessels. Currently, all un-capped under 10m licences have similar value. If

FQAs/user-rights were bought in, it was felt that only those with large track records would retain their current value and others would be “worthless”.

- 2.1.17 There were also concerns that quota would “leak” out of the under 10m fleet and end up with the largest vessels with the most capital. There were 22 responses to the question regarding the need for safeguards to stop the quota allocated to the under 10m fleet from moving back to the larger Sector vessels. Of those responses, 16 supported the proposal that some safeguards should be put in place to ensure that FQAs issued to the under 10m fleet stay in the under 10m fleet. That included the POs that responded to the question as well as a number of Fishing Representative Organisations. A further 2 were against (under 10m fisherman and a Fishing Representative Organisation) and the remaining 4 others were neither in support nor against this suggestion. Overall there was support for the introduction of safeguards for quota allocated to the inshore fleet if FQAs were to be introduced.
- 2.1.18 Another issue raised was the ability of individual fishermen to trade and lease quota due to the very small allocations some individuals would receive. Sufficient critical mass of FQAs was considered necessary to enable meaningful swaps.
- 2.1.19 Concerns were also raised over the ability of fishermen to be able to grow their businesses under an FQA/user-rights system. It was suggested that, because they will only be able to fish for what they have quota for, the cost of purchasing additional FQAs/user-rights would be prohibitive to further business growth.

Suggested Alternatives

- 2.1.20 Suggested alternatives to FQAs/user-rights included the use of effort controls and gear limitations, instead of quota, to restrict catches. This included pot and gear restrictions and a maximum number of days at sea/time spent fishing.
- 2.1.21 Related to this, it was suggested that smaller vessels (<7m), or vessels that use more environmentally sustainable fishing methods, should be taken out of the quota system completely and be allowed to fish unrestricted. It was argued that these vessels have such minimal impact on stocks that they need not be placed under restrictive management regimes.
- 2.1.22 Another suggestion was that track records should be based on the next two years fishing, rather than the 2007-2010 timeframe, to allow fishermen to build up a suitable track record to base future fishing efforts on.
- 2.1.23 Alternatively, it was suggested that FQA allocations should be based on the period of 2004-2007 (before more restrictive catch limits were introduced), or 1994-1996 (the reference period used to allocate FQAs to the over 10m

fleet). Allocating FQAs based on track records of skippers rather than the licence was also suggested; due to the high levels of turnover of licences amongst under 10m vessel owners, many fishermen may have sold on their track record unknowingly. It was also proposed that FQAs could be allocated equally amongst all boats currently fishing against the under 10m pool. There was also the suggestion made to base FQAs on vessel size and engine power, rather than track record of the vessel.

2.1.24 Instead of allocating individual businesses with FQAs, some suggested that under 10m fishing vessels form an inshore Producer Organisation (PO), allowing them to manage pool quota on a more regional basis. This suggestion was more popular in areas where working relationships amongst fishermen were better. There was also reasonable support to maintain the status quo, with some arguing that the system works well and that the pool system offers inshore fishermen the level of flexibility that they need to be able to run viable businesses. What became apparent during the coastal road shows was the significant difference in the needs of fishermen in different regions of England.

2.1.25 There were also calls to retain the current system, but inject more quota into the pool for the use of the under 10m fleet.

2.1.26 It was also suggested that environmental sustainability should be the main underpinning principle for the introduction of FQAs i.e. that those fishermen whose methods are considered more environmentally sustainable should be allocated the majority of FQAs, to encourage this type of fishing activity.

2.2 Return of individual FQAs to non-sector fishermen and dissolving of the non-sector pool

2.2.1 There were three written responses from non-sector fishermen but a number also gave their views on the proposals at the coastal road shows. They expressed their concerns over the dissolution of the non-sector pool, as proposed in the consultation. This is due to the fact that many non-sector vessel owners no longer have FQAs associated with their licences. This is mainly due to licences having been stripped of their FQA units and sold on separately. If the non-sector pool was dissolved without any further action, there may be a considerable number of non-sector fishermen that would have no FQAs to fish against. To continue fishing for quota species, they would need to purchase FQAs from other licences holders to be able to continue fishing at their current levels, at a considerable cost.

2.2.2 There was a suggestion that if the proposals were to be implemented then a more recent reference period should be used as the basis for allocating FQAs, to ensure that those fishermen that are currently active in the non-sector pool will be able to continue to fish at their current levels. This may have implications on the fact that those licences with FQAs stripped from them would have been bought at a lower cost than a non-sector licence that had FQAs associated with them.

2.3 Establish a network of Community Quota Schemes in England

Proposals

2.3.1 Another proposal set out in the consultation was that of the establishment of Community Quota Schemes (CQs) to enable more local/regional based management of quota. Through this, communities could safeguard their small scale fleets according to their individual characteristics, rather than creating arbitrary definitions based on vessel length or similar. Groups of small-scale fishermen would use CQs to manage quota effectively and flexibly, along with increasing their ability to swap quota and purchase FQAs. These groups would also have a representative role in discussions with Government, regulators and industry.

2.3.2 It was proposed that individual fishing businesses licensed in England and that satisfy chosen principles would be able to join the relevant community quota group. They would be able to access additional foundation quota, as well as benefits such as local/artisanal marketing opportunities. Guiding principles would be established, but they would not be too prescriptive. Views were sought on the type of criteria people would wish to see for these groups.

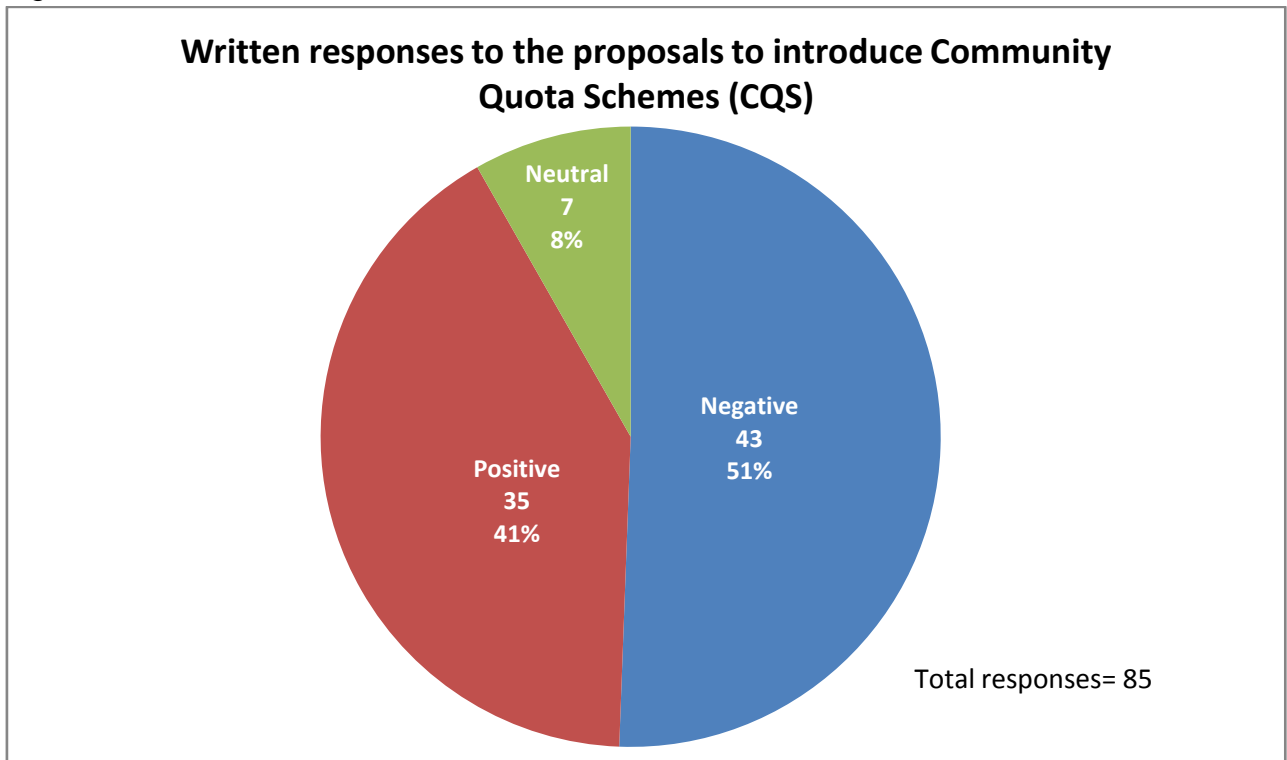
Responses to the proposals

2.3.3 There was some support for CQs in the written responses, including some appetite from individuals to pilot the schemes. Written responses to the consultation relating to the introduction of CQs are shown in Figure 3.

2.3.4 Of the 85 responses received to the question regarding whether or not CQs would be a good idea, responses were received from under 10m fishermen (27 negative, 17 positive and 2 neutral), POs (2 negative, 1 positive, 1 neutral), NDPBs (3 negative, 3 positive and 1 neutral), Government bodies (1 negative, 3 positive), the general public (1 negative, 1 positive), Fishing Representative bodies (9 negative, 8 positive and 2 neutral), NGOs (1 positive, 1 neutral) and 1 positive response from the retail sector.

2.3.5 Of the positive responses received, many qualified their support for CQs, by saying, for example, that they would require sufficient quota to manage. There were also calls to ensure that the UK as a whole had sufficient quota for these types of schemes to work. Of those negative responses, some of them commented that these groups had not been tried and tested, and therefore they could not offer their support until more evidence could be provided that they would work.

Figure 3.



2.3.6 Those that attended the coastal road shows expressed less of an appetite for CQs. The general opinion was that these schemes were somewhat idealistic and in reality they would not work successfully. The benefits to members were considered to be minimal. The opinion in the majority of ports was that fishermen would not be able to work together and that the formation of these groups may even cause tension and discord amongst fishermen.

2.3.7 It was suggested by some that no vessel should be automatically excluded from joining a CQS because of the vessel size/operation (e.g. higher catching under 10m vessels). Rather, it was argued that in some ports these vessels represent the majority of the local fleet and are an integral part of the local community. Other respondents considered that more detailed criteria were necessary for CQs because these are untried and untested. There were also suggestions that environmentally sustainable methods of fishing could be used as underpinning criteria for the establishment of CQs and that

proportionally more FQAs could be allocated for these types of fishing to encourage more sustainable fishing methods.

- 2.3.8 Some responses suggested that the role of CQSs was closely related to the role of Inshore Fisheries and Conservation Authorities (IFCAs) and so the responsibility of managing CQSs should lie with them. Others disagreed and stated that IFCAs should play no role in the management or operation of a CQS.
- 2.3.9 Similarly, the role outlined for CQSs was seen as closely related to work undertaken by POs. It was suggested by a number of respondents that this role should be undertaken by either an existing PO, or a newly created inshore PO and that quota should be allocated to them to manage on behalf of all inshore fishermen. Others stated that they would not wish to join a PO.
- 2.3.10 Some responses suggested that CQSs are a good idea in theory but were worried that there will be insufficient funds and support to set up these schemes and to have them continue to operate effectively in the long term. They suggested that ongoing support was needed from Government to ensure that they are able to operate in the future.
- 2.3.11 It was suggested that if CQSs were set up, individual members' catches should be counted first against their own FQAs before being counted against the foundation quota of the group.
- 2.3.12 Others suggested that the success or failure of CQSs will be entirely dependent on how much quota is allocated to each of these groups as a "foundation". With insufficient critical mass of quota, these groups would not be able to manage quota effectively for their members by swapping and leasing quota as required.

Suggested Alternatives

- 2.3.13 Alternatives suggested through the consultation process included the running of pilot schemes to test the assumptions of CQSs and how the allocation of FQAs would work for individual fishermen in practice.
- 2.3.14 Another suggestion was to examine existing community based systems, such as the Duchy Fish Quota Company in Cornwall, in order to help with the establishment of CQSs.

2.4 Timescale for introduction of proposals

Proposals

- 2.4.1 The proposals in the consultation set out the timeframes by which changes to the management of the domestic fleet might occur and sought views from the industry. Those timescales were to move the 139 higher catching vessels out of the pool from 1st January 2012, allocating them their own FQAs. They would then be able to join an existing PO or fish as individual vessels.
- 2.4.2 The rest of the under 10m fleet would be allocated FQAs from 1st January 2013. Alternatively, there would be invite self selection so that businesses could choose to move out of the pool from the beginning of 2012, or the whole of the under 10m fleet could be moved simultaneously on 1st January 2012.

Responses to the proposals

- 2.4.3 The majority of respondents considered the proposed timescales to be too quick. They felt that the timescale was too rushed and would like to see Government take more time over the introduction of any reforms to ensure that the correct policy decisions are taken to help the industry. They suggested that 2014 might be more realistic for the introduction of any changes. There was, however, also some support from parts of the industry to move forward quickly with changes, as the current situation for the under 10m fleet was considered untenable.
- 2.4.4 It was also suggested that no changes to the domestic management structure should take place until changes under Common Fisheries Policy (CFP) reform are finalised. These should be the main driver for any domestic reforms.
- 2.4.5 Some responses agreed with the idea of allocating FQAs and moving higher catching vessels out of the pool first, providing that this did not remove too much quota from the pool. However, some argued that higher catching vessels should not be taken out of the pool first, as the principles of the proposals were not to create new divides in the fleet, but rather remove them. There was also the comment that splitting the timing of allocation of FQAs to the under 10m fleet would make the process unnecessarily complicated.

Suggested Alternatives

- 2.4.6 Alternatives included getting agreement from all fishermen on the timing of FQA allocations for all vessels before any changes occur. This would mean that there would be no differentiation between the allocations of FQAs for the under 10m fleet, and that any changes would occur across the entire fleet at the same time.

2.5 Redistribution of Quota to the under 10m Pool

Proposals

- 2.5.1 The proposals set out details of both a realignment of FQAs associated with consistently under-used quota, and a 3% reallocation of key fished quota stocks from the over 10m sector to the under 10m fleet. These FQAs would then be used as a foundation for CQGs, supplementing the FQAs allocated to individual under 10m vessels. The Impact Assessment looked at a variety of percentages for the reallocation, from 0.5%-5%. The Impact Assessment indicated that a 3% reallocation, combined in option 2 with the chance to improve economic performance provided by individual or community quota management, would provide a substantial boost to the profitability of the under 10m fleet, net of the 139 highest catchers. Given that this could be achieved with a small relative impact on the value of quota held by sector vessels, from which the quota would be taken, this was the preferred level of transfer. The consultation sought views as to whether the industry supported this, and the stocks/levels of reallocation proposed.

Responses to the proposals

- 2.5.2 Of the written responses received, there was a large proportion in support of the proposals, all of which were from under 10m fishermen. However, of those written responses against the proposals, a number were from POs who represent large numbers of the over 10m vessels. If proportions of members represented are taken into account, the balance of positive and negative responses changes, with the majority against this proposal. This follows the expected trend that those who perceived they would be adversely affected would not support the proposals, whilst those that stood to benefit would support them.
- 2.5.3 When posed with the question as to whether a 3% reallocation of quota was sufficient or if it should be more or less, a total of 28 respondents answered the question. Of those 28 responses, 11 of them were from under 10m vessel owners suggesting that 3% was not sufficient. 4 under 10m vessel owners said that reallocation should not be considered at all, stating that it would have a negative impact on the industry, especially the relationship between the Sector and under 10m vessels. 4 responses were received from POs and none of them were in support of reallocation of quota from Sector vessels to the under 10m fleet, owing to the cost to their members. 1 response was received from the general public in support of a greater than 3% reallocation of quota to the under 10m vessels. 4 responses were received from Fishing Representative Organisations, of which, 3 supported greater than 3% reallocation, and 1 was against the principle of reallocation at any level. 2 responses were received from NDPBs, 1 in support of a greater reallocation

from Sector vessels to under 10m vessels, and 1 against. There were also 2 other responses received that did not specifically address the question of what level of reallocation they would like to see, however in principle they supported the proposals.

- 2.5.4 Qualifying statements for these responses included that the underlying issues faced by the under 10 m fleet could not be addressed unless the inequitable distribution of quota across the fleet was addressed, which would require significantly more quota to be redistributed from the Sector than the 3% reallocation as outlined in the consultation. Opposition was expressed from POs, who suggested that it is not fair or appropriate to take quota from Sector vessels to give to under 10m vessels, as POs and their members have paid money to accumulate quota, and their members are also struggling to make a living with current levels of quota allocated.
- 2.5.5 Some responses from under 10m fishermen also recognised the likely considerable opposition from existing POs and their members regarding the proposal to redistribute and reallocate quota. There were also concerns about the impact that the realignment and reallocation proposals would have on the under 10m pool, given that some POs currently gift quota or provide preferential swap rates to the under 10m pool.
- 2.5.6 There were several comments stating that a redistribution rate of 3% would be insufficient unless it was also accompanied by a decommissioning scheme to reduce the total number of vessels in the English fleet.

Suggested Alternatives

- 2.5.7 It was suggested that consistently unused quota could be put into a “bank” to be held and managed by Defra. Quota within that “bank” could then be redirected to where it is needed as appropriate during that year or the following year.
- 2.5.8 Instead of a permanent allocation of unused quota, it was proposed that Government could ask POs to donate that quota on an annual basis to the under 10m pool.
- 2.5.9 Some suggested that not just stocks that have been specifically targeted by the under 10m vessels during the proposed 2007-10 reference period, but all stocks should be redistributed, as restrictions and stock movements have meant that they have been unable to target some stocks since 2007.
- 2.5.10 Rather than looking at realignment of unused quota and 3% redistribution, it was suggested that Government should pay POs to acquire the additional

quota required for the under 10m fleet. This quota could then be distributed amongst all under 10m vessels.

- 2.5.11 Finally, rather than a blanket reallocation of unused quota, stocks should be assessed on a case by case basis and the reasons why it had been underutilised should be established. Government could then facilitate transfers where necessary with the emphasis on mutual agreement with industry.

2.6 Trading, Safeguards and Transparency

- 2.6.1 The proposal for a FQA register and a web based trading portal received positive feedback, though there were concerns surrounding the security of personal data being held on a public register and the level of transparency of any system that was introduced. The chance to have a more open and transparent system where FQA holdings are made public was supported. It was commented that if any changes were to be introduced, it would be necessary to gain agreement with Devolved Administrations to ensure a UK wide system. There was also the comment made that not all fishermen would have access to the internet, so there would need to be a mechanism for those fishermen to gain the information, perhaps through agents.
- 2.6.2 Respondents in general would like to see the establishment of a “one way valve” to ensure that the quota held by under 10m vessels will not be bought up by larger Sector vessels. Comments suggested that it was important to maintain a small-scale fleet, particularly where they are viewed as being the more environmentally sustainable. In contrast, there were some that suggested safeguards would affect market forces and remove the incentives for a market driven process of transferring quota to the most economically viable operators. Other comments suggested that if protection measures were established to prevent the leaching of quota from the under 10m vessels, then these should be reviewed yearly and the power to make amendments should be an essential part of any reform package.
- 2.6.3 There were some suggestions that realigned quota could potentially be redistributed to CQs, provided such schemes can be shown to be viable and beneficial. There were also queries regarding whether everyone in the under 10m pool should be allowed to join CQs and whether or not the redistribution should be evenly applied between all areas/vessels in the under 10m pool. The majority of respondents however did not want to see redistributed quota held back primarily for the use of CQs and would prefer for the additional quota to be shared equally amongst the entire under 10m fleet.

- 2.6.4 Some suggested holding back some of the realigned quota to allocate to new entrants into the industry, whereas others have said that new entrants should obtain their own FQAs through buying and leasing.

Suggested Alternatives

- 2.6.5 Safeguards should be put in place to prevent leaching of quota and reviewed annually, keeping sustainability of fish stocks and the implications of the developing Marine Protected Area (MPA) network (including associated displacement) as criteria against which to review.
- 2.6.6 Recommendations were made for a trading web portal such as those used in Denmark or New Zealand, to show volume and value of trades and create a transparent market reflecting the true market value of fishing rights, and therefore reflecting the total wealth generated by the fishery. Trading via the web based portal should not be tradable between geographical regions around England, to ensure that quota allocated to an area stays within that area.

2.7 Other Comments

- 2.7.1 A number of other points were raised relating to issues affecting the fishing industry, but which were not specifically covered in the consultation. These included the need to improve partnership working between fishermen and scientists to ensure that the science that contributes to the quotas set by the European Union accurately reflects the situation on the ground with regards to stock assessments.
- 2.7.2 Concerns were also expressed about potential impact on non-quota species if fishermen are forced to diversify owing to insufficient FQAs. If fishermen are prevented from catching quota species, then it is very possible that their efforts on commercially valuable non-quota species (such as squid, shellfish and bass) will increase, which is why high level proposals on the introduction of user rights for important shellfish species was being considered as part of this consultation. This could lead to a situation where those species need to have protective measures such as catch limitations.
- 2.7.3 There were a number of responses that mentioned recreational angling and that this activity should be subject to stricter controls. Currently, in many places there are no limitations placed on recreational angling. This is seen to be unfair and, in some cases, those recreational anglers are believed to have significant impacts on commercially valuable species such as bass, cod and haddock.

- 2.7.4 Through the consultation, the issue of ‘slipper skippers’ was also raised. Slipper skippers are individuals, some of whom may be former fishermen, or companies that do not fish, who hold quota and lease it to working fishermen for a fee. Some active fishermen resent paying for the use of fishing rights that were allocated for free on the basis that they were being used by the original recipient. Moreover, many fishermen who are “small players” in the FQA market feel that the current system of FQA holding and trading is inaccessible and not transparent.
- 2.7.5 Another suggestion made was that proposals should be revised taking into consideration comments made by the industry and then another consultation with industry should be held for further comments.
- 2.7.6 One alternative proposed during the coastal road shows was that quota should be allocated to areas of sea, as opposed to fishermen. Once the quota is fished, the area could be closed, therefore gaining a better understanding of the area, whilst also eliminating discards. It would work on a first come, first served basis, where fishermen would be free to go and fish until the quota in that area was exhausted.

Government Response to Consultation Responses - the way forward

3.1 The Way Forward

3.1.1 Through the consultation, we have received mixed views on the proposals that were set out for the reform of the domestic fisheries management arrangements. We have also received a number of suggested alternatives to the way that this could be done in England. This section aims to consider these alternatives, and to outline our proposed next steps.

Exploring alternative options

3.1.2 The option of technical (e.g. gear) and effort (e.g. days at sea) restrictions, was suggested as an alternative way of managing the under-10m fleet.

3.1.3 The management of fisheries and aquaculture falls under the EU Common Fisheries Policy (CFP), under which total allowable catch limits are set for 'quota' stocks. Under the principle of relative stability, each year the UK receives a set percentage of the total allowable catch limit for each stock in which it has a historical record of fishing, and is bound by that limit. As such, any technical or effort regime would have to manage uptake within the total catch limit and in itself would therefore not be considered a solution to the problems currently facing the under 10m fleet. It would be no less restrictive than the proposed system in the consultation, or the one that currently operates.

3.1.4 The recent European Commission proposals for CFP reform, released on 13th July 2011, are not suggesting any changes to either the setting of total catch limits for 'quota' stocks or the principle of relative stability. The Commission is however, proposing the obligatory allocation of Transferable Fishing Concessions (TFCs), lasting 15 years, to fishermen using boats over 12m long or using towed gear. Whilst the Government supports the ambition for an economically efficient industry where fishermen are able to plan for the long term, and benefit from improving stocks, we need to ensure national administrations are able to make decisions on the allocation and trading of rights and do not, therefore, support imposing the same system across all Member States.

3.1.5 There were also some responses that expressed the wish to retain the current management system and inject further quota into the under 10m pool. This option was explored in the Impact Assessment that accompanied the consultation.

- 3.1.6 Without addressing the fundamental reasons for overcapacity within the fleet, including the month to month uncertainty of access to quota within the pool system, simply transferring additional quota into the under 10m pool will at best provide limited short term relief. The benefits of additional quota will be lost relatively quickly, as, without certainty of access to a share of the quota businesses will invest in further capacity to ensure that they do not lose out, thereby increasing costs and eroding profitability. The Government's proposals focus on using any additional quota to underpin a long term, sustainable, solution rather than temporarily relieve the consequences of an unreformed and inefficient management system.
- 3.1.7 This option also does not take into account the issue of dormant and latent capacity in the fleet. At present, anyone with an under 10m fishing licence could decide to start prosecuting quota stocks (depending on whether or not they have a capped licence) up to the monthly catch limits set by the MMO. It is difficult to predict when dormant or latent capacity might become active. As such, there is a risk that pressure on the pool would increase and result in fisheries closing earlier. Similar issues apply on shellfish entitlements where there is also concern about the degree of dormant and latent capacity.
- 3.1.8 With regards to those respondents who did not agree with the methodology of using track record to allocate FQAs to fishermen, there were a number of differing suggestions as to alternative methods for FQA allocation. This included basing it on future landings (rather than the reference period of 2007-2010), on the track record of the skipper or owner of the boat rather than the licence attached to the vessel, or to allocate FQAs equally amongst all fishermen. The timeframe on which the track record was based also provoked a lot of debate amongst industry.
- 3.1.9 There are difficulties with each of these suggestions, mainly relating to the fact that we are working with a finite pool of quota. Any method of allocating FQAs that increases the allocation for one group of fishermen will reduce the allocation to other fishermen. Using future rather than past track record would provide a powerful incentive to race to fish, thus exacerbating the problems already seen in the under 10 fleet. Allocating FQAs equally across the under 10 fleet would in some cases mean a significant drop in access to fish, and in others a significant increase. In some cases, smaller vessels may not have the capacity to catch more. In effect this method would allocate a valuable resource that they cannot use at the expense of others who currently use it and would have to pay to continue to do so.
- 3.1.10 Similarly, suggestions to base FQA allocations on engine power, vessel size or type of fishing activity would be no more likely to provide an allocation of the species-specific fishing opportunities that closely matches vessel owners'

requirements than the proposed vessel track record method. It is also likely to create further arbitrary divides in the fleet, the removal of which was one of the main objectives of the proposals. Creating any rules specific to types of boats, fishing activity or engine size, would be likely to create a situation where more fishermen will opt for those vessels and the situation which we are currently in will continue to deteriorate.

- 3.1.11 The alternative timeframe suggested by some respondents was 1994-1996; that originally used to distribute FQAs amongst industry. Lack of verifiable data on landings by under 10 metre vessels makes this timeframe unsuitable. The proposed reference period of 2007-2010 is when the Government started to collect verifiable information on under 10m fleet catches, as part of RBS Regulations. In considering how we take forward any final reforms, we have taken note of the numerous calls for a fair appeals procedure.

3.2 Next Steps

Summary

We will:

- Look to establish voluntary pilot schemes to test alternative regional/local management approaches to managing quota;
- Work with NUTFA to explore their proposal for an inshore Producer Organisation;
- Recruit a number of Coastal Liaison Officers to support establishment and running of the pilots, which we will fund through the European Fisheries Fund;
- Allocate to pilots a share of the under-10m pool based on track record of participating vessels in pilots, supplemented by additional quota obtained through agreement with local POs, and where this is not possible, we will undertake a temporary “top-slice” of quota for relevant species for which the TAC increases next year;
- Undertake a permanent realignment of FQAs associated with consistently underutilised quota from 2012 to increase the under-10m pool, consulting with industry to finalise the methodology;
- Explore further with industry how to deal with increasing pressures on shellfish stocks;
- Re-consider the need for, and options to, change the management arrangements for non-sector vessels;
- Undertake further work to address the issues of latent/dormant capacity within the fleet;
- Develop an FQA register to increase the transparency of FQA holdings, in co-ordination with DAs.

- 3.2.1 Throughout the consultation there was a clear and consistent message from the industry to slow down and take more time over decisions on any reform measures. This would allow time to develop the evidence base to ensure a comprehensive understanding of how any new arrangements would work in practice. We have listened carefully to those views. Notwithstanding the desire of some to move quickly to implement changes, we consider that it is in the best interest of the inshore fleet as a whole to take more time to gather evidence before making definitive decisions which will result in permanent change. **We will not therefore be implementing the proposals set out in the consultation to the timetable outlined.**
- 3.2.2 We also understood both from written responses and from the coastal road shows that fishermen wanted to better understand how the options would work before they were able to decide whether or not the proposals would benefit them. With that in mind, we welcome the suggestion of establishing pilot schemes to test the assumptions surrounding the benefits of more regional/local management for quota species, and the proposal for an inshore Producer Organisation. It is our aim to set up a number of pilot schemes to test alternative management approaches. Information gathered through these pilots will be used to inform the final decisions on reform. Participation in the pilots will be voluntary and vessels which choose not to join a pilot will continue to fish against the under 10 metre or non-sector pools for 2012/13.
- 3.2.3 Through the pilots we aim to test, amongst other things, the appetite for more industry led management arrangements, their practicability, the most suitable scale to ensure critical mass, the ability to improve the profitability of its members, and the cost of setting up such groups.
- 3.2.4 As suggested in the consultation, we will be looking to employ Coastal Liaison Officers to help set up and support pilots over their duration. Liaison Officers will play a critical role both in helping to secure industry participation and ensuring the appropriate governance/accountability frameworks are in place. They will also be pivotal in sourcing expertise to help the pilots run effectively and to tap into the experience and success of similar organisations, such as the Duchy Fish Quota Company. These posts will be funded through the European Fisheries Fund.
- 3.2.5 Our aim is to identify the pilot areas by 1 January 2012, though they may not take on full quota management responsibilities until part-way through the year. Each pilot will run for at least one year and will inform final decisions on any changes to the management arrangements for the whole under 10 metre sector. We do not therefore intend to introduce any permanent changes to the management arrangements until at least 1 January 2014.
- 3.2.6 Alongside the pilots, we will work with NUTFA to explore the proposal for an inshore PO.
- 3.2.7 It is our intention that the proposals for a permanent realignment of under-utilised quota will be implemented. This will be used to boost the quota allocated to the under 10m pool and ensure a higher utilisation of the UK's

annual quota allocation. We are currently, and will continue to consult with industry representatives before finalising the methodology used to identify quota that has been consistently under-utilised. The stocks currently being explored for re-alignment are North Sea Lemon Sole and Witches, North Sea Dabs and Flounders, VII Saithe, VII Megrim, VII Pollack, VIId Sole, VIIa Plaice, VIIb-k Whiting and West of Scotland Nephrops.

- 3.2.8 We are not proposing to undertake a permanent reallocation of FQAs from the Sector at this time. However, to align the pilots more closely with the consultation proposals, including provision of foundation quota, the quota allocated to them will be based on a share of the opening allocation for the under 10 metre pool, a share of the additional quota usually obtained for this sector through post December Council swaps, and an additional top up. Subject to the pilots going ahead, we will therefore look to source additional quota through agreement with the local PO(s). Where this is not possible, we will undertake a temporary “top-slice” of relevant quota for those stocks for which TACs increase next year. This quota will be used solely as foundation quota for the pilot schemes. If non-sector vessels wish to take part in the pilot schemes, they will take FQAs associated with their licences into the pilots, where they exist.
- 3.2.9 Alongside the pilots we will continue to explore other ways of achieving a more sustainable future for this part of the fleet and welcome any further suggestions of how we might do this.
- 3.2.10 We recognise that this will mean a further period of uncertainty for under 10 metre vessel owners and POs. However, having reflected upon the responses received to the consultation, we consider that it is better to spend more time gathering experience and evidence to ensure the right reforms are made.
- 3.2.11 We intend to continue the current pool arrangements for the non-sector for now and explore further with this part of the fleet the need for, and options to change the current management arrangements.
- 3.2.12 Throughout the consultation, concerns about the potential loss of flexibility to the under 10 metre fleet were raised. This was particularly the case in relation to proposals for the allocation of shellfish user-rights from those not currently fully participating in these important fisheries but who may wish to do so in the future. In developing these proposals further with industry, consideration will be given to how best to safeguard these stocks whilst allowing for this flexibility.
- 3.2.13 We are also working with Devolved Administrations (DAs) to agree a new quota management and licensing Concordat which outlines how each of the administrations will work together on fisheries management issues. We hope that this Concordat will be agreed soon. It aims to provide the four UK administrations with a greater degree of control over the management of their own commercial fishing fleets, within a UK wide quota and effort management and licensing system. This will provide the framework under which we take forward the long term reform.

- 3.2.14 Recognising the widespread support for a FQA register, we are taking this work forward to help improve the transparency of FQA holdings. We will also explore the option of a web based trading portal to aid the fluidity of the FQA market. Views of how a FQA register can be developed and the functions that it will provide will be looked at in further detail, in conjunction with industry and DAs, with a view to establishing a UK wide system.
- 3.2.15 Further work will also be conducted on the issue of FQA holdings by non-active fishing interests, recognising the strong feelings expressed through the consultation on this issue. More discussion and thought is needed as to whether restrictions on the holding of FQAs should be implemented, including a full appraisal of the potential impacts of any such restrictions.
- 3.2.16 Also in response to concerns raised during the consultation, the issue of latent and dormant licences and the potential impact this could have on the effectiveness of any new management system is something that we will be looking into further. This applies to both quota and shellfish management.
- 3.2.17 We will also be looking at how closer partnership working can be established between fishermen and scientists. Both the coastal road shows and written responses to the consultation made it clear that there were strong feelings that the scientific evidence on which TACs were allocated to the UK was not in line with what was happening on the ground in regards to fish stocks.
- 3.2.18 As part of our wider recreational sea angling work we have launched a project called 'Sea Angling 2012', to provide data on the recreational fishing activity which takes place off our coast. This project is a collaborative effort between the Centre for Environment, Fisheries and Aquaculture Science (Cefas), the MMO and individual IFCAS. This project may allay concerns about the impact of angling or could highlight circumstances where anglers should play an important role along with commercial fishermen in this process of restoring vulnerable or over-exploited stocks. More information on this project is available on the MMO website at <http://www.marinemanagement.org.uk/seaangling/>.

3.3 How to get involved in the pilots

- 3.3.1 Quota will be allocated to pilot schemes as a pool, rather than on the basis of individual FQAs. The pilot schemes will take responsibility for the management of that quota, for the year, including swapping and leasing quota for the benefit of participating fishermen. The pilots will also be expected to undertake marketing functions for their members, to maximise the potential value that these fishermen can obtain from their catches. The intention is for Government not to be too prescriptive in setting out the criteria for pilot schemes, but they will be expected to demonstrate commitment to operating in a way that supports the sustainable development of the local fishing industry.

- 3.3.2 We welcome groups of fishermen who may be interested in getting involved in the pilot schemes to register their interest **by close Friday 18th November 2011**- by sending a list of the names of the fishermen and their vessels interested in participating, and the RSS and PLN numbers of their vessels, to fisheriesreform@defra.gsi.gov.uk or by writing to: Domestic Fisheries Management Reform Team, Defra, Nobel House, Area 2c, 17 Smith Square, London, SW1P 3JR. By registering your interest, you are not committing to take part in pilot schemes at this stage. More information is available on the MMO website: <http://www.marinemangement.org/>.
- 3.3.3 Once again we would like to take this opportunity to thank all of those people and organisations that took the time to respond to the consultation. We are committed to working with the industry to find the best solutions to the problems facing the English fleet.

Annex A- list of questions asked through the consultation

- Q1:** Are community quota schemes in England a good idea? What models would provide the right structure for managing quota on behalf of small scale fishermen and their communities?
- Q2:** Should community schemes be focussed on small-scale vessels?
- Q3:** Are the suggested guiding principles the rights ones; should some be excluded (e.g. those related to vessel characteristics) or other principles be included?
- Q4:** Should the guiding principles be more prescriptive?
- Q5:** Are you interested in creating a community quota scheme?
- Q6:** Should English under 10m and non-sector fishermen be integrated with the wider fleet, using allocation of FQAs?
- Q7:** Should England adopt the Danish system, defining a duration for user-rights?
- Q8:** Would any changes to monitoring arrangements be needed if the English pool was dissolved?
- Q9:** Should English allocations be based on RBS track records or should an alternative allocation mechanism be used? If so, what?
- Q10:** Should a ceiling be applied to the amount of FQAs allocated to an individual fisherman or fishing business?
- Q11:** Should a proportion (approx 10%) of the English pool be held back to support creation of community interest models?
- Q12:** Could a rights based management system be introduced in England for some non-quota stocks, starting by exploring the approach for brown crab and lobster stocks?
- Q13:** Should dormant and latent licences in England be issued with zero FQAs, preventing them from catching quota in future without sourcing FQAs?
- Q14:** Is the definition of consistently under-utilised quota suitable to underpin realignment in England?
- Q15:** Should the proposed redistribution be at 3% of FQAs or more/less?
- Q16:** Should redistribution and realignment be confined to stocks where the under 10m fleet has taken an average of 90%+ of its initial allocation since 2007 or more/less stocks than this?

Q17: What could be done with quotas un-used by the whole fleet, year on year?

Q18: Should quota secured through realignment and redistribution be targeted to community quota schemes?

Q19: Does allocating FQAs to English higher catching vessels in 2012, followed by the wider English fleet in 2013, constitute a sensible timescale for reform?

Q20: Are the proposed 'higher catching vessels' the right ones to target in the first phase of restructure?

Q21: Is a 'one way valve' a sensible measure to prevent user rights from being concentrated solely with larger scale businesses?

Q22: Should any safeguards be a temporary measure, kept under review, and withdrawn if they are no longer deemed appropriate?

Q23: Should a register of FQA holdings be introduced, with registration a requirement prior to allocation against FQAs?

Q24: Should a web based portal be introduced for quota trades?

Annex B - A list of all responding organisations and individuals to the consultation

Response No.	Organisation
114	Aldeburgh Fishermen's Trade Guild Ltd
111	Aldeburgh Fresh Fish Company
182	Amble Seine-Net and Keelboat Association
220	Angling Trust
154	Aquanet
219	Bass Anglers Sportfishing Society
243	Blackwater Oystermen
202	Bridport Commercial Boatowners & Fishermen's Association
18	Butley Orford Oysterage
180	Coastal Shellfish Ltd
195	CoastNet
109	Collective of Hartlepool U10M Fishermen
184	Cornish Fish Producers Organisation Ltd
156	Cornwall IFCA
194	Devon & Severn IFCA
157	Devon County Council
89	Devon Maritime Forum
95	Eastern IFCA
153	Felixstowe Fishermens' Association
164	Gadgwith Fishermans Ass
135	Goldfish Partnership
137	Hayle Fishermen's Ass
129	Isles of Scilly IFCA
239	Jersey Fishermen's Association
110	Kent and Essex Inshore Fisheries and Conservation Authority
79	Lankford & Sons (Fishing) Ltd
108	Lankford & Sons (Fishing) Ltd
229	Lowestoft FPO
232	Manx Fish Producers Organisation Ltd
251	Marine Scotland
237	MCB Seafoods
112	Mevagissey Fisherman's Assn
252	MP for Scarborough
163	MP for South Thanet
58	MP for Tynemouth
241	National Lobster Hatchery
249	Natural England
250	New Under Ten Fishermen's Ass

103	Newhaven (Sussex) Fish & Flake Ice Society Ltd
192	NFFO
227	North Atlantic Fish Producers Org Ltd
230	North Eastern IFCA
221	North Norfolk Fisheries Local Action Group
113	North Norfolk Fishermen's Association
159	North Sea Fishermen's Ass
253	North West IFCA
97	Northern Ireland Fish Producers' Org Ltd
255	Northumberland IFCA
145	Plymouth Fishermen's Association
117	Red Dwarf Partnership
90	Sardine Management Association
27	Scott Trawlers
66	Scottish Fishermen's Federation
217	Seafish
128	Shellfish Associaton of Great Britain
115	South Coast Fishermen's Council
126	South Devon and Channel Shellfishermen Ltd
144	South Western Fish Producer Organisation Ltd
93	States of Jersey
256	Sussex IFCA
214	Swordfish Licence Traders
162	Thanet Fishermen's Ass
215	The Fish Producers Org Ltd
143	Thorpe Bay Fisheries Ltd
247	UKAFPO
238	University of Iceland
216	Wales and West Coast FPO
57, 8, 55, 56, 94, 75, 74, 76	West Mersea Fishermen's Ass
218	Weymouth & Portland Fishermen's & Licensed Boatmen's Association
178	Young Elizabeth Quota Trading Ltd
A further 163 responses were received from individual fishermen	