

PADI response to MMO licensing fees by Suzanne Smith

I would like to respond on behalf of PADI Europe, Middle East & Africa Ltd, representing hundreds of thousands of recreational divers in the UK and abroad. Thank you for the opportunity to consult.

We appreciate the need to charge for marine licensing and the public subsidy support for smaller projects. As most of the licensable activities recreational divers fall into would be these smaller projects, the fees at this level are particularly significant for us.

We note a large increase from Tier 1a to Tier 1b, and find this disproportionate. In light of ongoing discussions with the MMO on what are licensable activities for the recreational diver, and therefore not knowing the likely tier banding, this is concerning. There have been confusions and misunderstandings regarding the use of Surface Marker Buoys (used in recreational diving for safety and navigation purposes, on each and every dive) and lifting bags (used for contemporaneous rubbish collection, lost item recovery and training purposes). Whilst we are still in discussion about the applicability and need for licenses for such activities, we have to say any of the tier charges would be too much for individual recreational divers either in training or recreational diving, and from an operational point of view, unmanageable. We hope a resolution to take these day-to-day benign diving activities out of the license regime is imminent and our discussions continue with MMO.

With regards to other smaller projects such as temporary marker buoy placements, again we are surprised to find this type of activity falling within the remit of a license requirement. Buoys of this nature are placed by divers for the season, are of a temporary nature and assist in ensuring minimal environmental impact. As you note Tier One charges are also subsidised, it would seem a waste of public money to impose licenses where they were not previously required for such a benign, recreational activity.

Wherein the underwater project is beyond the scope of recreation (archaeological investigation, industrial and salvage projects etc), charging for licensing via Tier levels is appropriate. In the case of small scale archaeological projects, often carried out by volunteers for the public good, even the Tier 1a may be cost prohibitive.

I hope our comments are useful and inform the consultation process.

Yours sincerely

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