

# BRIEFING FOR SANA MEMBERS

## CONSULTATION ON WILD FISHERIES REFORM: THE SCOTTISH GOVERNMENT RESPONSE TO THE WILD FISHERIES REVIEW REPORT

### Introduction

The Scottish Government has produced a paper on Wild Fisheries Reform (WFR) which will lead to new freshwater fisheries legislation. Reiterating the Government's commitment to freshwater fisheries management reform, the paper, <http://www.gov.scot/Resource/0047/00476999.pdf>, lays out the broad principles for a new management system. It seeks the views of interested parties on how these principles may be put into effect. 38 direct questions are posed, including two which refer to the possibility of rod licencing as a means of financing some part(s) of fisheries management functions at a local or national level.

The deadline for responses is 7<sup>th</sup> August. Thereafter, further consultation is planned on a draft Bill to be introduced by Spring 2016.

Prepared by SANA's Migratory and Non-migratory Fish Committees, this note is intended to encourage feedback from SANA members on what we should say to Government. To allow us time to compile a response **your comments are requested by July 15th**. You may, of course, respond individually to the consultation.

### We set out below a few of our initial observations on the paper.

(For more background, see our responses to the Wild Fisheries Review on the SANA website under Migratory Fish and Non-Migratory Fish)

### Organisation

1. A two tier all-species management system is proposed; (i) a National Unit to advise Ministers and to support and engage with, (ii) "locally driven" Fishery Management Organisations (FMOs). We accept this and think the upper tier should be located within Marine Scotland. The local FMOs tier, working on a catchment or other sensibly sized district basis, should be evolved from the existing District Salmon Fishery Boards and Fishery Trusts, with essentially input from local anglers,.

### All Species

2. The paper states that "wild fisheries" refers to all salmon and freshwater fisheries (including still water fisheries) in addition to those for which there is a management need but no current fishery. We agree with the principle that all freshwater fish should be encompassed within the new system of management.

### Protection Orders (POs)

3. The continuation of POs is questioned, because the new system could be tailored to provide both access for angling and “*equal protection for salmonid and non-salmonid fish species*”. We agree that, if new legislation incorporates their aims and is robust enough to ensure they work in practice better than currently, POs might be safely abandoned. (but see NMFC’s Project 6.2 paper on POs on the SANA website at <https://dl.dropboxusercontent.com/u/16129866/SANA%20Website/Access%20and%20Protection.pdf> )

### Funding and Rod licensing

4. The paper asks for views on the vexed question of funding a new system. It suggests a two tier system should be explored, with the salmon levy continuing, extended to include all fishery proprietors, charged at a uniform rate throughout Scotland, and collected centrally. *These costs are, of course, liable to be passed on to anglers in permit charges.* FMOs would pursue additional funding to help fund local priorities.
5. Questions are posed about the desirability of introducing a rod licence and the purposes to which that revenue might be applied. There are a range of opinions on this subject within the MFC and NMFC, reflecting differing views within the wider membership.

SANA’s existing policy position on this subject is:

*“Game anglers contribute significantly to fisheries management through permit charges for migratory fishing and SANA is opposed in principle to rod licensing, a poll tax. However, an all-species remit for the successor bodies to District Boards will require a channel for contributions to additional costs. Whether that channel should include rod licensing, e.g. for coarse fishing, is for others to discuss – and is complicated by the existing public rights to angling for non migratory species in some places.*

*Current debate about how new fisheries management will be funded contrasts with the position of the competing human predators for migratory fish. Anglers already take the brunt of management costs, yet return most fish and cannot sell their catch (of salmon). Levying the salmon farmers and netsmen for every fish they sell, to help support wild stocks through better fishery management would appear more equitable than the present system. Both of these parties impact on stocks of wild migratory fish.”*

6. At the time when the WFR was being conducted, it was suggested that the income from a rod licence might pay for an “Angling for All Programme” (AfAP). *This idea was not well defined and included, among other things, supporting recreational salmon netting.* The paper raises it in terms of an AfAP which would focus on helping youth participation in angling and coaching for those who want to take their participation further. This is the kind of activity which already takes place under the auspices of the Angling Development Board for Scotland (SANA, Federation of Coarse Anglers and the Sea Anglers Association) and funded by sportsScotland, albeit under a competitions remit. It is, however, ignored in the paper.

7. Should the SANA opposition to rod licensing be reconsidered? A contrary argument is that the wider public benefits of increased youth participation in angling should be funded from general taxation, not a levy on anglers. All things being equal, the imposition of a rod licence would be a disincentive to angling, leading to lower participation rates and the demise of some angling clubs and associations.

### **Representation of Anglers' Interests**

8. The paper proposes that an “umbrella” body be created for representation of anglers’ interests, i.e. a single body to act as spokesperson for all anglers when dealing with Government and with communications media. It may be argued that the Angling Development Board for Scotland is an umbrella body, albeit with a remit for delivering services with funding from sportScotland. That remit might be extended. However, some people, not only within SANA, doubt whether there is a real possibility for a single representational body when differing points of view have to be reported. *That complication already exists within SANA, never mind an all-angling body*, despite the evident success of the Angling Trust south of the Border.

This subject is being discussed further in the WFR Stakeholders Group of which SANA is a member.

If you wish to comment on any of the above, or on any aspect of the consultation, please write to Andrew McIntosh at [admin@sana.org.uk](mailto:admin@sana.org.uk), or at the address below.

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