

**Wild Fisheries Reform  
Consultation Analysis  
Report**

**January 2016**



**marinescotland**

# Table of Contents

<b>1</b>	<b>Introduction .....</b>	<b>1</b>
1.1	Background	1
1.2	Purpose and Structure of this Report	1
<b>2</b>	<b>The Consultation Document.....</b>	<b>2</b>
2.1	Background	2
2.2	Responses	4
<b>3</b>	<b>Overview .....</b>	<b>5</b>
<b>4</b>	<b>Roles and Responsibilities at National and Local Levels .....</b>	<b>7</b>
<b>5</b>	<b>Local Management Bodies .....</b>	<b>10</b>
<b>6</b>	<b>Resourcing Wild Fisheries Management.....</b>	<b>20</b>
<b>7</b>	<b>Sustainable Harvesting.....</b>	<b>26</b>
<b>8</b>	<b>Science And Skills .....</b>	<b>28</b>
<b>9</b>	<b>Regulation .....</b>	<b>31</b>
<b>10</b>	<b>Compliance.....</b>	<b>34</b>
<b>11</b>	<b>Opportunities and Access .....</b>	<b>36</b>
<b>12</b>	<b>Other Issues Raised.....</b>	<b>43</b>
<b>13</b>	<b>List of Abbreviations.....</b>	<b>44</b>

# 1 Introduction

## 1.1 Background

1.1.1 Scottish Ministers consulted<sup>1</sup> on broad policy options for the proposed reform of wild salmon and freshwater fisheries (“wild fisheries”) from 15 May to 7 August 2015.

## 1.2 Purpose and Structure of this Report

1.2.1 The purpose of this report is to set out the results of the analysis of responses to the consultation.

1.2.2 The remainder of this report is structured as follows:

- Following this introduction (Section 1), Section 2 provides an overview of the consultation document. It then sets out details of the number of responses received, as well as the sectors and related stakeholder groups who responded.
- Section 3 provides an overview of the key messages from respondents.
- Sections 4-11 provide the analysis for each of the topics discussed and questions asked.
- Section 12 summarises other issues raised by the respondents.
- A list of abbreviations is provided in Section 13.

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<sup>1</sup> available from <http://www.gov.scot/Publications/2015/05/7755>

## 2 The Consultation Document

### 2.1 Background

2.1.1 The consultation document set out the Scottish Government's response to the independent Wild Fisheries Review (WFR), and outlined broad policy options for the reform of salmon and freshwater fisheries ("wild fisheries") management. Stakeholders were invited to share their views on these options and to contribute ideas and thinking.

2.1.2 The document asked for views, by asking 38 questions (Table 2.1) about the following topics:

- roles and responsibilities at national and local levels;
- local management bodies;
- resourcing wild fisheries management;
- sustainable harvesting;
- science and skills;
- regulation and compliance; and
- opportunities and access.

**Table 2.1 Consultation Questions**

No	Question
1	Do you agree with the balance of functions as set out in Table 1?
2	Do you consider that any main functions are missing? If so, please state what these are. Do you think that any of these functions might be best fulfilled at a different level?
3	Do you agree that FMO <sup>2</sup> s should be charitable bodies?
4	Do you have any comments about the WFR's view that FMOs should be Scottish Charitable Incorporated Organisations rather than charitable companies?
5	Do you agree that in order to ensure appropriate governance and fitness for purpose, FMOs should operate to a model constitution?
6	What do you consider is an appropriate balance of interests on the board and wider membership of FMOs?
7	Do you agree that bodies wishing to become FMOs should do so through seeking approved body status from Scottish Ministers?
8	Do you agree that the cornerstone of the relationship between national and local management bodies should be the proposed plan-led approach? If not, why not?
9	Do you agree that the proposed package of measures in terms of constitution, governance and a plan-based approach provides an appropriate framework for decentralised delivery of fishery management functions?
10	Do you agree that the FMO network should cover the whole of Scotland?
11	Do you agree that Scottish Ministers, following discussion with stakeholders, should set out the boundaries of FMO areas?
12	What factors should be considered in determining the number and optimal coverage of FMOs?
13	Do you agree that bodies designated as FMOs should be able to deliver analogous work on behalf of local or national interests?
14	Are there any potential conflicts of interest in this approach?
15	Do you agree that funding raised from proprietors should continue to provide the core strand of revenue for local fishery management?

<sup>2</sup> Fisheries Management Organisations

No	Question
16	Do you agree that we should explore the potential for extending the responsibility for paying the levy to the owners of all fishing rights?
17	Do you agree that responsibility for collecting and distributing resources from fisheries proprietors for the purpose of delivering the national strategy at a local level should rest with the national unit?
18	Do you agree that we should explore the recommendation that redistribution of funds should form part of the new management system?
19	If not, what other means might be used for funding local fisheries management at appropriate levels across the country?
20	Do you agree that we should explore the recommendation for a two-tier levy system?
21	Do you agree that Ministers should have powers to control killing of all fish species on the grounds of conservation and be able to do so in line with the precautionary principle?
22	If not, what other mechanisms should exist in order to ensure a flexible regulatory system which can ensure delivery of legal obligations and policy priorities for management of species and is capable of responding to future changes?
23	Do you agree that, in the context of the wider proposals in this paper, the creation of an offence of reckless or irresponsible exercise of fishing rights should not be pursued?
24	Do you agree that data collection priorities and processes for fisheries management at a local and national level should be predicated on a consistent approach and that this should be via a national research and data strategy?
25	Do you have any suggestions for additional means to ensure that evidence-based decision making is embedded within the fisheries management system?
26	Do you have any suggestions for additional skills areas which might usefully be covered in training and CPD programmes?
27	Do you agree that annual and weekly close times should remain a key part of the management system for wild fisheries?
28	Do you agree that the proposed local management organisations should have responsibility for considering such close times in line with the national strategy and the local fisheries management plan?
29	Do you agree that the purpose behind Protection Orders can be achieved via the design of the new management system in line with the key principles set out in chapter 2?
30	Do you agree that the principles of the existing bailiffing system should be retained, but with amendment to set compliance within an appropriate framework of accountability with warrants issued by the national unit?
31	Are there other mechanisms for enforcing fisheries legislation that should be considered?
32	Do you consider that there are advantages in the bodies involved in recreational fishing being able to come together to speak through one lead body?
33	If so, do you have views on how this could be facilitated and in what timescale?
34	Do you agree that promotion of opportunities and access should be a central theme for the national strategy?
35	We are interested to hear views on how increasing opportunities and access to fishing can be embedded within the fisheries management system.
36	Do you support the concept of the angling sector coming together to develop a programme for development of angling (Angling for All), including an emphasis on opportunities for young people and promoting social and economic benefits?
37	Should funding for Angling for All come from a rod licence? If not, where should resources be found to support the programme?
38	Do you agree that a rod licence should only be used to fund Angling for All, rather than also being used to support wider management activity?

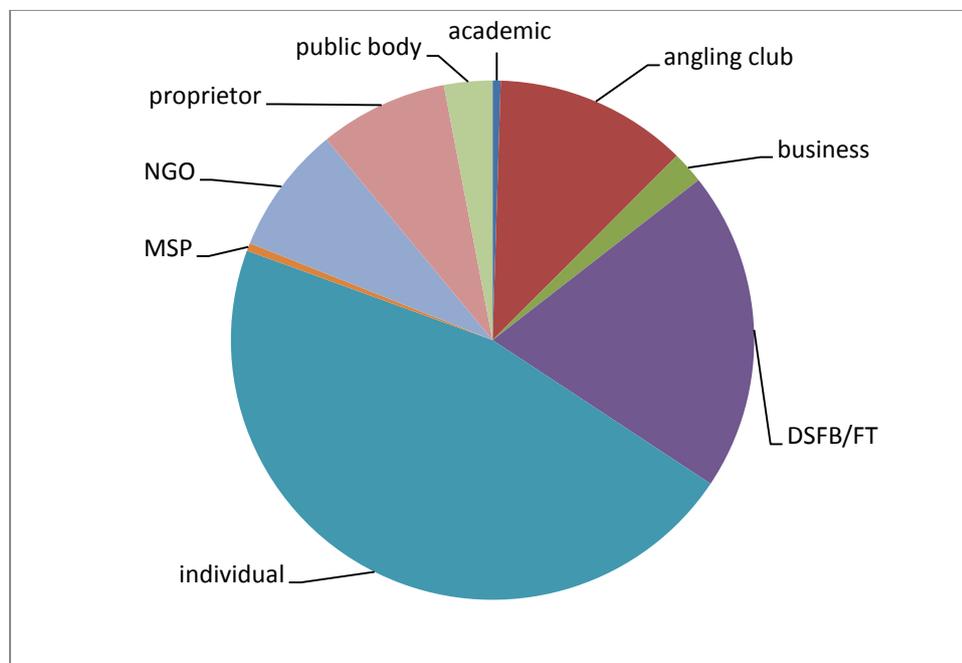
## 2.2 Responses

2.2.1 There were 201 responses to the consultation. Nine different sectors<sup>3</sup> responded (Figure 2.1 and Table 2.2). Please note that five of these responses related to the consultation on the proposed ban on the killing of wild salmon except under licence<sup>4</sup>, and these have been considered as part of the review of the conservation measures (kill licence) proposals.

**Table 2.2 Responses by Sector**

Sector	Number of responses	% of total
academic	1	0.5
angling club	24	12
business	4	2
District Salmon Fishery Board/ Fisheries Trust (DSFB/FT)	40	20
individual	93	46
Member of the Scottish Parliament (MSP)	1	0.5
non-governmental organisation (NGO)	16	8
proprietor	16	8
public body	6	3
<b>Total</b>	<b>201</b>	<b>100</b>

**Figure 2.1 Responses by sector**



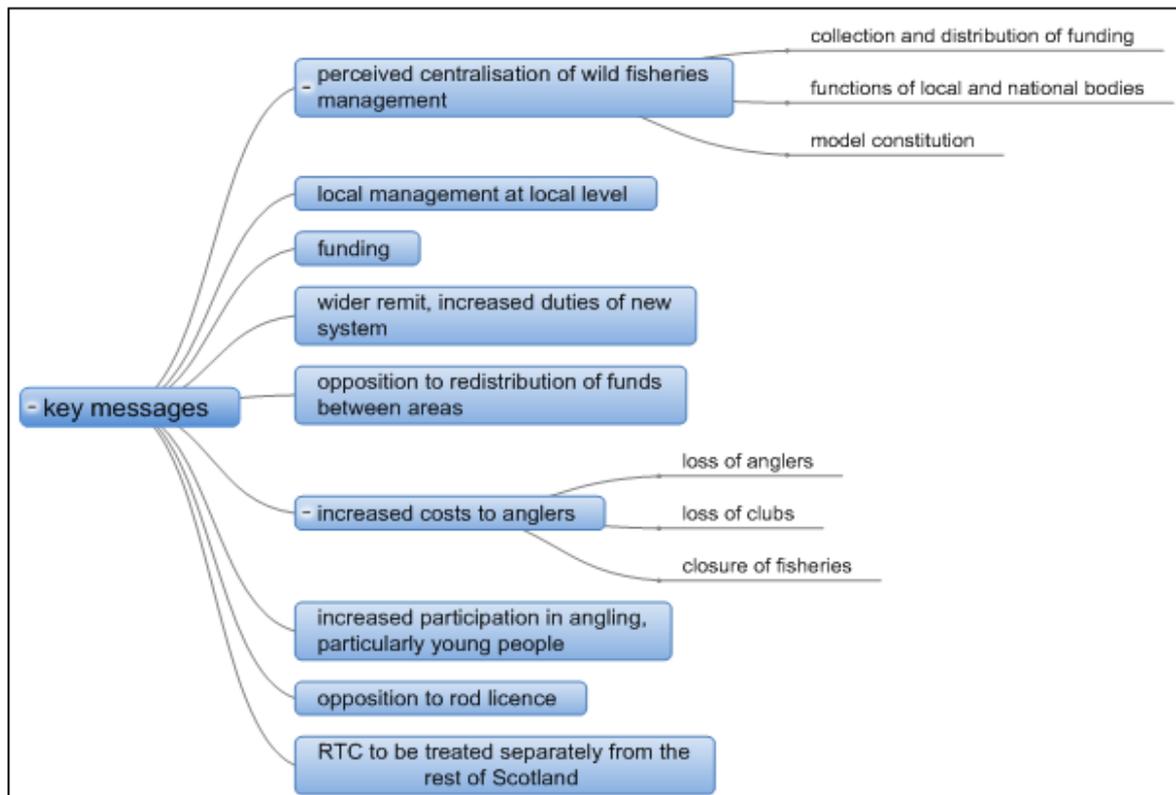
<sup>3</sup> Some individuals identified themselves as belonging to particular sectors (e.g. businesses), and their responses were allocated accordingly. The remainder were classified as “individual” responses.

<sup>4</sup> Consultation and associated documents are available at <http://www.gov.scot/Topics/marine/Salmon-Trout-Coarse/fishreform/licence/documents>

### 3 Overview

3.1.1 The consultation analysis identified a number of key messages delivered by the respondents. These are summarised in Figure 3.1 and outlined in the remainder of this section.

**Figure 3.1 Key Messages from Respondents**



3.1.2 Many respondents considered that the proposed new management system would result in centralisation of wild fisheries management. These concerns were strongly expressed in relation to the collection and distribution of funding, the functions of national and local bodies, and the model constitution.

3.1.3 Most respondents consider that wild fisheries management is best carried out at the local level, by those with local experience and expertise. Their view is that local management would take account of differing local characteristics, and encourage local engagement and support.

3.1.4 There were concerns that existing funding levels are inadequate, and that the wider remit and increased duties of the new system would require additional monies.

3.1.5 The majority of respondents were opposed to the proposal to redistribute funds between areas.

3.1.6 Many were concerned that the proposed changes would lead to increased costs for anglers, which they considered would result in the loss of existing

anglers and deter new ones. The perceived knock-on effects were identified as the loss of angling clubs/associations and the closure of fisheries. Potential effects for local economies were highlighted.

- 3.1.7 At the same time, most respondents supported proposals for increased participation in angling, particularly young people.
- 3.1.8 Many respondents took the opportunity to note their opposition to the concept of a rod licence in answer ring questions about opportunities and access to angling.
- 3.1.9 Respondents also suggested that the River Tweed be treated separately from the rest of Scotland, in taking forward the proposed changes to wild fisheries management.

## 4 Roles and Responsibilities at National and Local Levels

4.1.1 This section sets out the analysis of the responses to questions 1 and 2, about the potential roles and responsibilities at national and local levels.

Q1: Do you agree with the balance of functions as set out in Table 1 [of the consultation document]?

Q2: Do you consider that any functions are missing, or might be best fulfilled at a different level?

4.1.2 There were 183 responses to Question 1; 17 respondents did not answer (Figure 4.1 and Figure 4.2). About 12% of respondents were unsure; the views of the others were divided, with only slightly more agreeing with the balance of functions than disagreeing (48% and 37% respectively).

4.1.1 Many respondents found the proposed functions too vague and took the opportunity to offer suggested detail (Table 4.1). Many of these functions, while similar, entail different activities. For example, enforcement at the national level would involve ensuring consistency of training, issuing warrants, etc. whereas at the local level it would involve appointing and managing bailiffs, liaising with police, etc.

4.1.2 Many also took the opportunity to set out the principles that they considered should underpin the structure and governance of these bodies, including the way in which they should interact. These views included:

- A key principle is that of subsidiarity – that all functions should be delivered as locally as is practicable. Boundaries between national and local level functions should be clearly delineated.
- The work of the national unit should be strategic in nature, e.g. coordinating, facilitating and generally assisting local management.
- The national unit has a central role to play in the coordination and strategic development of wild fisheries work which meets national and international commitments.
- There should be a two-way approach whereby the national priorities are informed by local priorities and vice versa; the same principle would apply to national and local fishery management plans. The FMOs should develop and implement local management approaches and plans.
- There should be sufficient funding of FMOs if they are to function effectively.
- Any national body should have very clear terms of reference or a constitution.
- FMOs should have a strong degree of autonomy.

4.1.3 Several noted that they would prefer FMOs to retain the existing functions of District Salmon Fishery Boards (DSFBs).

Figure 4.1 Responses to Question 1, overall

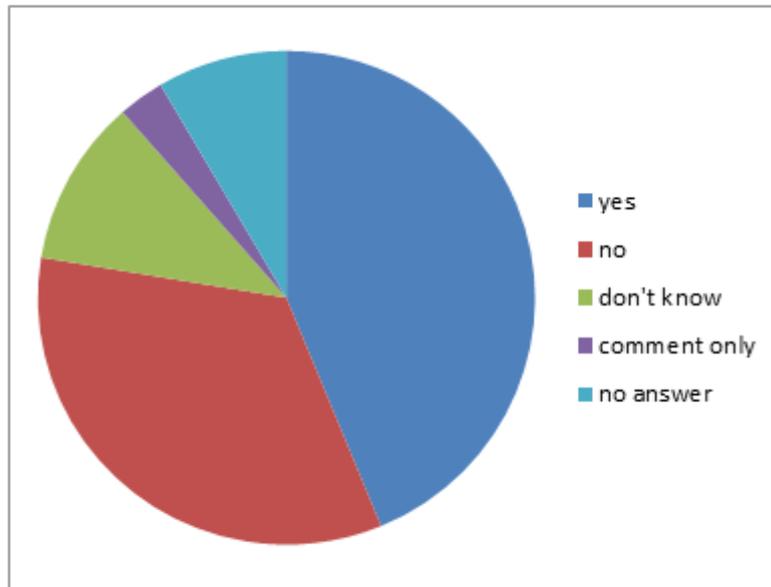
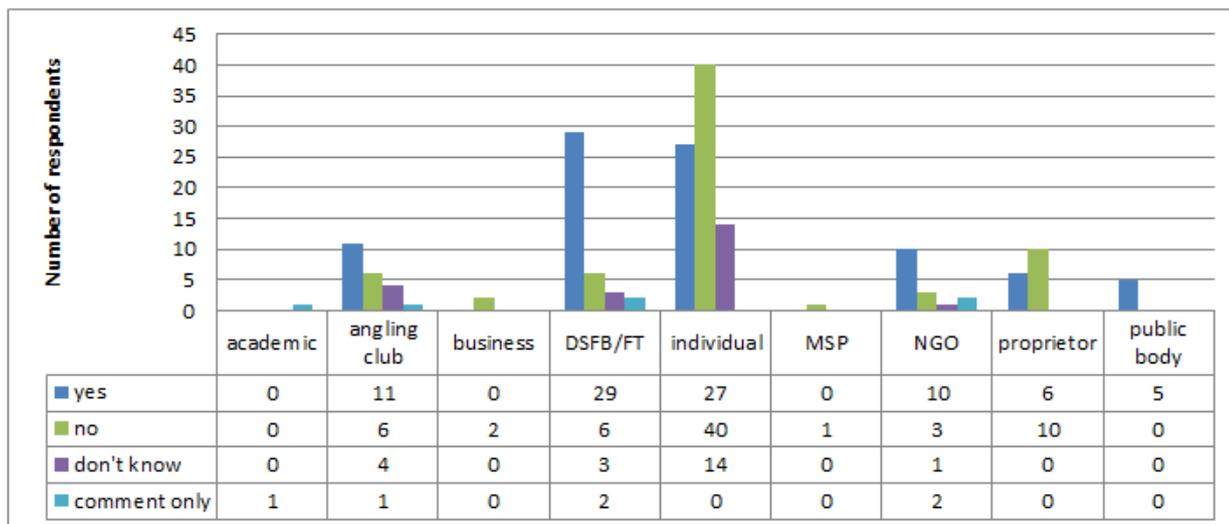


Figure 4.2 Responses to Question 1, by sector



4.1.4 Respondents also expressed the following concerns/comments:

- perceptions that the proposed allocation of functions between the national and local level would result in centralisation, with adverse effects on, e.g. the quality of management, the sense of ownership and goodwill, stakeholder engagement and the ability of the FMO to raise local funding.
- decision-making and raising funds should continue to be done at local level and not centralised.
- perception that local knowledge and/or issues would not be taken into account in decision-making (through perceived centralisation).
- funding at both the national and local levels: funding of the national unit should come from the public purse; money to be spent locally should be raised locally; national priorities requiring more money should be funded from the public purse.
- perception that the proposals represent “business as usual”, not a genuine change, so little/ no confidence that FMOs would effectively build cross-sectoral partnerships if the same interests were to be involved.

**Table 4.1 Q 1 and 2: suggested additional local/national functions**

<b>National functions</b>	<b>Local functions</b>
enforcement	compliance/enforcement
compliance with international obligations	delivery of local priorities
conflict resolution, e.g. between FMOs; between FMOs and others	conflict resolution, e.g. between fisheries; between fisheries and others
conservation and monitoring	conservation and monitoring
oversight of FMOs	providing economic safeguards
provision of advice, e.g. on best practice; on fisheries matters to public bodies	provision of advice, e.g. promoting best practice, consistency
data collection and research	data collection and research
funding	funding
competent authority (Habitats Regulations)	competent authority (Habitats Regulations)
training, e.g. recognition of training needs, provision of training	education, e.g. primary and secondary schools; anglers
planning, to assist in national-level planning issues arising for areas such as wind farms, hydro and aquaculture	planning, to act as consultee on planning applications; to provide advice to public bodies e.g. WFD <sup>5</sup> consultations
quality assurance	reporting to national body
coordination/liaison, to facilitate joint/partnership working between wild fisheries sector and national public/ private bodies; liaising with external stakeholders, coordination with other agencies, communications, sharing information	interaction/coordination, to build cross-sectoral partnerships, work with national unit and public bodies, influence national policy development, communications, developing links with national and international bodies
promotion of angling	promotion of angling
management of wider pressures	
setting conservation limits for salmon	

<sup>5</sup> Water Framework Directive

## 5 Local Management Bodies

- 5.1.1 The consultation document asked twelve questions about local management bodies, focusing on their constitution, membership and governance, approved body status, the proposed plan-led approach, geographic coverage, and analogous interests. This section sets out the analysis of the responses to questions 3-14.

Q3: Do you agree that FMOs should be charitable bodies?

Q4: Do you have any comments about the WFR's view that FMOs should be Scottish Charitable Incorporated Organisations rather than charitable companies?

- 5.1.2 There were 175 responses to Question 3; 25 respondents did not answer (30%). The remainder of the respondents were divided in their views, with only a slight majority of respondents indicating that they agreed with the proposal (Figure 5.1).
- 5.1.3 Some of those who agreed noted the benefits of access to additional funding streams, as well as encouraging volunteer involvement. However, the main issue raised, by all respondents, was their concern that charities may not be permitted to lawfully perform the functions required of FMOs, including enforcement in particular.
- 5.1.4 Some respondents to Question 4 felt that neither constitution was appropriate. Others expressed concern that, if FMOs were Scottish Charitable Incorporated Organisations, loss of charitable status would cause the FMO to lose its existence and forfeit all its assets to the Crown.
- Q5: Do you agree that in order to ensure appropriate governance and fitness for purpose, FMOs should operate to a model constitution?
- 5.1.5 There were 176 responses to Question 5 (Figure 5.1); 24 respondents did not answer. The majority of respondents (60%) indicated that they agreed with having a model constitution. However, 25% of respondents disagreed; 10% were unsure.
- 5.1.6 Those who agreed noted that a model constitution would be helpful in ensuring appropriate governance (consistency, transparency of management, finance, reporting and accountability) and fitness for purpose. Many considered that a model constitution should be drawn up in consultation with FMOs and other stakeholders.
- 5.1.7 The key concern of those who disagreed was that a model constitution could not be flexible in nature, and could not take into account the differing management requirements of the different rivers, given the diversity of their characteristics - one size would not fit all. They were also worried about it being imposed from the centre.

Figure 5.1 Responses to Question 3, overall and by sector

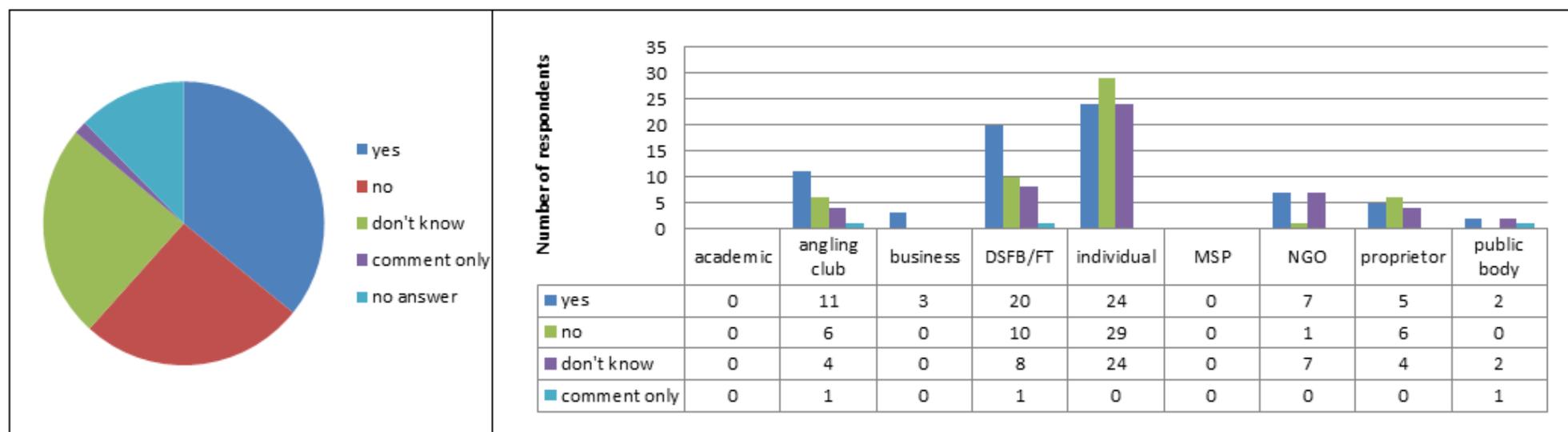
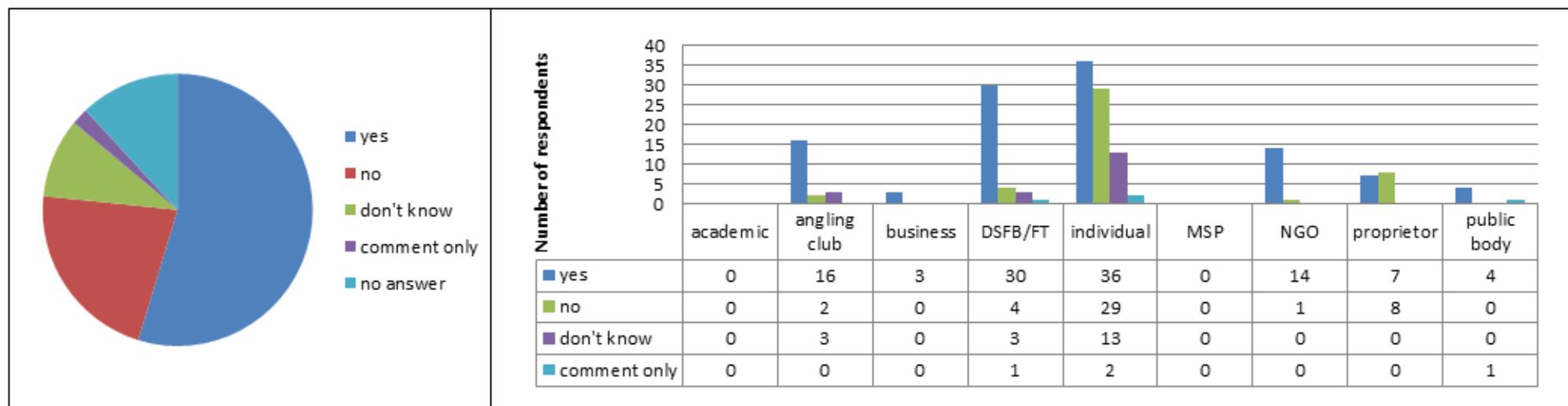


Figure 5.2 Responses to Question 5, overall and by sector



**Q6: What do you consider is an appropriate balance of interests on the board and wider membership of FMOs?**

- 5.1.8 Just under 80% of respondents answered Question 6.
- 5.1.9 Roughly 10% of respondents recommended that the model of the Tweed Commissioners and Tweed Forum should be followed. A few also suggested using the model of the Spey District Fishery Board.
- 5.1.10 Several respondents set out clear aims and objectives for the composition of FMOs that echoed those set out in the consultation document: they should be membership bodies representing the full range of interests in wild fisheries and their management at a local level, including local authority and other public sector interests in addition to the owners and users of fishing rights.
- 5.1.11 On the whole, in making their suggestions, respondents did not differentiate between who should be represented on the board and who should be included in the wider membership. Overall, respondents felt that the following should be represented:
- 57% of respondents considered that fishery owners should be represented; suggestions for representation ranged from 40-50% of the total board members. There were also suggestions that the migratory and non-migratory salmonid and coarse fisheries should be equally or proportionately represented.
  - 41% would like to see representatives of anglers included, with suggested representation ranging from 20% (lowest) to 55-60% (highest).
  - about 29% would like public bodies to be included. These would include SEPA, SNH and Local Authorities. Some suggested tourism representation, e.g. Visit Scotland. Others suggested that bodies with an interest in, but no statutory remit for, wild fisheries be represented, including (in no particular order) the Forestry Commission, energy generators (Scottish Hydro, Scottish and Southern Energy), Scottish Water, National Health Service, Scottish Enterprise/Highlands and Islands Enterprise, national park officers, and community councils.
  - about 9% want to see those with scientific expertise included.
  - about 5% want to see netting interests included. In contrast, netting interests requested that they be regulated by and answer to the national unit, rather than the FMO. However, in the event that this does not occur, netting interests consider that angler and netting interests should have equal representation and/or voting power.
  - a few suggested that ghillies and/or bailiffs be included in the wider membership of FMOs.
- 5.1.12 About 10% made comments about which representatives should hold the majority of posts on the board. These ranged from the view that no one group should hold a majority, to the suggestion that, although proprietors should be represented, they should no longer be the dominant members (in terms of numbers), to the suggestion that those who invest most should have the majority of seats, and that this would depend on the means of finance, e.g. levy (proprietors) or rod licence (anglers).

**Q7: Do you agree that bodies wishing to become FMOs should do so through seeking approved body status from Scottish Ministers?**

- 5.1.1 There were 172 responses to Question 7; 28 respondents did not answer. About 20% were unsure or only provided comments. Of the remainder, the majority (52%) agreed, with 27% disagreeing (Figure 5.3). More than half of those who answered “don’t know” were unsure of the definition of “approved body status”, or felt that more information was required before they could respond.
- 5.1.2 Those who agreed noted that approved body status would provide assurance that FMOs have the capacity, competence, accountability and transparency required to operate in an effective manner. They also noted that the criteria for approved body status should be clearly transparent and publicly reported.
- 5.1.3 Those who disagreed had concerns about the possible centralisation of control and the potential for political interference.
- 5.1.4 Many respondents, both those who agreed and those who did not, were concerned that approved body status is not compatible with charitable status. They were also clear that there would be a need to ensure local engagement, involvement, and empowerment if the proposal is progressed.

**Q8: Do you agree that the cornerstone of the relationship between national and local management bodies should be the proposed plan-led approach? If not, why not?**

- 5.1.1 There were 181 responses to Question 8; 19 respondents did not answer. The majority of respondents (60%) agreed with the proposal (Figure 5.3). About 23% disagreed, and the remainder did not know or made comments only.
- 5.1.2 Both those who agreed and disagreed had concerns about centralisation and felt that the plan must be prepared locally, to ensure that local issues are taken into account; that the planning process should be two-way, i.e. that local and national plans inform one another, rather than the national plan being imposed upon the FMO; and about the adequacy of funding. They also considered that there should be clarity about which elements of the plans are national priorities, and which are local priorities, and noted that not all national priorities would be relevant in all FMO areas.
- 5.1.3 There was also a general view that the plan should be long-term in nature. The minimum time frame suggested ranged from three to five years; the maximum was five to six years. Some suggested that the timeframe could be aligned to the river basin management planning cycle.

Figure 5.3 Responses to Question 7, overall and by sector

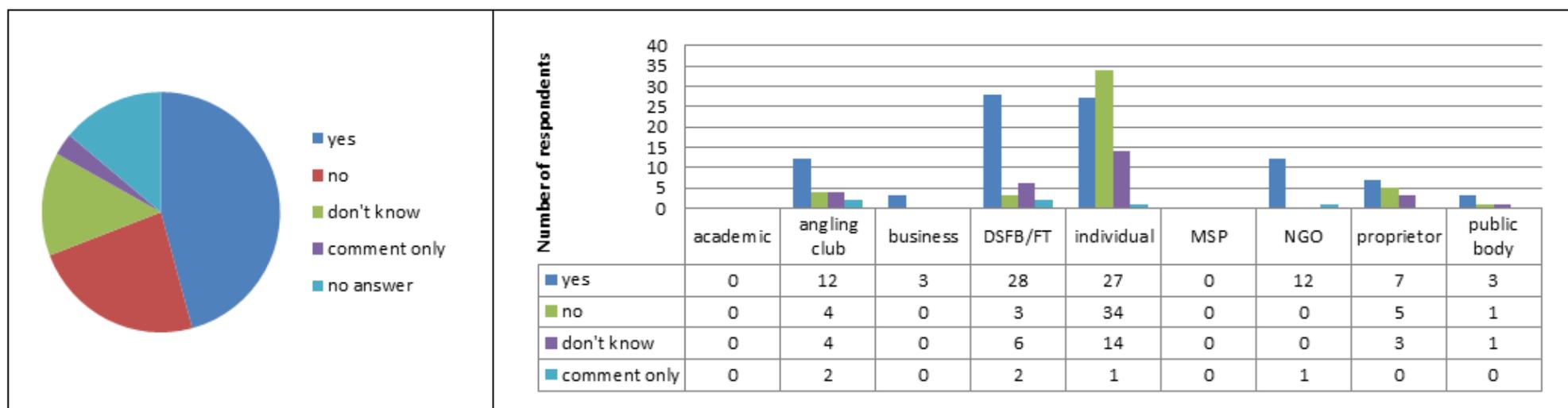
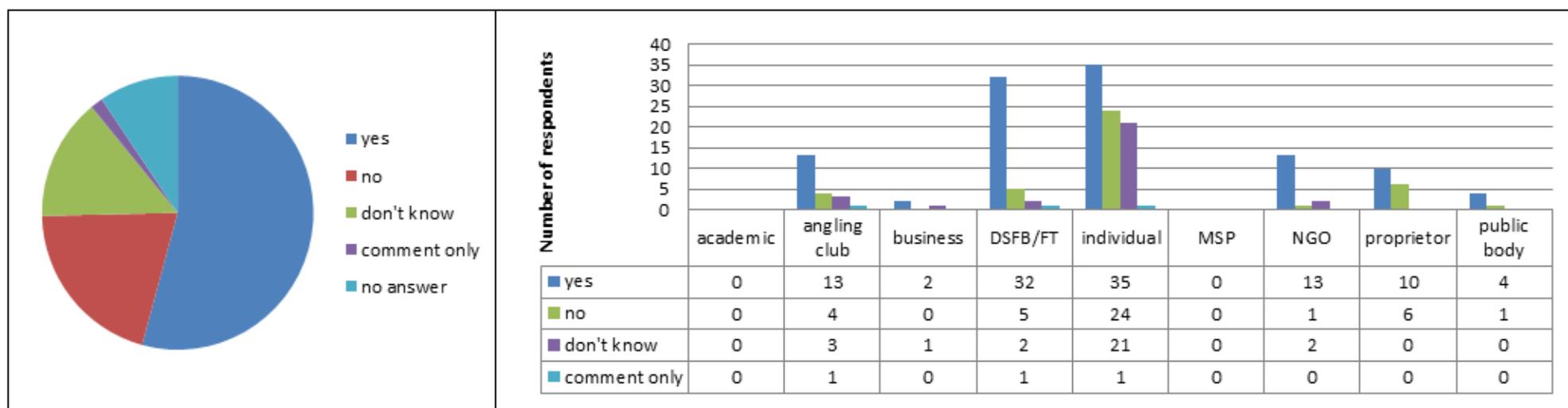


Figure 5.4 Responses to Question 8, overall and by sector



**Q9: Do you agree that the proposed package of measures in terms of constitution, governance and a plan-based approach provides an appropriate framework for decentralised delivery of fishery management functions?**

- 5.1.1 There were 180 responses to Question 9; 20 respondents did not answer (Figure 5.5). Just over 20% of respondents were unsure. Many of these felt that they could not comment in the absence of detailed information about what is proposed for the constitution, governance and plan-based approach.
- 5.1.2 The answers from the remainder of respondents were fairly evenly divided between agreement and disagreement (40% and 35% respectively).
- 5.1.3 There was strong consensus, from all sides, that adequate funding should be provided for FMOs. Those who disagreed that the proposed package of measures provides an appropriate framework for decentralised delivery of fishery management functions had strong concerns about the perceived centralisation of fisheries management; those who agreed also noted that decentralisation was a proviso of agreement. Another proviso of agreement was that concerns expressed in responses to the preceding questions would be taken on board in progressing arrangements for the FMOs. Other comments focused on the need for two-way working, and for any model constitution/approach to allow for flexibility in terms of priorities, scope and purpose to address local priorities.

**Q10: Do you agree that the FMO network should cover the whole of Scotland?**

- 5.1.4 There were 182 responses to Question 10; 18 respondents did not answer (Figure 5.5). About 10% of respondents were unsure about the coverage of the network. Of the remainder, the majority (65%) agreed that the network should cover the whole of Scotland; 20% disagreed.
- 5.1.5 Those who disagreed noted that achieving whole-of-Scotland coverage may prove difficult or impossible, and were unhappy about the possibility of gaps being filled by Scottish Ministers: they felt that delivery of wild fisheries management should be at the local level and were concerned about centralisation. There were also concerns about increased costs for anglers in areas where DSFBs do not currently operate. These were echoed in the comments of those agreeing with the proposal.
- 5.1.6 Those who agreed that the FMO network should cover the whole of Scotland also noted that it might be desirable and/or necessary to bring together areas that currently have no fisheries management structure with those with existing DSFBs and trusts. There were also suggestions to amalgamate existing DSFBs.
- 5.1.7 Many of those who agreed added the proviso that this should not apply to the River Tweed or that there should be a separate process for Tweed; many of those who disagreed said the same. There were also differing opinions as to whether the FMO network should apply to Orkney and Shetland.

Figure 5.5 Responses to Question 9, overall and by sector

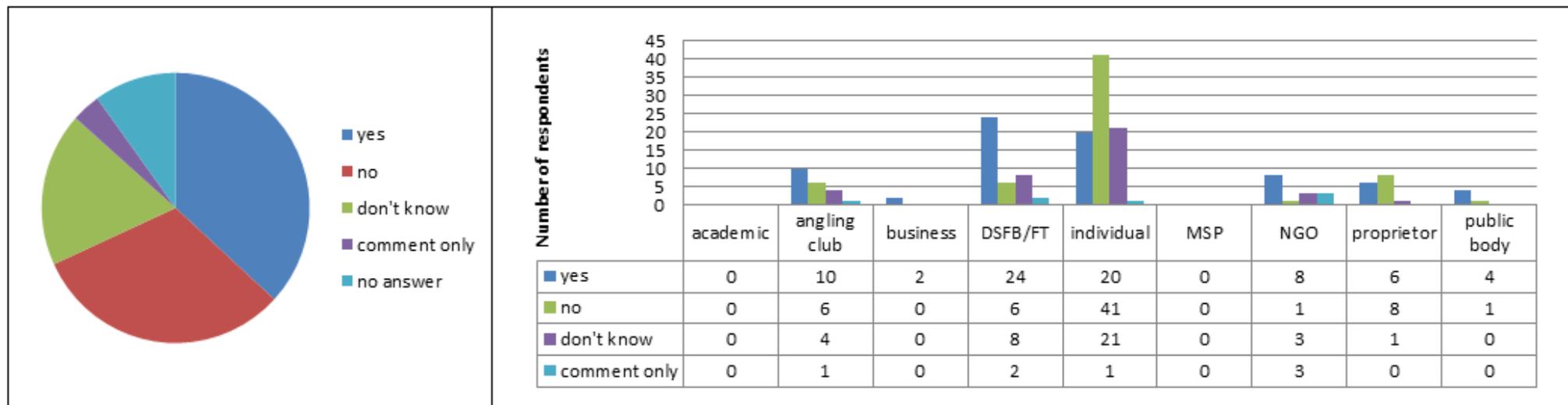
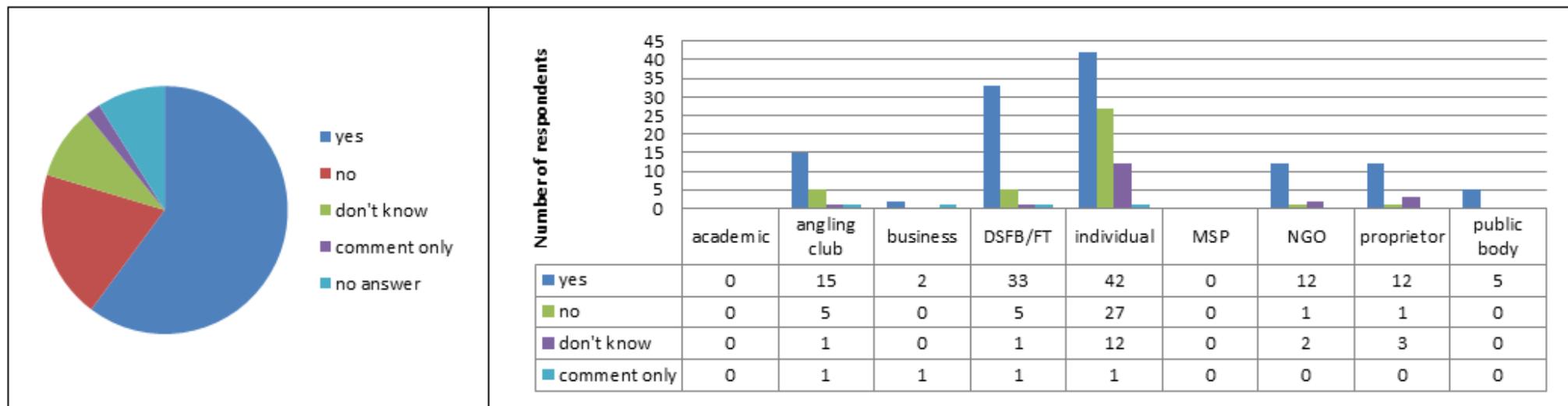


Figure 5.6 Responses to Question 10, overall and by sector



**Q11: Do you agree that Scottish Ministers, following discussion with stakeholders, should set out the boundaries of FMO areas?**

- 5.1.8 There were 177 responses to Question 11; 23 respondents did not answer (Figure 5.7). Just under 15% were unsure as to whether Ministers should set the boundaries. The remainder were divided: 48% in favour and 37% opposed.
- 5.1.9 Those who agreed did so with the proviso that there should be local input and that there should be agreement with local interests and stakeholders before boundaries were set. Those who disagreed echoed this view, noting that the setting of boundaries would require specific local knowledge. Some went further and stated that stakeholders should set the boundaries and that Ministers should only consider assisting if agreement could not be reached amongst stakeholders.

**Q12: What factors should be considered in determining the number and optimal coverage of FMOs?**

- 5.1.10 Respondents identified the following as the key factors (in no particular order):
- river catchments – these form natural units and should not be subdivided. Whether or not catchments should combine will depend on the level of funding required or available, the compatibility of the catchments and the distances involved.
  - local priorities
  - biological and geographic factors, including location, area, physical geography
  - size - sufficient size and capacity to deliver the functions expected but not too large for staff to cover; small enough to retain and encourage local and volunteer involvement and support
  - the amount of resources available, including funding, staffing levels, etc
  - the number and type of fisheries requiring fisheries management resources in an area
  - number of rivers/estuary size
- 5.1.11 There was some limited support for the idea of integrating fishery management areas with Water Framework directive boundaries.
- 5.1.12 A few respondents commented that, for cost-effective purposes, it may be worth considering some form of regionalisation. For example, a number of existing organisations could come together to cover a larger FMO area but retain a local presence, for example through employing local catchment officers. Another suggestion was for an additional regional FMO layer, whereby the regional FMO provides general services and support (including admin) for a number of small local FMOs.

Figure 5.7 Responses to Question 11, overall and by sector

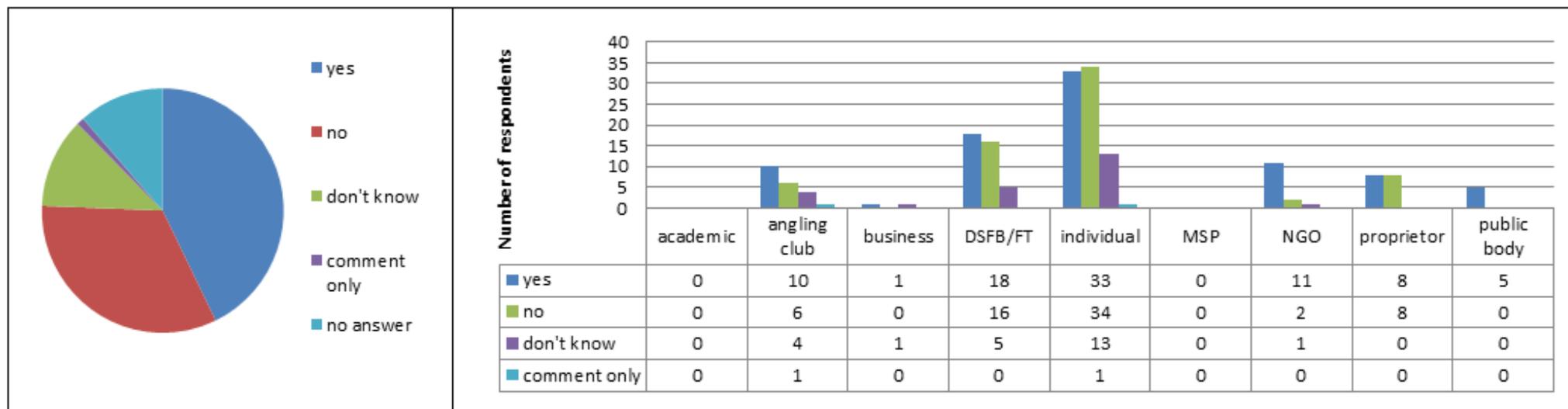
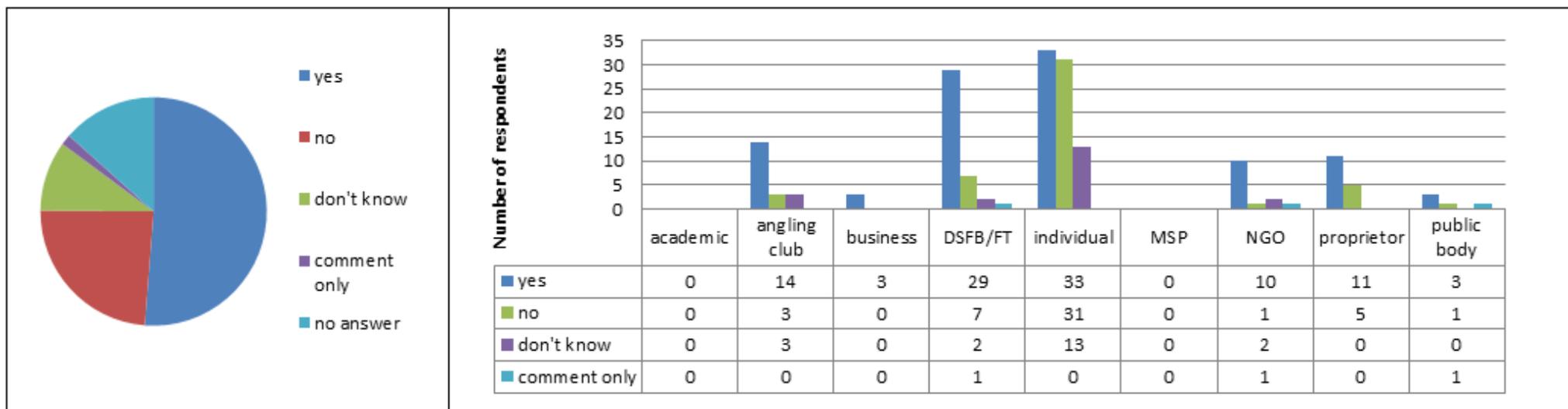


Figure 5.8 Responses to Question 13, overall and by sector



Q13: Do you agree that bodies designated as FMOs should be able to deliver analogous work on behalf of local or national interests?

Q14: Are there any potential conflicts of interest in this approach?

5.1.13 There were 173 responses to Question 13; 27 respondents did not answer (Figure 5.7). Just over 10% were not sure. About 60% agreed; just under 30% disagreed.

5.1.14 Most of those who agreed did so with the following provisos:

- Only if the work is important for fishery management of all species, not for general river work or general wildlife management.
- Only where FMO is best placed and if their core business/responsibilities are not adversely affected.
- Only if there are enough resources, and this analogous work does not divert these away from fisheries management.

5.1.15 Those who disagreed mainly did so on the grounds that FMOs should concentrate on fishery management.

5.1.16 Many respondents answered Question 14 in terms of potential conflicts between/within fisheries management organisations and others, rather than conflict of interest. The remainder were of the view that there would not be a conflict of interest if fisheries management were to be the priority activity and analogous work secondary to that.

## 6 Resourcing Wild Fisheries Management

6.1.1 The consultation document asked six questions about the potential resourcing of wild fisheries management. This section sets out the analysis of the responses to questions 15-20.

Q15: Do you agree that funding raised from proprietors should continue to provide the core strand of revenue for local fishery management?

6.1.2 There were 178 responses to Question 15; 22 respondents did not answer (Figure 6.1). Just under 10% were not sure. The majority of respondents agreed with this proposal (about 70%), while about 20% disagreed.

6.1.3 Many of those who agreed did so on the proviso that money should be raised from all owners of fishing rights (i.e. migratory and non-migratory species), and that these funds should be controlled and spent locally in the FMO area. They also noted that funding raised from proprietors should constitute core FMO funding, but felt that this should not be the only source of revenue. They considered that this was particularly important, given the need to meet the aims of effective management and the fact that the management remit would widen to include non-migratory species.

6.1.4 Those agreeing also considered that salmon proprietors should not bear the cost of managing both migratory and non-migratory species. This was strongly echoed by many of those who disagreed.

6.1.5 There were also comments to the effect that those contributing to the levy would require to be adequately represented on the FMO board. This was echoed by netting interests, who noted that they would prefer a nationally set levy, as they are not confident that an FMO would adequately represent their interests.

6.1.6 Many respondents considered that the new management system would result in increased costs, as a result of its wider scope and increase in duties. There were therefore concerns that the levy alone would not be enough to support fisheries management and that other sources would thus be needed.

6.1.7 Following on from this, there were concerns that increased levies would result in increased charges to anglers - either in the situation where existing levies increase or where the levy is a new charge because no DSFB currently exists in the area. Many considered that increased costs would deter anglers from fishing, which would lead to the loss of angling clubs/associations and/or the closure of fisheries. Several felt that a Business Regulatory Impact Assessment/economic impact analysis would help to clarify these issues.

6.1.8 Some of those who agreed did so because this is the existing situation, with respect to the River Tweed.

Figure 6.1 Responses to Question 15, overall and by sector

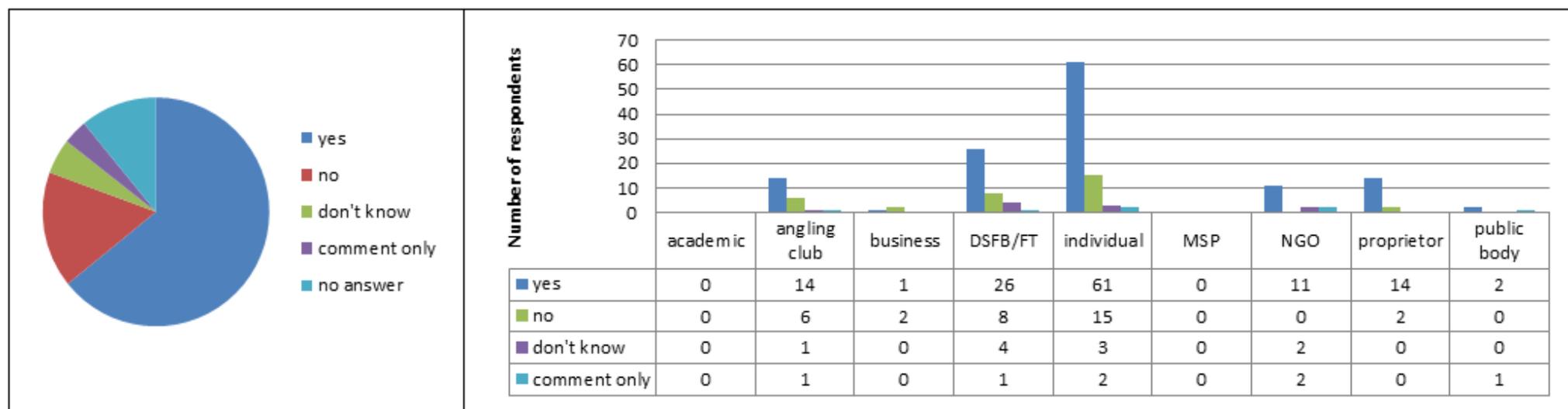
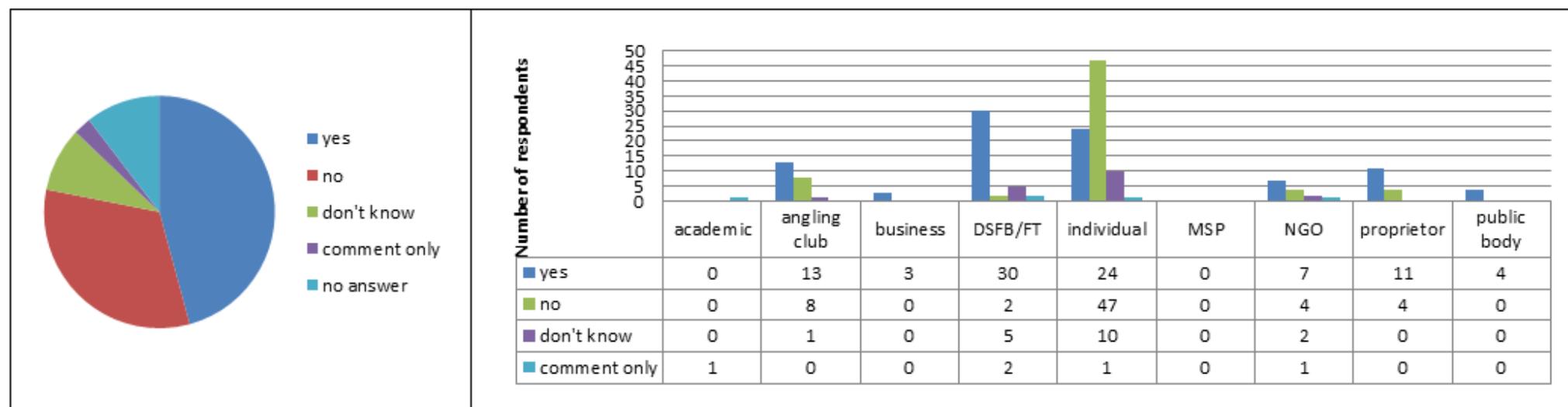


Figure 6.2 Responses to Question 16, overall and by sector



**Q16: Do you agree that we should explore the potential for extending the responsibility for paying the levy to the owners of all fishing rights?**

- 6.1.9 There were 179 responses to Question 16; 21 respondents did not answer (Figure 6.3). About 12% of respondents were unsure about extending the levy. There was a majority in favour (51%), but not a strong one: 36% of respondents disagreed.
- 6.1.10 One-third of those who agreed noted that, as the future aim is to cover and benefit all fish species, then their associated fisheries should help to support the system, and should be represented on the FMO board.
- 6.1.11 Those opposed to the proposal considered that it was not practical – there are too many riparian owners (many of whom are unknown), which would make the levy difficult to collect. Many felt that the administrative costs of collecting the levy would exceed the monies raised. This was echoed by concerns that not enough income would be raised from non-migratory fisheries; that these fisheries could not support such a levy; that this would result in issues for future commercial viability. These concerns were echoed in the provisos made by those who agreed with the proposal. As with Question 15, respondents raised concerns about the potential for increased costs leading to a decline in angler numbers.
- 6.1.12 There was a difference of opinion as to whether stocked/stillwater fisheries should be liable to such a levy.
- 6.1.13 Several respondents also noted that there are species of specific conservation value which have no commercial interest, but which will require resources to maintain and improve the status of these populations. They felt that this would increase costs overall.

**Q17: Do you agree that responsibility for collecting and distributing resources from fisheries proprietors for the purpose of delivering the national strategy at a local level should rest with the national unit?**

- 6.1.14 There were 177 responses to Question 17; 23 respondents did not answer (Figure 6.3). There was significant opposition to the idea that the national unit should collect and distribute resources, with nearly 60% of respondents disagreeing with the proposal. Only about 30% agreed; about 10% were unsure. Those who disagreed were also influenced by their opposition to any proposals for redistribution of funds.
- 6.1.15 All respondents expressed similar concerns about the proposal. A key concern was perceived centralisation: funds raised locally should be spent locally. Respondents reiterated that they want to see local engagement/empowerment, and responses to local issues. There were suggestions that central government should have the powers to collect at the national level, but that this should be delegated to FMOs. Several were concerned that national collection and distribution would affect the harnessing of charitable and volunteer effort, and would result in the “drying up” of voluntary levy payments and donations.

Figure 6.3 Responses to Question 17, overall and by sector

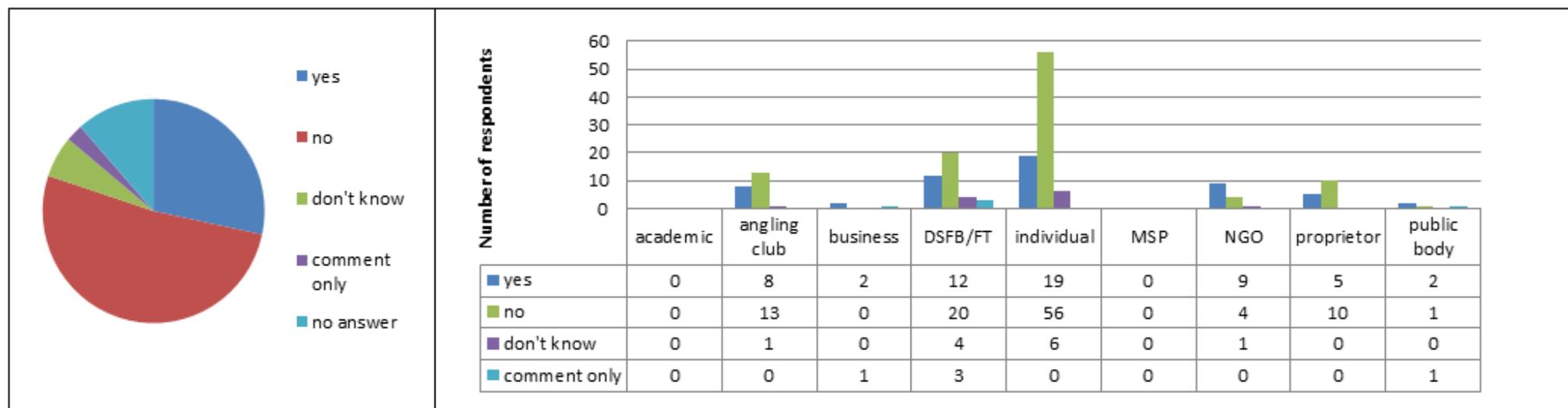
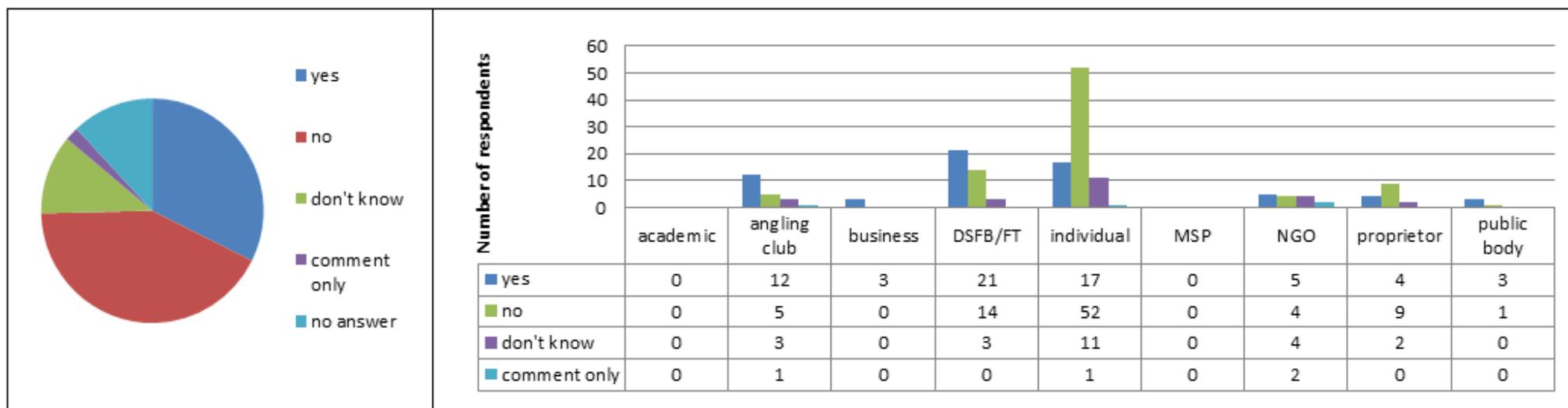


Figure 6.4 Responses to Question 18, overall and by sector



- 6.1.16 There were also concerns about inefficiencies and additional costs resulting from national collection and distribution of funds. Several respondents considered that national collection would result in resources being diverted away from fisheries management into other uses.
- 6.1.17 Some of those who agreed with the proposal felt that collection at the national level would be an administrative efficiency, but that there would be a need to demonstrate transparency and accountability. A similar view was expressed by those disagreeing, who considered that there would be better transparency and accountability when collecting and spending resources locally.

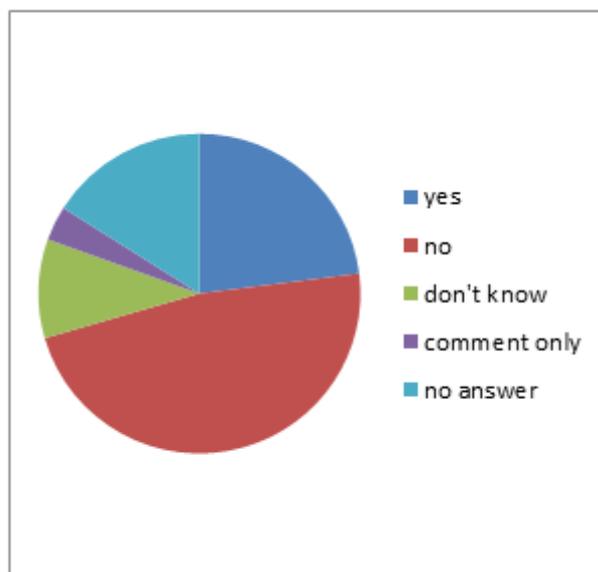
Q18: Do you agree that we should explore the recommendation that redistribution of funds should form part of the new management system?

Q19: If not, what other means might be used for funding local fisheries management at appropriate levels across the country?

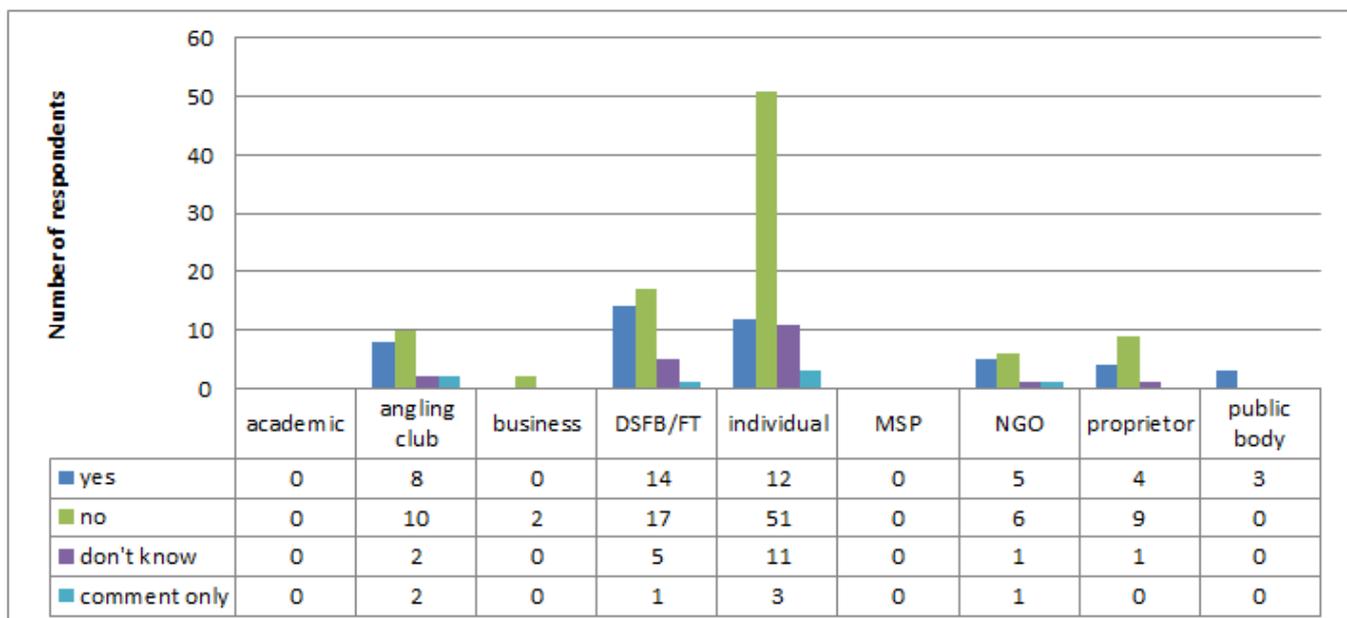
- 6.1.18 There were 176 responses to Question 18; 24 respondents did not answer (Figure 6.3). More respondents (48%) disagreed with the proposal than agreed (36%); 15% were unsure. The key messages from those opposed to the proposal were: that money raised locally should be spent locally; they considered that there is no surplus of funds now and that this will continue into the future; the effectiveness of local fisheries management would be reduced; funders would disengage in general, and those paying a voluntary levy and/or charitable donations would cease to do so.
- 6.1.19 The key message from those supporting the proposal was that the present system means that fisheries in the poorest health and in need of resources have the least to work with, and that the proposal would assist in redressing this. Supporters felt that funding should be allocated on the basis of identified needs and priorities in the national strategy and local fisheries management plans.
- 6.1.20 Other means of funding local fisheries management were suggested in response to Question 19 and included a range of suggestions: national funding; European Union/Scottish Rural Development Programme; lottery funding; landfill tax; SEPA; grants from Local Authorities and/or businesses; rod licences; permit sales; and charity. Several felt that there should be no change to existing funding arrangements. One suggested the re-introduction of sporting rates.
- 6.1.21 An alternative suggestion was that FMO boundaries could be set to link well-resourced with poorly-resourced rivers; this would enable redistribution within FMOs, which respondents noted already occurs in some DSFB areas.
- Q20: Do you agree that we should explore the recommendation for a two-tier levy system?
- 6.1.22 There were 168 responses to Question 20; 32 respondents did not answer (Figure 6.5 and Figure 6.6). The majority of respondents (56%) disagreed with the proposal. Only 27% agreed, nearly 25% were unsure.

- 6.1.23 Those who disagreed did so mainly on the grounds that they considered a two-tier levy system to be unnecessary, complicated and difficult to manage and that this, coupled with predicted inefficiencies, would result in increased costs to FMOs. Respondents also felt that local support would be lost, including voluntary financial support.
- 6.1.24 Some of those who agreed noted that they welcomed the exploration of a two-tier levy system, but were unsure about its desirability. They too had concerns about costs and the resulting loss of local support and decline in angler numbers.
- 6.1.25 Others wanted to see flexibility in the application of a two-tier levy, for example, allowing FMOs to opt out, only using the levy when needed to fund local initiatives or deal with unique circumstances. There were concerns that a two-tier levy would mean that national funding would be inadequate.

**Figure 6.5 Responses to Question 20, overall**



**Figure 6.6 Responses to Question 20, by sector**



## 7 Sustainable Harvesting

7.1.1 This section sets out the analysis of the responses to questions 21, 22 and 23, about sustainable harvesting.

Q21: Do you agree that Ministers should have powers to control killing of all fish species on the grounds of conservation and be able to do so in line with the precautionary principle?

Q22: If not, what other mechanisms should exist in order to ensure a flexible regulatory system which can ensure delivery of legal obligations and policy priorities for management of species and is capable of responding to future changes?

7.1.1 There were 182 responses to Question 21; 18 respondents did not answer (Figure 7.1). The majority of respondents (58%) agreed with the proposal. However, this was not a strong majority: 35% disagreed. About 7% were unsure.

7.1.2 A significant number of those who agreed and disagreed felt that Ministers already have such powers. Those who agreed with the proposal noted that any exercise of such powers should be evidence-based and noted that there are evidence gaps in many areas. This was echoed by those who disagreed.

7.1.3 The other main reason for disagreement was the view of respondents that such powers should be held and implemented at the local level.

7.1.4 Many respondents considered that the precautionary principle should be used only when the necessary data is absent.

7.1.5 In response to Question 22, respondents suggested that the River Tweed model for species management could be used; there was again support for the idea that powers should be held by FMOs or else that the national unit should work closely with FMOs in exercising nationally-held powers. Several considered that the regulatory system should include management of wider pressures such as aquaculture. A few suggested catch and release as an alternative regulatory mechanism. Several reiterated the need for an evidence base to support regulation.

Q23: Do you agree that, in the context of the wider proposals in this paper, the creation of an offence of reckless or irresponsible exercise of fishing rights should not be pursued?

7.1.6 There were 169 responses to Question 23; 31 respondents did not answer (Figure 7.1). The majority of respondents (70%) agreed with the proposal. About 17% disagreed; 12% were unsure. Most respondents felt that pursuing such an offence was unnecessary. Some made their agreement subject to the salmon kill licence legislation proving effective. Others considered that enforcement of existing powers should suffice.

7.1.7 Those who disagreed did so because they felt that there must be legal redress against those who behave in this way.

Figure 7.1 Responses to Question 21, overall and by sector

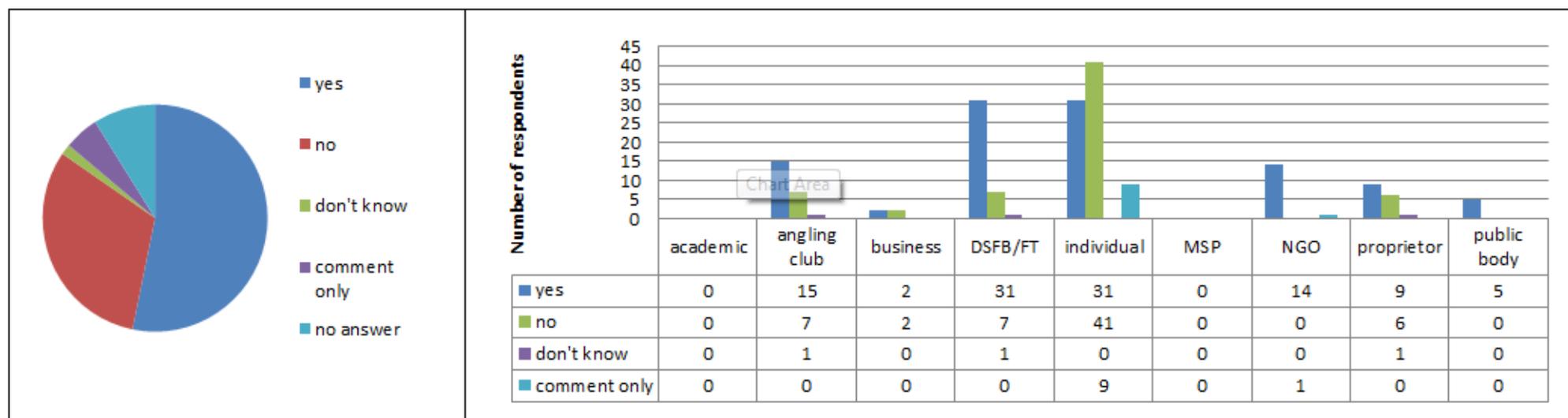
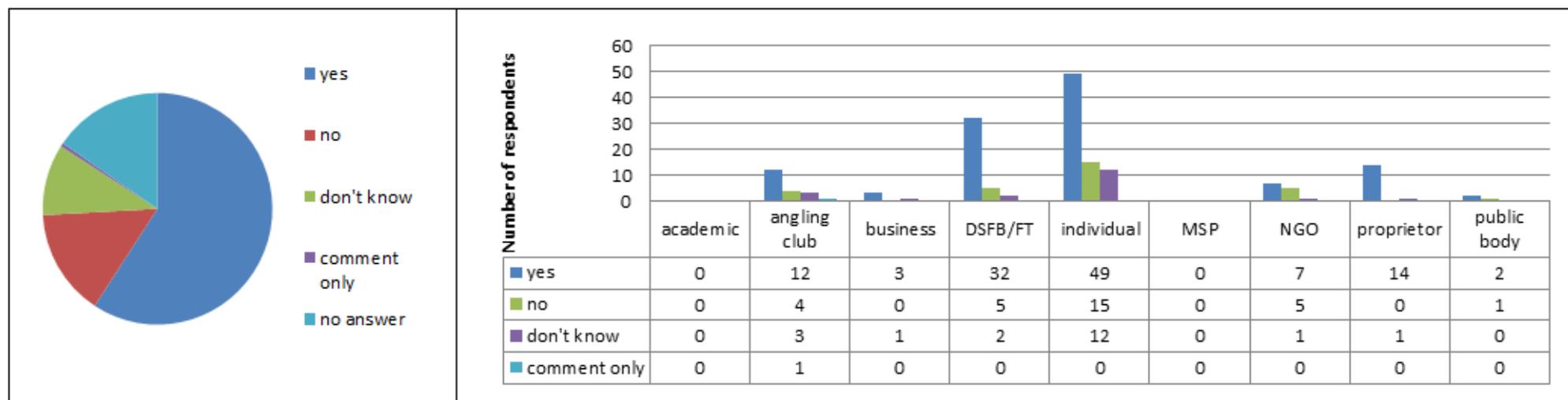


Figure 7.2 Responses to Question 23, overall and by sector



## 8 Science And Skills

8.1.1 This section sets out the analysis of the responses to questions about science and skills (24, 25 and 26).

Q24: Do you agree that data collection priorities and processes for fisheries management at a local and national level should be predicated on a consistent approach and that this should be via a national research and data strategy?

Q25: Do you have any suggestions for additional means to ensure that evidence-based decision making is embedded within the fisheries management system?

8.1.2 There were 177 responses to Question 24; 23 respondents did not answer (Figure 8.1 and 0). The majority of respondents (73%) agreed with the proposal. Roughly equal numbers of respondents disagreed or were unsure/provided comments only (13% and 14% respectively).

8.1.3 Those who agreed made this subject to the FMOs being consulted about the strategy, preferably through partnership working between national and local levels, and on FMOs being free to decide local data collection priorities. There was a desire to see a much higher degree of co-ordination, prioritisation and collaboration between the public and third sectors.

8.1.4 These respondents also wanted to see more data collection, e.g. more fish counters, smolt counts, fry and parr data, angling effort, water quality monitoring. Some also wanted aquaculture data included. Some felt that Marine Scotland Science (MSS) should take the lead in the collection of wild salmon data. Respondents wanted all data made publicly available for independent scrutiny. In addition, they felt that the strategy should explain how data will be taken into account in decision-making.

8.1.5 Those who disagreed primarily did so because they felt that research data and collection should be directed and managed at the local level. Both agreed that consistency, accuracy and harmonisation of data is important.

8.1.6 Some respondents also suggested that this reform opportunity should cover the function and work streams of Marine Scotland Science.

8.1.7 In answer to Question 25, respondents made the following suggestions for additional means to ensure that evidence-based decision making is embedded within the fisheries management system:

- This principle could be included in the model constitution/ specified in FMO duties and responsibilities.
- Improve data collection/quality of evidence and ensure funding is available for data gathering.
- Make databases nationally available and transparent, including SEPA data (e.g. pollution incidents) and MSS data.
- Establish conservation limits.

- The priorities to be identified and progressed in local fisheries management plans must be evidence-based.
- Training and CPD will be key to attaining and retaining the knowledge and skills required to continue to deliver evidence-based fisheries management.
- Use the model established by the River Tweed Commission.

Q26: Do you have any suggestions for additional skills areas which might usefully be covered in training and CPD programmes?

8.1.8 Respondents suggested a wide range of additional skills/training needs (Figure 8.3 ). One noted that there would be a need for a fully operational CPD programme involving practical courses, one day seminars and workshops along with larger conferences. This could be deliverable in the future using existing connections with the Scottish Fisheries Co-Ordination Centre and other organisations e.g. the Scottish Centre for Ecology and the Natural Environment and/or the Rivers and Lochs Institute (part of the University of the Highlands and Islands).

Figure 8.1 Responses to Question 24, overall



Figure 8.2 Responses to Question 24, by sector

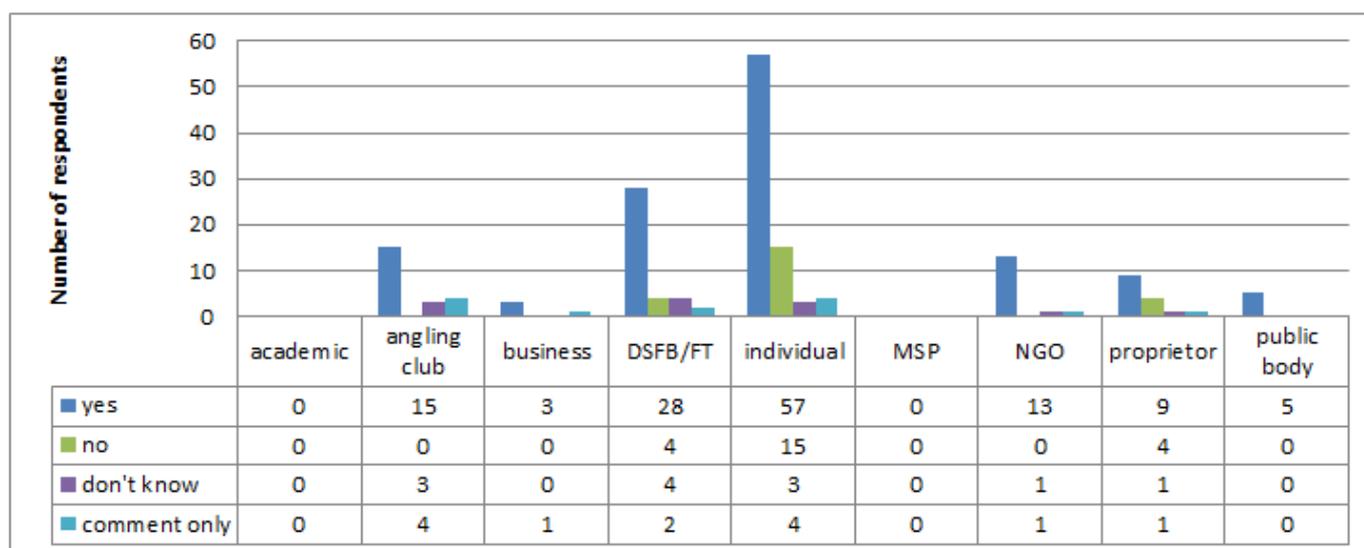
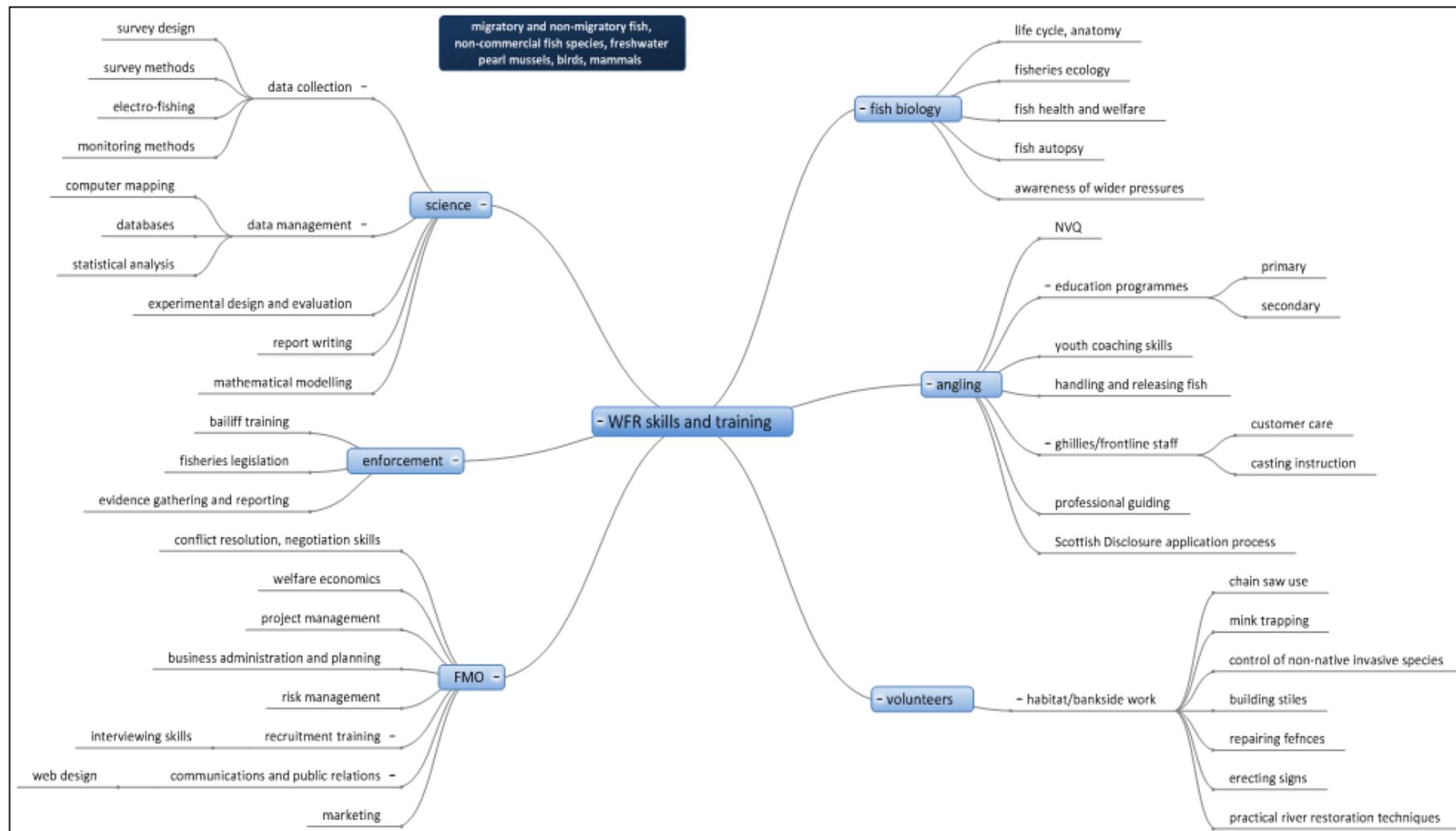


Figure 8.3 Respondents' answers to Question 26



## 9 Regulation

9.1.1 This section sets out the analysis of the responses to questions 27, 28 and 29, the three questions asked about regulation.

**Q27: Do you agree that annual and weekly close times should remain a key part of the management system for wild fisheries?**

9.1.2 There were 166 responses to Question 27; 34 respondents did not answer (Figure 9.1). The majority of respondents (85%) agreed with the proposal to retain annual and weekly close times. Roughly equal numbers disagreed or were unsure (8% and 6% respectively).

9.1.3 The main proviso was that close times should be decided at local level for local waters. Several respondents also suggested that angling should be allowed on Sunday, with perhaps an alternative rest day during the week.

9.1.4 Respondents from the netting sector wanted a change to the weekly close times for nets, citing that such a change would allow them to work around the weather as well as complying with modern health and safety obligations. In contrast, other respondents felt that it was important to keep weekly close times for nets and rods.

**Q28: Do you agree that the proposed local management organisations should have responsibility for considering such close times in line with the national strategy and the local fisheries management plan?**

9.1.5 There were 173 responses to Question 28; 27 respondents did not answer (Figure 9.1). The majority of respondents (81%) agreed with the proposal. Only 10% said no; 8% were unsure.

9.1.6 Some respondents noted that decisions about the conservation of fish will vary with weather, time of the year, disease and many other factors and therefore agreed that FMOs should make these decisions. Some agreed, with the proviso that the national unit should issue guidance on assessing the need to adjust close times and that such decisions must be agreed with the national unit in the interests of consistency. They also felt that the decisions should be informed by evidence.

9.1.7 Those who disagreed felt that close times should remain a ministerial responsibility, with advice from the national unit. (Netting interests were included in this.) Some of those who disagreed also raised the issue of potential lack of consistency across the country.

Figure 9.1 Responses to Question 27, overall and by sector

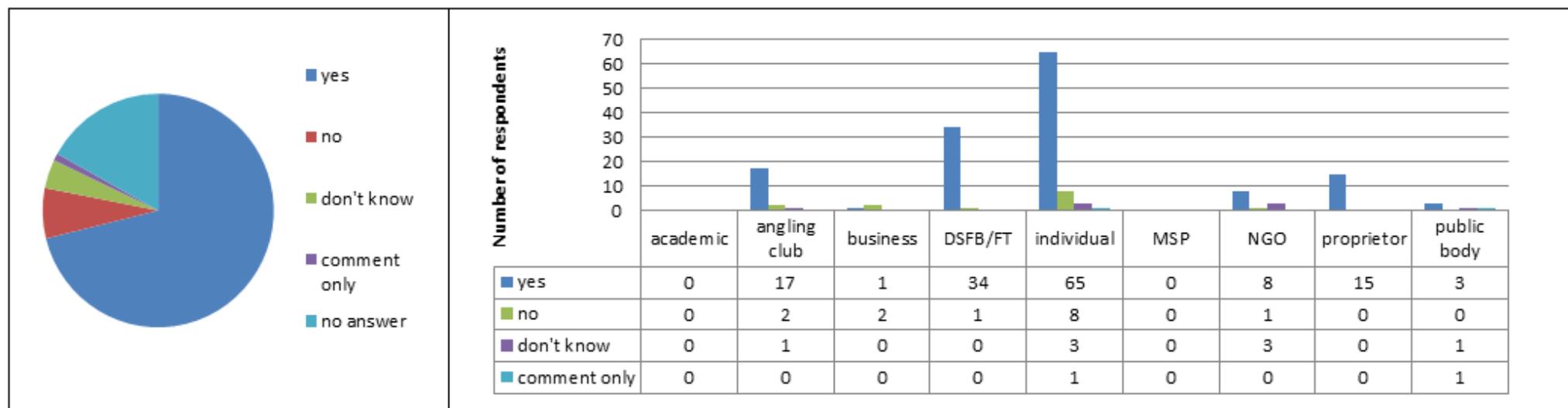
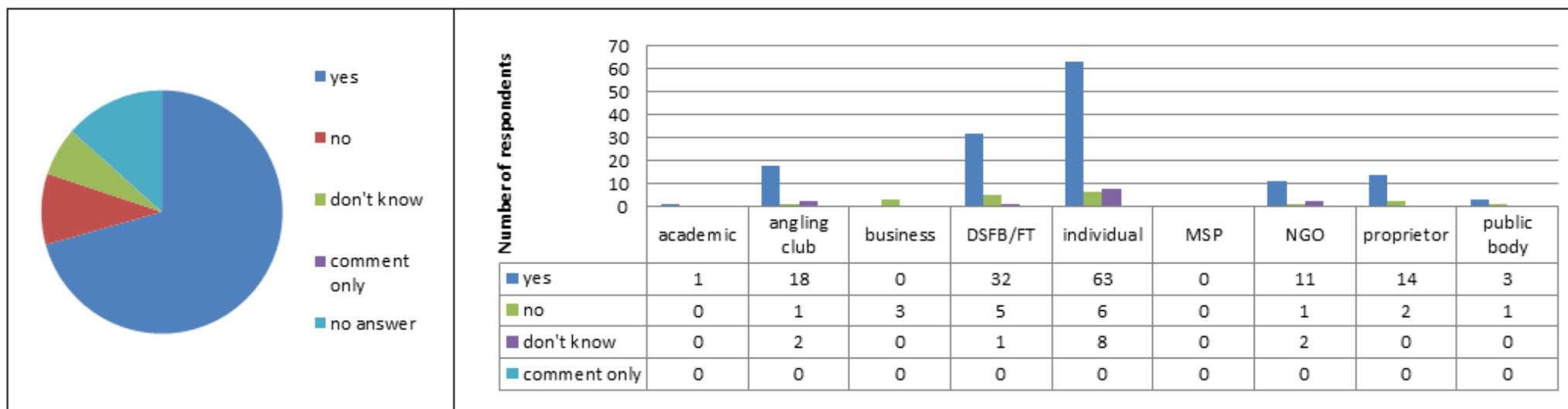


Figure 9.2 Responses to Question 28, overall and by sector



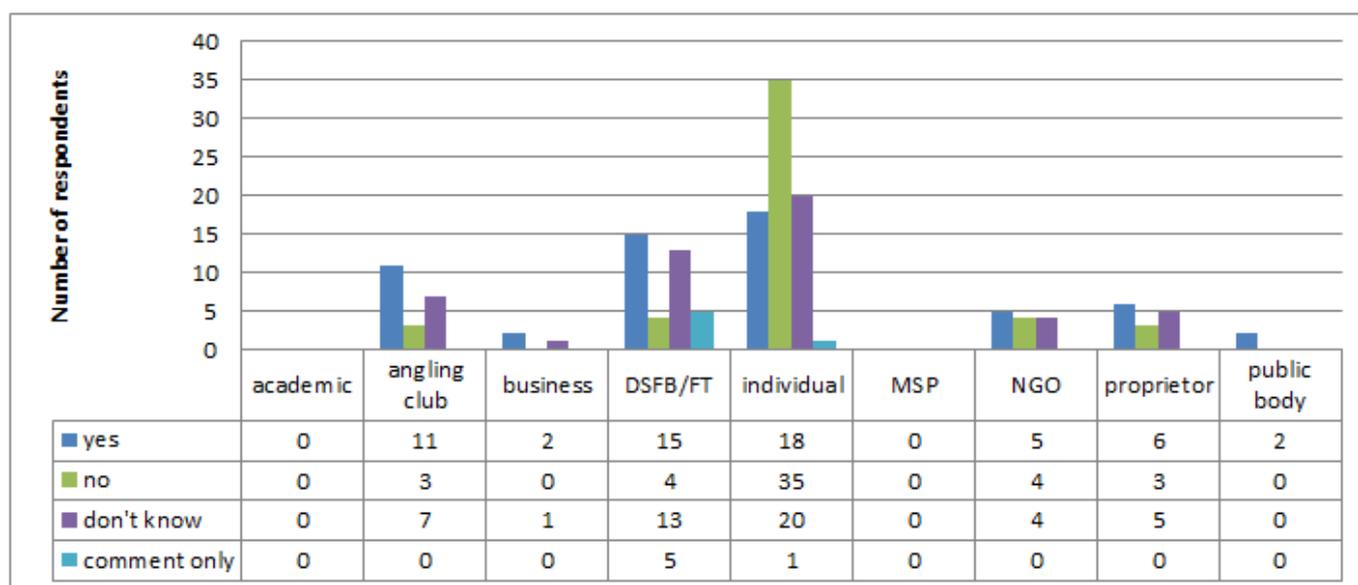
Q29: Do you agree that the purpose behind Protection Orders can be achieved via the design of the new management system in line with the key principles set out in chapter 2?

- 9.1.1 There were 163 responses to Question 29; 37 respondents did not answer (Figure 9.3 and Figure 9.4). The responses were fairly evenly distributed: 36% agreed; 30% disagreed and 30% were unsure.
- 9.1.2 Those who agreed did so on the proviso that the new legislation should incorporate the aims of Protection Orders and would be robust enough to ensure that they work in practice, better than currently. If this were to be the case, Protection Orders might be safely abandoned. However, many noted that fishing without permission should be made a criminal offence for all species.
- 9.1.3 Those who disagreed were of the view that Protection Orders are tried and tested, and that we should stay with the existing system.

Figure 9.3 Responses to Question 29, overall



Figure 9.4 Responses to Question 29, by sector



## 10 Compliance

10.1.1 This section sets out the analysis of the responses to the two questions (30 and 31) about compliance in the consultation document.

Q30: Do you agree that the principles of the existing bailiffing system should be retained, but with amendment to set compliance within an appropriate framework of accountability with warrants issued by the national unit?

Q31: Are there other mechanisms for enforcing fisheries legislation that should be considered?

10.1.2 There were 174 responses to Question 30; 26 respondents did not answer (Figure 10.1 and Figure 10.2). The majority of respondents (65%) agreed with the proposal. About 12% disagreed and 15% were unsure.

10.1.3 A few points were made:

- Many, both agreeing and opposing the proposal, emphasised that bailiffs are essential to protect fisheries.
- Most were content that the national unit should issue warrants. A few were concerned about the potential for centralisation; they wanted warrants issued by FMOs.
- Many reiterated that it is vital that the employment, deployment and management of enforcement teams is delivered locally through FMOs.
- Some had concerns about funding.

10.1.4 Many of those who answered “don’t know” complained that a definition of “appropriate framework of accountability” was needed, and were not clear about what was being proposed under the new system.

Figure 10.1 Responses to Question 30, overall

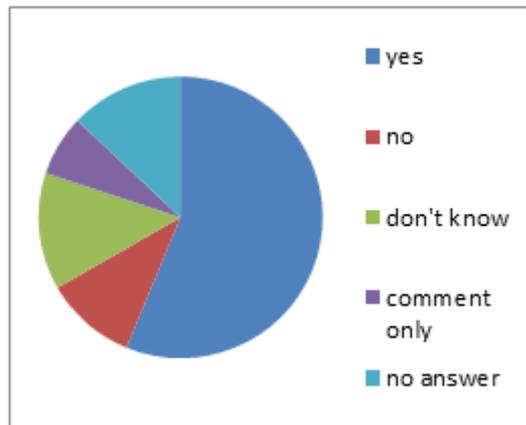
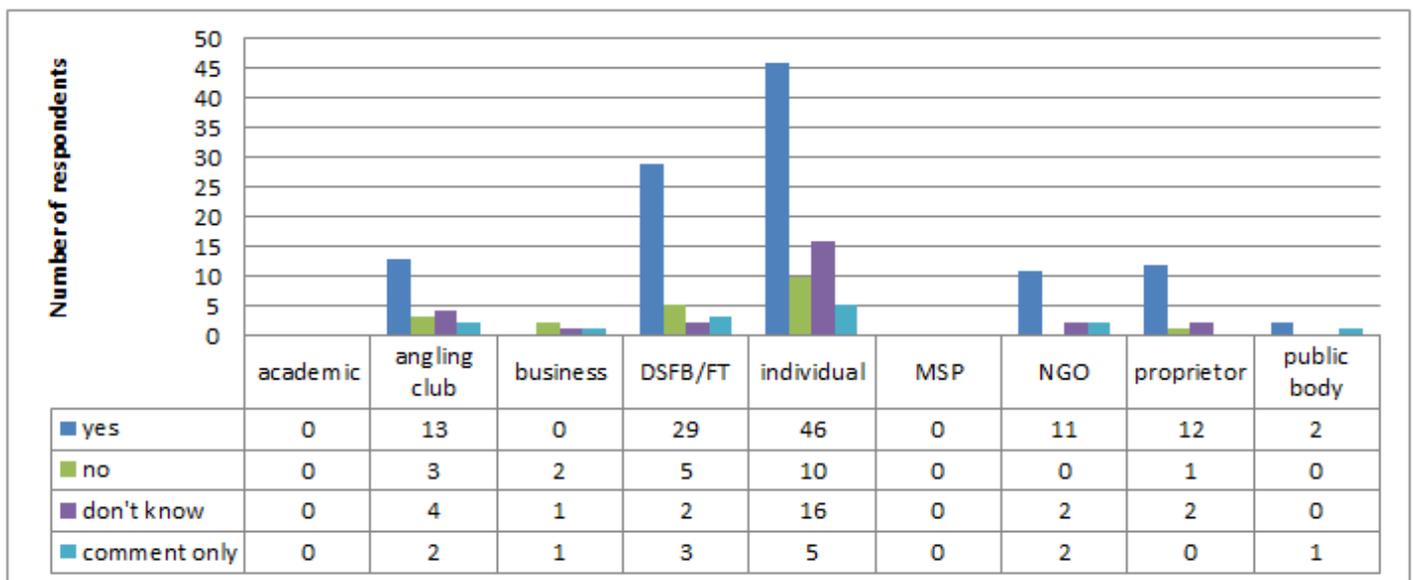


Figure 10.2 Responses to Question 30, by sector



## 11 Opportunities and Access

11.1.1 This section sets out the analysis of the responses to the seven questions about the opportunities within and access to angling (questions 32-38).

Q32: Do you consider that there are advantages in the bodies involved in recreational fishing being able to come together to speak through one lead body?

Q33: If so, do you have views on how this could be facilitated and in what timescale?

11.1.2 There were 169 responses to Question 32; 31 respondents did not answer (Figure 11.1). Three noted that they did not feel that enough information had been provided to enable them to answer “yes” or “no”. About half (52%) of respondents agreed with the proposal. About 24% disagreed and 21% were unsure.

11.1.3 Most respondents acknowledged the diverse nature of these angling bodies, including the different characteristics of the water bodies on which they fish, the different species fished, and the different tackle used. Many felt that this diversity makes the creation of a single lead body impractical, that it would be difficult to represent these diverse interests through one lead body and also that it would be difficult and/or impossible to achieve agreement on common approaches and/or policy positions. This challenge was also acknowledged by those who agreed with the proposal.

11.1.4 A note of caution was sounded, with 17 respondents noting that experience of a similar attempt in England to unify angling associations had, in their opinion, been unsuccessful.

11.1.5 This very same diversity, however, prompted many to cite the benefits of speaking with one voice. Some felt that this was already happening through the Angling Development Board of Scotland and the Angling Trust in England and Wales. Suggestions were made regarding the potential structure of such an organisation, including reconstituting the Freshwater Fisheries Forum and having a central committee to represent the different bodies, using the model of RAFTS, for example. Concerns were also expressed about ensuring that all voices should be heard.

11.1.6 Some also felt that setting up such a body should rest with the recreational fishing bodies, rather than the Scottish Government: “if those different bodies wish to merge and speak with one voice they will”.

11.1.7 Many of the respondents to Question 33 suggested that a single body should be set up, with a government lead/facilitator in place for the first few years. Alternative suggestions included: dissolving or amalgamating the many independent conservation organisations, angling bodies, and representative bodies; reintroduction of the Freshwater Fish Forum; reintroducing the post of Inspector of Fisheries, who could serve as a link between government policy and local management; using the Stakeholder Reference Group as a good starting point; setting up of a discussion and reporting forum, comprising the Chairs of the FMOs; or establishing an independent

Figure 11.1 Responses to Question 32, overall and by sector

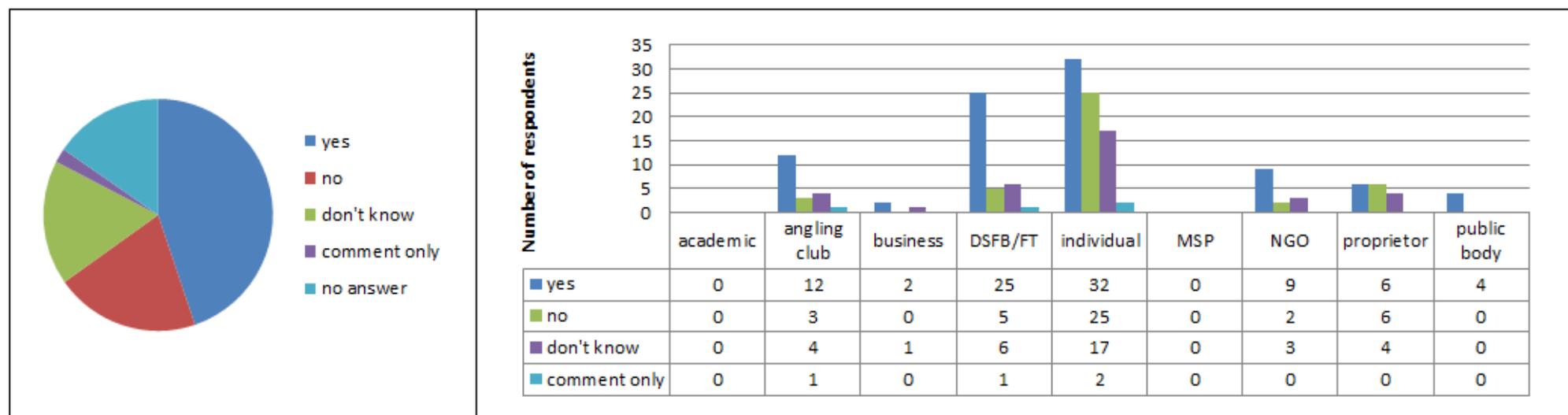
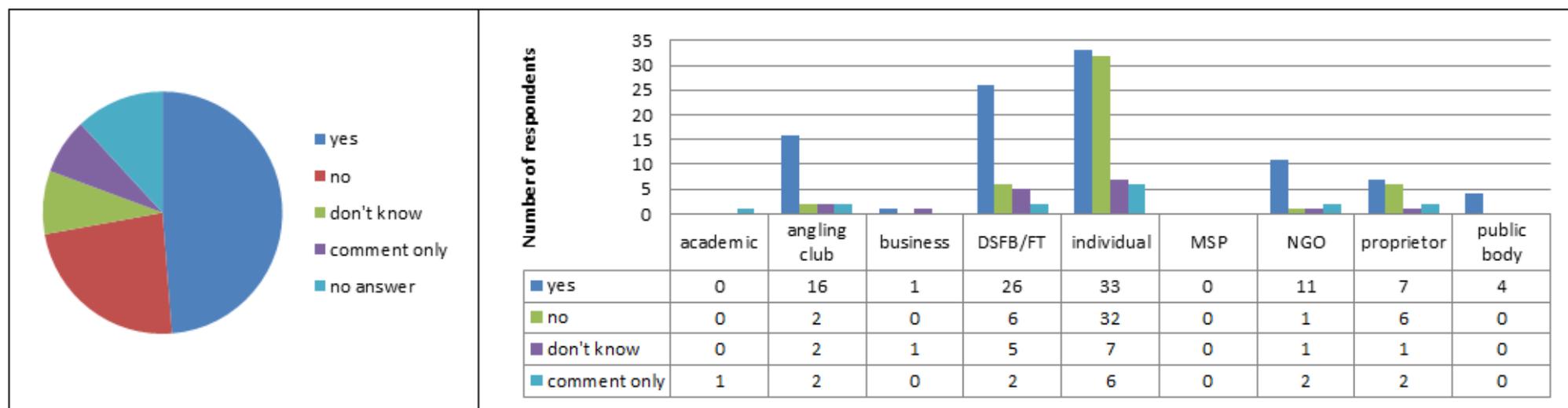


Figure 11.2 Responses to Question 34, overall and by sector



membership organisation made up of all fisheries interests or representatives with the necessary specialist knowledge (management, financial, political or operational).

11.1.8 Various bodies were suggested as the lead body, including: the Salmon and Trout Association, NASCO, and SANA.

11.1.9 Several suggested possible mechanisms for setting up a lead group, including democratic election and invited representatives.

Q34: Do you agree that promotion of opportunities and access should be a central theme for the national strategy?

Q35: We are interested to hear views on how increasing opportunities and access to fishing can be embedded within the fisheries management system.

11.1.10 There were 176 responses to Question 34; 24 respondents did not answer (Figure 11.1). Just over half of the respondents (55%) agreed that promotion of opportunities and access should be a central theme for the national strategy. About 27% disagreed, with 10% unsure.

11.1.11 Many of those who agreed with the proposal noted that there is already an abundance of fishing available across Scotland, at all price points. They noted that opportunities for angling are not being taken up, and that the numbers of new participants are in decline (particularly young people), so welcomed such promotion, both in Scotland and at the UK and international levels. Again, there were concerns that the changes to the management system would increase costs for anglers, thereby affecting participation.

11.1.12 Many of those who disagreed also cited the abundant availability of angling opportunities and felt that promotion would be unnecessary. Some of those who disagreed felt that promotion of opportunities and access is important, but is not a central activity to fisheries management. (This concern was echoed by some of those who agreed with the proposal: they felt that promotion should be subordinate to the central aims of the WFR.) Others felt that an increase in anglers would result in adverse environmental effects or unacceptable increases in angling pressure.

11.1.13 Respondents provided a number of suggestions on how increasing opportunities and access to fishing can be embedded within the fisheries management system. Some noted that opportunities exist already: there is a significant number of schemes with these aims, run by organisations such as angling clubs and SANA, and they suggested that knowledge of these should be shared with others. Several considered that it would be best delivered locally, but supported by funding from the national unit. Others felt that a cross-government approach would be more appropriate, with partnership working between the national unit, the FMOs, angling organisations, Sport Scotland and Visit Scotland.

11.1.14 There were suggestions that both the national unit and FMOs should be given a duty in their constitutions to enhance the contribution that salmon and freshwater fisheries make to the economy and to enhance the social

Figure 11.3 Responses to Question 36, overall and by sector

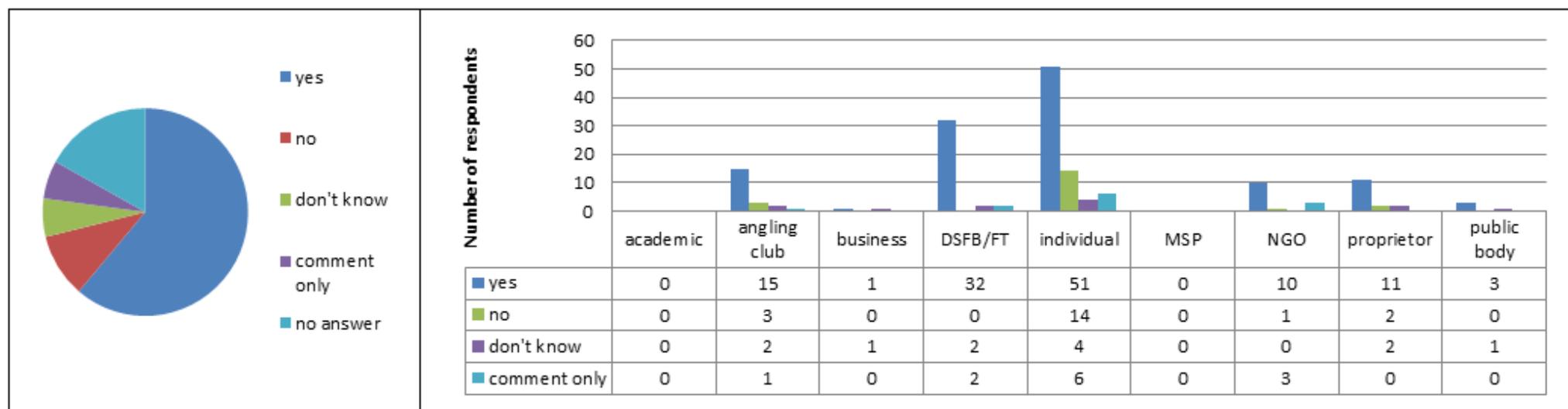
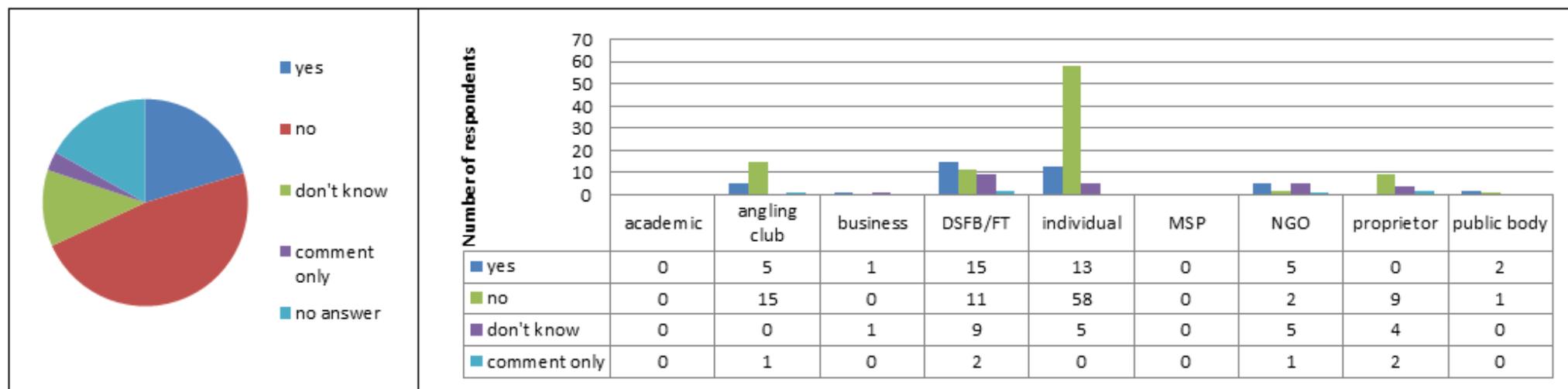


Figure 11.4 Responses to Question 37, overall and by sector



- 11.1.15 value of fishing as a widely available and healthy form of recreation. Promotion of angling should be within the remit / a core function of all FMOs.
- 11.1.16 There were also suggestions to continue school visits or to go further and include angling courses in the national curriculum, and that education representatives could perhaps be included on the boards or wider membership of FMOs.
- 11.1.17 Others reiterated their concern that the costs of angling would be increased by the changes to the management system, and felt that keeping such costs under control or providing additional funds from the centre would be key to maintaining and increasing angler numbers.

**Q36: Do you support the concept of the angling sector coming together to develop a programme for development of angling (Angling for All), including an emphasis on opportunities for young people and promoting social and economic benefits?**

- 11.1.18 There were 166 responses to Question 36; 33 respondents did not answer (Figure 11.3). The majority of respondents (about 75%) agreed with the concept of the Angling for All programme. Only 12% disagreed, 7% were unsure.
- 11.1.19 Those who agreed noted that there are existing programmes for angling development, most of them run by angling clubs, for example on the River Tweed. Encouragement from central government was considered to be a help. However, several considered that the creation of the programme should be progressed by the national unit, FMOs and the angling sector working in partnership (perhaps including Sport Scotland, Visit Scotland and other interests), rather than being the responsibility of the angling sector alone. They were of the view that delivery would be best at the local level, with enough flexibility to adapt to local circumstances. This could be set out in the national strategy and in local fisheries management plan. One respondent suggested that the Angling for All programme should follow the model of the National Angling Strategy, being successfully delivered by the Angling Trust in England.
- 11.1.20 Those who disagreed also cited the existing programmes for angling development and the fact that, in their view, they are not successful in achieving their aims. Accordingly, why introduce another programme? There were also concerns that it would not be appropriate for Angling for All to be part of fisheries management.

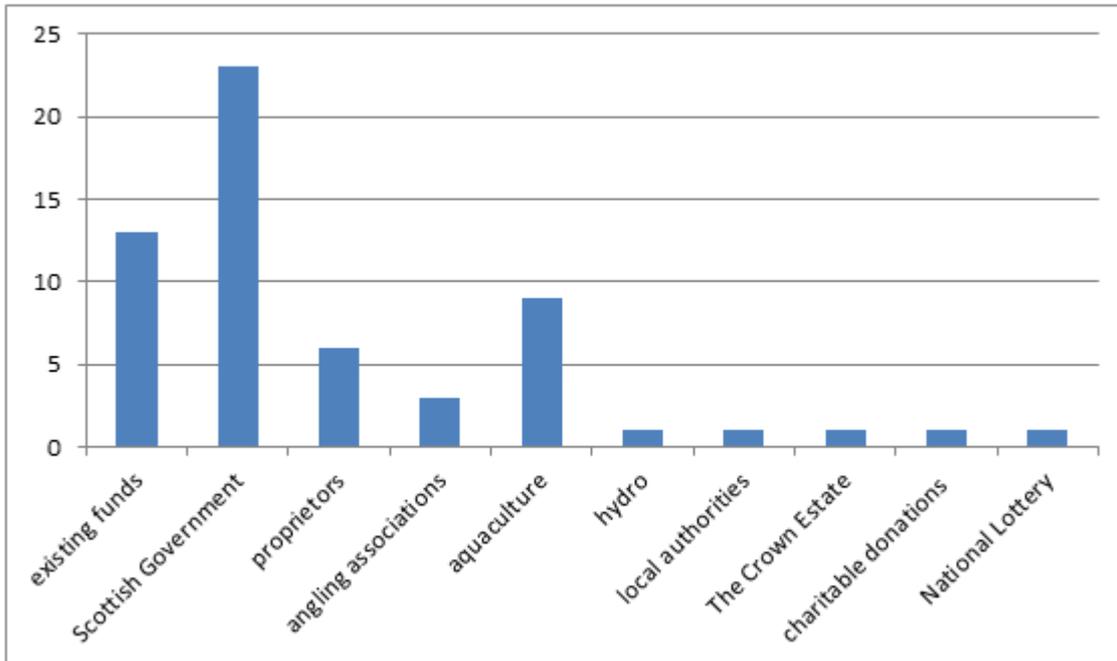
**Q37: Should funding for Angling for All come from a rod licence? If not, where should resources be found to support the programme?**

- 11.1.21 There were 164 responses to Question 37; 34 respondents did not answer (Figure 11.3). About 25% of respondents agreed; 15% were unsure. However, the majority of respondents (about 60%) did not agree that funding should come from a rod licence.
- 11.1.22 Of these, half stated that this was because they oppose rod licences. About 10% considered that existing local programmes could be continued, with

their existing funding sources, including the use of volunteers. A few were opposed to Angling for All on principle (see discussion under Q 36).

11.1.23 A range of alternative funding sources (Figure 11.5) was suggested: central government funds or other angling groups, such as proprietors, and angling associations. Other suggestions included levying those who may affect salmon stocks, including aquaculture and hydro. A range of other possibilities included local authorities, The Crown Estate, the national lottery and charitable donations.

**Figure 11.5 Alternative Funding Sources**



**Q38: Do you agree that a rod licence should only be used to fund Angling for All, rather than also being used to support wider management activity?**

11.1.24 There were 172 responses to Question 38; 28 respondents did not answer (11.1.28 and Figure 11.7). The majority of respondents (nearly 75%) disagreed with this proposal. Only 11% agreed; 9% were unsure.

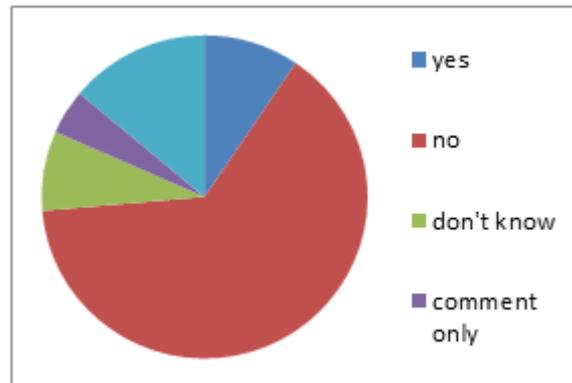
11.1.25 About half of those who answered “no” to this question noted their opposition to the rod licence. Others noted that, if a rod licence were to be imposed, the monies raised should be used for wider fisheries management, specifically mentioning river and habitat improvement and resourcing of research. One or two considered that rod licence monies should support the national fisheries unit or angling associations. Several considered that it should be used to fund the proposed FMOs first, and then Angling for All, with the leftover funds. Some felt that monies could also go to assist impoverished fishery areas.

11.1.26 The main concern raised by those who agreed with the proposal was that the money should be ring-fenced for the Angling for All programme.

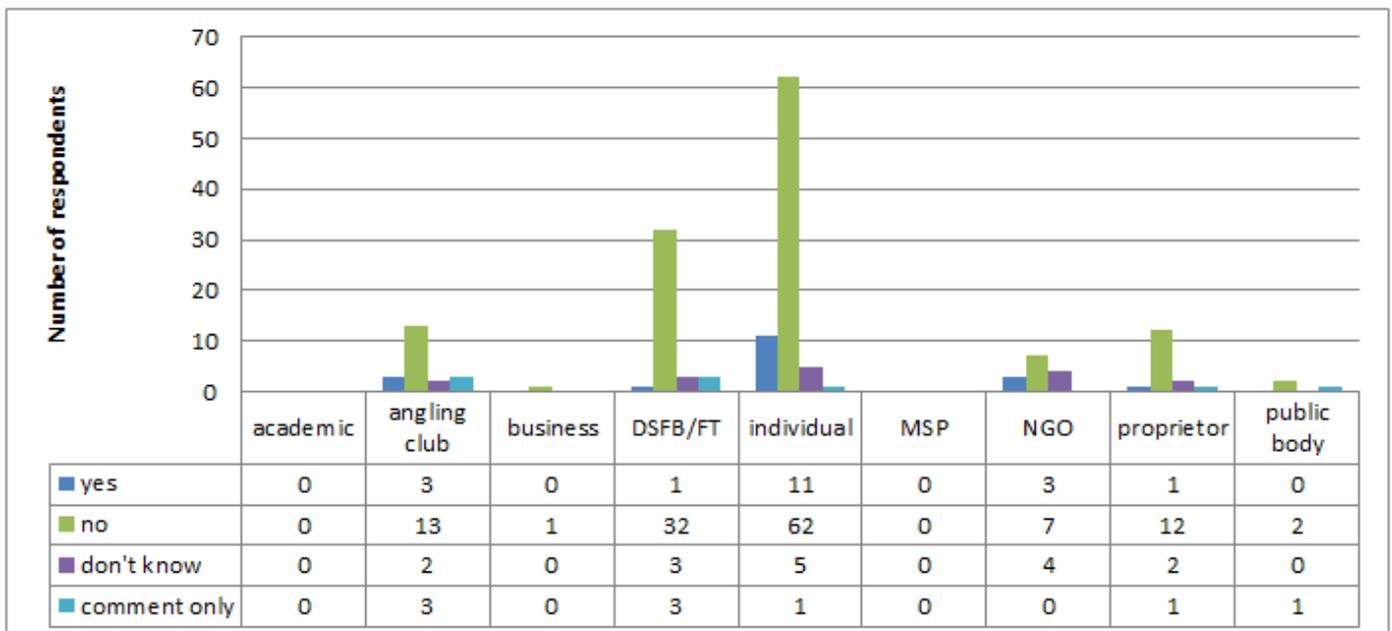
11.1.27 Concerns were raised about the administrative costs associated with a rod licence, whether the money would really be ring-fenced and if there would be enough to support Angling for All.

11.1.28 Several respondents considered that, before any decisions are made, the WFR should be completed and the proposed system fully costed.

**Figure 11.6 Responses to Question 38, overall**



**Figure 11.7 Responses to Question 38, by sector**



## 12 Other Issues Raised

### 12.1.1 Respondents consistently raised several issues in their responses:

- There were concerns that radical changes are proposed to a system that they perceived has, broadly speaking, worked well: changes were considered to be unnecessary.
- Furthermore, there has been no public consultation on the central question of whether District Salmon Fishery Boards should be replaced by FMOs.
- No BRIA or economic impact analysis has been carried out; respondents consider that this should be undertaken before progressing further.
- Some felt that additional consultation is needed.
- There were views that the wider pressures on wild salmon should be considered as part of the new management system (aquaculture; global warming; illegal trawling; over-fishing at sea; over-fishing of salmonid food sources; bycatch of salmon in pelagic fisheries).
- The Scottish Government cannot impose legislation and/or taxation on the proprietors of the River Tweed who are in England.
- There was no identification of the purpose of wild fisheries management: without purpose it is hard to identify objectives and a strategy to achieve these objectives through a series of actions delivered in accordance with a plan. One respondent offered the following vision: the overriding function of a wild fisheries management system is "A system of wild fisheries management delivered at local level and supported by a national unit that is capable of delivering agreed strategic fisheries outcomes both for Salmon and freshwater fisheries and for the benefit of the people of Scotland".

## 13 List of Abbreviations

BRIA	Business Regulatory Impact Assessment
CPD	continuing professional development
DSFB	District Salmon Fishery Board
FMO	Fisheries Management Organisation
FT	Fishery Trust
MSP	Member of the Scottish Parliament
MSS	Marine Scotland Science
NASCO	North Atlantic Salmon Conservation Organization
NGO	non-governmental organisation
RAFTS	Rivers and Fisheries Trusts of Scotland
RTC	River Tweed Commission
SANA	Scottish Anglers National Association
SCIO	Scottish Charitable Incorporated Organisations
SEPA	Scottish Environment Protection Agency
SFCC	Scottish Fisheries Co-Ordination Centre
SNH	Scottish Natural Heritage
WFD	Water Framework Directive
WFR	Wild Fisheries Reform