

**ICELANDIC-WATER
TRAWLERMEN COMPENSATION
SCHEME**

A consultation

FEBRUARY 2009

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Executive summary

1. The Department of Trade and Industry (now the Department for Business, Enterprise and Regulatory Reform) operated a compensation scheme that was open to claims between 2000 and 2002, for trawlermen that lost their livelihoods as a consequence of the 'Cod Wars' of the 1970s. Under this scheme, around £43 million was paid to 4,400 claimants.

2. The Parliamentary Ombudsman reported on the scheme in February 2007. Her report '*Put together in haste*' can be found at:

http://www.ombudsman.org.uk/pdfs/trawlermen_HC313_200702.pdf or obtained from the Stationery Office. She found (in particular) that the scheme rules and criteria had not recognised the effects of the 'pool system', and that some claimants under the scheme had received unfairly low payments, because of the rules on breaks in service. She recommended that:

'DTI should review the eligibility criteria and scheme rules to ensure they are consistent with the policy intention underlying the scheme'.

3. We have been looking very carefully over the last 18 months at whether it might be possible to run a new scheme in a way that delivered a better fit with the Government's policy intentions. We appreciate that it has taken longer than originally expected to complete this review. However this is a complex issue and it is important to get it right.

4. As announced at the end of last year (December 2008) the Government has concluded that we should run a new scheme, under which we propose that: additional payments should be calculated on the basis of aggregate service on vessels that fished in Icelandic waters; the qualifying test should be amended to require claimants to have two years' aggregate service on Icelandic vessels during the period of the Cod Wars; the new scheme should be limited to existing claims only; claimants should be required to submit applications under the new scheme within six months of its launch; and that where a trawlerman is deceased, his personal representatives (those with legal authority to deal with his affairs) may submit claims.

5. We have also concluded that interest should be added to the additional payments; that consolatory payments of £200 should be made to successful claimants under the new scheme; and that we should establish an appeals process, with a final appeal to an independent adjudicator.

6. This document seeks views on these issues within 12 weeks, until 22 May 2009. We will consider all comments received very carefully in May and June, and notify all respondents of the outcome. It should be possible then to formally launch the scheme in the summer of 2009.

How to respond to this consultation

7. Responses to this consultation must be received by 22 May 2009.

These should be submitted via survey monkey at: www.tinyurl.com/c3u599

Alternatively you can respond by email using the consultation [response form](#) at Annex A to:
trawlermen@berr.gsi.gov.uk

Or by letter or fax to:

Stephen Taylor
Department for Business, Enterprise and Regulatory Reform
Bay 410
1 Victoria Street
London SW1H 0ET
Tel: 0207 215 2844
Fax: 0207 215 0227
Email: Stephen.Taylor@berr.gsi.gov.uk

or

Mini Krishnan
Department for Business, Enterprise and Regulatory Reform
Bay 410
1 Victoria Street
London SW1H 0ET
Tel: 0207 215 3922
Fax: 0207 215 0227
Email: Mini.Krishnan@berr.gsi.gov.uk

Please state if you are responding as an individual or representing the views of an organisation, by selecting the appropriate interest group on the consultation response form (Annex A). If responding on behalf of an organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

Additional copies

8. You may make copies of this document without seeking permission. Further printed copies of the consultation document can be obtained from:

BERR Publications Orderline
ADMAIL 528
London SW1W 8YT
Tel: 0845-015 0010

You can download additional copies at: <http://www.berr.gov.uk/files/file49973.pdf>

Confidentiality and data protection

9. Information provided in response to this consultation, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004). If you want information, including personal data that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

10. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

Help with queries

11. Questions about the policy issues raised in the document can be addressed to:

Stephen Taylor
Employment Relations
Department for Business, Enterprise and Regulatory Reform
Bay 410, 1 Victoria Street
London SW1H 0ET
Tel: 0207 215 2844
Stephen.Taylor@berr.gov.uk

Comments or complaints

12. If you have comments or complaints about the way this consultation has been conducted, these should be sent to:

Kathleen McKinlay
BERR Consultation Co-ordinator,
Better Regulation Team
1 Victoria Street,
London
SW1H 0ET

Email Kathleen.McKinlay@berr.gsi.gov.uk
Tel: 0207 215 2811
Fax: 0207 215 2235

A copy of the Code of Practice on Consultation is in Annex B.

The Government's proposals

13. We would appreciate views on three key aspects of the scheme in particular: – the shift to a system based on aggregate service on Icelandic vessels; the amendment to the qualifying period rule; and the rules surrounding claims under the new scheme. These issues are taken in turn below.

A. Basis for calculating payments

14. The Parliamentary Ombudsman found that some trawlermen had been paid for a shorter period of service than they might reasonably have expected, because of the 'breaks rule' used in the previous scheme.

15. Payments made under the previous scheme were calculated after establishing the length of each claimant's continuous service in the industry. Under the 'breaks rule', any gaps of less than 12 weeks between trips on Icelandic vessels were disregarded and did not affect a trawlerman's continuous service. However if: –

(a) a gap in service lasted more than 12 weeks; and

(b) the trawlerman worked outside the fishing industry or on a non-Icelandic vessel for any time in that gap;

then that gap was defined as a 'relevant break', which meant that service before the break was not counted in calculating compensation. If trawlermen were posted to work on non-Icelandic vessels, that could therefore – depending on the length and timing of non-Icelandic service in each case – have adversely affected the payments made to them. In some cases this could have meant a trawlerman would not have received any payment at all.

16. We have therefore considered ways of amending the breaks rule to address the concerns expressed by the Ombudsman. One possibility we have considered is to alter the breaks rule, so that trawlermen could take occasional longer breaks on non-Icelandic vessels without reducing the level of their payment. Under such an alteration, one longer gap – of up to six months – involving service on non-Icelandic vessels would not be treated as a relevant break (and so would not affect continuous service) provided there was no more than one such gap every five years. The period of continuous service would be calculated back until the next break in service within the preceding five years (as reckoned under the current rules). A second

possibility could have been to allow previous periods of continuous service to count towards the payment calculation.

17. A fundamental difficulty with both of the above options is that they would still depend (although to a lesser extent) on the breaks rule. However the break is defined, there will always be some people that fall just inside the definition (and receive a higher payment) and others that fall just outside it (and receive a lower payment). In our view, these options could therefore perpetuate the unfairness identified by the Ombudsman.

18. These options would, in addition, require officials to check whether trawlermen had worked outside the industry during all 12 week gaps in service. We know from the previous scheme that this work produces an uncertain result, as the national insurance records do not show precisely when the person worked for another employer or for how long. The passage of time since the 1960s and 70s means that it is now very difficult to establish what trawlermen did during gaps in their service. Therefore it would be extremely difficult to establish whether or not gaps in service were “relevant breaks” which affect continuous service. This aspect of the previous scheme was criticised by the National Audit Office in their report.

19. We therefore propose to depart from the breaks rule completely and calculate whether any additional payments should be made by reference to aggregate service on Icelandic vessels. Under this option, we would calculate the total number of weeks served on Icelandic vessels by each claimant during the last twenty years of their Icelandic fishing career, and multiply this by the current payment rate (£19.23/week, equivalent to £1,000/year).

20. In other words, where a trawlerman (who qualifies for compensation) had his last date of Icelandic service in January 1975, we would run this calculation for the period January 1955 to January 1975. We propose to set the last date of Icelandic service – for the purpose of this calculation – as the last date on which the trawlerman served on an Icelandic vessel, ending no later than 31 December 1979.

21. Where this calculation produces a larger payment than that received under the previous schemes, we would pay the difference. We would not, of course, be looking to recover payments where the reverse is the case. Unlike the previous scheme, under which time spent on breaks was included in calculating payment (unless the breaks were “relevant” as described in paragraph 15 above), only time spent on Icelandic vessels will be counted for the purposes of calculating compensation.

22. It seems to us that the aggregate service option presents some clear advantages over the previous scheme, and would provide a better fit with the Government's objective of compensating former-trawlermen for the loss of their livelihoods following the Cod Wars.

23. We believe that the aggregate service option is fair, because it would provide additional payments for claimants, whose payments under the last scheme did not adequately reflect their amount of service on Icelandic vessels. It relates the level of payment more directly to the amount of time actually spent on Icelandic vessels. Although no payment would be made for breaks under this option, this should make relatively little difference to the level of individual payments, which would reflect overall Icelandic service. Importantly, the impact of breaks would be sharply reduced and the breaks rule (criticised by the Ombudsman) removed altogether.

24. Furthermore, the calculation of payments by reference to aggregate service will make it easier to assess claims by reference to available evidence. Evidence of service is found in the fishing passports, which set out the vessel name and dates for each fishing trip, throughout each trawlerman's career. These passports are reliable and of good quality in almost all cases, enabling the Department readily to assess how long each trawlerman spent on Icelandic waters vessels. It would no longer be necessary to attempt to identify whether claimants had been working outside the industry in any gaps in their service. This option should therefore be relatively straightforward to administer, and this should help us to make the additional payments as quickly as possible.

Defining "service in Icelandic waters":

25. Under the previous scheme, trawlermen were paid for their most recent period of continuous service on vessels that had fished at least twice in Icelandic waters (which meant waters within 200 miles of the Icelandic coast). The vessels which satisfied these conditions were identified by the Department after very extensive discussions with the industry, which fully explored the evidence in this area. As a result of these discussions, a final list of around 730 'Icelandic waters vessels' was agreed in March 2004 (attached at Annex E). We propose to use the same list of Icelandic vessels as the previous scheme, with one addition. We are aware of one vessel (the Thessalonian) which satisfied the conditions for inclusion in the list and which was supported by the industry at the time, but omitted from the list due to an administrative error. We therefore propose to add the Thessalonian to the list of Icelandic waters vessels. This issue was (as mentioned) extensively explored during the previous

scheme. We do not therefore propose any other changes to the list of Icelandic waters vessels or to the way in which “service in Icelandic waters” is defined.

26. We therefore propose to run a new scheme on the basis of aggregate service in Icelandic waters, as set out above. Our estimate is that around 1,000 claimants should receive additional payments under this option. This is based on an analysis of 10 per cent of claims received under the previous scheme. We expect the average additional payment to be around £6,000, including interest.

Q1: Do you agree that any additional payments should be calculated on the basis of aggregate service on Icelandic vessels, during the last twenty years of Icelandic service? If not, please say which system you would prefer, and why this would produce a fairer outcome.

Q2: Do you have any views on the method to be used to set the last date of Icelandic service?

Q3: Do you agree that the Government should rely on evidence from the fishing passports when making decisions about payments? If not, please say which other evidence you would prefer and why this would produce a fairer outcome?

Q4: Do you agree that service on Icelandic waters vessels should continue to be defined by reference to the list of vessels previously agreed with industry representatives (with the addition of the Thessalonian)?

Q5: Do you have any other comments about the basis on which the new scheme will be run?

B. Qualifying period

27. Under the previous scheme, claims were only successful if the trawlerman had two years of continuous service on Icelandic vessels ending on or after 1 January 1974. The latter date was chosen on the basis that if a trawlerman had left the industry before that date, he or she would not have been adversely affected by the Cod Wars. “Continuous service” was defined in the scheme rules, which included the provision for breaks discussed in paragraph 15. Therefore, a “relevant break” (lasting more than 12 weeks and including work done outside the industry or on non-Icelandic vessels) could mean that a trawlerman would receive no compensation at all.

28. As we are proposing to make additional payments to claimants on the basis of their aggregate service on Icelandic vessels, we have therefore considered whether the existing requirement for two years continuous service is appropriate. That requirement relies in part on the breaks rule and so we have considered whether to move to an ‘entry test’ which relates more closely to aggregate service.

29. We have concluded that it would make sense for us to change the continuous service requirement. It seems to us inconsistent to make additional payments on the basis of aggregate Icelandic service – and then retain the existing continuous service ‘entry test’, which relies in part on the treatment of breaks.

30. In addition we know that the breaks rule, which was criticised by the Ombudsman, did not only create unfair outcomes for some people in terms of the level of payments received. Taken with the requirement for at least two years continuous service, the breaks rule also meant that some people with long careers on Icelandic vessels received no payment at all, because they had breaks in their last two years of service.

31. We therefore propose to move to a qualifying test which would require successful claimants to have at least two years aggregate service on Icelandic vessels during the period of the Cod Wars, which we propose to define as the four years from 1 January 1973 to 31 December 1976. The first ‘Cod Wars’ Treaty between the UK and Iceland, which for the first time restricted the UK vessels allowed to fish within 50 miles of Iceland, was signed in November 1973. Under the terms of the June 1976 Treaty, no UK vessels were allowed to fish within 200 miles of Iceland after 31 December 1976. If someone left the industry before the end of 1976, we would calculate the aggregate over their last four years of service. As in the previous scheme,

only those that served on Icelandic vessels on or after 1 January 1974 would be eligible for any payment.

32. This would retain the general sense of the current test – two years' service – while tying any additional payments to aggregate service at the time of the Cod Wars. It seems to us reasonable to require successful claimants to have spent half of their time in this period on Icelandic vessels.

Q6: Do you agree that the qualifying test should be amended in this way? If not, please say how you believe the test should be framed and why you believe this would produce a fairer outcome?

C. Applications under the new scheme

33. The previous scheme was extensively publicised at its launch in 2000. We are not aware of any cases where people have argued that the scheme was not fully advertised and that they were unable to submit a claim within the two years' period allowed.

34. We therefore propose to restrict the new scheme to existing claims only. Everyone that submitted a claim under the previous scheme would be entitled to claim under the new scheme, including claims that failed, or where claimants lost their appeals under the previous scheme. However we would only be considering claims made under the new scheme rules.

35. We propose to advertise the new scheme in local newspapers at each of the four principal ports (Hull, Grimsby, Aberdeen and Fleetwood). We would also write to contacts at the British Fishing Association (BFA) and ask port MPs to pass copies of the announcement on to their lists of interested constituents.

36. We propose to require claimants under the new scheme to complete a standard application form. We would ensure that this form was kept as short as possible, but it would need to include the trawlerman's name and National insurance number, and the claimant's current address. Copies of the form could be downloaded from the BERR website or obtained from our Orderline.

37. Claimants would not need to re-submit details of their fishing careers, as we still hold details from the claims submitted under the previous scheme. As the previous scheme was so widely publicised and we are only seeking very limited new information, we propose that claimants should be given six months to apply under the new scheme, rather than two years as previously.

Q7: Do you agree that claims under the new scheme should be restricted to those that applied under the previous scheme?

Q8: Do you agree that six months should be sufficient for people to submit claims under the new scheme?

Q9: Do you have any comments on the way in which the new scheme is to be publicised or on the applications process?

Other issues

38. We have also considered a number of other aspects of the new scheme.

39. Interest Payments The Ombudsman recommended that interest be added to any additional payments made. It seems to us that there is a range of possibilities for setting the interest rate.

40. HM Revenue & Customs (HMRC) offer different repayment rates for different taxes. The average rate paid by HMRC since 2000 for inheritance tax, income tax, stamp duty and corporation tax overpayments is about 3.7 per cent, although the current rates paid are substantially lower and 0 per cent in some cases. The average Bank of England rate since 2000 is 4.7 per cent, although the average savings rate offered by banks and building societies will have been rather less than that – and of course the current Bank of England rate is only 1.0 per cent. The first ex-gratia scheme in 1994 paid simple interest at 8 per cent. Under the previous scheme, trawlermen were paid £1,000 for each year of continuous service, with no additional amount paid for interest.

41. It seems to us that fairness must be the key here. The rate should be set at a level that puts a claimant, that lost out as a result of maladministration in the previous scheme, into the position that he would have been had the maladministration not occurred. In our view it would be wrong either for this claimant to be worse off or to be over-compensated, as that would be unfair to other claimants. For that reason, we intend to add simple interest at the rate of 4 per cent to the additional payments, calculated for eight years – on the assumption that previous payments were made in October 2001 (the middle point for applications) and that most payments under the new scheme will be made in the autumn of 2009.

42. Consolatory payments The Ombudsman also recommended that consolatory payments should be made. We intend to make a consolatory payment of £200 to all successful claimants under the new scheme. This is a significant amount – equivalent perhaps to a new digital television or a quarterly utility bill – and recognises the errors made by the Government when designing the previous scheme.

43. Appeals process the previous scheme contained an appeals process, which allowed claimants to pursue any concerns with DTI officials and then an independent adjudicator. We intend, in the same way, to establish an appeals mechanism under the new scheme, which would include a final appeal to an independent adjudicator. However this mechanism will only

look at appeals in connection with the new scheme and we do not intend to re-open any appeals considered under the previous scheme.

44. Scheme rules a first draft of the scheme rules is attached at Annex D. These are by no means finalised and are simply intended to help clarify the Government's proposals, but any comments would be welcomed.

Q10: Do you have any view on these other issues - interest payments, consolatory payments and the appeals process?

Q11: Do you have any other comments on issues raised in this consultation paper?

Q12: Do you have any comments on the draft scheme rules?

Annex A - Icelandic-Water Trawlermen Compensation Scheme: Response form

There are 12 questions to this consultation.

Your name

What organisation do you represent (if any)?

E-mail address

Please tick the box below that best represents you as a respondent:

- | | |
|---|--------------------------|
| Micro business (up to 9 staff) | <input type="checkbox"/> |
| Small business (10 to 49 staff) | <input type="checkbox"/> |
| Medium business (50 to 250 staff) | <input type="checkbox"/> |
| Large business (over 250 staff) | <input type="checkbox"/> |
| Legal representative | <input type="checkbox"/> |
| Business representative organisation/trade body | <input type="checkbox"/> |
| Trade union or staff association | <input type="checkbox"/> |
| Charity or social enterprise | <input type="checkbox"/> |
| Local government | <input type="checkbox"/> |
| Central government | <input type="checkbox"/> |
| Individual | <input type="checkbox"/> |
| Other | <input type="checkbox"/> |

We will publish all the responses received in this consultation unless we are asked to keep it confidential.

Please treat my response as confidential:

- | | |
|-----|--------------------------|
| Yes | <input type="checkbox"/> |
| No | <input type="checkbox"/> |

We would like to keep you informed of the developments of the legislation. If you wish to join the mailing list please indicate below:

- | | |
|--|--------------------------|
| Please add me to the list (using the e-mail address above) | <input type="checkbox"/> |
| Please do not add me to the list | <input type="checkbox"/> |

Basis for Calculating Payments

Q1: Do you agree that any additional payments should be calculated on the basis of aggregate service on Icelandic vessels, during the last twenty years of Icelandic service? If not, please say which system you would prefer, and why this would produce a fairer outcome.

Yes

No

No view

Q2: Do you have any views on the method to be used to set the last date of Icelandic service?

Yes

No

Q3: Do you agree that the Government should rely on evidence from the fishing passports when making decisions about payments? If not, please say which other evidence you would prefer and why this would produce a fairer outcome?

Yes

No

No view

Q4: Do you agree that service on Icelandic waters vessels should continue to be defined by reference to the list of vessels previously agreed with industry representatives (with the addition of the Thessalonian)?

Yes

No

No view

Q5: Do you have any other comments about the basis on which the new scheme will be run?

Yes

No

Qualifying period

Q6: Do you agree that the qualifying test should be amended in this way? If not, please say how you believe the test should be framed and why you believe this would produce a fairer outcome.

Yes

No

No view

Applications under the new scheme

Q7: Do you agree that claims under the new scheme should be restricted to those that applied under the previous scheme?

Yes

No

No view

Q8: Do you agree that six months should be sufficient for people to submit claims under the new scheme?

Yes

No

No view

Q9: Do you have any comments on the way in which the new scheme is to be publicised or on the applications process?

Yes

No

Other issues

Q10: Do you have any view on these other issues interest payments, consolatory payments and the appeals process?

Yes

No

No view

Q11: Do you have any other comments on issues raised in this consultation paper?

Yes

No

Q12: Do you have any comments on the draft scheme rules?

Yes

No

Annex B - The Consultation Code of Practice Criteria

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out an Impact Assessment if appropriate.

The complete code is available on the Better Regulation Executive's web site, address <http://bre.berr.gov.uk/regulation /consultation/code/>

Annex C - Partial Impact Assessment

Summary: Intervention & Options

Department /Agency: BERR	Title: Impact assessment of new trawlermen compensation scheme	
Stage: Consultation	Version: Final	Date: 10 February 2009
Related Publications: ...URN 09/656		

Available to view or download at: <http://www.berr.gov.uk/files/file49973.pdf>

Contact for enquiries: Stephen Taylor/Tim Harrison

Telephone: 0207 215 2844

What is the problem under consideration? Why is government intervention necessary? The Department is responding to the views expressed by the Parliamentary Ombudsman in her report 'Put together in haste', published in February 2007. She found that some claimants under the previous trawlermen scheme had received unfairly low payments, because of the rules on breaks in service, and that the scheme rules had not met the Government's policy intention. She recommended that the Department should 'review the eligibility rules and scheme criteria to ensure they are consistent with the policy intention underlying the scheme'.

What are the policy objectives and the intended effects? To run a new scheme in a way that addresses the Ombudsman's concerns and delivers a better fit with our policy intentions.

What policy options have been considered? Please justify any preferred option. The Government has considered the breaks rule in light of the concerns expressed by the Ombudsman. We have identified a preferred option, which would calculate any additional payments on the basis of aggregate service on Icelandic vessels. This would remove the breaks rule completely. In addition the Government is proposing to amend the qualifying test to require claimants to have two years aggregate service on Icelandic vessels during the period of the Cod Wars; that interest should be added to the additional payments; that consolatory payments of £200 should be made to successful claimants under the new scheme; and that the new scheme should be limited to existing claims only.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? We are currently seeking views on the Government's proposals, as set out in our consultation paper. We will consider the views put forward very carefully.

Ministerial Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:

Pat McFadden

Date: 10 February 2009

Summary: Analysis & Evidence

Policy Option: 2	Description: Compensation for eligible trawlermen who meet the qualifying test and compensation to be calculated on 'aggregate service'
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COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' Costs to the Exchequer of making compensation payments (including interest payments) range from £4.9-9.1m (over 2 years). Exchequer consolatory payments range from £0.16-0.24m (over 2 years). Administrative costs to the Exchequer – up to £0.5 million .		
	One-off (Transition)	Yrs			
	£ 0	0			
	Average Annual Cost (excluding one-off)				
£ 2.78-4.92m	2	Total Cost (PV)		£ 5.51-9.76m	
Other key non-monetised costs by 'main affected groups'					

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups' Trawlermen will receive compensation payments (including interest payments) that range from £4.9-9.1m (over 2 years) and consolatory payments that range from £0.16-0.24m (over 2 years). These transactions between the Exchequer and trawlermen are transfers.		
	One-off	Yrs			
	£ 0	0			
	Average Annual Benefit (excluding one-off)				
£ 2.53-4.67m	2	Total Benefit (PV)		£ 5.02-9.26m	
Other key non-monetised benefits by 'main affected groups'					

Key Assumptions/Sensitivities/Risks We estimate that take-up of claims will be between 800 and 1200. Also we have estimated various interest rate options that range between 4% and 8%. We assume on average that the eligible length of service will be 4.5 years. Finally, the costs and benefits are spread 75% and 25% in years 1 and 2 respectively.

Price Base Year 09/10	Time Period Years 2	Net Benefit Range (NPV) £ up to - £0.5 million	NET BENEFIT (NPV Best estimate) £ up to - £0.5 million
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What is the geographic coverage of the policy/option?				UK	
On what date will the policy be implemented?				Summer 2009	
Which organisation(s) will enforce the policy?				N/A	
What is the total annual cost of enforcement for these organisations?				£ N/A	
Does enforcement comply with Hampton principles?				N/A	
Will implementation go beyond minimum EU requirements?				No	
What is the value of the proposed offsetting measure per year?				£ N/A	
What is the value of changes in greenhouse gas emissions?				£ N/A	
Will the proposal have a significant impact on competition?				No	
Annual cost (£-£) per organisation (excluding one-off)		Micro	Small	Medium	Large
Are any of these organisations exempt?		0	0	0	0

Impact on Admin Burdens Baseline (2005 Prices)				(Increase - Decrease)	
Increase of	£ 0	Decrease of	£ 0	Net Impact	£ 0

Key: Annual costs and benefits: Constant Prices (Net) Present Value

Evidence Base (for summary sheets)

[Use this space (with a recommended maximum of 30 pages) to set out the evidence, analysis and detailed narrative from which you have generated your policy options or proposal. Ensure that the information is organised in such a way as to explain clearly the summary information on the preceding pages of this form.]

A: Strategic overview

1. The Department is responding to the views expressed by the Parliamentary Ombudsman in her report 'Put together in haste', published in February 2007. She found that some claimants under the previous trawlermen scheme had received unfairly low payments, because of the rules on breaks in service, and that the scheme rules had not met the Government's policy intention. She recommended that the Department should 'review the eligibility rules and scheme criteria to ensure they are consistent with the policy intention underlying the scheme'.

B: The issue

2. The Department for Trade and Industry (now the Department for Business, Enterprise and Regulatory Reform) operated a compensation scheme that was open to claims between 2000 and 2002, for trawlermen that lost their livelihoods as a consequence of the 'Cod Wars' of the 1970s. Under this scheme, around £43 million was paid to 4400 claimants.

3. The Parliamentary Ombudsman reported on the scheme in February 2007. Her report ('Put together in haste') can be found at [http://www.ombudsman.org.uk/improving_services/special_reports/pca/trawlermen/]. She found (in particular) that the scheme rules and criteria had not recognised the effects of the 'pool system', and that some claimants under the scheme had received unfairly low payments, because of the rules on breaks in service. She recommended that:

'DTI should review the eligibility criteria and scheme rules to ensure they are consistent with the policy intention underlying the scheme'.

4. The Ombudsman found that some trawlermen had been paid for a shorter period of service than they might reasonably have expected, due to the effects of the 'pool system' (under which trawlermen could be posted from one vessel to another) and the 'breaks rule' used in the previous scheme.

5. Payments made under the previous scheme were calculated after establishing the length of each claimant's continuous service in the industry. Under the 'breaks rule', any gaps of less than twelve weeks between trips on Icelandic vessels were disregarded and did not affect a trawlerman's continuous service. If however a trawlerman worked outside the fishing industry or on a non-Icelandic vessel during a gap of more than twelve weeks between trips on Icelandic vessels, then that was defined as a 'relevant break', and his continuous service was only calculated back to that point. Being posted by the pool system to work on a non-Icelandic vessel could therefore – depending on the length and timing of that service - have adversely affected the payments made to a number of trawlermen.

Consultation

Public consultation

6. This impact assessment accompanies a public consultation for the period 12 February 2009 to 22 May 2009.

C: Objectives

7. The objective is to run a new scheme in a way that addresses the Ombudsman's concerns and delivers a better fit with the Government's policy intentions, namely to fairly compensate former Icelandic-water trawlermen for the loss of their livelihoods as a consequence of the 'Cod Wars' of the 1970s.

D: Options identification

8. We have considered possible changes to the breaks rule, designed to address the concerns expressed by the Ombudsman. One possibility could have been to allow one longer gap – of up to six months - on non-Icelandic vessels every five years, to count towards continuous service. This would have allowed trawlermen to take occasional longer breaks on non-Icelandic vessels without reducing the level of their payment. The period of continuous service would then have been calculated back until the next break in service within the preceding five years (as reckoned under the current rules). A second possibility could have been to allow previous periods of continuous service to count towards the payment calculation.

9. A fundamental difficulty with both of these options is that they would still have depended (although to a lesser extent) on the breaks rule. However the break is defined, there will always be some people that fall just inside the definition (and receive a higher payment) and others that fall just outside it (and receive a lower payment). These options would therefore perpetuate the unfairnesses identified by the Ombudsman.

10. These options would, in addition, have required officials to check whether trawlermen had worked outside the industry during all twelve week gaps in service. We know from the previous scheme that this work produces an uncertain result, as the national insurance records do not show precisely when the person worked for another employer or for how long. This aspect of the scheme was criticised by the National Audit Office in their report.

11. We have therefore identified a third option, which would calculate any additional payments on the basis of aggregate service on Icelandic vessels. This would remove the breaks rule completely. Under this option, we would calculate the total number of weeks served on Icelandic vessels by each claimant, and multiply this by the current payment rate (£19.23/week, equivalent to £1000/year). Where this calculation produced a larger payment than that received under the previous schemes, we would pay the difference. We would not, of course, be looking to recover payments where the reverse is the case.

12. The aggregate service option presents some clear advantages over the previous scheme, and would provide a better fit with the Government's objective of compensating former-trawlermen for the loss of their livelihoods following the Cod Wars. There is a strong 'fairness' argument because this approach would direct additional payments only to claimants that have lengthy Icelandic service, but received payments under the previous scheme that were commensurate with 'short' service. Although no payment would be made for breaks and other gaps in service, this should make relatively little difference to the level of individual payments, which would reflect overall Icelandic service. Importantly, the breaks rule (criticised by the Ombudsman) would have been removed completely.

13. In addition, evidence for service is found from the fishing passports. This is the principal evidence that we hold which is reliable and of good quality in almost all cases. This source of

information, and the fact that it would no longer be necessary to attempt to identify whether claimants had been working in any gaps in their service, mean that this option should also be relatively straightforward to administer – and this should help us to make the additional payments as quickly as possible.

14. As mentioned above, the Government is also proposing to amend the qualifying test. Under the previous scheme, claims were only successful if the trawlerman had two years of continuous service on Icelandic vessels (as defined in the scheme rules, including the provisions for breaks) ending on or after 1 January 1974 (on the basis that if they had left the industry before that date, they had not been adversely affected by the Cod Wars).

15. We are now proposing to make additional payments to claimants on the basis of their aggregate service on Icelandic vessels. We have therefore been considering whether it was appropriate to retain the existing requirement for two years continuous service, which relies in part on the breaks rule, or whether it would make sense to move to a qualifying test which used aggregate service in some way.

16. We have concluded we shouldn't change the continuous service requirement. It seems to us inconsistent to make additional payments on the basis of aggregate Icelandic service – and then retain the existing continuous service qualifying test, which relies in part on the treatment of breaks.

17. In addition we know that the breaks rule did not only create unfair outcomes for some people in terms of the level of payments received. It also meant that some people with long careers on Icelandic vessels received no payment at all, because they had breaks in their last two years of service.

18. We therefore propose to move to a qualifying test which would require successful claimants to have at least two years aggregate service on Icelandic vessels during the period of the Cod Wars (defined as the four years from 1 January 1973 to 31 December 1976). If someone left the industry before the end of 1976, we would calculate the aggregate over their last four years of service. As in the previous scheme, only those that served on Icelandic vessels on or after 1 January 1974 will be eligible for any payment.

19. The Government is also proposing that interest should be added to the consolatory payments; that consolatory payments of £200 should be made to successful claimants under the new scheme; and that the new scheme should be limited to existing claims only.

20. We therefore propose to run a new scheme on this basis. Our estimate is that around 1000 claimants should receive additional payments under this option (see section E below).

- **Option 1:** Do nothing.
- **Option 2:** Compensation for eligible trawlermen who meet the qualifying test (more than 2 years service aggregate service on Icelandic vessels during the period of the Cod Wars 1 January 1973 to 31 December 1976). Compensation to be calculated on 'aggregate service' paid at a rate of £19.23 per week of service, where this calculation produces a higher amount than that paid under previous schemes.

Option 2 will be benchmarked against the 'do nothing' option so that the costs and benefits of option 2 measure the additional impact of this policy change.

E: Analysis of options

Assumptions

There have been two previous trawlermen schemes (in 1994 to 1996, and 2000 to 2002), which cost around £60 million in total.

21. As set out above, the aim of this exercise is to ensure that trawlermen receive a fair level of compensation that reflects more closely their length of service. As the Parliamentary Ombudsman identified, some trawlermen received unfairly low payments under the previous scheme because of the rules on breaks in service.

22. An estimate of the number of potential claims affected has been made by BERR after running a sampling exercise during the summer of 2008, under which the fishing records for a sample of 10% of all claims submitted under the previous scheme were entered onto our database. From this we have estimated that around 1,000 claims would be affected. Recognising that this is based on a 10% sample of total claims, we have assumed these estimates to be accurate within a range of plus or minus 20%.

23. Hence, the cost-benefit estimates provided below are calculated on the basis of scenarios, ranging from a low case of 800 claims, a medium case of 1000 claims and a high case scenario of 1200 claims. For ease we assume a 100% take-up rate.

24. For those trawlermen who were underpaid under previous schemes interest payments will be added. We have estimated 3 scenarios, 4%, 5% and 8% interest rates. In addition to interest payments, one-off consolatory payments will be paid at a rate of £200 per claim.

Costs and benefits

Costs to the Exchequer

Payments made from the scheme that address previous underpayment

25. As set out above we modelled 3 scenarios for total numbers of claims – 800, 1000 and 1200. We assume that on average a trawlerman making a claim will have an additional 4.5 years length of eligible service (equivalent to 234 weeks). And that compensation for that period is paid out at a rate of £19.73 per week of eligible service. The total payment levels is calculated by multiplying the estimated number of claims by 234 weeks and then multiplying this aggregate weeks of eligible service by £19.73. This total reflects the total compensation paid, excluding interest and consolatory payments.

Interest payments

26. In addition we propose that interest will be added to this sum. Within this impact assessment we have estimated 3 scenarios - 4%, 5% and 8% interest rates have been applied to the total compensation payments using a 'simple interest'¹ technique that covers a span of 8 years. This reflects the period that has elapsed since the middle of the last compensation scheme.

Consolatory payments

27. Option 2 includes a flat rate payment 'consolatory payments' of £200 per claim. The total level of consolatory payments depends on the aggregate level of take-up.

Administrative costs to the Exchequer (one-off costs)

¹ Simple interest is interest paid only on the initial amount borrowed and not on past interest.

28. We estimate that the total cost to Government from hiring a contractor to enter data, administer the scheme and sufficiently publicise the existence of the scheme, will cost up to £0.5 million.

Summary of costs

29. The table below summarises all the costs mentioned above. We estimate that within the 2 years of operating the scheme 75% of total payments will be made in 2009/10 and 25% in 2010/11.

Table 1. Total costs to the Exchequer (non-discounted)			
Total number of claims	800	1000	1200
Total amount of compensation	£3.7m	£4.6m	£5.5m
Total amount of compensation including interest (4%)	£4.9m	£6.1m	£7.3m
Total amount of compensation including interest (5%)	£5.2m	£6.5m	£7.8m
Total amount of compensation including interest (8%)	£6.1m	£7.6m	£9.1m
Consolatory payments	£0.16m	£0.20m	£0.24m
Exchequer administration cost	Up to £0.5m	Up to £0.5m	Up to £0.5m
Total	£5.6 – 6.8m	£6.0 – 8.0m	£8.3 – 9.8m

Source: BERR estimates

Benefits to trawlermen

30. Compensation costs including interest payments and consolatory payments reflect a transfer from the Exchequer to trawlermen on a 'one-for-one' basis. The magnitude of costs to the Exchequer is equal to benefits received by trawlermen as they receive the compensation, interest payments and consolatory payments. Hence the total amount of compensation including interest payments ranges from £4.9m to £9.1m depending on the number of claims and rate of interest. Trawlermen will also benefit from receiving consolatory payments that range from £0.16m to £0.24m.

F: Risks

31. This impact assessment is based on various key assumptions such as the total number of claims and average length of service. There is a risk that we have underestimated the cost to Government through our assumptions. To factor in this uncertainty we have applied sensitivity analysis to the total number of claims and assumed a 100% take-up rate.

32. Another potential risk is that the target population of trawlermen are not aware of the new scheme. To mitigate this risk the Government will be advertising the consultation paper in local newspapers, contacting the representatives of the former British Fishing Association, and writing to all port MPs, asking them to inform interested constituents of the scheme. We expect to publicise the formal launch of the scheme – in the summer of 2009 – in a similar way.

G: Enforcement

33. This scheme will be administered by contractors, operating under a contract with BERR.

H: Recommendation and summary table of costs and benefits

34. Overall costs and benefits by main group affected are given in Table 2 below. The costs and benefits are for the 2 years of the scheme (2009/10 -2010/11).

Table 2. Summary of costs and benefits			
Total costs to the Exchequer (non-discounted)			
Total number of claims	800	1000	1200
Total amount of compensation (paid by the Exchequer)	£3.7m	£4.6m	£5.5m
Total amount of compensation including interest (4%) - (paid by the Exchequer)	£4.9m	£6.1m	£7.3m
Total amount of compensation including interest (5%) - (paid by the Exchequer)	£5.2m	£6.5m	£7.8m
Total amount of compensation including interest (8%) - (paid by the Exchequer)	£6.1m	£7.6m	£9.1m
Consolatory payments (paid by the exchequer)	£0.16m	£0.20m	£0.24m
Exchequer administration cost	Up to £0.5m	Up to £0.5m	Up to £0.5m
Total benefits (non-discounted)			
Total amount of compensation (received by trawlermen)	£3.7m	£4.6m	£5.5m
Total amount of compensation including interest (4%) - (received by trawlermen)	£4.9m	£6.1m	£7.3m
Total amount of compensation including interest (5%) - (received by trawlermen)	£5.2m	£6.5m	£7.8m
Total amount of compensation including interest (8%) - (received by trawlermen)	£6.1m	£7.6m	£9.1m
Consolatory payments (received by trawlermen)	£0.16m	£0.20m	£0.24m
Source: BERR estimates			

The Government proposes to pay interest at the rate of 4%.

I: Implementation

35. We will carefully consider the views put forward in May and June. This should enable the scheme to be formally launched in the summer of 2009.

J: Monitoring and evaluation

36. BERR will be carrying out an internal audit of the money spent from this scheme. Government will also be ensuring that the scheme is sufficiently publicised so that take-up of the scheme will be maximised.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	No	Yes
Small Firms Impact Test	No	Yes
Legal Aid	No	No
Sustainable Development	No	No
Carbon Assessment	No	No
Other Environment	No	No
Health Impact Assessment	No	No
Race Equality	No	Yes
Disability Equality	No	Yes
Gender Equality	No	Yes
Human Rights	No	Yes
Rural Proofing	No	No

Annexes

Competition

The initial analysis of the competition filter is that a detailed competition assessment is not considered necessary. The proposed measure will apply to individual trawlermen and is unlikely to affect the competitiveness of any particular sector.

Table A4. Competition assessment.

Question: <i>In any affected market, would the proposal..</i>	Answer
..directly limit the number or range of suppliers?	No
..indirectly limit the number or range of suppliers?	No
..limit the ability of suppliers to compete?	No
..reduce suppliers' incentives to compete vigorously?	No

Source: BERR

Small Firms Impact Test

The new scheme will be open to anyone that served on Icelandic fishing vessels at the time of the Cod Wars that applied under the previous compensation scheme. None of these tests are applicable as there will be no cost on business.

Equality

In line with better regulation best practice we have considered the impact of the scheme by equality group (gender, race and disability) and believe that the impact will not be detrimental to any of these groups.

We will make copies of the consultation document available in large print or Braille on request.

Annex D - New Icelandic Trawlermen's Compensation Scheme Rules

1. Purpose of the new scheme

The purpose of the new scheme is to provide additional compensation to any former Icelandic waters trawlerman (referred to in these rules as 'a trawlerman') who lost their livelihoods as a result of the "Cod Wars" settlement of the mid 1970s, and whose compensation under the previous Icelandic trawlermen's compensation scheme was unfairly low.

2. Persons eligible for compensation under the new scheme

2.1 A claim for compensation may be made by a trawlerman or the appropriate person (defined below) providing all the requirements of paragraphs (a) to (d) below are satisfied:

(a) a claim may only be made in respect of a trawlerman for whom an application was made under the previous scheme between October 2000 and October 2002 (whether by the trawlerman himself or by the appropriate person (defined below));

(b) The trawlerman must have completed at least two years aggregate service on Icelandic water vessels:

(i) during the period from 1 January 1973 to 31 December 1976;
or

(ii) if the trawlerman left the Icelandic fishing industry before 31 December 1976, during the four years ending with the date the Trawlerman left the industry.

and in either case the trawlerman's last period of service on Icelandic waters vessels must have ended on or after 1 January 1974.

(c) The trawlerman's fishing passport must confirm that he meets the requirements of paragraph (b) above.

(d) A claim must be submitted on the appropriate form and be submitted to the Department within six months from the formal launch of the new scheme.

2.2 The term 'Appropriate person' includes (in particular) a personal representative or executor where the trawlerman is deceased. A personal representative or executor must provide a copy of the grant of probate or letters of administration. Claims may be considered, at the Department's discretion and if satisfactory proof is provided, by other appropriate representatives.

2.3 “Aggregated service on Icelandic waters” vessels means the aggregate period of service (excluding breaks in service) on Icelandic vessels during the twenty years ending with the last date of a trawlerman’s Icelandic service.

2.4 The last date of Icelandic service will be the last date for which payment was made under the previous scheme or (for previously failed applications) the last date on which a trawlerman served on an Icelandic vessel, ending no later than 31 December 1979.

2.5. The list of Icelandic vessels is unchanged from the final list agreed under the previous scheme, with the addition of the Thessalonian.

3. Consideration of applications

3.1 Claims will be considered by officials at the Department for Business, Enterprise and Regulatory Reform (BERR) or by contractors operating under a contract with BERR.

3.2 If the criteria for eligibility under section 2 above are satisfied, claims will be considered for payment using the calculation set out in section 4 below.

4. Amount of Compensation payable to eligible Claimants

4.1 Where a claimant trawlerman satisfies the eligibility criteria under section 2 above, we will calculate whether he is entitled to any additional payment as set out below.

4.2 We will calculate the aggregate Icelandic service during the last twenty years of each trawlerman’s career (see paragraphs 2.3 to 2.5 above) to the nearest whole week. We will then multiply that by the weekly rate payable of £19.23 (equivalent to £1000/year, as paid under the previous scheme).

4.3. Where this calculation produces a higher amount than that already paid to the claimant under the previous schemes, we will pay the difference. We will not be seeking to recover monies where the reverse is the case. We will also add the following to the difference:

(a) Simple interest at the rate of 4% in respect of the difference only for a period of eight years (to take into account the time that has passed since the last scheme).

(b) A compensatory award of £200.

5. Appeals

5.1 If a Trawlerman or the Appropriate Person is dissatisfied with the outcome of his or her Application, he may write to a nominated official at BERR, setting out his or her grievance and the reasons for it.

5.2 If the BERR representative agrees that the application should have been accepted or that a higher amount of compensation should have been paid, the additional amount due will be paid and the Trawlerman or Appropriate Person will be informed of the decision.

5.3 If the BERR representative does not accept the appeal and the Trawlerman or Appropriate Person is dissatisfied, he may then appeal to an independent adjudicator appointed by BERR. The independent adjudicator will notify the Trawlerman or Appropriate Person of his decision. Once he has done so, neither the independent adjudicator, nor the BERR representative will consider the appeal any further .

5.4 BERR will only consider claims made in accordance with the rules of this new scheme.

Annex E - List of Icelandic vessels

Vessel	Port
Aberdeen Distributor	Aberdeen
Aberdeen Enterprise	Aberdeen
Aberdeen Explorer	Aberdeen
Aberdeen Fisher	Aberdeen
Aberdeen Merchant	Aberdeen
Aberdeen Progress	Aberdeen
Aberdeen Venturer	Aberdeen
Abunda	Grimsby
Achroite	Fleetwood
Achroite	Fleetwood
Admetus	Hull
Admiral Bruce	Aberdeen
Admiral Burnett	Aberdeen
Admiral Drake	Aberdeen
Admiral Hawk	Aberdeen
Admiral Frobisher	Aberdeen
Admiral Jellicoe	Aberdeen
Admiral Mountbatten	Aberdeen
Admiral Nelson	Grimsby
Admiral Rodney	Aberdeen
Admiral Vian	Aberdeen
Afgan	Hull
Afidi	Grimsby
Alamein	Hull
Aldershot	Grimsby
Alsey	Grimsby
Andanas	Grimsby
Anthony Hope	Hull
Arab	Hull
Arctic Adventurer	Hull
Arctic Avenger	Hull
Arctic Brigand	Hull
Arctic Buccaneer	Hull
Arctic Cavalier	Hull
Arctic Challenger	Hull
Arctic Corsair	Hull
Arctic Crusader	Hull
Arctic Explorer	Hull
Arctic Freebooter	Hull
Arctic Galliard	Hull

Arctic Hunter	Hull
Arctic Invader	Hull
Arctic Outlaw	Hull
Arctic Privateer	Hull
Arctic Raider	Hull
Arctic Ranger	Hull
Arctic Rebel	Hull
Arctic Scout	Hull
Arctic Trapper	Hull
Arctic Vandal	Hull
Arctic Viking	Hull
Arctic Warrior	Hull
Arlanda	Fleetwood
Armana	Fleetwood
Arsenal	Grimsby
Ashanti	Grimsby
Ashlea	Aberdeen
Aston Villa	Grimsby
Auburn Wyke	Hull
Avondow	Aberdeen
Avon River	Aberdeen
Balthazar	Hull
Banquo	Fleetwood
Banquo	Hull
Banyers	Hull
Bardia	Hull
Barnett	Grimsby
Barnsley	Grimsby
Barry Castle	Grimsby
Bayella	Hull
Belgaum	Grimsby
Belinda	Grimsby
Ben Arthur	Aberdeen
Ben Asdale	Aberdeen
Ben Barvas	Aberdeen
Ben Bhrackie	Aberdeen
Ben Edra	Aberdeen
Ben Gairn	Aberdeen
Ben Gulvain	Aberdeen
Ben Heilem	Aberdeen
Ben Idris	Aberdeen
Ben Loyal	Aberdeen
Ben Lui	Aberdeen
Ben Meidie	Aberdeen

Ben Screel	Aberdeen
Ben Strome	Aberdeen
Ben Tarbet	Aberdeen
Ben Torc	Aberdeen
Ben Wyvis	Aberdeen
Benella	Hull
Bengali	Grimsby
Benvolio	Hull
Black Watch	Grimsby
Blackburn Rovers	Grimsby
Blaefell	Fleetwood
Blankenese	North Shields
Bombadiar	Grimsby
Boston Attacker	Fleetwood
Boston Beverley	Fleetwood
Boston Beverley	Grimsby
Boston Blenheim	Fleetwood
Boston Boeing	Grimsby
Boston Britannia	Fleetwood
Boston Comanche	Grimsby
Boston Concord	Grimsby
Boston Crusader	Fleetwood
Boston Defender	Fleetwood
Boston Explorer	Fleetwood
Boston Fury	Grimsby
Boston Halifax	Grimsby
Boston Hercules	Aberdeen
Boston Invader	Fleetwood
Boston Kestral	Fleetwood
Boston Kestral	Grimsby
Boston Lightning	Fleetwood
Boston Lincoln	Grimsby
Boston Marauder	Fleetwood
Boston Monarch	Fleetwood
Boston Phantom	Fleetwood
Boston Phantom	Grimsby
Boston Seaform	Fleetwood
Boston Seafoam	Fleetwood
Boston Stirling	Fleetwood
Boston Tristar	Grimsby
Boston Typhoon	Fleetwood
Boston Wasp	Grimsby
Boston Weelsby	Grimsby
Boston Welvale	Grimsby

Boston Wyke	Hull
Boston York	Hull
Braconville	Grimsby
Bradman	Grimsby
Brandur	Grimsby
Branham	Hull
British	Grimsby
Broadwater	Fleetwood
Broadwater	Grimsby
Brontes	Hull
Brucella	Hull
Bruner	Hull
Brutus	Hull
Burfell	Grimsby
Burke	Grimsby
Burwood	Aberdeen
C.S Forester	Hull
Caledonian	Aberdeen
Calvi	Grimsby
Calydon	Hull
Camilla	Hull
Cape Adair	Hull
Cape Barfleur	Fleetwood
Cape Campbell	Hull
Cape Canaveral	Hull
Cape Cleveland	Hull
Cape Columbia	Grimsby
Cape Columbia	Hull
Cape Cormorin	Hull
Cape Crozier	Hull
Cape Duner	Hull
Cape Gloucester	Hull
Cape Kennedy	Hull
Cape Mariato	Hull
Cape Otrano	Hull
Cape Palliser	Hull
Cape Portland	Hull
Cape Spartel	Hull
Cape Trafalgar	Grimsby
Cape Tarifa	Hull
Cape Trafalgar	Hull
Cape Warwick	Hull
Captain Foley	Fleetwood
Captain Foley	Grimsby

Captain Freemantle	Fleetwood
Captain Inman	Fleetwood
Captain Hardy	Fleetwood
Captain Riou	Fleetwood
Carella	Fleetwood
Carlisle	Grimsby
Carthusian	Hull
Cassio	Hull
Ceaser	Hull
Cedarlea	Aberdeen
Churchill	Grimsby
Cirolana	Grimsby
Clarkwood	Aberdeen
Clova	Aberdeen
Clovella	Aberdeen
Coastal Emperor	Aberdeen
Coastal Empress	Aberdeen
Collena	Fleetwood
Coldsteamer	Grimsby
Colwyn Bay	Grimsby
Conan Doyle	Hull
Conqueror	Grimsby
Cordella	Hull
Corena	Hull
Corina	Aberdeen
Coriolanus	Hull
Coventry City	Grimsby
Craddock	Grimsby
Criscilla	Fleetwood
Crystal Palace	Grimsby
D B Finn	Hull
Dalewood	Aberdeen
Dane	Hull
Daniel Quare	Grimsby
David Ogilvie	Aberdeen
David Wood	Aberdeen
Dayspring	Hull
Daystar	Hull
Defiance	Hull
Derby County	Grimsby
Dinas	Fleetwood
Dinas	Hull
Donwood	Aberdeen
Dorinda	Fleetwood

Dragoon	Fleetwood
Dragoon	Grimsby
Dunkinty	Aberdeen
Dunsley Wyke	Hull
Edward East	Grimsby
Edwina	Fleetwood
Ella Hewitt	Fleetwood
Ephesian	Grimsby
Erimo	Grimsby
Ernest Holt	Grimsby
Equerry	Grimsby
Esquimaux	Hull
Etonian	Hull
Evander	Hull
Evelyn Rose	Fleetwood
Everton	Grimsby
Fairtry One	Hull
Fairtry Two	Hull
Fairtry Three	Hull
Fairway	Fleetwood
Falstaff	Hull
Faraday	Hull
Farnella	Hull
Franc Picard	Aberdeen
Fritz Homann	North Shields
Frobisher	Fleetwood
Furious	Grimsby
Fyldea	Fleetwood
Galilean	Grimsby
Gaul	Hull
Gavina	Fleetwood
Gelgairn	Aberdeen
Gillingham	Grimsby
Glen Carron	Aberdeen
Glen Coe	Aberdeen
Glen Moriston	Aberdeen
Glen Urquart	Aberdeen
Glenalla	Hull
Glendee	Aberdeen
Goth	Grimsby
Grampian Monarch	Aberdeen
Gregory	Grimsby
Grimsby Town	Grimsby
Hackness	Fleetwood

Hammond Innes	Hull
Hargood	Grimsby
Haselbech	Grimsby
Hausa	Hull
Hawfinch	Grimsby
Hekla	Grimsby
HMS Lincoln	
HMS Leander	
HMS Galatea	
HMS Diomedea	
Hondo	Grimsby
Howard	Hull
Huddersfield Town	Grimsby
Hull City	Grimsby
Ian Fleming	Hull
Ikena	Aberdeen
Ikena	Fleetwood
Imperialist	Hull
Invincible	Hull
Irvana	Fleetwood
Isernia	Grimsby
Jacamar	Aberdeen
Jacinta	Aberdeen
Jacinta	Fleetwood
James Barrie	Hull
Janwood	Aberdeen
Japonica	Aberdeen
Jasmin	Aberdeen
Jolena	Aberdeen
Josena	Fleetwood
Joseph Conrad	Hull
Joseph Knibb	Grimsby
Judaen	Grimsby
Julia Brierley	Fleetwood
Junella	Hull
Juniper	Aberdeen
Kandahar	Grimsby
Kelt	Hull
Kennedy	Fleetwood
Khartoum	Grimsby
King Sol	Grimsby
Kingston Agate	Hull
Kingston Almadine	Hull
Kingston Amber	Hull

Kingston Andalusite	Hull
Kingston Beryle	Hull
Kingston Chrysolite	Hull
Kingston Coral	Hull
Kingston Crystal	Hull
Kingston Cynaite	Hull
Kingston Diamond	Hull
Kingston Emerald	Hull
Kingston Galena	Hull
Kingston Garnet	Hull
Kingston Jacinth	Hull
Kingston Jade	Hull
Kingston Onyx	Hull
Kingston Pearl	Hull
Kingston Peridet	Hull
Kingston Ruby	Hull
Kingston Sapphire	Hull
Kingston Sardius	Hull
Kingston Topaz	Hull
Kingston Turquoise	Hull
Kingston Zircon	Hull
Kipling	Grimsby
Kirkella	Hull
Kirkness	Grimsby
Kyoto	Grimsby
Kurd	Hull
Lacarno	Aberdeen
Lady Parkes	Hull
Lancellia	Hull
Lancer	Grimsby
Larissa	Hull
Lavinda	Aberdeen
Leeds United	Grimsby
Leswood	Aberdeen
Lifeguard	Grimsby
Lincoln City	Grimsby
Lindenlea	Aberdeen
Locarno	Aberdeen
Locarno	Grimsby
Loch Alsh	Hull
Loch Bora	Aberdeen
Loch Doon	Hull
Loch Eriboll	Hull
Loch Fleet	Fleetwood

Loch Inver	Hull
Loch Kildonan	Aberdeen
Loch Leven	Hull
Loch Moidart	Hull
Loch Melfort	Hull
Loch Tornidon	Fleetwood
Loch Seafort	Hull
Longest	Aberdeen
Long Set	Grimsby
Lord Alexandra	Hull
Lord Ancaster	Hull
Lord Beatty	Grimsby
Lord Beatty	Hull
Lord Cunningham	Grimsby
Lord Cunningham	Hull
Lord Essendon	Hull
Lord Fraser	Grimsby
Lord Fraser	Hull
Lord Gort	Fleetwood
Lord Hawke	Hull
Lord Hotham	Hull
Lord Howe	Hull
Lord Jellicoe	Grimsby
Lord Jellicoe	Hull
Lord Lloyd	Fleetwood
Lord Lloyd	Hull
Lord Lovat	Hull
Lord Melfort	Hull
Lord Middleton	Hull
Lord Moidart	Fleetwood
Lord Montgomery	Fleetwood
Lord Mountevans	Hull
Lord Nelson	Hull
Lord Nuffield	Hull
Lord Plender	Fleetwood
Lord Plender	Hull
Lord Rowallen	Hull
Lord Sands	Aberdeen
Lord Seaforth	Hull
Lord St Vincent	Hull
Lord Stanhope	Hull
Lord Tay	Hull
Lord Tedder	Hull
Lord Wavell	Hull

Lord Willoughby	Hull
Lorenzo	Hull
Lorwood	Aberdeen
Loyal	Grimsby
Lucerne	Grimsby
Lucida	Fleetwood
Lucida	Hull
Luneda	Aberdeen
Luneda	Fleetwood
Macbeth	Hull
Magnolia	Hull
Man o War	Hull
Marbella	Hull
Maretta	Fleetwood
Margaret Wicks	Fleetwood
Marwood	Aberdeen
Masona	Fleetwood
Maythorne	Fleetwood
Merrydale	Fleetwood
Miletus	Hull
Milwood	Aberdeen
Miranda	Hull
Milyan	Hull
Mohave	Grimsby
Mount Eden	Aberdeen
Mount Everest	Aberdeen
Mylina	Hull
Navena	Fleetwood
Nanoa	Grimsby
Neath Castle	Grimsby
Nelis	Fleetwood
New Prince	Hull
Nellis	Grimsby
Newby Wyke	Hull
Norina	Fleetwood
Norse	Hull
Northella	Hull
Northern Chief	Grimsby
Northern Crown	Grimsby
Northern Dawn	Grimsby
Northern Duke	Grimsby
Northern Eagle	Grimsby
Northern Foam	Grimsby
Northern Gem	Grimsby

Northern Gift	Fleetwood
Northern Gift	Grimsby
Northern Isles	Grimsby
Northern Jewel	Grimsby
Northern Pride	Grimsby
Northern Prince	Grimsby
Northern Princess	Grimsby
Northern Queen	Grimsby
Northern Reward	Grimsby
Northern Sceptre	Grimsby
Northern Sea	Grimsby
Northern Sky	Grimsby
Northern Spray	Grimsby
Northern Star	Hull
Northern Sun	Grimsby
Northern Wave	Grimsby
Northolme	Grimsby
Norwich City	Grimsby
Notts County	Grimsby
Notts Forest	Grimsby
Novena	Aberdeen
Ogano	Grimsby
Okino	Grimsby
Olivian	Hull
Olsey	Grimsby
Olvin	Hull
Onslow	Fleetwood
Onslow	Hull
Orotavi	Grimsby
Orsino	Hull
Orsio	Hull
Osako	Grimsby
Othello	Hull
Padgett	Grimsby
Paramount	Aberdeen
Park Royd	Grimsby
Partisan	Aberdeen
Pataudi	Grimsby
Patti	Grimsby
Paynter	Grimsby
Peter Chancey	Hull
Peter Scott	Hull
Philadelphian	Grimsby
Pict	Hull

Port Vale	Grimsby
Portia	Hull
Primella	Hull
Prince Charles	Grimsby
Prince Charles	Hull
Prince Phillip	Fleetwood
Prince Phillip	Grimsby
Princess Anne	Fleetwood
Princess Anne	Hull
Princess Elizabeth	Grimsby
Princess Elizabeth	Hull
Princess Royal	Grimsby
Princess Royal	Aberdeen
Priscillian	Grimsby
Quantock	Hull
Radiation	Aberdeen
Ranger Ajax	Shields / Hull
Ranger Appollo	Shields / Hull
Ranger Auora	Shields / Hull
Ranger Boreas	Shields / Hull
Ranger Briseis	Shields / Hull
Ranger Cadmus	Shields / Hull
Ranger Calliope	Shields / Hull
Ranger Callisto	Shields / Hull
Ranger Castor	Shields / Hull
Rapier	Grimsby
Real Madrid	Grimsby
Red Charger	Fleetwood
Red Crest	Fleetwood
Red Crusader	Aberdeen
Red Crusader	Fleetwood
Red Dragon	Fleetwood
Red Falcon	Fleetwood
Red Gauntlet	Fleetwood
Red Hackell	Fleetwood
Red Knight	Fleetwood
Red Lancer	Fleetwood
Red Plume	Fleetwood
Red Plume	Hull
Red Rose	Fleetwood
Red Sabre	Fleetwood
Red Sword	Fleetwood
Red Sword	Hull
Reighton Wyke	Hull

Reneva	Fleetwood
Reptonian	Fleetwood
Resound	Fleetwood
Rhodesian	Grimsby
Rinivia	Grimsby
Robert Hewett	Fleetwood
Rodney	Grimsby
Roman	Grimsby
Rosella	Hull
Ross Altair	Hull
Ross Anson	Grimsby
Ross Antares	Hull
Ross Aquila	Hull
Ross Archer	Grimsby
Ross Arcturus	Hull
Ross Battler	Grimsby
Ross Beaver	Aberdeen
Ross Canopus	Hull
Ross Canaveral	Hull
Ross Cheetah	Grimsby
Ross Civert	Grimsby
Ross Cleveland	Hull
Ross Columbia	Hull
Ross Cougar	Grimsby
Ross Curlew	Fleetwood
Ross Dunner	Hull
Ross Falcon	Grimsby
Ross Fame	Grimsby
Ross Fighter	Grimsby
Ross Fortune	Fleetwood
Ross Genet	Grimsby
Ross Howe	Grimsby
Ross Hunter	Grimsby
Ross Illustrious	Hull
Ross Implacable	Hull
Ross Intrepid	Hull
Ross Jackal	Grimsby
Ross Jaguar	Grimsby
Ross Jupiter	Grimsby
Ross Jumo	Grimsby
Ross Kandahar	Grimsby
Ross Kashmir	Grimsby
Ross Kelly	Grimsby
Ross Kennedy	

Ross Kelvin	Grimsby
Ross Kennilworth	Grimsby
Ross Khartoum	Grimsby
Ross Kipling	Grimsby
Ross Kittiwake	Grimsby
Ross Leonis	Hull
Ross Leopard	Grimsby
Ross Lynx	Grimsby
Ross Orion	Hull
Ross Otranto	Hull
Ross Panther	Grimsby
Ross Polaris	Hull
Ross Procyon	Hull
Ross Puma	Grimsby
Ross Ramilles	Grimsby
Ross Renown	Grimsby
Ross Repulse	Grimsby
Ross Resolution	Hull
Ross Revenge	Grimsby
Ross Rodney	Grimsby
Ross Searcher	Grimsby
Ross Sirius	Hull
Ross Spartel	Hull
Ross Stalker	Grimsby
Ross Tarifa	Grimsby
Ross Tiger	Grimsby
Ross Tracker	Grimsby
Ross Trafalgar	Hull
Ross Valiant	Grimsby
Ross Vanguard	Grimsby
Ross Zebra	Grimsby
Rossallian	Hull
Royal Lincs	Grimsby
Royal Marine	Grimsby
Rudyard Kipling	Hull
SSAFA	Fleetwood
Samaraian	Grimsby
Samual Hewitt	Fleetwood
Sando	Grimsby
Scalby Wyke	Hull
Scampton	Grimsby
Scottish King	Aberdeen
Scottish Princess	Aberdeen
Seafridge Osprey	Hull

Seafridge Petral	Hull
Seafridge Skua	Hull
Serron	Grimsby
Shawnee	Grimsby
Siapon	Fleetwood
Sir Fred Parkes	Hull
Sisapon	Grimsby
Sletnes	Grimsby
Somerset Maugham	Hull
Southella	Hull
Souvenir	Aberdeen
Spurnella	Hull
Spurs	Grimsby
St Achilleus	Hull
St Alcuin	Hull
St Amant	Hull
St Andronics	Hull
St Apollo	Hull
St Arcadius	Hull
St Bartholomew	Fleetwood
St Benedict	Hull
St Botolph	Fleetwood
St Britwin	Hull
St Chad	Hull
St Christopher	Hull
St Crispin	Hull
St Dominic	Hull
St Elstan	Hull
St Finbarr	Hull
St Gerontius	Hull
St Giles	Hull
St Hubert	Hull
St Jason	Hull
St Jasper	Hull
St Jerome	Hull
St Just	Fleetwood
St Keverne	Hull
St Leger	Hull
St Loman	Hull
St Mark	Hull
St Matthew	Hull
St Necton	Hull
St Peter	Hull
St Romanus	Hull

St Wistan	Hull
Stafness	Grimsby
Starella	Fleetwood
Starella	Hull
Starwood	Aberdeen
Star of Aberdeen	Aberdeen
Star of Lathallan	Aberdeen
Star of Loretto	Aberdeen
Statham	Grimsby
Stayon Wyke	Hull
Stella Aldair	Hull
Stella Antares	Hull
Stella Aquilla	Hull
Stella Arcturus	Hull
Stella Canopus	Hull
Stella Capella	Hull
Stella Carina	Hull
Stella Dorado	Hull
Stella Leonis	Hull
Stella Pegus	Hull
Stella Polaris	Hull
Stella Procyon	Hull
Stella Rigel	Hull
Stella Sirius	Hull
Stockham	Grimsby
Stoke City	Grimsby
Strathdon	Aberdeen
Summerlee	Aberdeen
Swanella	Hull
Swansea Castle	Grimsby
Syerston	Grimsby
Tarchon	Hull
Tervani	Fleetwood
Tervani	Hull
Tesla	Grimsby
Tesla	Hull
Teutonia	Grimsby
Thomas Thompion	Grimsby
Thornella	Hull
Thornwick Bay	Grimsby
Thuringa	Grimsby
Tiberian	Grimsby
Tokio	Grimsby
Tom Grant	Aberdeen

Trimella	Hull
Tripoli	Hull
Trueman	Grimsby
Tunisian	Grimsby
Turcoman	Hull
Valafell	Grimsby
Vanessa	Grimsby
Vascama	Grimsby
Velia	Fleetwood
Velinda	Grimsby
Vestland	Grimsby
Vian	Hull
Vianova	Grimsby
Victory	Grimsby
Victrix	Hull
Vindora	Grimsby
Visenda	Grimsby
Vivaria	Grimsby
Viviana	Grimsby
Vizalma	Grimsby
Volesus	Grimsby
Warwick Deeping	Hull
Wellard	Grimsby
Welsh Monarch	Aberdeen
Welsh Princess	Aberdeen
Westella	Fleetwood
Westella	Hull
Westhaze	Hull
Westhope	Hull
William Wilberforce	Grimsby
Winmarleigh	Aberdeen
Wolverhampton Wanderers	Grimsby
Woolton	Fleetwood
Wyre British	Fleetwood
Wyre Captain	Fleetwood
Wyre Conqueror	Fleetwood
Wyre Corsair	Fleetwood
Wyre Defence	Fleetwood
Wyre Gleaner	Fleetwood
Wyre Majestic	Fleetwood
Wyre Marina	Fleetwood
Wyre Mariner	Grimsby
Wyre Monitor	Fleetwood
Wyre Nab	Fleetwood

Wyre Revenge	Fleetwood
Wyre Vanguard	Fleetwood
Wyre Victory	Fleetwood
Wyre Warrior	Fleetwood
Wyre Woolton	Fleetwood
Yardley	Grimsby
Yesso	Grimsby
York City	Grimsby
Yorkshire Rose	Hull
Zonia	Aberdeen
Zonia	Fleetwood
Zonia	Hull

