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For the attention of KEIFCA Authority

I Thank you for the continued fair and transparent consultation process you have undertaken to date on the new management measures that will be introduced upon the Expiry of the TEFCO Fishery Order (1994).

I would like to suggest the following proposals ideas for the Authority to discuss and maybe take some of them on board when finalising your framework for the future.

Criteria should be based on a long track record of cockle fishing in the Thames and also taking into account close family's ownership of a vessel committed to the Thames Cockle Fishery

There should not be a system were only TEFCO fisher's whether owners. Crew, Skippers etc are the only fishers who can gain track record to fish the new TEFCO area as this has been difficult for most fishers fishing the Permit Fishery to achieve.

If this does happen it will mean a closed shop was formed as very limited opportunities to fish on a TEFCO vessel to gain track record over the last 28 years had been made available.

If this kind of record is used then the Authority must go back to when the TEFCO was being made to include fishers who did fish the TEFCO before its introduction.

This is a Cockle Licence/Permit application so should be based on cockle fishermen with experience of fishing for cockles in the methods used historically to avoid damage to the Thames Cockle fisheries.

If there is to be a limit as suggested in the New Jamaica for the TEFCO of 15 to 20 licences issued then with smaller TACs available in the Permit fishery the same rules have to apply. Even with the added areas of 13,11,15 the Permit fishery will still have less TAC consistently than the TEFCO available, so it is advised the Permit fishery will need limiting to a similar number as the TEFCO.

To create two sustainable fisheries both, require similar Vessel limitation on them.

Track record should go as far back as records show why should a Fisher lose a lifetimes commitment to the Thames cockle fishery because a new criterion excludes him from someone who has just come on the scene.

The aim of each fishery TEFCO/PERMIT should be to start at the same time each year, why should there be a different start date? I personally think this is a factor in the Current Permit fishery difficulties, it cannot hurt anything to try something that had worked successfully in the past Permit Fisheries.

If this is difficult to enforce starting both fisheries at the same time regarding KEIFCA Officers enforcement then Tracking systems could be used as one solution, or alternative days through each week could be fished for example TEFCO Monday, Permit fishery Tuesday, TEFCO Wednesday, Permit Fishery Thursday.

I would only use alternative days as an option if tracking systems are not an option available as a Fisher does have to work around the weather and the Tracking option is the easiest to apply out of the two stated.

There should be a limit on the number of Licences a Company or Individual can own or control in either TEFCO or Permit fishery.

If not, it will give opportunities for a similar system that is in place today were companies can in effect have a monopoly owning the majority.

KEIFCA Authority should do everything in their power to prevent licences becoming a tradable commodity, Licences should only be transferred to genuine close family who have track records in fishing the Thames cockle fisheries.

If this is not looked at seriously then the system will allow the wealthiest Companies to dominate the industry preventing grass roots fishermen entry in effect stopping genuine new blood gaining access into the fishery.

Criteria should maybe have an option of what fishery you would prefer to fish i.e., TEFCO/PERMIT If a limitation on Vessels is put on each fishery.

Quota at 6 ton a day I feel will be the lowest for a suction Dredge fishery, to have any chance of being environmentally friendly, emission wise vessels have to keep the number of transits to and from a fishery to a minimum. Smaller quotas will result in more transits to and from a fishery throughout a season with higher emissions a consequence of this.

Previous consultations have been suggested by some that Locals must be preferred in any new application for a Licence. This is not legally correct due to the (fisheries act 2020) and the right to have equal access opportunities.

All UK fishers pay taxes to the same government so contribute to the economy in the same way. The only thing a Fisher can do if granted fishing opportunities in the Thames Cockle fisheries differently is employ people in the local area and contribute to the local economy. This can be achieved by all fisher's whether they live in the area or not.

As you are aware the Wash Cockle Fisheries are currently under review, Over the 30 year term of the Wash Fishery Order there has been multiple licences granted to Thames TEFCO fishermen to fish the Wash Fishery Order (1992), the same should have happened in the Thames Cockle fisheries, Also in the new Proposed Wash Fishery management for the future there are mechanisms in place that will also grant Thames fishers rights to a Licence/ Permit in the Wash cockle fisheries, again the same fair and equal rights should be applied to Wash fishers with relevant track record and commitment to the Thames Cockle fisheries historically in the new Thames cockle fishery plans.

Regards ██████████

