

W.G. & S.J.Dell Ltd.

Wholesale Shellfish Sales & Exports

V.A.T Reg. No. 250 3999 47

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To:

Kent and Essex Inshore Fisheries and Conservation Authority
("KEIFCA")

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By email: info@kentandessex-ifca.gov.uk

From:

WG & SJ Dell Limited

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Subject: Licence Type Request to Change - Response to
Clarification Request No.2

Dear Dr Wright,

Thank you for your letter dated 24 July 2025 requesting further clarification regarding our application to change from a non-transitional to a transitional licence. Please find our responses to the two requested points below:

1. Request for documentation evidencing our understanding of Article 5(12) in January 2025

We did not produce any internal documents in January 2025 that specifically referenced Article 5(12). The TECFO-001 application form did not provide space to explain the reasoning behind the licence type selected. We formally raised our concerns regarding Article 5(12) at the first available opportunity when the LAP results were communicated, in our objection letter submitted in March 2025, and have consistently referenced this matter in all formal correspondence since.

2. Telephone calls with Deputy Chief Officer of Kent and Essex IFCA in March 2025

As you mentioned, I spoke with Dominic Bailey on 14 March 2025. At that stage, the full ranking list had not yet been published, there was no indication that there had been a misapplication of TECFO 2024 and no reason to specifically mention Article 5(12).

The full ranking list was published on 20 March 2024 and I then spoke with Dominic again shortly after the list became public. There had not yet been sufficient opportunity to review the information and to digest its consequences. Once we had reviewed the rankings and understood the impact of the Order's interpretation, we formalised our concerns in our objection letter submitted on 23 March 2025.

We trust this provides the clarification required. Please let us know if any further information would assist the Authority in reaching its decision.

Yours Sincerely,

Steven Dell

For and on behalf of WG & SJ Dell Limited