

47. Are there any additional options, over those presented here, that should be considered? If so, outline your proposed option below.

Response Category	Comments
TECFO	<p>To say "Leave it as it is", will not be accepted, so. I strongly believe you should have 2 zones on the outside for small LOCAL boats to fish, but I also feel strongly that you should keep the inner management zone to the current level of 14 Boats. (042202)</p>
	<p>The current TECFO as it is with 14 limited licenses as per the TAC allows, it is time proven and fully sustainable, this allowed the fishery to be awarded the MSC world recognition which is now of major importance for the sale of the finished product. This is now a requirement by most major retailers worldwide. The current CFFPB to be limited to no more than 20 vessels with limited TAC suggesting maximum of 2 tons per trip and limited fishing methods i.e. drag dredge, pump scoop dredge, hydraulic dredge There should be no minimum vessel size only the KEIFCA maximum vessel size (x 14: 050602, 050607, 050608, 050701, 050702, 050703, 050607, 050707, 050708, 050803, 050804, 050806, 050908, 050801)</p>
	<p>The existing TECFO fleet of 14 licences, with the same TECFO area which is proven to work over past thirty years. We believe keeping the MSC accreditation is crucial to ensure the product is sellable at a retail level (this is industry standard). The current CFFPB should be limited to local vessels only, with limited tonnage taken with any gear type used by the boat for vessels up to 14m. (x 2: 050603, 050604)</p>
	<p>The current TECFO as it is with 14 limited licenses as per the TAC allows, it is time proven and fully sustainable, This allowed the fishery to be awarded the MSC world recognition which is now of major importance on the sale of the finished product. This is now a requirement by most major retailers worldwide. The Current CFFPB to be limited to no more than 20 vessels with limited TAC suggesting maximum of 2 tons per trip. The current CFFPB allows for any gear type as long as criteria regarding damages and minimum sizes are met. By default the current CFFPB makes it possible for local fishers to get involved and try fishing methods that suit there vessels. Although 2 tons is not enough to sustain a business that targets cockles as its only source of income it would be enough to supplement a local boat's income and also is enough, if vessels combine their fishing activities, for a processor to be willing to accept the cockles. (050704)</p>
	<p>I would suggest that the only option that is tried and tested, that has been widely praised as an example of best practice and has been awarded MSC accreditation be considered. The current Thames Estuary Cockle Fishery Order is incredibly successful. It fulfils all of the evaluation criteria and has already made the proposed vision statement a reality! Doesn't anybody realize that you're seeking to achieve some-thing you already have. The MSC accreditation process is completely independent and has worldwide recognition and reinforces comments made about the successful management of the TECFO by other bodies. MSC accreditation is now of major importance on the sale of the finished product. This is now a requirement by most major retailers. The Current CFFPB should be open at the same time for the same reasons as the TECFO. It should be open to local boats only with a limited TAC. A maximum of 2 tons per trip and limited fishing methods i.e. drag dredge, pump scoop dredge. All current regulations should apply with regard to minimum size and breakage rates. We should not be seeking to encourage full time cockling but rather to supplement other fishermen's income (050705)</p>
	<p>My option would be to leave the current TECFO management system in place with 14 licences (subject to TAC numbers). Over many years this industry has strived to achieve a sustainable, viable fishery, and its success is mainly due to</p>

	<p>industry efforts to ensure the longevity of the cockle industry, whether this be through ensuring MSC accreditation, working to classify grounds or maintaining its vessels to the highest standards. Adding extra licences to the fishery would have a detrimental effect to overall investment in our coastal communities and add extra pressure in terms of administration and management to the KEIFCA officers. It would undoubtedly bring more conflict with Natural England and add pressure to the Army who need to alert each vessel about firing orders on the Maplin Sands. My option for the CFFPB would be to limit the vessels to 20, with a limited TAC, with no vessel size restrictions, as long as they were no larger than the KEIFCA maximum vessel size. (050802)</p>
	<p>Cockle line set up to include text message, text on leaving port as well as to Fishery Officers (050905)</p>
	<p>The maintain the current TECFO with 14 licenses, in line with the TAC. The fishery has proven itself over time to be sustainable at this level. Our MSC recognition has become of great importance to the commercial viability of the fishery, and a change to the number of licences will cause this to be under threat. Maintaining MSC is totally aligned with the objectives of this consultation. Coastal management zones with limited numbers and varied gear types. Keeping the daily quota small to allow for greater marginal control of the TAC. (050902)</p>
	<p>I think the 14 licences should stay as it is and as it has been for 30 years. It has worked it is a good sustainable fishery and has been since the regulating order started. (050911)</p>
<p>CFFPB</p>	<p>Owners who sold their licenses and got very rich should not receive a new license. They received up to three million pounds for their licenses. They decided to sell their right to the fishery and should not be allowed to start a new company, buy a new boat and continue to make money from the fishery. The license should never have been able to be sold in the first place. (050301)</p>
	<p>would like Jamaica modified, with 14 TMZ licences. 8 -10 licences in the CMZ. Small scale should refer to catch limits not vessel size or gear. Small scale as follows: less than 14 metres, less than 5 metres wide, any gear type, try maximum catch 4-6 tonne for suction dredging maybe reduce for drag dredging as smaller boats can't carry the weight. No TECFO TMZ boats Local boats only No coastal split. Existing TECFO licence holders can only be issued TMZ licences in existing company names. If anyone has sold a company or family have, they forfeit the right to be eligible for a further TMZ licence /permit. Existing TECFO licence holders can only be issued TMZ licences in existing company names. This is what I wanted in my interview, however I conceived small scale as just being for under 10's so felt like I didn't have an option. Modern under 10's are bigger than my boat. Small traditional under 10 metre vessel are at risk from the weather, define their days? they aren't used to working Monday – Friday. The boats have got bigger due to safety and efficiency. Breakage rules and gear size should be adhered to. Vessels, not using present gear, must have stability book. VMS should be compulsory in KEIFCA area, for all vessels. Please think about two under 10 metre boats landing in Kent 1 ton each, how are they going to get them processed? So much wasted fuel and time not really good for the carbon footprint. (x2: 050605, 050606)</p>
	<p>I suggest CAYMAN combined new with ARUBA in a new fishery Order. I feel 25 to 28 licences issued would be a better way of distributing a very sustainable and proven cockle fishery to more fishers. (050808)</p>
	<p>***'S OPTION. My option would be to combine the CAYMAN and ARUBA options together. Having the CAYMAN orange Thames management zone which makes the whole area into one fishery except for areas 1,2,3 and creating the separate (ARUBA) 1,2,3 Southend shores hand working fishery. And having</p>

	<p>the coastal management zones for areas 17,18,19,20. But CRUCIALLY having the 28 industry proposed licences within the Thames management zone. (050811)</p> <p>I feel that there should be one combined Thames management area like CAYMAN but with the small handwork fishery included. I also think that due to this being a larger area there should be 28 vessel licences in this area, but with management if needed to allow a certain amount of vessels in one area at a time as I believe that it does not affect the seabed activity if there are more vessels in fact it allows the TAC to be achieved faster which then results in less seabed activity for the remainder of the time which usually would be fished by 14 vessels for a longer time. I feel this could be beneficial to the sustainability of the fishery as it allows a longer undisturbed time for the area to thrive which can only be a good thing in my opinion, a farmer doesn't worry about how fast his field is harvested but how long it is left to grow and thrive. (050812)</p>
Other - Catching Sector	<p>Ability to fish outside 6 mile limit for 10m boats would be very handy for cockles & clams etc. We see clams in our nets at times and a towable dredge in deep water or a water spray dredge in shallow could provide a valuable income. (050601)</p>
	<p>Include East Barrow, West Barrow and the Maplin Sands in small scale fisheries and to have access before suction dredging starts and maybe a winter fishery which would be very beneficial to us (050805)</p>
	<p>To create the most opportunities to people across the district why couldn't you have a combination of the Bermuda and the Jamaica to give the Kent and Southend inshore fleets a good opportunity to create a small-scale fishery. As for the north side of the area the boats haven't gained anything that I can see the stocks in area 7 have decreased since 2011 and the north Kent boats would have great opportunities on the Margate sands with a good yielding cockle bed. I think it would be fair for the small-scale inshore fleet from the Blackwater to have area 8 the East Barrow head as well as area 7. This would give them a similar increased opportunity to similarly good cockle grounds and a small-scale hand rake fishery on the Southend foreshore. I'm sure you will get lots of feedback from the current cockle fisherman that the grounds in area 8 will affect their business model too much and they will have to diversify into new fishing methods forcing more pressure on to other stock. I would like to know what fishery they think they will turn to as I am yet to find one that would sustain them. (050810)</p>
Other Sector	<p>Cayman with 28 licences. A smaller daily quota would allow this. Admittedly the carbon footprint would be slightly higher, but this would be offset by employing more people. One person at sea supports fifteen ashore. (042201)</p>
<p>48. Evaluation of your option – why do you think it is better than those presented in this consultation?</p>	
Response Category	Comments
TECFO	<p>My opinion is no better or no worse than anyone else's we all have valid opinions that we must all respect (042202)</p>
	<p>I believe leaving the TECFO as it will allow the current industry to continue as a well-managed and balanced fishery which supports and generates income for the local coastal economies, whilst preserving and protecting the grounds. (050802)</p>
	<p>I believe it encompasses all of the requirements of a fully managed and sustainable fishery that supports the local coastal community and local economies, it allows for small scale investment for long term gain and gainful employment bringing the younger generations in to the fishery encouraging growth and general wellbeing of the local communities of the KEIFCA district without the massive financial burdens that are seen in all types of fishing, This</p>

would also reflect fully that the KEIFCA have understood and engaged with the local industry that its desires and needs are being met and looking forward to a very sustainable future both in economic and satisfaction criteria. We are now trapped in a cockle fishery by choice and our vessels do not have any other entitlement to fish for other species (x 14) (050602, 050607, 050608, 050701, 050702, 050703, 050607, 050707, 050708, 050803, 050804, 050806, 050908, 050801)

It ticks all the Evaluation Criteria boxes. A fully managed and sustainable fishery which supports the local coastal community and wider economies (such as tourism). Allowing for small scale investment which will lead to long term gain and employment opportunities. The cockle boats are unique boats which do not allow for different types of fishing to be carried out on them, and therefore we would have to invest greatly in other entitlements to be a viable business. Cockling is specialised, and we do not have knowledge of other fisheries, where we have invested our time (and resources) into the cockle industry. (x 2: 050603, 050604)

With the benefit of the past and my in depth knowledge of the cockle industry, I know, that my option encompasses all of the requirements of a fully managed and sustainable fishery that supports the local coastal community and local economies, it allows for small scale investment for long term gain and gainful employment bringing the younger generations in to the fishery encouraging growth and general wellbeing of the local communities of the KEIFCA district without the massive financial burdens that are seen in all types of fishing. I know this because this is the fishery we are in now. This current fishery is the success of the past 27 years of a well-run fishery. This would also reflect fully that the KEIFCA have understood and engaged with the local industry that its desires and needs are being met and looking forward to a very sustainable future both in economic and satisfaction criteria. (050704)

Let me say again! The Thames Estuary Cockle fishery Order already fulfils the vision statement and meets all of the evaluation criteria. Every option presented seeks to achieve the same thing but by a different method. Why? Surely something that is tried and tested and proven successful needs no changing. The coastal management zones need managing in a different way but are receiving an unwarranted amount of attention and are a distraction. In the 35 years I've been working in the industry these areas have produced no amount of regular cockles of commercial worth. Only very isolated occurrences. Let other fisherman try to supplement their income if they can but be aware the current Thames cockle fleet are dedicated to that task and are not able to do anything else. We cannot supplement our income! (050705)

Since leaving school, I have devoted my life to the Thames cockle fishery. I have worked at every level within it, from deck hand to skipper to processor. This has given me a very deep understanding of the specific aspects of why the Thames cockle fishery is successful and sustainable. I have also gained unique insights into the UK and European cockle fisheries as a whole, since moving into processing seven years ago. Being involved with eight different cockle fisheries simultaneously has meant that I'm well placed to contribute and judge ideas which ensure the future success of the Thames cockle industry. In the process I've gained experience with what works and what doesn't within cockle fisheries from both a commercial and sustainable standpoint. I now have years of experience in selling live cockles to processors, buying live cockles as a processor, and selling cockles in Europe to brands, supermarkets and consumers. I hope this goes some way to justifying why my suggestions should be considered, and hope that you share in this view. (050902)

Very similar to BERMUDA (050911)

	<p>The people that sold they sold to big foreign companies that have always been the main buyers of cockles and once they owned half the licenses they have since controlled the price (050301)</p> <p>Greater area, suits the existing fishery and type of boats fishing the areas. I have applied constantly for an outside permit which will now be CMZ, spent money each year getting ready for suction dredging, as this is the fishery. (x2: 050605, 050606)</p> <p>The TECFO fishery historically has larger TACs than the Wash fishery where 61 entitlements are issued. Each year in the Wash 45 to 55 Fishers take part sharing a smaller TAC than the TECFO shares with 14 fishers. Fishers in the Wash do make a living in a fair and proportionate manner and some Thames fishermen also take part in the Wash fishery so it must be viable for them to travel and take part. My point is if you combine the TECFO and CFFPB fisheries the TAC will be bigger to share to more fishers and retain viability. To avoid problems of too many vessels fishing in one area on a given day fishing plans can be made for each vessel with a licence to fish a certain area eachday during the week. If 28 licences were issued 14 vessels could be classed as group (1) who could fish for example areas A.B.C on a Monday. The other 14 vessels could be classed as group (2) who could fish say areas D.E.F on a Monday. Then on the next fishing day that would be open Group (2) Vessels could fish A.B.C areas with group (1) fishing D.E.F. This could be broken down into even more groups if needed if say there was a small area with dense cockles that could be fished but was too small for safety reasons to allow small areas to be opened. (050808)</p> <p>I feel like this is a better option for all who have shown financial dedication and a great fishing effort to the area to all benefit from the area without leaving a small few having less or even in some options no fishery in the Thames which they rely on. surely the fair way is the right way and not only financially. I feel this option gives the chance for a limited amount of vessels to be spread over a large area resulting in less activity being targeted on a small area and which in turn creates a more sustainable area to be in. This also gives the chance of a small handwork fishery which is beneficial to anyone who wants to take part. (050812)</p> <p>I think this is a better option because:</p> <ul style="list-style-type: none"> - it gives the opportunity for a handwork cockle fishery for the inshore fisherman and new fishers. - it would give all current cockle fishers an economically viable fishery - the coastal management zones are protected in the event of a future fishery taking place - It would be environmentally friendly and viable - it is the simplest option for all involved - the carbon footprint would not increase as the fishing effort would maintain the same as the current system (050811)
Other - Catching Sector	JAMAICA (050805)
	<p>This would hopefully relieve pressure on some of the other ground and would give more people an equal share of the pie there are a lot of people in the district that have not had the opportunity to fish in such a lucrative fishery to then bring a business plan to the IFCA to say how they will lose it. If the cockle fishery isn't divided between the whole of the district more fairly giving more equal opportunity to others there will only be a handful of people left in the whole district. My suggestion above would create more job across the whole area keep more boats going to sea (050810)</p>

Other Sector	More vessels means more competition. More competition means higher prices. At the moment you have two companies setting the price. More employment. (042201)		
49. Please provide feedback on the YOUR SUGGESTED option below using the evaluation criteria as a guide. These are designed to help you structure and focus your response.			
<u>Creating a well-managed fishery</u>			
(a) Does the option provide a simple framework that is easy for fishers, Authority members and other stakeholders to understand and work within?			
Response Category	Yes	No	Comments
TECFO	20		You will be using the existing frameworks (x 2: 050603, 050604)
CFFPB			Yes it's simple, it's an existing fishery with some modifications, gear type in TMZ is already set and managed. Suction dredging in CMZ will be the same. Other gear types is up to KEIFCA, but will struggle to make it viable. KEIFCA have vast experience already in these rules so yes. (x2: 050605, 050606)
			A New combined Order for the whole of the Thames cockle fisheries would be simpler to apply for as only one application would be required. It would also be more cost effective and easier for officers to manage and run. (050808)
			The option is the simplest for all involved. (050811)
			This would create a simple framework with only one area to be policed and surveyed meaning one set of paperwork which makes it simple for IFCA and the stakeholders (050812)
Other - Catching Sector			My option would possibly be the hardest to enforce and administer. (050810)
Other Sector			
(b) Will the option be easy and cost-efficient to administer, and not create too much paperwork for applicants to fill in?			
Response Category	Yes	No	Comments
TECFO	20		The framework is already in place, so there is lower costs involved to administer the scheme. (x 2: 050603, 050604)
CFFPB			It will be the easiest and most cost-efficient option with the least paperwork (050811)
			I think this is the most cost-effective way as there is only one area but has all involved investing and wanting this area to thrive. (050812)
Other - Catching Sector			I think the rules and regulations would be simple enough to understand (050810)
Other Sector			
(c) Will the option help create clear rules and regulations and be straightforward for KEIFCA officers to enforce and fishers to comply with?			
Response Category	Yes	No	Comments
TECFO	20		The rules are already clear to all licence holders. The additional suggestions would not need any additional resources (x 2: 050603, 050604)

CFFPB			It will be the easiest option for officers to enforce and for fishers to comply with. (050811)
			This option I believe will create an understanding which rules everyone taking part must follow as the rules set apply to you as there is only one area (050812)
Other - Catching Sector			
Other Sector			
Creating an environmentally responsible fishery			
(d) Does the option help ensure the cockle stock population is fished within clear limits that consider stock assessments and breeding stock?			
Response Category	Yes	No	Comments
TECFO	20		Yes, you are limiting licences in the TMZ and you are limiting tonnage taken in the CMZ. (x 2: 050603, 050604)
CFFPB	1		Yes, restricting licences in the Thames management zone, reducing some ground and limiting tonnage and permits in the CMZ. Yes, keeping TECFO/TMZ at 14 and having a TAC set allows this. (x2: 050605, 050606)
			It would ensure cockle stocks are fished within its limits. (050811)
Other - Catching Sector			With the small-scale fishery happening across more of the district it should be lower impact on the ground but should be beneficial to the cockle beds if they are anything like oysters they need working which this option would create that (050810)
Other Sector			
(e) Does the option help assess and monitor the impact of the fishery on the seabed, and strive to make the impact as small as possible?			
Response Category	Yes	No	Comments
TECFO	20		Yes, limiting licences and tonnage allows this to happen and puts the fishery's sustainability at its heart. (x 2: 050603, 050604)
CFFPB			The impact would be no more than all other proposals as the fishing effort would maintain the same. (050811)
Other - Catching Sector			
Other Sector			
(f) Does the option help consider the impact of the cockle fishery management on the wider ecosystem (including carbon footprint) and support internationally recognised accreditation systems (e.g. Marine Stewardship Council)?			
Response Category	Yes	No	Comments
TECFO	20		Yes, limiting licences and tonnage allows this to happen and puts the fishery's sustainability at its heart. (x 2: 050603, 050604)
CFFPB			Whatever plan is chosen limits will be assessed yearly to avoid overfishing. Having 28 licences as I propose in a combined new Order would not damage the MSC; an example of this is the WASH Brown Shrimp Fishery where there is more than 60 Fishers fishing alongside their own MSC for the Brown Shrimp. (050808)

			Yes the carbon footprint would be no more than all other options as the fishing effort would maintain the same (050811)
			I believe this option If implemented correctly will achieve all above. (050812)
Other - Catching Sector			
Other Sector			
Helping to support a successful and resilient local coastal economy			
(g) Does the option provide a framework that will help sustain a viable long-term cockle industry in the KEIFCA district?			
Response Category	Yes	No	Comments
TECFO	20		Yes, we have already shown this in the existing fishery, this plan proposed does not really alter that much from that. (x 2: 050603, 050604)
CFFPB	1		Yes the existing fishery works, why make any drastic changes, let go some areas for the CMZ and limit permits set a TAC Jobs will be created, processors will have more to cook. (x2: 050605, 050606)
			This option will definitely sustain a viable long term fishery as there would be no increased fishing effort compared to the last 30 years, which has been extremely sustainable and viable. (050811)
Other - Catching Sector			This would create the most opportunity across the whole district Southend north Essex/Blackwater and the north Kent coast. The small-scale fishers will look to maximise their catch profits by creating new markets local to them and the UK they will do this by investing in infrastructure and shore side facilities to help improve the profitability of the operations creating employment and skilled labour. while still giving the most lucrative fishing opportunity to the main suction dredging fleet and only a small amount of boats inside the firing area (050810)
Other Sector			
(h) Will the option help support local skilled employment?			
Response Category	Yes	No	Comments
TECFO	20		Yes by allowing other vessels to apply for permits to fish cockles (x 2: 050603, 050604)
CFFPB			It will help support skilled local employment. (050811)
Other - Catching Sector			
Other Sector			
(i) Will the option help assist long-term investment and growth in the local economy, supporting local shore side infrastructure and supply chains?			
Response Category	Yes	No	Comments
TECFO	19		Yes, a 30 year Regulating Order in the TMZ will help this and limiting tonnage will help support this and create opportunities in the CMZ. (x 2: 050603, 050604)

CFFPB			A New combined Order will share the TAC to more areas in the Thames resulting in support to more of the local economies. (050808)
			It will definitely encourage investment in all sectors as it will be viable and sustainable in the long term. (050811)
			I think this would achieve all above but not only for the locals, I feel this would benefit everyone who over the years have shown the dedication to the fishery and would in turn support the local economy and the local infrastructure as well. I don't think it will add value to the cockles caught as this usually depends on supply and demand which none of the options can change. (050812)
Other - Catching Sector			
Other Sector			
(j) Will the option help to 'add value' to the cockles that are caught in the cockle fishery?			
Response Category	Yes	No	Comments
TECFO	20		market prices dictate cockle prices (042202)
			Yes, the whole fishery will still be limited by TAC, which will help to keep demand high and minimise a fall in prices (x 2: 050603, 050604)
CFFPB			It will maintain its current level of cockle value and possibly even increase it. (050811)
Other - Catching Sector			
Other Sector			
<u>Strengthening and supporting our dynamic local coastal community</u>			
(k) Does the option provide fair opportunities for individuals and businesses, and help support young or new fishers?			
Response Category	Yes	No	Comments
TECFO	20		Yes, it will encourage young fishermen into the industry. (x 2: 050603, 050604)
CFFPB			It depends how the criteria is set, most people within the TECFO, are owners, or have been. It will only help training and safety if the vessels are capable of working the CMZ, otherwise people will go out single handed, this isn't a small boat fishery, as the gear is heavy and the processing will have to be carried out in line with other fisheries. (x2: 050605, 050606)
			Young Fishers will only come into the industry if they see a long-term future this is currently a big problem. A combined TECFO and CFFPB Fishery in a New Order option will help the Heritage side by sharing the landing of cockles to more ports regularly within the Thames fisheries. If more ports around the Thames are used for commercial cockle fishing more consistently this will add to the Dynamic of more local communities around the Thames. Whatever plan either ORDER or BYELAW chosen there should be a guarantee to fishers that once they've invested in the cockle fishery they are

			assured they can take part every year there is stock available. (050808)
			This option will provide fair opportunities for all, from the inshore fleet and newcomers in the hand work sectors old and young. Also to the current Thames cockle dredge fisherman old and young, where young/new fishers are naturally coming into the fishery by being family members to fishermen (sons/daughters, grandsons/granddaughters, nephews coming into the family business). (050811)
			I feel this is the best option to give fair opportunities to all involved and would give young fishers like myself and new fishers a chance to access the fishery instead of being shut out. I feel this idea in a new regulating order would give the security and long-term accessibility to the fishery which people have the confidence to invest in creating a safer and more sustainable fishery to work in. This option supports the heritage and culture of the fishery as nothing is being taken away from the fishery but being added which in my opinion will enhance every aspect of the fishery. (050812)
Other - Catching Sector			The new investment in shore side facilities and the opportunities in a successful renown cockle industry will create both on shore and at sea jobs (050810)
Other Sector			
(l) Will the option help encourage businesses to invest in a safe and skilled workforce?			
Response Category	Yes	No	Comments
TECFO	20		Yes, as the workforce are the most valuable asset to making the fishing a success. (x 2: 050603, 050604)
CFFPB			
Other - Catching Sector			
Other Sector			
(m) Does the option help support the heritage and culture of the cockle fishery, including supporting local tourism associated with the Thames cockle fishery?			
Response Category	Yes	No	Comments
TECFO	20		Yes, it most definitely does. Keeping the heritage and knowledge for many more generations will help maintain the industry which in turn will help to keep the local tourism buoyant. (x 2: 050603, 050604)
CFFPB			
Other - Catching Sector			
Other Sector			