

EXPLANATORY MEMORANDUM TO:

THE FISHERY PRODUCTS (OFFICIAL CONTROLS CHARGES) (ENGLAND) REGULATIONS 2007

2007 No. 3392

1. This explanatory memorandum has been prepared by the Food Standards Agency and is laid before Parliament by Command of Her Majesty.

2. Description

2.1 This instrument requires payment by food business operators to local food authorities of a contribution towards the costs of carrying out hygiene inspection and analyses in respect of fishery products caught in their natural environment and landed directly in England from:

- Member States
- EEA States other than Member States
- Greenland, and
- Third countries

2.2 These direct landings of fishery products are not required to enter through controlled points of entry into England. The charges in respect of hygiene controls on direct landings are assessed and made in relation to the first placing on the market of fishery products, on the basis of the tonnage of fishery products that have been landed and the tonnage of fishery products that enter a processing establishment. The vendor must then make a return to the local food authority within a specified period. The authority will then levy the charge on the basis of the landing or throughput of fishery products.

2.3 The charges contribute to the costs of local food authority's legal obligation under Annex III to EC Regulation 853/2004 to:

- Check fishing vessels in relation to hygiene controls;
- Check on condition of landings and first sale of fishery products;
- Make hygiene inspections of establishments and factory vessels on conditions of approval, correct handling, cleanliness and staff hygiene, and health certification and marking; and
- Carry out organoleptic, parasitic, chemical, contaminant (heavy metals etc) and microbiological analyses.
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3. Matters of special interest to the Joint Committee on Statutory Instruments.

3.1 None

4. Legislative Background

4.1 The instrument is being made to continue to provide for the collection of hygiene official controls charges for direct landings in England of fishery products, as required by EC legislation. It needs to come into force from 1 January 2008 when the new rates for official controls contained in Article 27 of Regulation (EC) 882/2004 on Official Feed and Food Controls (the OFFC Regulation) take effect in all Member States.

4.2 From that date, the Fishery Products (Official Controls Charges) (England) Regulations 2006, which currently provide for recovery of fish hygiene official controls charges in England, will be revoked.

5. Extent

5.1 This instrument applies to England. Parallel legislation is being developed in Scotland, Wales and Northern Ireland.

6. European Convention on Human Rights

As the instrument is subject to negative resolution procedure and does not amend primary legislation, no statement is required.

7. Policy background

7.1 Policy

7.1.1 The objective of Article 27 of the OFFC Regulation in setting out the charging provisions for hygiene inspections is to ensure that industry contributes to the costs of enforcement authorities in sampling and testing direct landings of fishery products to ensure they meet the hygiene standards set down in the EU hygiene legislation. Such products may enter England without being subject to controls at point of entry and these requirements are therefore necessary to monitor these products to ensure they meet EU hygiene standards and are fit for human consumption. A transitional derogation in Article 27 permitted the retention of the rates in Directive 85/73, as amended, until 1 January 2008, when the new rates in Annex IV, Chapter V of the Regulation come into force.

7.1.2 This Instrument is being made to introduce national measures effective from 1st January 2008 to implement the new rates in the OFFC Regulation for the financing of official controls for hygiene inspections relating to direct landings into England of fishery products. The Instrument is needed to carry forward the charging requirements in England.

7.2 Consultation

- 7.2.1. Over 200 interested parties, including all Local Food Authorities in England responsible for executing and enforcing the charging provisions, were consulted on the draft Instrument. Other Government Departments, industry and voluntary organisations were also included in the twelve week consultation.
- 7.2.2 A total of 5 responses were received with no objection to the proposals. The majority of these were requests for clarification on particular aspects of the draft Instrument. A summary of the responses may be found at: www.food.gov.uk/consultations
- 7.2.3 There are no changes brought in by the Instrument that are politically or legally important.

7.3 Guidance

- 7.3.1. The Food Standards Agency (FSA) has held meetings with representatives from the fishing industry prior to, and during, the consultation period to explain the reason for introducing a new national Instrument.
- 7.3.2. The FSA intends to produce separate guidance for Local Food Authorities on this Instrument.

8. Impact

- 8.1 The impact in England and Wales of implementing the new provisions is estimated at £38,000 - £60,000 per annum. This is an increase of between £5000 - £27,000 per annum from the current impact to industry. An Impact Assessment for this Instrument is attached as Annex C. There are no new additional costs to the public sector.

9. Contacts

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Summary: Intervention & Options

Department /Agency: Food Standards Agency	Title: Impact Assessment of The Fishery Products (Official Controls Charges) Regulations 2007	
Stage: Final proposal	Version: 1	Date: 5 November 2007
Related Publications:		

Available to view or download at:

<http://www.food.gov.uk>

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What is the problem under consideration? Why is government intervention necessary?

From 1 January 2008 Regulation (EC) 882/2004 on Official Food and Feed Controls (OFFC) sets new minimum charges as contributions by food businesses to local food authorities for hygiene controls on directly landed fishery products in all Member States (MS) as part of the EU common market agreement.

This instrument is required to achieve continued compliance with the OFFC Regulation by the due date. Failure to do so would be anti-competitive and create a trade barrier. It would widen the gap between the cost of official controls and charges for those controls at a different rate from other MS.

What are the policy objectives and the intended effects?

By 1 January 2008 to implement the new minimum rates for charges applicable to official hygiene controls on direct landings of fishery products in England to achieve continued compliance with the OFFC Regulation. The rates will be reviewed by the European Commission every two years to take account of inflation.

Food business operators will continue to pay the lesser of the actual cost of carrying out the official controls or charges calculated at the specified new rates, depending on throughput of fish.

What policy options have been considered? Please justify any preferred option.

1. Do nothing.
2. Implement the minimum rates applicable for official hygiene controls of direct landings of fish as prescribed in the OFFC Regulation by the due date.
3. Implement rates for official hygiene controls higher than the specified minima to seek full cost recovery.

Preferred option 2 would achieve continued compliance with EC law whilst limiting increases to charges to the minimum possible under EC law.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? January 2010

Ministerial/CEO Sign-off For SELECT STAGE Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister/Chief Executive*:

Dawn PrimaroloDate: 29th November 2007

* for Impact Assessments undertaken by non-ministerial departments/agencies and NOT being considered by Parliament

Summary: Analysis & Evidence

Policy Option: 2

Description: Implement the minimum rates applicable for hygiene official controls on direct landings of fish as required by EC law

COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' Costs presented pertain to England and Wales fishing industry and relevant Local Authorities One-off costs to LAs, understanding legislation - £1200 One-off costs to industry, understanding legislation - £11,000
	One-off (Transition)	Yrs	
	£ 2,450	5	
	Average Annual Cost (excluding one-off)		
	£ 5,000-27,000		Total Cost (PV) £ 7,450-29,450
Other key non-monetised costs by 'main affected groups'			

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups' Benefits presented pertain to reduced England and Wales public spending.
	One-off	Yrs	
	£ 0	5	
	Average Annual Benefit (excluding one-off)		
	£ 5,000-27,000		Total Benefit (PV) £ 5,000-27,000
Other key non-monetised benefits by 'main affected groups' By helping to develop an EU-wide system of cost based enforcement chages there is less potential for trade and equity distortions across the EU.			

Key Assumptions/Sensitivities/Risks

Price Base Year 2007	Time Period Years 5	Net Benefit Range (NPV) £ -2,450	NET BENEFIT (NPV Best estimate) £ -2,450
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What is the geographic coverage of the policy/option?	England		
On what date will the policy be implemented?	1/1/2008		
Which organisation(s) will enforce the policy?	Local Authroities		
What is the total annual cost of enforcement for these organisations?	£ 240		
Does enforcement comply with Hampton principles?	Yes		
Will implementation go beyond minimum EU requirements?	No		
What is the value of the proposed offsetting measure per year?	£ N/A		
What is the value of changes in greenhouse gas emissions?	£ N/A		
Will the proposal have a significant impact on competition?	No		
Annual cost (£-£) per organisation (excluding one-off)	Micro £8	Small £8	Medium Large
Are any of these organisations exempt?	No	No	N/A N/A

Impact on Admin Burdens Baseline (2005 Prices)		(Increase - Decrease)
Increase of £ 0	Decrease of £ 0	Net Impact £ 0

Key: Annual costs and benefits: Constant Prices (Net) Present Value

Evidence Base (for summary sheets)

1. OBJECTIVES

- 1.1 The objective of the proposed regulations is to implement in the UK from 1 January 2008 those provisions of Council Regulation 882/2004 on Official Feed and Food Controls (the OFFC Regulation) that relate to the requirement to charge food business operators for official hygiene controls on direct landings of fish and fishery products according to the rates specified in Chapter V of Annex IV of the OFFC Regulation.
- 1.2 The key elements of this proposal are:
 - i. to apply the rates in the OFFC Regulation for the collection of charges for direct landings in the UK of fish and fishery products from 1 January 2008;
 - ii. to require charges relating to the controls applicable to the first sale of fish and fishery products in a fish market and the first placing on the market to be calculated on the basis of the tonnage of fish and fishery products landed per month, rather than per consignment (as is the current practice). This requirement for aggregate landings does not apply to direct landings of specified pelagic fish (SPF) and those fishery products entering a processing establishment.
 - iii. to remove the current practice of applying a 55% reducible element for fish that has been appropriately graded or grouped together. Under the proposed Regulations, the reduction is replaced by the requirement that the charge for the first sale in a fish market of relevant landed fishery products will be doubled where these activities are not carried out ;
 - iv. to maintain the current maximum charging rate (50 Euro per consignment) for direct landings of specified pelagic fish (SPF); and
 - v. to amend the 'processing establishment charge' from 1 Euro per tonne to 0.5 Euro per tonne. It should be noted that the current practice of applying a 55% reducible element for fish that has been appropriately graded in processing establishments will no longer be applicable. In real terms this equates to a relatively small increase of 0.05 Euro per tonne, which we would view as having minimal impact.
- 1.3 Fees for hygiene inspections on direct landings of fish and fishery products are to be calculated on the basis of the tonnages landed. The catching sector will be charged for official controls on the basis of the tonnage of fishery products landed directly in the UK whilst operators of approved establishments processing fishery products will be charged according to the throughput of fishery products entering these establishments for the purpose of processing. The regulations do not apply to landings of live bivalve molluscs such as mussels and cockles.
- 1.4 All food business operators will continue to pay the lesser of the actual cost of inspection or charges calculated at the minimum rates.

2. OPTIONS

- 2.1 The possible options are:

- i. Option 1 – do nothing;
- ii. Option 2 – apply the charges prescribed in the OFFC Regulation; or
- iii. Option 3 – apply a higher set of charges to seek full cost recovery for costs incurred by Local Food Authorities.

2.2 Analysis of options

- i. Option 1 (do nothing) – this would breach an EU obligation to apply the OFFC Regulation and leave the UK open to infraction proceedings by the Commission for failing to comply with the fish hygiene official controls charges requirements of the Regulation (which might have cost implications). It would also widen the gap between the cost of controls and the charges for those controls.
- ii. Option 2 (apply the charges prescribed in the OFFC Regulation) – this would ensure continuing compliance with EU law. It would partly offset the cost of exercising official controls. It should be noted that food business operators will continue to pay the lesser of the cost of carrying out the official controls or the specified new rates. There would be no social or environmental impacts (on businesses) associated with this option.
- iii. Option 3 (apply a higher set of charges to seek full cost recovery) - this would allow Local Food Authorities to recover the actual costs of conducting official controls. However, this would put UK food business operators at a disadvantage as compared with their competitors in the fishing industry in other Member States.

Recommendation: Doing the minimum necessary to ensure continued compliance with EC law (option 2) is preferred.

3. COSTS AND BENEFITS

3.1 Sectors and groups affected

3.1.1 The catching sector and establishments processing fish and fishery products will be affected by the proposed changes in rates. Voluntary organisations and charities are unlikely to be affected by the charging provisions of the OFFC Regulation.

3.2 Benefits

Option 1

3.2.1 There are no benefits from Option 1 over and above those already of assistance to businesses (i.e. principally, that costs charged are lower than the actual costs of implementation).

Option 2

3.2.2 Local authorities carrying out official control checks and hygiene inspections¹ will benefit from the regulations, which will enable a greater percentage of the actual cost of exercising these controls to be recovered from industry².

¹ on direct landings of fishery products, at the point of first placing on the market and at the point of first sale in a fish market.

² At present a high percentage of the cost of exercising the controls is borne by the budgets of authorities in England and Wales, Scotland and Northern Ireland.

3.2.3 All businesses will pay the specified legal minimum rates or the actual cost of the inspection, whichever is the lower.

Option 3

3.2.4 Local authorities will be able to recover the full cost of carrying out the official controls on directly landed fish and fishery products. There are no benefits to industry in applying full cost recovery.

3.3 Costs

Option 1

3.3.1 There are no additional costs from Option 1 over and above those already incurred. There may be cost implications if the Commission decide to initiate infraction proceedings against the UK for failing to comply with EU legislation.

Option 2

3.3.2 The catching sector and operators of establishments first placing fishery products on the market will be affected by the draft regulations. Based on the responses received during the consultation and the work of the FSA/industry working group (paragraph 7.3), the effect on the catching sector of applying the minimum rates specified in the regulations, for direct landings into the UK, is shown in the Table 1. This includes the breakdown of the charges across England and Wales, for which we were unable to separately apportion the cost to industry.

Table 1: Official Controls Charges for Fish and Fishery Products on Catching Sector in England and Wales – present and proposed* (Option 2)

2006 Data	England and Wales
Total landings (000s tonnes) (A)	73
% UK landings (B)	19
Total number of businesses affected (vessels landing > 25T per annum) (C)	624
Current annual impact across industry (total landings charges) (£s to the nearest hundred) (D)	33,000
Proposed annual impact across industry (total landings charges) (£s to the nearest hundred) (E)	38,000 [60,000]*
Change in annual impact across industry (£s to nearest hundred) (F)	5000 [27,000]*
Current annual impact: average charge per business (£s) (G)	53
Proposed annual impact: average charge per business (£s) (H)	61 [96]*
Change in annual impact: average per business (£s) (I)	8 [43]*

* [Figures in square brackets represent impact of full compliance; the other figure in those cells provides a more accurate impact assessment according to the current level of compliance.]

Basis of calculations

A, B and C = 2006 fish landings data, UK Sea Fisheries Statistics 2005, Marine Fisheries Agency (MFA)

D = Seafish Industry Authority; Consideration of the impact of the new EU minimum hygiene inspection charges for fishery products and of the operation of border inspection posts

E = Seafish Industry Authority; Estimate provided during consultation

$F = E - D$

$G = D / C$

$H = E / C$

$I = H - G$

3.3.3 In response to the consultation, Seafish³ were of the view that the figure in square brackets in row E should be regarded as the actual impact of the proposed 2007 SI, as opposed to the figure in square brackets in row F. These figures have been included in the table above. Appendix 1 sets out the rates proposed under the Regulations.

3.3.4 Industry representatives were also able to provide estimates during the consultation relating to the impact on individual vessels. Seafish estimated an impact of £200 per vessel across the UK on average. In England, this does not include the vessels under 10 metres, which land less than 25 tonnes of fishery products a year. The impact on these small vessels is therefore not likely to be significant (see Small Firms Impact Test section in Annexes). The FSA agrees with this figure and considers it to be a realistic assessment. Although the relative impact of the new rates appears to vary significantly according to the size of the vessel, stakeholders agree that the total financial impact on industry is unlikely to be significant for the large majority of fishing vessels, and industry in general.

3.3.5 The table above does not include the impact to landings of SPF (specified pelagic fish), the rates for which remain unchanged (paragraph 1.2). Similarly it also does not include the impact to direct landings of fishery products from third country vessels, aquaculture businesses or to processing establishments as we have not been able to obtain this information. Furthermore, given the variability of the throughput it was not possible for us to produce a representative figure. However, stakeholders have confirmed that the likely impact to the processing sector, in England, is considered to be minimal. We received no response regarding the impact to the other sectors.

3.3.6 The revenue raised from charges will still not fully reflect the cost of exercising hygiene inspections. However this shortfall will be lower than if the current charges are retained. The responses received from industry and stakeholders agree that contributions closer to full cost recovery will be possible for businesses handling higher throughputs of fish. Option 2 was considered by stakeholders to be the most favourable.

³ The Seafish Industry Authority is a UK cross-industry seafood body working with fishermen, processors, wholesalers, seafood farmers, fish friers, caterers, retailers and the import/export trade.

Option 3

3.3.7 The catching sector and operators of establishments first placing fishery products on the market will be required to pay the full cost of an actual inspection. This would be anti-competitive and due to the different costing structures in enforcement authorities across the UK and EU this would put industry at a disadvantage as compared with their competitors in other Member States. It is also because of the variety of inspections and costing structures in local authorities across the UK, that we have not been able to estimate the impact of this option on industry.

3.4 Administrative Burdens

3.4.1 No new administrative burdens to business have been identified in these regulations. Industry representatives are also of the view that the new Regulations will impose some additional administrative burdens on fishing vessel agents, but have been unable to provide any figures. As the requirement to provide written returns is not new, we do not consider the new rates to introduce any new or additional administrative burdens.

4 TEST RUN OF BUSINESS FORMS

4.1 No other changes to the administration of the system for charging for fish hygiene official controls are intended as part of these proposals. No new or additional forms will be introduced.

5 ENFORCEMENT, SANCTIONS AND MONITORING

5.1 Local Food Authorities will remain responsible for enforcement, sanctions and monitoring for the fish hygiene charging provisions set out in the Regulations.

6 IMPLEMENTATION AND DELIVERY PLAN

6.1 The FSA will implement the proposal in England in accordance with usual procedures. This includes ensuring the food business operators are alerted to the new minimum rates that may affect them.

7 CONSULTATION

7.1 A partial RIA accompanied a formal 12-week public consultation launched on 29 June 2007 to gain stakeholder comments on the proposed draft England Regulations. Approximately 200 interested parties, including consumer organisations, industry associations and enforcement authorities were consulted.

7.2 5 responses were received to the England consultation from three trade associations and two local food authorities. Responses to the parallel consultations carried out in the devolved administrations on the proposed legislation in similar terms were also considered. Generally, all responses were favourable. Specific comments made related to points of clarification concerning the application of charges and enforcement responsibilities relating to different types of fish landings. The Agency has addressed these in correspondence to the consultees. Another comment related to an explicit request for the Regulations to be amended to allow for charges to be applied to containerised fishery products from EEA States. This suggestion can not be adopted as charges can not be applied to fishery products which have been on land prior to entry into England. As EEA states are regarded as EU Member States for the purposes of these Regulations, any such charging would pose a barrier to trade.

- 7.3 The FSA has also been consulting industry representatives through informal discussions on the proposed new rates since early 2006. More recently, a working group involving representatives from various sectors of the fishing industry was set up in January 2007 to progress work on the impact of the proposed draft Instrument. The work of the group has encouraged positive discussion and addressed issues relating to the practical implementation of Article 27 of the Regulation 882/2004. It is with the assistance of members of this group that we have been able to assimilate data to calculate the figures used in section 3 of the Evidence Based Summary.

8 DEVOLUTION

- 8.1 The proposed regulations will be implemented by separate but similar legislation in England, Wales, Scotland and Northern Ireland. However, one partial RIA covering the Statutory Instruments (SI) in all four countries was used during the consultation period.

FISH HYGIENE CHARGING RATES

	Current Actual Rate	Sterling equivalent	Proposed 2008 Rate	Sterling equivalent*
Sector/Activity				
First placing on the market (per tonne)	€1/T for first 50T €0.5/T >50T	£0.67/T £0.34/T	€1/T for first 50T per month €0.5/T >50T thereafter	£0.68/T £0.34/T
First sale in a fish market (per tonne)	n/a		€0.5/T for first 50T per month €0.25/T >50T thereafter	£0.68/T £0.34/T
Processing establishment charge (per tonne)	€1/T	£0.67/T	€0.5/T	£0.34/T
Pelagic landings (max/consignment)	€50	£33.5	€50	£34
¹ Reducible element (%)	55%		[see note 1]	-
(per tonne)	€0.45/T for first 50T €0.225/T >50T	£0.3/T £0.15/T	[see note 1] [see note 1]	- -

Note 1: The reducible element for relevant landed fishery products which have been suitably graded or grouped together as in the current Statutory Instrument will no longer apply (see paragraph 1.2iii). Under the proposed Regulations, the reduction is replaced by the requirement that the charge for the first sale in a fish market of relevant landed fishery products will be doubled where these activities are not carried out.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	No	Yes
Small Firms Impact Test	No	Yes
Legal Aid	No	No
Sustainable Development	No	Yes
Carbon Assessment	No	No
Other Environment	No	No
Health Impact Assessment	No	No
Race Equality	No	Yes
Disability Equality	No	Yes
Gender Equality	No	Yes
Human Rights	No	No
Rural Proofing	No	No

BACKGROUND

Existing charges regulations⁴ require fees for official controls (including hygiene inspection and analyses) of fish and fishery products to be collected under Article 27 of the OFFC Regulation at the Community rates specified in Council Directive 85/73/EEC (as amended by Directive 2004/41/EC). This system of charging was introduced to require contributions towards the costs incurred by Local Food Authorities in carrying out official controls on directly landed fishery products. These direct landings of fishery products are not required to enter through controlled points of entry into the UK (via Border Inspection Posts) and are therefore not subject to hygiene checks at that stage.

A new framework for the financing of official feed and food controls (as set out in the OFFC Regulation) came into force on 1 January 2007. A transitional derogation in the OFFC Regulation has allowed for the retention of the rates in Directive 85/73 (as amended) until 31 December 2007. This derogation will expire on 1 January 2008 when the new charge rates for official controls for fishery products, set out in Chapter V, Annex IV of the OFFC Regulation, will apply.

The current rates for charging have remained unchanged since 1998. The proposed increase in rates for fish hygiene charges from 1 January 2008 are relatively small and remain below the increase in inflation throughout this period. The rates have neither increased in-line with inflation, nor with the actual costs of implementation throughout this time.

⁴ The Fishery Products (Official Controls Charges) (England) Regulations 2006, in Wales by the Fishery Products (Official Controls Charges) (Wales) Regulations 2006, in Scotland by the Fishery Products (Official Controls Charges) (Scotland) Regulations 2006 and in Northern Ireland by the Fishery Products (Official Controls Charges) (Northern Ireland) Regulations 2006

Competition Assessment

The Regulations apply to the catching sector and operators of approved establishments processing fishery products. All sectors will pay the lesser of actual inspections costs or throughput charges. With the exception of UK fish markets, the recommended Option 2 to apply the rates for official controls charges in the OFFC Regulation would tend to maintain the present proportions of businesses that pay fish hygiene charges and thus have a minimal effect on competition.

It can be stated that the new Regulation is unlikely to impose significant negative impact on competition across England, and when compared with other Member States. Our discussions with industry and stakeholders did not provide any information to the contrary in response to the public consultation.

Small Firms Impact Test

We do not believe that the proposed Regulations will disproportionately impact small businesses as the charging requirements do not apply to vessels directly landing less than 25 tonnes of fish per annum. This accounts for approximately 83%⁵ of vessels in England and Wales. During consultation, industry representatives confirmed this view.

Similarly, land based businesses regarded as small, marginal and restricted, handling less than 25 tonnes per annum of fishery products, which are exempt from the requirements of Regulation 853/2004 will also fall outside the scope of the Regulations.

Sustainable development

The economic, social and environmental costs and benefits associated with the three options were all considered.

Option 1 - This option is not sustainable as it would leave the UK open to infraction proceedings by the EU Commission

Option 2 - Environmental and social costs are not significant. There will be economic costs falling on industry but these are offset against the benefit of not applying different rates for charges across Member States, which would be anti-competitive. Furthermore, there is also an economic benefit to local authorities in being able to recover greater contributions to the cost of hygiene official controls than at present.

Option 3 - Costs are as outlined for Option 2, with a higher degree of anti-competitiveness.

Option 2 is the most sustainable option.

Race equality issues

There are no race equality impacts associated with this proposal.

Gender equality issues

There are no gender equality impacts associated with this proposal.

Disability equality issues

There are no disability impacts associated with this proposal.

⁵ UK Seafisheries Statistics 2006, Marine Fisheries Agency (MFA).