



# Responses to the Consultation on Inshore Mackerel Fishery Trial

Analysis Report

## Introduction

On 1 November 2017, the Scottish Government issued a public consultation seeking views following the completion of the four year trial of increased allocation and open access to inshore mackerel fisheries.

This report provides an analysis of the 133 written responses to the questions ([Annex 1](#)) in the consultation document. The published responses can be found on the Scottish Government website: [https://consult.gov.scot/marine-scotland/inshore-mackerel-fishery-trial/consultation/published\\_select\\_respondent](https://consult.gov.scot/marine-scotland/inshore-mackerel-fishery-trial/consultation/published_select_respondent)

## Background

A fixed amount of NS mackerel quota (300t) has been re-allocated from UK share and awarded to the Scottish 10m and under pool for prosecution in sea area IVa since 2002. To limit capacity and ensure a full summer fishery, in 2008 Handline Mackerel Entitlements were created and granted to a limited number of Scottish 10mu licences (based on historic track record in the fishery), permitting landing of mackerel in sea area IVa. Further entitlements were created in 2012 to enable a fishery in IVb fishery. There are currently 325 of these entitlements.

There has been no restriction to fish mackerel on the West of Scotland, and whilst the total quota available to this stock has been low, catch limits have been roughly similar to those set for the North Sea stock. Uptake of this fishery has been traditionally low and the quota has tended to not be exhausted.

In 2014 a trial period started, whereby an increased allocation was made to the Scottish non-sector, 10mu (hereafter 10mu) fleet for both the NS and western mackerel fisheries (1,000 tonnes in the NS and around 320 tonnes in western waters). The trial concluded following the 2017 quota year. The IVa and IVb Handline Mackerel Entitlements were made defunct for the trial period.

The Government proposed the following:

- A permanent continuation of the increased allocation of the NS mackerel stock to the Scottish 10mu fleet.
- A reduction of the additional allocation of western mackerel from 300 to 50 tonnes.
- The removal of all Handline Mackerel Entitlements associated with licences, thereby maintaining an open access fishery, as per all other quota stocks for this fleet sector.

The Government sought opinion on the following:

- Current management arrangements for the North Sea mackerel fishery
- Potentially widening access to the fisheries by permitting non-sector vessels over 10m in length to have right of use of quota.

## Analysis of Responses

### Key findings

#### Overview

- 133 responses, of which 96 were from 10mu licence holders.
- The majority opinion is that the quota allocations, as per four year trial, should continue permanently, that open access to these fisheries for the 10mu fleet should continue but that access for the over 10m fleet should not be established.
- Respondents were generally happy with current management arrangements for the NS mackerel fishery.

#### **Question 1 Do you agree that the allocation of mackerel to the non-sector, 10mu pool should continue?**

- 124 (93%) of the respondents agreed.

#### **Question 2 Maintain the 1,000 tonnes allocation of NS mackerel**

- 103 respondents agreed (77%), 11 disagreed (8%), of which 4 proposed a reduced allocation.

#### **Question 3 Reduce the additional allocation of western mackerel**

- 26 respondents agreed (20%), 48 disagreed (36%) and 59 answered “Don’t know” (39%).
- The large number of “Don’t know” responses is likely due to the majority of respondents being from the North and East of Scotland and the proposal in this question having no impact on them.

#### **Question 4 Maintain current management arrangements for the allocation of NS mackerel**

- 98 respondents agreed (74%) that localised management should continue.

#### **Question 5 Opportunity to alter the allocation shares of NS mackerel between the geographically distinct sub-groups**

- 62 respondents disagreed (47%) and 46 did not know (35%).
- Of the 19 who agreed (14%), nine proposed in-year changes to the allocations rather than changes to the allocation key (this opportunity was inherent in the management arrangements during the trial period).

#### **Question 6 Extinguishing of Handline Mackerel Entitlements from licences**

- 87 respondents agreed (65%), 18 did not know (19%) and 24 disagreed (18%) with the proposal to permanently remove Handline Mackerel Entitlements from licences.

#### **Question 7 Should access be extended to include the over 10m, non-sector fleet**

- 76 respondents disagreed (57%), 40 agreed (30%) and 16 did not know (12%).

## Summary

There is clear support across the respondents, including individual skippers effected, representative organisations and from the sector, to continue with an expanded NS mackerel fishery for the non-sector, 10mu fleet.

Responses to the proposed decrease in allocation for the western fishery are less clear-cut and for a number of reasons. A number of individual fishermen and representatives of the sectoral fleet supported a reduction, or a full withdrawal, of the increased allocation.

The proposed removal of the Handline Mackerel Entitlements is an issue where individual circumstances and opinion was more diverse. Current holders of the entitlement do not wish to lose any perceived value of their licence, whilst non-holders would lose a significant portion of annual income if they were once again denied access to the fishery.

There is some support for access to inshore mackerel opportunities for the non-sector, over 10m fleet. However, almost twice the number of respondents, from both the 10mu fleet and from the sector, were not in favour. Reasons included the potential negative impact on quota exhaustion and market price if larger vessels were permitted entry to the fishery.

## Profile of respondents

Responses were received from the people most affected by the Government proposals, namely holders of 10mu licences (72% of all responses).

16 responses were received from organisations.

Only eight respondents classified themselves as having no direct link to fishing.

A profile of the respondents is contained in [Annex 2](#) and a list of the organisations who responded to the consultation and who consented to the publication of their responses is contained in [Annex 3](#).

## **Cross-cutting themes**

Many respondents commented on the following issues in their responses.

### Economic boost to a fleet segment with minimal opportunity for diversification

Accessing any additional stream of quota boosts the potential profitability for the 10mu vessels, which are primarily reliant on non-quota species (crab, lobster, squid and scallops).

Good quality, well-presented mackerel can deliver a premium price and the cost for re-gearing from pots to lines is relatively low.

### Additional cost and 'closed shop' arising from Handline Mackerel Entitlements

Between 2008 and 2014, 10mu licence holders could only prosecute the mackerel fishery in the North Sea if they also held a Handline Mackerel Entitlement; the mackerel fishery on the west coast has always been open to all 10mu licences.

At 1 January 2014 there were 325 of this associated with licences. Naturally, that placed a premium on them and therefore added value/cost to the licence when sold/purchased.

With the increase in allocation from 2014, the policy objectives of the trial would not be met by a continuation of limited access to the mackerel fishery in the North Sea, therefore, the entitlements were made void were the four years for the trial.

Respondents opposed to the permanent removal of the Handline Mackerel Entitlement see this as their licence being devalued and some may have paid a significantly higher price to acquire a 10mu licence associated with the mackerel entitlement. However, their retention, alongside any permanent continuation of an increased quota allocation, will confer an even greater value on these permits, with the resulting outcomes that newcomers into the sector will face inflated start-up costs and that the fishery becomes a closed shop to outsiders, or new skippers.

Several respondents, who stated that their fishing licence had a Handline Mackerel Entitlement associated with it, wrote that they were willing to 'take the hit' of losing the value of the entitlement in order to maintain the access to the increased quota allocation.

### Reduction in fishing pressure for shellfish stocks

By changing gears for one or two days per week, vessels will not target shellfish and therefore may reduce pressure on these stocks, which would otherwise not be possible.

## Analysis of each question

### Question 1

Do you agree that the mackerel allocations for 10mu non-sector pool fishery should continue?

<b>Responses organised by category</b>	<b>Agree</b>	<b>Disagree</b>	<b>Don't know</b>	<b>Not answered</b>
Non-sector, 10mu licence holder	90	2	3	1
Non-sector, over 10m licence holder	6	0	0	0
Sectoral licence holder	5	2	0	0
Producer Organisation (POs)	5	0	0	0
Representative Organisation	10	0	0	0
Local council	1	0	0	0
Non-fisherman	7	1	0	0
TOTAL	124	5	3	1
Share of total replies	93.2%	3.8%	2.3%	0.8%

## Question 2

Do you agree that the current allocation (1000 tonnes) for the North Sea stock is the right amount?

Responses organised by category	Agree	Disagree	Don't know	Not answered
Non-sector, 10mu licence holder	76	5	13	2
Non-sector, over 10m licence holder	6	0	0	0
Sectoral licence holder	4	2	1	0
Producer Organisation (POs)	3	2	0	0
Representative Organisation	8	1	1	0
Local council	0	0	1	0
Non-fisherman	6	1	1	0
TOTAL	103	11	17	2
Share of total replies	77.4%	8.3%	12.8%	1.5%

### Main reasons for agreement

Clear source of additional income for a fleet segment which is often limited to certain stocks for the year.

Reduction in pressure on shellfish stocks.

Has invigorated investment into the fleet segment and, to a lesser extent, ancillary onshore businesses.

### Main reasons for disagreement

Potential for large increase in effort in the fishery which would decrease opportunity and also potentially cause market prices to drop.

The full amount has never been taken and the allocation can therefore be lowered. At the time of publishing the consultation, 2017 catch figures were incomplete, however, 2017 was the first year in which the full NS mackerel allocation was caught by the 10mu group.

### Additional opinions

All POs and the Scottish Pelagic Fishermens' Association stated that any allocation should change in-line with annual changes to the TAC, primarily so that TAC decreases would similarly reduce the allocation to the 10mu pool. No comment was made if this should be likewise reflected following an increase in the TAC .

### Question 3

Do you agree that the additional allocation (300 tonnes) for the western stock should be reduced to 50 tonnes?

Responses organised by category	Agree	Disagree	Don't know	Not answered
Non-sector, 10mu licence holder	15	33	46	2
Non-sector, over 10m licence holder	1	4	1	0
Sectoral licence holder	3	1	1	2
Producer Organisation (POs)	3	2	0	0
Representative Organisation	2	3	3	2
Local council	0	1	0	0
Non-fisherman	2	4	1	1
TOTAL	26	48	52	7
Share of total replies	19.5%	36.1%	39.1%	5.3%

It is noted that a large number of respondents did not answer or marked “don’t know” to this question (44% combined). This may be due to respondents based on the north and east coast not wishing to make decisions that do not impact them.

#### Main reasons for agreement

Clear evidence that the west coast fleet has never used any amount of the additional tonnage. [The additional quota allocation has never been fished and in each year of the trial all 300 tonnes was re-allocated to the sector.]

#### Main reasons for disagreement

A return to the original allocation (circa 25 tonnes) will not permit any future development of the fishery.

The option for an in-year re-allocation to the sector could still continue, so there is no need to reduce the allocation permanently.

#### Additional opinions

Several respondents opined that both segments of the non-sector (vessels under and over 10m) based on the west coast would benefit from access to this stock and therefore the increased allocation should remain and be open to both groups.

Comment was made that the western stock is currently not seen so close to the shoreline and therefore for it to be prosecuted, potentially the over 10m fleet would have opportunity to prosecute the stock.



#### Question 4

Do you agree with the arrangements for the current quota allocation pools for the NS mackerel stock?

Responses organised by category	Agree	Disagree	Don't know	Not answered
Non-sector, 10mu licence holder	72	5	16	3
Non-sector, over 10m licence holder	5	1	0	0
Sectoral licence holder	6	1	0	0
Producer Organisation (POs)	3	0	2	0
Representative Organisation	5	0	4	1
Local council	0	0	1	0
Non-fisherman	7	1	0	0
TOTAL	98	8	23	4
Share of total replies	73.7%	6.0%	17.3%	3.0%

#### Main reasons for agreement

Majority of responses view the current method of localised management as working well and appropriately.

#### Main reasons for disagreement

No common comments.

Some comments made are more appropriately reflected in responses to question 5.

### Question 5

Do you think that the allocation shares between these pools should change?

Responses organised by category	Agree	Disagree	Don't know	Not answered
Non-sector, 10mu licence holder	16	45	31	4
Non-sector, over 10m licence holder	1	4	1	0
Sectoral licence holder	0	3	4	0
Producer Organisation (POs)	0	3	2	0
Representative Organisation	0	4	5	1
Local council	0	0	1	0
Non-fisherman	2	3	2	1
TOTAL	19	62	46	6
Share of total replies	14.3%	46.6%	34.6%	4.5%

#### Main reasons for agreement

A small number of respondents asked for increase to the allocations in their area.

One opinion was that the allocations should be rebased by number of vessels in each area. [The current allocation is based on a historic track record of catches.]

Several respondents offered the view that quota could move between pools in-year if uptake in particular areas was low. This has already been the case in at least two of the years during the trial.

#### Main reasons for disagreement

Almost half of all respondents viewed the allocation shares as appropriate and fair, whilst over a third offered no opinion.

Questions 4 and 5 were asked to gauge opinion on management arrangements rather than seeking definitive conclusions.

### Question 6

Do you agree with the Scottish Government's proposal to establish handline mackerel as a fishery open to all 10mu licences and therefore remove all Handline Mackerel Entitlements from licences?

Responses organised by category	Agree	Disagree	Don't know	Not answered
Non-sector, 10mu licence holder	70	18	6	2
Non-sector, over 10m licence holder	4	1	1	0
Sectoral licence holder	4	2	1	0
Producer Organisation (POs)	1	1	3	0
Representative Organisation	3	0	5	2
Local council	0	0	1	0
Non-fisherman	5	2	1	0
TOTAL	87	24	18	4
Share of total replies	65.4%	18.0%	13.5%	3.0%

#### Main reasons for agreement

Open access has provided additional and fair opportunity for all licence holders to a valuable catching opportunity.

This action will remove the cost of what had become an expensive barrier to being able to prosecute a fishery.

Inconsistent with policy of equal and open access to all quota stocks across the 10mu fleet.

Investment has been made into vessels during the trial so a return to restricted access will invalidate that.

#### Main reasons for disagreement

Loss of value as some may have paid an additional amount for a licence with a Handline Mackerel Entitlement.

Removing the Handline Mackerel Entitlement will remove any simple control mechanism for managing effort in this fishery.

### Question 7

Should all non-sector vessels (under and over 10m in length) have access to the inshore mackerel fishery?

Responses organised by category	Agree	Disagree	Don't know	Not answered
Non-sector, 10mu licence holder	24	61	10	1
Non-sector, over 10m licence holder	4	2	0	0
Sectoral licence holder	3	3	1	0
Producer Organisation (POs)	1	3	1	0
Representative Organisation	3	4	3	0
Local council	1	0	0	0
Non-fisherman	4	3	1	1
TOTAL	40	76	1	0
Share of total replies	30.1%	57.1%	12.0%	0.8%

#### Main reasons for agreement

The non-sector, over 10m fleet is effectively locked into single species (nephrops) or non-quota species, much like the 10mu fleet, therefore an opportunity to target mackerel would provide a similarly beneficial diversification.

#### Main reasons for disagreement

If the quota were open to over 10m vessels, it would be used much quicker than currently due to the potential large capacity increase, thereby shortening the season and reducing previous expectation of access for the 10mu group.

Increased volumes of mackerel going to market may cause prices to crash.

Opening access to the over 10m segment was not a consideration for the trial. If these above scenarios were to eventuate, it would invalidate the significant work by improve the fishing model for the 10mu group, including all aspects of the recent trial.

## Next steps

All consultation responses have been published where permission to do so was granted. These can be found here

[https://consult.gov.scot/marine-scotland/inshore-mackerel-fishery-trial/consultation/published\\_select\\_respondent](https://consult.gov.scot/marine-scotland/inshore-mackerel-fishery-trial/consultation/published_select_respondent)

A Consultation Report setting out details of the Scottish Government's policy intentions for the inshore mackerel fisheries will be published in due course. If you require further information about any aspect of this analysis report please contact [Ross.Parker@gov.scot](mailto:Ross.Parker@gov.scot).

## **Annex 1     Consultation Questions**

### Question 1

Do you agree that the mackerel allocations for 10mu non-sector pool fishery should continue?

### Question 2

Do you agree that the current allocation (1000 tonnes) for the North Sea stock is the right amount?

### Question 3

Do you agree that the additional allocation (300 tonnes) for the western stock should be reduced to 50 tonnes?

### Question 4

Do you agree with the arrangements for the current quota allocation pools for the NS mackerel stock? i.e. managing pots of quota discreetly by ports of administration?

### Question 5

Do you think that the allocation shares between these pools should change?

### Question 6

Do you agree with the Scottish Government's proposal to establish handline mackerel as a fishery open to all 10mu licences and therefore remove all Handline Mackerel Entitlements from licences?

### Question 7

Should all non-sector vessels (under and over 10m in length) have access to the inshore mackerel fishery?

## Annex 2 Quantitative analysis

### Question 1

Response	Total	% of total replies
Yes	124	93%
No	5	4%
Don't know	3	2%
Not answered	1	1%

### Question 2

Response	Total	% of total replies
Yes	103	77%
No	11	8%
Don't know	17	13%
Not answered	2	2%

### Question 3

Response	Total	% of total replies
Yes	26	20%
No	48	36%
Don't know	52	39%
Not answered	7	5%

### Question 4

Response	Total	% of total replies
Yes	98	74%
No	8	6%
Don't know	23	17%
Not answered	4	3%

### Question 5

Response	Total	% of total replies
Yes	19	14%
No	62	47%
Don't know	46	34%
Not answered	6	5%

### Question 6

Response	Total	% of total replies
Yes	87	65%
No	24	18%
Don't know	18	14%
Not answered	4	3%

### Question 7

Response	Total	% of total replies
Yes	40	30%
No	76	57%
Don't know	16	12%
Not answered	1	1%

## Profile of respondents

### Individuals

<b>Respondent Group</b>	<b>Total</b>	<b>% of total replies</b>
Non-sector, 10m & under licence holder	96	72%
Non-sector, over 10m licence holder	6	4%
Sectoral licence holder	7	5%
Non-fishing	8	6%

### Organisations

<b>Respondent Group</b>	<b>Total</b>	<b>% of total replies</b>
Producer Organisation	5	4%
Fishermens' Association	10	8%
Local Authorities	1	1%



### **Annex 3      Organisational Respondents (published)**

Anglo Scottish Fishermen's Association  
Comhairle nan Eilean Siar  
Fife Creel Fishermen's Association  
Fife Fishermen's Mutual Association  
Fife Producers' Organisation  
Klondyke Fish Producers' Organisation  
North East Creel and Line Association  
Orkney Fisheries Association  
Scottish Fishermen's Federation  
Scottish Fishermen's Organisation  
Scottish Pelagic Fishermen's Association  
Shetland Fishermen's Association  
Shetland Fish Producers' Organisation  
Shetland Shellfish Management Organisation  
Western Isles Fishermen's Association



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