

ANNEX B

Fees for commercial and recreational potting permits in NWIFCA District to be incorporated in the potting byelaw

1. Government policy is for regulators to achieve cost recovery for services provided from the public purse.
2. Cost recovery has been considered for 2 byelaws introduced by NWIFCA, namely the cockle and mussel permit byelaw and the permit to dredge byelaw.
3. NWIFCA has estimated the overall costs of regulating these fisheries as in the attached spreadsheet (Annex C) at £130K per year. This figure uses an average cost of officer time of £50 per hour. This is the same as the charge out rate agreed by the Authority for work done by IFCOs for external bodies such as shellfish sampling for Environmental Health Services.
4. The expected numbers of permits are:
 - a. 80 non-commercial crab and lobster
 - b. 30 commercial crab and lobster
 - c. 30 commercial whelk
5. Full cost recovery would require an average permit charge of £930 / year. A charge at this level would not be appropriate for recreational permits and would likely be unacceptable to the majority of commercial fishers.
6. Permit charges made by other IFCA are shown in the table at Annex D. The maximum IFCA charge for a commercial potting permit is £180 in Northumberland IFCA. And the maximum charge for a recreational potting permit is £30 in Kent and Essex IFCA
7. The national overview of IFCA charging for permits (Annex D) shows that IFCA charging regimes are inconsistent, generally low and appear rather arbitrary. However, there are some fisheries such as the Thames cockle fishery (£836 per Fishery Order permit) and the Poole harbour oyster fishery (£1000 per permit) where charges appear high and inconsistent with other fisheries in those Districts.
8. These discrepancies may result from IFCA using old byelaws and the effort required to update byelaws with modern rates of charging.
9. The Authority is invited to consider the commercial and recreational permit charges and if possible reach agreement on rates to be set in the byelaw. The following options are suggested.
10. Commercial permit: £900: This would be close to full cost recovery for commercial fishers Alternatives such as £500 or £300 may be considered.
11. Hobby permit: £100. This may seem high but would be still well below the value of the catch which could be expected from regular fishing with 5 pots. Alternatives such as £50 or £30 may be considered.

CEO
23rd January 2019