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To the IFCA members,

After receiving an email on the 20th October 2022, asking for written proposals to be submitted regarding the New Jamaica management framework, we have either misunderstood the wording or taken back regarding (proposals needed to be in the spirit of the framework and proposals presented on behalf of a group of stakeholders or an association will be given greater weight when the authority discusses any reviews any proposals) we are not in an association and don't intend to be now or in the future, and to the best of my knowledge neither Wivenhoe or Brightlingsea has a fishing association, to which would be one of the places we would be working from, does this define discrimination, as we are the weaker individuals. Another disturbing response, if I haven't misunderstood what Mr Rattley said, 'it has been evident throughout the 49 responses that trials for small scale fishery have not been adopted through this part of the consultation, the worrying aspect of this is that the majority of the local fishing fleet that could have participated in this fishery over the many years have not understood they were able to be involved, this is worrying that a local fishery is misunderstood by its local incumbents and shows very poor engagement from the IFCA', when I applied for a cockle license many years ago due to lack of quotas, and an optional fishery to keep myself going I was turned down but was it the case I could have been permitted on a low scale fishery? I would like to add, I had many years at DEFRA and 5 different fishery ministers, debating the local Thames quota issues and if you are not careful and don't listen to the existing industry but with the view of allowing a small amount of extra entrants there will be more damage than good done.

Now we would like to comment on the New Jamaica management framework.

Regarding the 28 year regulating order we are being reminded that the decision has been made on the New Jamaica framework, and detail can be added. For a young man to start a new business, with a modern boat, which would have to be up to MCA standards for carrying weight, is very costly. I have spoken to our bank regarding a loan for a new build, the type of money involved to borrow would not be able to be secured on the 7 year review with the chance of the license being revoked, so bearing in mind it would be a 28 year license, the 7 year review with the potential of it being revoked needs to be dropped, this is important because nobody now or in the future coming from a normal fishing background wouldn't be able to get finance for a new build to modern standards as the bank wouldn't lend against a 7 year license. That would be shutting potentially any youngsters from acquiring a proper modern vessel now or in the future, this happened with banks on the fin fish with quotas, not enough quota means no loan. So a big emphasis on the economics and fishermans ability to finance there vessels. The existing fleet are already established but some might have similar problems when renewing there vessels in the future. Potentially if this isn't addressed it will stop investment and allowing people

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to enter the fishery, if granted a license. Therefore this excludes the younger generation, except if you are already one of the existing 14 vessels. You have to consider a lot of the existing vessel owners are getting on in age, and who is going to be there in 28 years time? The other thing to bare in mind for those with no understanding of time frame for a new build is about 2 years from bank to completion and a lot of hard work and stress and then got to make it pay ,so that's another factor just to get started,

Ownership of license

In our opinion, it should be like a pressure stock license, where it remains with the boat and owner for the security of the big investment, which would secure bank loans and personal security of investment. The investment goes beyond just the vessel, this is a very important issue.

Regarding the areas,

Steven Dells letter summed the problem up, that would arise from closing areas away from the main suction fleet, putting extra pressure on grounds available to the suction fleet. We should learn by mistakes, on what's happened In the quota fishery where everybody jumps on one species, because there not allowed another, i.e. too much effort on one type of fish, look what has happened to the Whelk fishery. What I am trying to say, is you need the fleet spread over a bigger area at times, this wouldn't impact a small scale fishery and I would like it noted now, in my opinion I don't think now that there will be many boats,(apart from existing boats connected to the main dredging fleet which could be several) that will be able to participate because of new MCA regulation or even want to if they can't carry weight , by boats coming from the local estuary ports. I hope I am wrong, but I don't think so. This needs serious thought.

We think this process should of started to look favourable for young local fishermen but in our opinion

In 10 years or less there will be only a hand full of full time fishermen left, the cockle fleet will be there and their associated vessels and most of what's left now gone, because of the age the existing men

Best Regards

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