

A Modernised Framework for Scotland's Wild Fisheries: Finance, Capacity and Governance for the Future

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SECTION 1: INTRODUCTION

1.1 Background

Scotland's Wild Salmon Strategy was published in January 2022 with the associated Implementation Plan published in February 2023. These documents recognise the important contribution that district salmon fishery boards (DSFBs), the River Tweed Commission (RTC), and Rivers and Fisheries Trusts have made to the management of our wild fisheries and the restoration of the habitats on which they depend. However, the strategy also recognises that there are inherent difficulties in the current system, particularly in relation to developing and maintaining stable and consistent income streams. This document forms one part of a workstream to develop a modernised and fit for purpose policy framework, by undertaking a broad review of the current policy framework. The primary focus of this work is to examine new ways to better support and resource local management, whilst also examining changes to governance which would support this ambition.

There have been a number of previous initiatives which have sought to explore the governance and policy framework associated with Scotland's wild fisheries. Most recently, the [report and recommendations](#) of the Wild Fisheries Review Panel were published in 2014. This led to a process of engagement and consultation, culminating in the publication of a consultation on draft provisions for a Wild Fisheries (Scotland) Bill and draft Wild Fisheries Strategy. However, in February 2017, the Scottish Government ruled out proposals to introduce rod licences, a new wild fisheries levy and the criminalisation of freshwater fishing without written permission. Proposals to overhaul the structure and remit of district salmon fishery boards, were also ruled out. Whilst this is not a re-run of Wild Fisheries Reform, where useful thinking had been developed previously, this thinking was used to inform the current process.

1.2 Policy Framework and Financial Review Group

This process was established to develop initial thinking and recommendations in relation to Action 5.1. of the Wild Salmon Strategy Implementation Plan.

Establish a task and finish group of stakeholders to undertake a broad review of the current policy framework [2023] (Scottish Government)

The aim of the group will be:

- *to make recommendations aimed at improving the protection of salmon, and enhancing the environmental, economic, and social benefits arising from it.*
- *to examine new ways in which we can better support and resource local management.*
- *to explore new means of making investments in Scotland's rivers, including investigating private sector contributions in line with Scottish Governments*

commitment to develop a high integrity, values-led market for responsible investment in natural capital.

In order to progress this important action, Fisheries Management Scotland volunteered to lead this process and established a task and finish group to support his work. This work was developed by a committee ([Appendix A](#)) and developing challenges and recommendations were tested with members of Fisheries Management Scotland through a survey. A summary of survey responses is included in [Appendix B](#).

1.3 Problem Statement

A problem statement serves as the foundation for identifying challenges and proposing targeted solutions. It outlines the core issue that need to be addressed and sets the stage for the development of actionable recommendations. In this paper, the Wild Salmon Strategy – Policy Framework and Financial Review group define the key problem facing local fisheries management structures in Scotland as:

Local rivers and fisheries management structures in Scotland lack the financial and human resources needed to fully support catchment-wide ecosystem health, limiting their capacity to address the wild salmon crisis and other environmental challenges.

In thinking about resourcing local management, it was decided by the group that issues related to finance and resourcing cannot be looked at in isolation from inherent issues associated with the governing legislation for freshwater fisheries in Scotland. In [Section 3](#), we elaborate on this problem statement, outlining the challenges that contribute to the problem and setting the stage for proposed solutions to address them.

SECTION 2: WILD FISHERIES SECTOR

2.1 Overview of District Salmon Fishery Boards and the River Tweed Commission

2.11 History of Fisheries Management and the Law

By the 18th century, it had been established in Scots property law that no-one could fish for salmon and sea trout in freshwater without the landowner's permission. Since medieval times, there has been the presumption in Scots law that the right to fish for salmon in freshwater and coastal waters belongs to the Crown unless it has been granted out. One consequence of the Crown property right to salmon fishing, was that salmon fishing rights became established in Scots law as a distinct property right, capable of being owned by someone separately from the ownership of the land over which the right was held. This is still the case.

The growing importance to landowners of salmon fishing for sport in the 19th century, resulted in issues between riparian owners along rivers and also increased concerns over poaching. As a result, the Salmon Fisheries Acts 1862-68 were passed which created the district salmon fishery boards. The legislation governing DSFBs has been amended on numerous occasions since 1862, and in 2003 several pieces of legislation were drawn together under the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003. The 2003 Act was further amended in 2007 and 2013 but remains the legislation that DSFBs work under. In recent decades some DSFBs have merged to cover larger land areas, a process that can be implemented by the Scottish Parliament passing a Statutory Instrument.

The Act which established the River Tweed Commission came into force even earlier, in 1807. This legislation was groundbreaking, as for the first time, the commercial interests of the lower river were balanced by the importance of salmon migration to the upper river. After Scottish devolution, the Scotland Act 1998 (River Tweed) Order 2006 came into force in place of the previous legislation.

2.12 Structure and Legal Framework of District Salmon Fishery Boards and the River Tweed Commission

District salmon fishery boards (DSFBs) are associations of fishery proprietors, including representative of salmon anglers and tenant netsmen, that operate within the legal framework of the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003. For the purposes of this document, when we refer to a District salmon fishery board, we mean the board members and staff employed by the organisation.

DSFBs are constituted when fishery proprietors within a district choose to form a board. While not statutory bodies themselves, DSFBs derive statutory powers and duties from the Act to manage, protect, and enhance salmon and sea trout fisheries within designated

salmon fishery districts including but not limited to raising money to fund fisheries management through the fishery assessment or any other source, appointing water bailiffs, and enforcing regulations to protect salmon fisheries. For information on the statutory duties and powers of district salmon fishery boards, see [Appendix D](#).

The River Tweed Commission (RTC) has a broader role than district salmon fishery board because it is responsible not only for the preservation and increase of salmon and sea trout but also for trout and other freshwater fish. This broader mandate is established under the Scotland Act 1998 (River Tweed) Order 2006, which reflects the unique cross-border nature of the River Tweed, with its catchment spanning both Scotland and England. The composition of the RTC includes elected representatives from proprietors, the Scottish Borders and Northumberland Councils, freshwater fishing associations, clubs, and other stakeholders involved in the use and management of the River Tweed's waters.

At present, Scotland has 39 DSFBs, in addition to the River Tweed Commission. Scottish Ministers have powers to act in areas without DSFBs, and in some instances, appoint water bailiffs to provide law enforcement in such areas.

Whilst DSFBs operate across Scotland, not all river systems are covered (e.g. Clyde, Lomond/Leven and Irvine). These areas were not covered by the designations in the 1860s primarily because they had no salmon at that time. Under the current legislation, the proprietors within these rivers catchments (which now do have salmon) could apply to form a DSFB, but have not done so. Many areas without DSFBs are covered by a Fisheries Trust, with the exception of Shetland, Fleet (Sutherland) and some west coast islands.

2.13 The Fishery Assessment

District salmon fishery boards are funded primarily through the fishery assessment, which is a form of non-domestic rate. At the request of the DSFB, local authority district assessors value the salmon and sea trout fisheries within that district. The valuation is largely based on the catches of salmon and sea trout within each fishery. Having produced a budget to deliver the actions required (as determined by the DSFB), the DSFB then sets a rate in the pound to meet this amount which is applied at a uniform rate to all fisheries in the district.

Where the value of the fishery is low in relation to the identified actions the rate in the pound will be high with the reverse situation resulting in a low rate. Rates in pound reported to FMS by its membership in 2024 ranged from £0.21 to £2.86. The decision is a balance between what is required, what is desirable and what is affordable.

The fishery assessment on the River Tweed is broadly similar to that for DSFBs, with the exception that the RTC must determine the annual value of each salmon fishery in the district (not less frequently than every 5 years) and enter that valuation in a valuation roll.

The DSFB fishery assessment raises approximately £4m each year and forms the single biggest source of core funding for DSFBs. In the case of the River Tweed Commission, the

fishery assessment raises approximately £600,000 per annum (2024 figures). In many cases, it is also an important source of funding, via donations, for rivers and fisheries trusts who deliver key management tasks within fisheries districts.

2.2 Overview of Rivers and Fisheries Trusts

2.21 History of Rivers and Fisheries Trusts

Since the 1980's, a number of rivers and fisheries trusts, were established as environmental charities to support an objective, scientific approach to salmonid management. The Tweed Foundation was established in 1983 and Galloway Fisheries Trust was set up in 1988. Further momentum was achieved in the 1990s with the developing network of fisheries trusts on the west coast of Scotland. These were represented initially by the Association of West Coast Fisheries Trusts, and with the further expansion of the network across Scotland, a new organisation called Rivers and Fisheries Trusts of Scotland (RAFTS) was formed to represent the trust network across Scotland. RAFTS was dissolved in 2017 and Fisheries Management Scotland took on the representative role for trusts and DSFBs.

2.22 Structure and Legal Framework of Trusts

There are 27 rivers and fisheries trusts in Scotland. These environmental charities work to promote conservation and evidence-based management of fisheries, undertake a wide range of environmental monitoring and improvement works, and work to raise awareness and educate the public about the aquatic environment.

As charities, rivers and fisheries trusts are regulated by the Office of the Scottish Charity Regulator (OSCR) and must work within their charitable objectives. As environmental charities, rivers and fisheries trusts are not limited in their remit to salmon and sea trout. Trusts often work in partnerships with the district salmon fishery board(s) which cover the same catchment(s) to manage and conserve Scotland's fisheries resources. In some cases, these organisations share staff at a local level, but there remains an important legal distinction between the constitutions of these organisations.

Trusts benefit from their charitable status, which provides access to a wider range of funding opportunities, as many grants are restricted to charities or organisations with an asset lock. They frequently secure public and philanthropic grants, often through partnership working. These funding streams have been essential for staffing, river restoration projects, and monitoring activities. Many Trusts also raise important unrestricted income through the delivery of various specialised contract work and receiving donations from individuals and organisations. However, in common with DSFBs, securing consistent and adequate core funding remains a challenge for Trusts.

2.3 Impact of Local River and Fisheries Management

Wild salmon in Scotland are subject to a wide range of pressures, which are under the control of Scottish Government and a range of regulators. It is important to recognise that the majority of these pressures are not under the direct control of fisheries managers. However, district salmon fishery board, the RTC, and rivers and fisheries trusts have achieved a great deal for the protection and restoration of wild salmon, sea trout and other freshwater and migratory species.

DSFBs and the RTC have taken massive strides to reduce both legal and illegal exploitation of wild salmon and sea trout. DSFBs and the RTC employ water bailiffs, fisheries enforcement officers who are dedicated to addressing fish poaching in rivers and coastal waters. Fish poaching is formally classified as a wildlife crime and now has one of the highest conviction rates of any class of wildlife crime. DSFBs, the RTC and fisheries proprietors have also taken widespread action to reduce exploitation within net fisheries, particularly mixed-stock fisheries in coastal waters. Over the last few decades, many coastal net fisheries were bought out by fisheries interests at great expense. In parallel with these efforts, DSFBs, the RTC, proprietors and anglers have adopted catch and release into their conservation policies, and in some cases have applied for statutory conservation measures to support these policies. Scotland now has the highest level of catch and release of any signatory to NASCO.

Rivers and fisheries trusts, and in some cases DSFBs, deliver vital monitoring of freshwater fish populations which has significantly improved our understanding of the state of Scotland's rivers. Rivers and fisheries trusts (and DSFBs) monitor young fish and returning adults to help understand how important local pressures impact the aquatic environment. In other cases, fisheries managers work to collect information which is then applied at local, national and international levels. Projects such as the National Electrofishing Programme for Scotland, or Scotland's River Temperature Monitoring Network are designed and coordinated by Marine Scotland but delivered on the ground by rivers and fisheries trusts (and DSFBs).

Trusts also deliver widespread education projects which raise awareness of our rivers and the species that they support. Habitat restoration projects are often delivered in partnership and include riverside tree planting, barrier removal or easement, bank stabilisation work, instream habitat restoration and a range of other projects. Increasingly, it is recognised that such work must be undertaken at scale, in order to build resilience in our river catchments and the wider natural environment.

DSFBs, the RTC and Trusts serve an important function in responding to development proposals to ensure the protection of watercourses and fish populations. These consultations include developments related to commercial forestry creation, aquaculture, renewable energy projects and major infrastructure projects.

2.4 Models of Working

District salmon fishery boards and rivers and fisheries trusts often work closely to deliver complementary fisheries management objectives. The same is true for the River Tweed Commission and the Tweed Foundation. While DSFBs and the RTC manage statutory responsibilities such as enforcement and exploitation control, rivers and fisheries trusts often provide the scientific expertise and capacity for broader conservation and restoration projects. In some cases, the two entities share staff or coordinate activities at a local level, but they remain legally distinct organisations with different governance structures. Across all configurations of local management, both DSFBs and rivers and fisheries trusts may undertake contract work to supplement their core income and sustain delivery capacity. [Appendix C](#) offers a categorisation of some of the different models of collaboration, including benefits and challenges of each.

Note to Readers

The River Tweed Commission shares some broad functions with district salmon fishery boards such as protecting, enhancing, and regulating Salmon fisheries – but it is a distinct body with its own legal basis (see section 2.1). Not all of the challenges and recommendations set out in Section 3 and 4 of this document apply to the RTC and we have tried to make this clear throughout. However, if there is any doubt readers should refer to The Scotland Act 1998 (River Tweed) Order 2006.

SECTION 3: CHALLENGES IN THE CURRENT SYSTEM – LOCAL FISHERY MANAGEMENT IN SCOTLAND

CHALLENGE

1

Dependence on the Fishery Assessment as an Unsustainable Funding Model

The fishery assessment system, while critical to the funding of DSFBs and some rivers and fisheries trusts, is increasingly strained due to its reliance on declining salmon and sea trout catches and inconsistent valuation.¹

The valuation of fisheries is closely tied to salmon and sea trout catches. With declining catches in recent years, assessments increasingly impose a greater financial burden on proprietors (in proportion to the income that can be derived from the fishery), and some proprietors are now questioning the fairness and sustainability of the system. This has led to concerns about the fundamental sustainability of resourcing local fisheries management.

The valuation of fisheries within DSFBs is undertaken by the local authority district assessor on the request of the clerk to the district salmon fishery board. Where such a request is made, the assessor will value each fishery and enter it in the valuation roll. The process which is used is set out in a practice note on the Scottish Assessors Association [website](#). Valuations are derived from local rental evidence but are primarily based on the number of fish caught by a fishery. However, the valuation takes account of other evidence where a right to fish on a particular beat is not exercised. The accuracy, or otherwise, of any such valuations is dependent on consistent and accurate access to catch statistics by fishery.

Furthermore, DSFBs frequently express frustration with perceived inconsistencies in valuation approaches between and within districts. These discrepancies are believed to create unintended incentives for underreporting catches, undermining the integrity and fairness of the system. Revaluations, conducted periodically, can lead to significant and unpredictable changes in rateable values. This volatility creates financial uncertainty for proprietors and complicates DSFB budget planning.

¹ Note the different approach to the fisheries assessment for the RTC as set out in section 2.13

Recent changes to the appeals process have exacerbated delays and uncertainty, which is now a two-stage process taking at least two years, with no set deadline for the subsequent tribunal stage. Successful appeals in some District salmon fishery board areas have led to the resulting new valuations being retrospectively applied, although there is some uncertainty as to whether this approach is being used consistently across Scotland and what the legal requirement is. Fisheries Management Scotland therefore sought King's Counsel opinion on section 44(3) of the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003. Counsel's advice is that where a board has issued an assessment based on a valuation that is subsequently reduced as a result of a successful appeal (following the submission of a proposal challenging the assessment), *then the proprietor may legitimately reclaim any overpayment from the board.*

The key elements of counsel's advice is as follows:

1. The assessor for any valuation area shall, as respects that area, alter the roll to give effect to any decision following a proposal being made under section 3ZA(1)²
2. A proposal requires to conform to the Valuation (Proposals Procedure) (Scotland) Regulations 2022 in which regulation 5(1) (ix) requires that a proposal should state "the date from which the proposer considers the proposed alteration should have effect"
3. The assessor may decide to alter the entry in accordance with the proposal or other than in accordance with the proposal.³
4. The Scottish Ministers are empowered to make regulations for or about the day from which an alteration made to an entry in the valuation roll following a decision [in response to a proposal] is to have effect.⁴ They have not made any such regulations to date.
5. S44(3) of the 2003 Act provides that the fishery assessment shall be exigible according to the valuation of a fishery as entered in the valuation roll⁵. When this is read in conjunction with s.3ZA of the Local Government (Scotland) Act (see 1. above) they "mean that where the roll is altered, the reference on the roll in sub-section 44(3) is to the entry as it has effect from the effective date of the alteration. Otherwise the concept of an alteration having an effective date, or taking effect from a given date, would be empty of meaning".

² Subsection 2(1A) of the Local Government (Scotland) Act 1975

³ S. 3ZA of the Local Government (Scotland) Act 1975

⁴ S 3ZA (7)(f)

⁵ S.44(3) The Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003.

6. Thus, "it follows that, regardless of the content of the roll at the date when an assessment is in fact issued, the roll is deemed to have the content which is provided by an alteration which is subsequently made, if it has an effective date which is the same as or earlier than the date of the assessment."

The conclusion of this advice is that where there is any likelihood of valuations being appealed, boards are left in an invidious position. This is because the process by which proposals are submitted provides for generous timelines. Under r.22 of the Valuation (Proposals Procedure) (Scotland) Regulations 2022 proprietors are given 4 months to submit a proposal. The assessor must determine the issue no later than 30 September in the year before the next revaluation date. That means that on the worst case scenario a proposal decision notice issued by the assessor could change the quantum of an assessment for three successive years. If the fishery to which the assessment applies is a major one in the district this could put potentially give rise to huge financial uncertainty for the board.

The fishery economy is mainly reliant on people fishing – the number of rods let on the river. Number of rod days let during the fishing season is an approximate proxy for potential fishery income, whereas catch is an approximate proxy for the quality of the product. A decline in catch numbers in recent years is driving a decline in the uptake of available rods, and this has a fundamental impact on the sustainability of the fishery assessment. The financial resilience of the fishery assessment system has also been tested by external shocks such as the Covid-19 pandemic, which introduced additional strain on proprietors and DSFB budgets.

CHALLENGE

2

Capacity

DSFBs require a broad range of expertise to manage fisheries effectively, but their ability to build capacity is constrained by the inflexibility of the governing legislation⁶

District salmon fishery boards rely on proprietors who voluntarily contribute their expertise. The system for the RTC is different with 81 commissioners in total, appointed by Scottish Borders Council, Northumberland County Council, and the remainder comprised of elected proprietors. Due to this distinction, this section is focused on DSFBs.

Managing fisheries effectively requires knowledge in hydrology, fish ecology, water quality, and conservation science, as well as legal and regulatory expertise. Increasingly, DSFBs are asked to review Environmental Impact Assessments and planning applications for

⁶ This section is focused on DSFBs as opposed to the RTC.

developments within their districts. To meet these demands, DSFBs must either employ skilled staff, rely on expertise within the local Trust, identify expertise within their proprietor network, or contract external consultants.

Beyond scientific and regulatory expertise, DSFBs also require skills in financial management, stakeholder engagement, and compliance with legal requirements. Some of these functions can be covered by employing key staff or appointing a clerk with relevant expertise. In many cases, rivers and fisheries trusts support DSFBs through local agreements, and Fisheries Management Scotland provides guidance and advice at a national level.

However, two key barriers limit DSFBs' ability to strengthen their capacity:

1. Inflexibility of the governing legislation: The 2003 Act limits DSFBs' ability to adjust board composition, meaning they cannot easily appoint members to fill identified gaps in skills or expertise. This restricts the ability to expand board membership to reflect the range of skills required for effective fisheries management.
2. Financial Constraints: Even when DSFBs recognise the need for additional expertise, many lack the financial resources to hire skilled staff or commission external advice. DSFBs in districts with limited capacity to raise funds, can struggle to employ staff equipped to address these increasingly complex challenges.

CHALLENGE

3

Governance and Constitution

While DSFBs provide a strong local framework for managing salmon fisheries, their governance arrangements present challenges that may limit their ability to secure alternative funding and build broader confidence in their management role.⁷

A key strength of DSFBs is their ability to draw on the knowledge and investment of proprietors who have a clear stake in the resource. Despite this clear advantage, it is acknowledged that this may also represent a theoretical conflict of interest, where proprietors, who form the majority on a DSFB, must decide between what is best for the fish and fishery and their own, possibly narrower interest. Whilst such conflicts do manifest themselves, they can usually be resolved by a properly constituted and well-run board. The ability of DSFBs to authorise their own activities (e.g. hatcheries) is also often cited as an issue. Matters relating to the financing of DSFBs have the potential to become more acute as fish populations, and therefore income derived from fisheries, continue to decline. It should be

⁷ This section is focused on DSFBs as opposed to the RTC.

noted however, that the income derived through the fisheries assessment across Scotland is still many times greater than would be raised through business or sporting rates.

There is no formal mechanism to include broader stakeholders, such as conservation groups, local communities, or independent experts. Stakeholders can attend DSFB meetings, but with the exception of the Annual Public Meeting, there is no formal opportunity to contribute to the topics under consideration or decisions made. In reality, there appears to be little uptake in the opportunity to attend DSFB meetings.

During the election of proprietors to the DSFB, the number of votes that a qualified proprietor has, is based on the rateable value of each fishery that person owns within the district. Each proprietor has one vote in an election, but they also receive an additional vote for each £5,000 of value over £5,000, up to a maximum of four votes. While this reflects their investment in the resource, and their financial contribution to the board, it can also mean that some proprietors have essentially a permanent presence on boards, which may make it challenging to introduce new perspectives.

In districts with fewer proprietors, the pool of eligible board members is naturally smaller, which can also make it harder to bring in fresh approaches or broaden stakeholder engagement.

The way in which DSFBs are constituted under the 2003 Act means that they do not readily fall into an easily understood category of organisation. As a consequence, DSFBs can face practical difficulties—such as when applying for a business bank account or mobile phone contract—because their legal status is not widely understood.

The constitutional model of DSFBs also affects their ability to secure alternative funding. While the Fishery Assessment remains the primary source of income, DSFBs do have statutory powers under the *Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003* to borrow funds and authorise expenditure from other sources. However, the lack of formal external oversight and accountability mechanisms may reduce confidence among potential funders and stakeholders. Unlike charities, DSFBs are not subject to OSCR (the Scottish Charity Regulator) or Companies House regulations, and while formal complaints procedures were introduced in 2013, there is no clear arbitration mechanism for resolving governance concerns.

Where a DSFB fails to schedule a meeting of qualified proprietors for the purpose of electing or re-electing board members, within a period of three years of the last election, the committee forming that board shall cease to be a DSFB. This represents a 'cliff edge' which has resulted in at least one DSFB ceasing to exist. In the event that this happens, the current situation is that the proprietors have to go through the legal process of forming a new board, at their own expense.

The election process means the entire board is appointed at the same time, potentially resulting in all board members changing at the same time, with an associated loss of organisational memory. This is quite different from the process used for charity trustees, which may make succession planning difficult and funders may view any associated uncertainty as a concern.

Another limitation is the absence of an asset lock—a legal mechanism that ensures assets cannot be used for private gain. Under current legislation, if a DSFB were to be dissolved, its assets must be returned to proprietors within the district. Many charitable and philanthropic funders require an asset lock to ensure that funding supports long-term public benefit. Without this safeguard, DSFBs face challenges in accessing a broader range of funding opportunities, which could otherwise support fisheries management, habitat restoration, and conservation work.

Addressing these governance challenges may be key to unlocking new funding sources and building confidence in DSFBs as effective, transparent, and inclusive local fisheries management bodies.

CHALLENGE

4

Ensuring Sustainable Fisheries Contributions Across Scotland

The formation of a district salmon fishery board is not mandatory⁸ and as a result some areas of Scotland lack a formal management structure and are not required to contribute financially to local fisheries management.⁹

Each individual DSFB can determine how much they raise and contribute via the fisheries assessment (see section 3.13). The decision on the amount to raise through the levy is a balance between what is required, what is desirable and what is affordable. DSFBs are required to publish an annual report and accounts and share these with Scottish Ministers. However, there is no requirement to report on whether available budgets are adequate to deliver essential management actions, and therefore no simple means for Government to compare available resources against the cost of meeting DSFB objectives. Such an independent evaluation would help identify the scale of additional funding necessary to support local management.

⁸ The existence of the RTC is mandatory as set out in The Scotland Act 1998 (River Tweed) Order 2006.

⁹ This section is focused on DSFBs as opposed to the RTC.

There are also a number of fishery districts in Scotland which do not have a DSFB. In such areas, proprietors and tenants are not required to make any formal or mandatory financial contributions toward fisheries management and the range of wider benefits that arise from this work. This creates an inequitable situation, where those areas without a DSFB who benefit from the presence of salmon protected as a national resource do not make a formal contribution to its sustainable management. Whilst in many cases these areas have coverage from rivers and fisheries trusts, who perform a range of vital functions, the lack of a statutory management structure and associated assessment income (which could also benefit the trust) remains an issue.

It is important to note that the current fisheries assessment framework, levied on districts with DSFBs, could inadvertently discourage the continuation of voluntary DSFBs in some areas. This is particularly concerning if the perceived or actual financial burden of maintaining a DSFB outweighs the incentives for proprietors and tenants to sustain one. Without DSFBs, these areas risk losing structured, localised governance and management, potentially undermining the sustainability of fisheries and associated ecological benefits.

CHALLENGE

5

Securing and Sustaining Public Funding

Public funding remains essential for fisheries managers, but ongoing challenges related to availability, stability, and accessibility present challenges to long-term fisheries management.

Maintaining existing public investment is an increasing concern, as shifts in political and economic priorities create uncertainty around long-term funding, despite Scotland's climate and biodiversity commitments. Programs like the Nature Restoration Fund (NRF) and National Electrofishing Programme for Scotland (NEPS) are vital, but their future remains uncertain. The constant cycle of change in funding streams requires fisheries managers to frequently adapt to shifting priorities and eligibility criteria placing a heavy administrative burden on fisheries managers, diverting resources away from delivery. While some funding sources remain available, accessibility is also an issue. Not only are diminishing budgets a challenge, but so too are aspects of the public funds themselves, including:

Perceived Inflexibility of Funding Rules

Funding rules often dictate what activities can be supported, impose strict spending timelines, and include post-project maintenance obligations without financial backing.

Lengthy Application Processes

Lengthy and resource-intensive application processes can pose challenges for smaller organisations, which may face difficulties preparing competitive submissions due to limited resources or experience in navigating complex application requirements

Short-Term Funding Cycles

Short-term funding creates challenges in forward planning, retaining skilled staff, and sustaining project momentum. This poses significant challenges for fisheries management actions like invasive species removal, which require ongoing, long-term support to ensure effectiveness and prevent the reinfestation or spread of invasive species.

Fragmented Funding

Multiple funding sources with conflicting rules complicate the ability to layer or stack grants for comprehensive projects. However, strict guidelines for many public funding grants often require organisations to apply to multiple funds or secure match funding, complicating efforts to deliver multi-benefit projects efficiently.

Cash Flow

Several funding mechanisms, including Marine Fund Scotland, require evidence of expenditure in advance of claiming back money in arrears. This can act as a significant barrier to smaller organisations with limited financial reserves and in many cases, may prevent such organisations accessing vital funding.

SECTION 4: FUTURE OPTIONS FOR SCOTLAND

In [Section 3](#) we described a number of challenges faced by DSFBs, Trusts, and in some cases, the RTC. The purpose of Section 4 is to assess these challenges in turn and identify future options to help address these issues.

4.1 Reform of the Fisheries Assessment Process

The group discussed the current valuation and funding model for DSFBs as a mechanism for addressing Challenge 1: Dependence on the Fishery Assessment as an Unsustainable Funding Model. It was recognised that the existing system had some advantages including the familiarity with the system amongst proprietors, the distribution of the financial burden amongst proprietors based on relative value of fisheries, and the fact that DSFBs can adjust the rate locally to meet budget needs. The cost involved in valuing the fisheries within the district is borne by district assessors.

Local managers who expressed support for reform highlighted that the current model fails to allow investment where need is greatest – fisheries with the lowest returns often generate the least income, despite requiring the most support. Others pointed out that catch-based valuation is unreliable, given reduced fishing effort and inconsistent reporting, and argued that income-based valuation could be more logical, but it was also recognised that this would be difficult to define and police.

Alternative assessment models were explored including shifting the basis of valuation from catches—particularly relevant given the IUCN status of GB salmon populations—to metrics like the number of rod days sold, but care would need to be taken in ensuring that a metric was chosen that district assessors can easily assess. Consideration was also given to a ‘tiered’ system of valuation, whereby the amenity or existence value of the fishery could be given greater weight in the valuation process, in addition to value based on use of the resource (however, defined).

It was recognised that any changes to the assessment system would need to avoid penalising fisheries that actively market their rods (and conversely rewarding those that do not). Feedback from local managers also suggested that using ticket sales as an assessment method would not necessarily reflect a fishery’s financial capacity or conservation need.

The group were unable to reach a clear consensus on a suitable alternative to the current levy system, but there was broad support for commissioning an independent review to explore viable funding models—drawing on solutions used in other sectors and ensuring any future system supports the principles outlined above.

Recommendation 1

Scottish Government should commission an independent review to explore viable funding models to replace or reform the fisheries assessment process¹⁰

In order to address issues related to the valuation appeals process as outlined in [Challenge 1](#), we recommend the following steps. Scottish Government should issue guidance to assessors to the effect that valuations of fisheries should only be carried out with up-to-date fishery returns and not using estimated data which may be the subject of a challenge under a proposal (see recommendation 3 below). S3ZA(7) (f) of the Local Government Act 1975 contains a power for Scottish Ministers to, by regulations, make provision for the date from which an alteration made to an entry in the valuation roll arising from the assessor decision on a proposal. Scottish Ministers should use these regulations to limit the financial impact on DSFBs. S.3ZA(7) (d) of the Local Government Act 1975 contains a power for Scottish Ministers to by regulations make provision for notices to be sent by an assessor to any person with an interest in the lands and heritages to which the proposal relates. This power should be used to ensure that DSFBs are given notice of, and the right to comment on, proposals. Finally Scottish Ministers should shorten the timeline over which proposals are submitted and determined.

Recommendation 2

Scottish Government should:

- (a) provide clear guidance to assessors to the effect that valuations of fisheries should only be carried out with up-to-date fishery returns and not using estimated data;
- (b) Scottish Ministers should make regulations under S3ZA(7) (f) of the Local Government Act 1975 to the effect that any changes to the valuation roll cannot predate the publication of the decision notice;
- (c) Scottish Ministers should make regulations under S3ZA(7) (d) of the Local Government Act 1975 to make it compulsory for assessors to give notice to the local district salmon fishery board regarding proposals challenging a valuation, along with a right to comment; and
- (d) Scottish Ministers should shorten the timeframe in which proposals are submitted and determined so as to reduce the risk of financial damage to board finances.¹¹

¹⁰ This recommendation does not apply to the RTC.

¹¹ This recommendation does not apply to the RTC.

Currently salmon and sea trout catch data is collected by Marine Directorate (official catch statistics), DSFBs and RTC (local management priorities) and Local Authority District Assessors (to inform the valuation of fisheries). This long-running source of data is vitally important and should be maintained regardless of any changes to the assessment system. Marine Directorate have indicated previously that they intend to progress a web-based, catch repository system, which will allow access to real time data for the above authorised organisations. Any such change should not increase administrative burden on DSFBs. This is intended to avoid the situation whereby the same data is collected three times, by different organisations, with different results, and may help to prevent discrepancies between local and national information.

Recommendation 3

Scottish Government should progress a web-based, catch repository system, including fishing effort data, with real time access for Marine Directorate, DSFBs, the RTC, and District Assessors.

To address the situation highlighted in section 3 (Ensuring Sustainable Fisheries Contributions Across Scotland), the group considered whether DSFBs should be mandatory across Scotland. On balance, it was felt that imposing a DSFB on a district was not the correct approach. However, there was a strong view that formation of DSFBs should be incentivised in areas where no DSFB exists.

There are a number of means of incentivising the formation of DSFBs including, but not limited to:

1. Making the process of DSFB formation less arduous. Grant funding should be provided to support the process of creating the board, including establishing the roll of upper and lower proprietors (undertaken by the sheriff at the expense of proprietors)
2. In order to remove any financial incentive to avoid forming a DSFB, Scottish Government should collect an assessment in areas without DSFBs. This should be set at a level sufficient to incentivise the creation of a DSFB in the area in question, but also at a level which would not incentivise any areas with a DSFB to cease to exist. Money collected should be placed in a ringfenced fund for use in the area of collection with the purpose of funding appropriate fisheries enforcement and other actions to improve the environment for migratory salmonid species.

Recommendation 4

Scottish Government should investigate mechanisms to incentivise and ensure there is full coverage of DSFBs in all of Scotland's fisheries districts.¹²

Recommendation 5

Scottish Government should collect a fisheries assessment in areas of Scotland which do not have a DSFB.¹³

None of the above fishery assessment reform options will provide a suitable and consistent source of adequate funds for DSFBs across Scotland to discharge their powers and duties in full. It is therefore essential that these recommendations be taken forward in combination with other recommendations designed to broaden the range of funding options available to DSFBs and Trusts.

4.2 Proposed legislative changes to support DSFBs

Throughout this document we have identified a number of challenges associated with the 2003 Act. Further engagement with the sector would be required before attempting to address these challenges, in order to avoid the significant disruption that was involved with the previous wild fisheries reform process. However, the group felt that it was sensible to set out these potential issues in the context of supporting the creation of a long-term, stable funding mechanism for DSFBs.

It is recognised that fishery proprietors have a vital role to play in local management, but there remains the possibility of broadening the membership of DSFBs. Changes in legislation were considered, including setting a maximum tenure for board members. However, given that some districts have a limited pool of proprietors to draw from and can struggle to identify people willing to sit on the board, such changes could make the system unworkable. We do not consider that this should be required by legislation but there may be advantage in giving DSFBs a power to co-opt members, with voting and decision-making powers, who can demonstrate relevant skills, such as expertise in science, finance, or land management.

¹² This recommendation does not apply to the RTC.

¹³ This recommendation does not apply to the RTC.

Recommendation 6

Scottish Government should consider the advantages and disadvantages, in consultation with DSFBs, of reviewing the relevant sections of the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 to give DSFBs a discretionary power to co-opt members to fill identified skills gaps.¹⁴

The current good governance provisions were introduced in 2013. We believe that there is scope to revisit these, particularly if a different constitution for boards is introduced (see recommendation 9 below). Several FMS members have noted that the provisions in the 2003 Act can be difficult to interpret, often requiring clarification from external bodies like Fish Legal or FMS, which suggests a need to simplify and clarify the legislative framework. We have also received feedback that there is very little interest amongst the general public in attending DSFB meetings. We have previously raised with the Scottish Government that the requirements for accounts to be audited is disproportionate for very small DSFBs. Further consideration should also be given to arbitration of complaints, where these cannot be addressed through the local complaints mechanism. We recommend below that Scottish Government should review the good governance sections of the 2003 Act, but we emphasise that any changes should not increase the administrative burden on DSFBs.

Recommendation 7

Scottish Government should review the governance sections of the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 to ensure that they are fit for purpose.¹⁵

Where a DSFB fails to schedule a meeting of qualified proprietors for the purpose of electing or re-electing board members, within a period of three years of the last election, the committee forming that board shall cease to be a DSFB. This represents a 'cliff edge' which has resulted in at least one DSFB ceasing to exist. In the event that this happens, the current situation is that the DSFB has to go through the legal process of forming a new board, at their own expense. We believe that these provisions should be amended to provide more flexibility.

¹⁴ This recommendation does not apply to the RTC.

¹⁵ This recommendation does not apply to the RTC.

Recommendation 8

Scottish Government should amend the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 to provide more flexibility around the timing of triennial elections.¹⁶

As mentioned in Challenge 3, many charitable and philanthropic funders require an asset lock to ensure that funding supports long-term public benefit. Without this safeguard, DSFBs face challenges in accessing a broader range of funding opportunities, which could otherwise support fisheries management, habitat restoration, and conservation work.

It is recommended that the assets of DSFBs are safeguarded upon dissolution for the purposes set out in the 2003 Act, similar to the process that applies to charities in Scotland. This would require a change to the 2003 Act. Subject to further clarification, we believe that this change might allow DSFBs to transition to Community Interest Companies (CICs) should they see advantage in doing so, whilst maintaining their powers and duties within the 2003 Act. If this was possible, it would potentially open up a wider range of funding opportunities for DSFBs.

Recommendation 9

Scottish Government should amend Section 43 (5) of the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 such that that funding raised by district salmon fishery board (DSFBs) is safeguarded upon dissolution for the purposes set out in the Act.¹⁷

4.3 Public Funding

As highlighted in [Section 3](#), current public funding mechanisms do not provide core funding for fisheries management organisations, although there are means through which public funding has supported important fisheries management activities. There is a strong case for public funds being used to ensure that sufficient core funding is available for DSFBs and the

¹⁶ This recommendation does not apply to the RTC.

¹⁷ This recommendation does not apply to the RTC.

RTC to support key activities where it can be demonstrated that such funding cannot reasonably be raised through the assessment. One mechanism for achieving this was discussed during the wild fisheries reform process - linkage of budgets to delivery of fisheries management plans could form a useful mechanism for assessing whether the necessary funds to deliver core management actions could or could not be raised through the fisheries assessment. Alternatively, the current requirement on DSFBs to submit an annual report and accounts to Scottish Ministers, could be utilised to evidence any shortfall in available funding.

Another alternative is to provide every district with a baseline level of public support. For example, this could be enough to fund at least one full-time staff member (e.g. a Catchment Manager), per district or group of smaller districts. This would help ensure that all areas—particularly smaller or less well-resourced catchments—have the minimum capacity required to carry out essential fisheries management functions and oversee strategic delivery of environmental improvement and stakeholder engagement. There is a useful precedent for this through the Scottish Invasive Species Initiative (SISI) where a number of publicly funded posts are hosted by fisheries trusts or DSFBs across northern Scotland.

In return for such investment, it is essential that clear expectations are established on both sides regarding roles, responsibilities, and deliverables. One possible reciprocal contribution from the sector could be the assumption of responsibilities currently undertaken by the Marine Directorate, such as the collection of catch data. This would reduce administrative burdens on government while ensuring data collection remains robust and locally informed.

However, it is recognised that it would only be acceptable for public funding to be used to enhance, but not replace, existing sources of income. With that in mind, a suitable mechanism should be created to balance the level of public support against a *de minimis* fishery assessment income appropriate for the district in question.

In [section 4.4](#) we consider the potential for income arising from water user contributions to also support core activities of DSFBs and the RTC and this approach might help offset the burden on the public purse.

Recommendation 10

Scottish Government should establish a dedicated funding mechanism to provide core funding to DSFBs and the RTC where fishery assessment income is demonstrably insufficient.

For delivery of projects and capital works, as highlighted in [section 3](#), we have identified several systemic and structural challenges which limit the ability of fishery managers to access and utilise public grant funding effectively.

Recommendation 11

Scottish Government should review existing public funding mechanisms to ensure they are accessible, cross-compatible, flexible, and aligned with the long-term needs of DSFBs, the RTC, trusts and other beneficiaries.

4.4 Water User Levy

Scotland's rivers and lochs support diverse user groups, offering recreational, economic, and cultural benefits. However, many of these users do not currently contribute directly to resource management. Water user levies require users to contribute towards the environmental services they utilise, ensuring that those who benefit from the use of the resource contribute to the upkeep and management. Unlike fines, which address non-compliance or environmental damage, levies would provide a proactive, stable, and equitable funding mechanism for management, conservation, and habitat restoration. This approach aligns with Scotland's land reform agenda, promoting equitable and sustainable use of natural resources by requiring beneficiaries to support their care and management. It would also incentivise stewardship by creating a direct link between water use and conservation funding, increasing awareness and support for sustainable practices.

Commercial User Levy

The long-term sustainability of freshwater management and restoration requires investment in locally embedded, skilled catchment management staff as outlined in [Challenge 2](#). However, many river systems lack the capacity and resourcing to support a dedicated Catchment Manager to coordinate and oversee strategic delivery of environmental improvement and stakeholder engagement.

To offset the burden on the public purse of providing core funding to fisheries management as outlined in [Section 4.3](#) and in keeping with the beneficiary pays principle, a statutory or regulatory mechanism should be developed to enable or require commercial users of the water environment, particularly those who benefit from abstraction, discharge, engineering or other regulated activities, to contribute to the funding of dedicated Catchment Manager posts. These roles could be hosted regionally by DSFBs, the RTC, or rivers and fisheries trusts depending on local management structures.

Two potential approaches are proposed:

Option A: Statutory Contribution Mechanism

Introduce new legislation or amend existing frameworks (e.g. the Water Environment and Water Services (Scotland) Act 2003), to require commercial operators to contribute to catchment management costs, proportionate to their environmental footprint or abstraction/impact level.

Option B: Licence-based Funding Conditions

Enable SEPA and Scottish Government to attach funding conditions to CAR licences, marine licences, or other regulatory instruments, requiring operators to contribute to regional environmental management funds or to directly support Catchment Manager posts or core funding in relevant catchments.

These approaches are conceptually aligned with mechanisms such as compulsory wayleave compensation under the Electricity Act 1989, whereby developers are required to cover land agent and environmental costs associated with their activity.

Careful design and implementation of such contributions will be critical to balancing economic and environmental goals. This includes setting thresholds and rates that reflect the environmental value of water resources, avoiding undue burdens on essential services, and considering exemptions or reduced rates for activities with minimal environmental impact or significant public benefits.

Recommendation 12

Scottish Government should conduct a feasibility study to evaluate the potential of water user levies as a sustainable funding mechanism for fisheries management and freshwater conservation.

Angler Levy/Rod Licence

A rod licence is a legal permit, that individuals can purchase in order to fish using a rod and line. It is commonly required in many countries to regulate recreational fishing activities while generating revenue that supports sustainable fisheries management, conservation efforts, and the maintenance of aquatic habitats.

As part of this process various international approaches to funding and managing fisheries were explored, including models in France, Norway, Denmark, England, Wales, and Northern Ireland. All of these countries employ a rod license or levy system, though the structure, scope, and revenue allocation of these mechanisms vary significantly. For example, some countries use national licenses to fund centralised fisheries programs, while others apply regional or water-specific fees that directly benefit local management efforts. In many cases these licences are in addition to paying for fishing at specific locations.

Scotland is almost unique in not requiring recreational anglers to obtain a rod license. This issue was explored in detail during the Wild Fisheries Reform process. Beyond providing an additional and reliable funding stream to supplement the Fisheries Assessment, introducing a rod license in Scotland would have the added benefit of providing important data on angling activity in Scotland, such as the number of participants, and may present opportunities for

alternatives means of collecting catch statistics. Purchase and distribution of rod licences would also allow direct communication with anglers on important topics such as catch and release practice, biosecurity and policy developments/consultations of specific relevance to anglers.

If a rod licence is pursued, the funding should support efforts which benefit fish, fisheries, and angling, including angling development, access, and representation. In France, anglers are provided with clear and accessible information on how fishing licences and permits are used to finance fisheries management, including enforcement and conservation. If a rod licence were introduced in Scotland, a similar level of transparency and clear delineation of expenditure would be essential. It is also important that anglers have voice in how it is spent, via a well-resourced representative body.

Any additional funding generated through a rod licence should not result in a reduction of fishery assessment income and mechanisms would have to be put in place to ensure this was not the case – it is unlikely that anglers would accept rod licence income being used to offset proprietorial contributions to management. The cost of a rod licence should be set at a rate which does not act as a disincentive to anglers and provides options for visiting anglers and reduced rates for youth and senior anglers.

Recommendation 13

An angler levy should be introduced in Scotland, in full consultation with anglers and angler membership bodies, including Angling Scotland.

4.5 Commercial Work

As nature markets continue to evolve, a growing number of sectors are engaging in speculative work across diverse land-use types, including aquatic environments. District salmon fishery boards and rivers and fisheries trusts possess extensive expertise and knowledge, positioning them as key contributors to third-party nature market projects seeking to integrate aquatic interests.

A number of DSFBs and Trusts have significant experience providing consultancy and fishery management services. This includes mitigating development impacts, conducting fish rescues, and advising on infrastructure projects such as commercial forestry in Galloway, large-scale engineering on the Nith, hydro projects on the Tay, barrier removal projects in the Forth and road construction on the Spey and Dee. In other parts of Scotland, this important work is less well-developed and could potentially form an important revenue scheme for environmental restoration work, in addition to supporting the protection of the resource from damaging activities. Delivery of ecological baseline assessments and ongoing monitoring services for

nature markets could also provide a valuable opportunity for the sector. Investing in DSFB and Trust staff, for example in securing professional qualifications or chartered status, would support fisheries managers in demonstrating expertise to prospective developers.

In support of this section, FMS is working with members and partners to create a skills register highlighting expertise and training needs within the sector and is considering mechanisms to ensure that the skills of DSFBs and Trusts can be best highlighted to prospective developers.

Recommendation 14

Financial and logistical support should be provided to help DSFBs and rivers and fisheries trusts gain necessary accreditations, ensuring they can be included on developers approved supplier lists.

4.6 Public Good Contracts

District salmon fishery boards, the River Tweed Commission, and rivers and fisheries trusts already deliver a wide range of functions which align closely with responsibilities typically held by government or its agencies. These include the protection of freshwater pearl mussels, lampreys, eels, and other non-salmonid species; the management of invasive non-native species; and advisory roles for infrastructure and land-use planning. Given the scale and importance of this work, it is both reasonable and necessary that, in parallel with core funding for delivering statutory functions, the Scottish Government and SEPA should explore opportunities to contract fishery managers for the delivery of additional functions that contribute to the wider public good and support compliance with environmental legislation.

One specific example is that DSFB, RTC, and trust staff have a regular presence on the riverbank and in the case of water bailiffs, currently operate under extensive enforcement powers. In the current financial climate, agencies such as SEPA are limited in their ability to conduct onsite inspections and undertake enforcement activity. With appropriate support as outlined above, there is a possibility of cross-warranting water bailiffs, to help ensure compliance with relevant environmental regulations for the benefit of sustainable fisheries management. This could include environmental issues previously covered by the now repealed Salmon (Fish Passes and Screens) (Scotland) Regulations 1994.

Recommendation 15

Scottish Government and SEPA should explore opportunities to contract the expertise of DSFBs and the RTC in ensuring compliance with environmental legislation.

4.7 Ringfenced Environmental Fines

Revenue from environmental fines could represent a powerful tool to support the restoration of ecosystems and promote the sustainable management of natural resources. The current system, which channels most proceeds from environmental fines into the Scottish Consolidated Fund without direct reinvestment in local environmental restoration, fails to directly address the environmental harm caused.

It is important to note that ringfenced fines are inherently unpredictable, and reliance upon income from fines should not be considered to be a sustainable long-term solution. Indeed, in an ideal situation such funding would never be available (as ideally no environmental harm would occur). However, it is crucial to ensure that when environmental harm does occur, the resulting fines are directed toward mitigating harm, restoring ecosystems, and supporting sustainable local management of the resource. Such an approach would be in line with the polluter pays principle.

The Water Restoration Fund in England was established with £11 million from water and sewerage company fines (April 2022–October 2023) and forms a useful precedent for ringfencing environmental fines. The fund is intended to support projects that restore and enhance the water environment. Eligible projects must address water quality, restore habitats, and tackle challenges like climate change and biodiversity loss.

Recommendation 16

Scottish Government should ensure that relevant environmental fines, particularly those impacting the freshwater environment, are ringfenced for projects which would protect and restore river catchments.

Enforcement Undertakings (EUs) are a mechanism already in use in Scotland, where polluters voluntarily offer reparations for non-compliance. Instead of being directed to the Scottish

Consolidated Fund, these funds contribute toward environmental restoration projects in the affected catchment.

SEPA accepted 20 EUs from 2020-2024, with eight publicly listed agreements contributing £97,154 in financial donations. Of this, 97% (£94,404) was allocated directly to DSFBs or rivers and fisheries trusts for habitat restoration, riparian planting, and water quality improvements. The Tweed Foundation has also received funding from enforcement undertakings via the Environment Agency.

The effectiveness of EUs is limited by low awareness among polluters, reducing uptake and potential application. Additionally, EUs often involve small financial contributions from minor offences, which are insufficient to meet the broader funding needs of local managers. However, EUs represent only a fraction of the potential resources available from environmental fines. Building awareness of the option of an enforcement undertaking as a restorative, voluntary measure would increase the financial resources available for restorative projects while reinforcing the accountability of polluters. Making greater use of Enforcement Undertakings to fund important restoration work is an important first step in reforming the current system of environmental fines.

Fishery Management Plans (FMPs) offer a structured framework to integrate environmental fines directly into local fisheries management. These plans specify actionable, high-priority projects, such as restoring degraded habitats, planting riparian vegetation to improve river health, and enhancing water quality to support fish populations. Direct collaboration between local fishery managers, SEPA, and parties responsible for environmental harm is crucial to identify restoration priorities and ensure fines are effectively directed toward impactful projects with measurable outcomes that directly benefit salmon conservation and the restoration of critical aquatic ecosystems.

Recommendation 17

SEPA should develop a mechanism for engaging with local fisheries managers in negotiating Enforcement Undertakings with polluters, using Fisheries Management Plans as a starting point for identifying and delivering restoration projects.

4.8 Nature Finance/BNG

Nature finance is an emergent market sector in Scotland. Nature finance is “finance that specifically finances or invests in improvements to the natural environment”¹⁸. The Scottish

¹⁸ [Ecosystems Knowledge Network Nature Finance Glossary](#)

Government recently launched the [Natural Capital Market Framework](#) that sets out Scottish Government's broad approach to supporting development of nature markets and creating better opportunities for investing in these markets, underpinned by the [Principles for Responsible Investment in Natural Capital](#).

Nature Finance is available through an array of market mechanisms with different degrees of complexity. The main mechanisms currently operating in Scotland on a scale of increasing complexity are:

Market mechanism	Description
Corporate / private philanthropy	A corporate or private entity directly or through an intermediate Trust or grant awarding body sponsors an organisation for an agreed purpose in line with their philanthropic objectives usually with few strings attached.
Corporate voluntary biodiversity offsetting	A corporate entity provides finance to improve biodiversity outcomes to voluntarily compensate for their corporate impacts on biodiversity with a relatively light requirement for impact reporting.
Biodiversity Net Gain	A system tied to planning policy that requires a developer to leave biodiversity in a better state measured by a standard set of metrics and assessment methods that compares projected improvements in biodiversity against a baseline and ensures a long-term legacy.
Carbon investing (in woodlands or peatlands)	Standardised systems for sequestering carbon through tree planting and peatland restoration. The projected sequestered carbon is measured as carbon units that can allow an entity to purchase these as credits either as a tradable asset and/or to offset their carbon footprint or emissions. The buying and selling of carbon units is usually administered by brokerages. The value of units fluctuates according to the market at the time. The schemes are validated against established woodland carbon and peatland carbon codes.
Ecosystem services (water security, flood mitigation, soil management)	Typically, these are so-called nature-based solutions whose services can be quantified and costed and that provide benefits derived from nature that are valued and paid for by beneficiaries to land and water owners and managers as a way to reduce risk (like flood prevention), provide safeguards (like soil retention) and ensure sustained supply (like water flow and quality) through modified land and water use and management.
Biodiversity investing	An as-yet undeveloped market that entails the purchase of biodiversity credits (similar to carbon) that are priced according to a system of biodiversity valuation methods (distinctiveness, rarity, irreplaceability) to safeguard and enhance biodiversity.

Each market mechanism (e.g., carbon credits, biodiversity net gain) requires active oversight and administration. This means that if local management organisations want to benefit from these markets, they would need to be involved in the planning, implementation, and monitoring to ensure the projects meet specific objectives, and to be skilled in the appropriate methods to meet market standards. For these mechanisms to work, the projects must also deliver clear, quantifiable environmental benefits, such as restored habitats, increased biodiversity, or carbon sequestration accounted for against verifiable market standards and reporting requirements to demonstrate their outcomes and impact.

However, for local management organisations to take advantage of nature finance to support their work, they would need to be structured and governed in such a way that they could manage and administer finance from the various sources of nature finance. Also, whilst these organisations are experts in fisheries and rivers management, they are well placed to play an enhanced role in providing independent specialist support and advice on river related nature market investments like establishing baselines, monitoring and reporting.

Recommendation 18

Support should be provided for training local managers to ensure they can take advantage of the emerging nature and biodiversity markets.

Scottish Government's Nature Restoration Fund and other public sources such as National Lottery Funding has provided much needed financial support for river restoration projects. Also, FIRNS has supported nature-market development projects designed to encourage private investment into rivers and river catchment focused initiatives. This is welcome, but to secure a reliable pipeline of investable projects, development funding to get projects to the important stage of "delivery readiness" is a role that public funding should fulfil.

Recommendation 19

Scottish Government should work with agencies to expand public funding opportunities to support the development of projects that are prepared to enter nature finance markets.

While BNG represents an important mechanism for quantifying and securing environmental gains from development, current metrics can be limited in their ability to capture the complexity and full biodiversity value of aquatic systems. In particular, BNG calculations often

focus on habitat type and area, potentially overlooking species-level benefits — including those to fish, birds, mammals, and freshwater invertebrates — and underestimating the role of riparian buffer zones in supporting catchment-scale ecosystem function. Scottish Government is working to produce a biodiversity metric that will apply as a measure for compensating for development impacts through a biodiversity net gain principle, and an “Ecosystem Restoration Code” to apply to a nature investment “functional unit” (currently suggested as 200ha). It is important that the dynamic nature of freshwater catchment-based systems is captured satisfactorily within these metrics and not lost through area-based or linear metrics that do not adequately capture essential river ecosystem characteristics. Scottish Government should ensure that BNG is used in conjunction with complementary ecological indicators, particularly in aquatic and riparian contexts.

Recommendation 20

Scottish Government should urgently convene a specific working group tasked with prioritising the development of metrics that are relevant and contribute to the restoration of freshwater and river systems as an integral part of the development of biodiversity and nature related units, credits and codes.

SECTION 5: STRATEGIC RECOMMENDATIONS

CHALLENGE

1

Dependence on the Fishery Assessment as an Unsustainable Funding Model

The fishery assessment system, while critical to the funding of DSFBs and some rivers and fisheries trusts, is increasingly strained due to its reliance on declining salmon and sea trout catches and inconsistent valuation.¹

#	Page	Recommendations	Outputs	Impacts (Long-Term Change)
1	20	Scottish Government should commission an independent review to explore viable funding models to replace or reform the fisheries assessment process ¹⁰	A new funding model is identified that is fairer, more resilient, and less dependent on declining salmon catches.	The wild fisheries sector is supported by a modernised, and fit-for-purpose fishery assessment system, complemented by a broader and more resilient mix of public, private, and user-based funding sources.
2	20	Scottish Government should progress changes to address issues related to the valuation appeals process (see page 18 for full working of this recommendation)	Clearer rules on appeals give DSFBs stability and confidence in financial planning.	
3	21	Scottish Government should progress a web-based, catch repository system, including fishing effort data, with real time access for Marine Directorate, DSFBs, the RTC, and District Assessors.	A new online system which leads to less duplication and admin, better data, and more confidence in assessments.	
12	27	Scottish Government should conduct a feasibility study to evaluate the potential of water user levies as a sustainable funding mechanism for fisheries management and freshwater conservation.	The possibility to introduce sustainable funding from major non-angler water users.	
13	28	An angler levy should be introduced in Scotland, in full consultation with anglers and angler membership bodies, including Angling Scotland.	An important route for anglers to have a voice and support funding for angling development and fisheries management.	

CHALLENGE

2

Capacity

DSFBs require a broad range of expertise to manage fisheries effectively, but their ability to build capacity is constrained by the inflexibility of the governing legislation⁶

#	Page	Recommendations	Outputs	Impacts (Long-Term Change)
18	33	Support should be provided for training local managers to ensure they can take advantage of the emerging nature and biodiversity markets.	In-house expertise grows and new income is unlocked via investor-ready nature-finance projects	The wild fisheries sector demonstrates organisational readiness and competitiveness, with the skills, expertise, and accreditation required to secure commercial contracts and participate in emerging nature markets.
14	29	Financial and logistical support should be provided to help DSFBs and rivers and fisheries trusts gain necessary accreditations, ensuring they can be included on developers approved supplier lists.	Local managers can demonstrate their competence and are listed on developers' frameworks, unlocking bid opportunities and fee-earning work.	
15	30	Scottish Government and SEPA should explore opportunities to contract the expertise of DSFBs and the RTC in ensuring compliance with environmental legislation.	Environmental compliance and incident response are strengthened locally, with DSFBs/Trusts funded through service contracts.	
6	23	Scottish Government should consider the advantages and disadvantages, in consultation with DSFBs, of reviewing the relevant sections of the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 to give DSFBs a discretionary power to co-opt members to fill identified skills gaps. ¹⁴	DSFBs can co-opt specialists strengthening decision-making and better meet funder governance expectations.	

CHALLENGE

3

Governance and Constitution

While DSFBs provide a strong local framework for managing salmon fisheries, their governance arrangements present challenges that may limit their ability to secure alternative funding and build broader confidence in their management role.⁷

#	Page	Recommendations	Outputs	Impacts (Long-Term Change)
7	23	Scottish Government should review the governance sections of the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 to ensure that they are fit for purpose. ¹⁵	The good governance requirements of the 2003 Act are proportionate and fit for purpose.	DSFBs have an opportunity to attract and manage diverse funding sources and deliver their statutory functions more effectively.
8	24	Scottish Government should amend the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 to provide more flexibility around the timing of triennial elections. ¹⁶	Greater flexibility sustains organisational continuity and supports effective knowledge transfer.	
9	24	Scottish Government should amend Section 43 (5) of the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 such that funding raised by district salmon fishery boards (DSFBs) is safeguarded upon dissolution for the purposes set out in the Act. ¹⁷	Safeguarded assets unlock access to charitable and philanthropic funding tied to asset-lock requirements.	

CHALLENGE

4

Ensuring Sustainable Fisheries Contributions Across Scotland

The formation of a district salmon fishery board is not mandatory⁸ and as a result some areas of Scotland lack a formal management structure and are not required to contribute financially to local fisheries management.⁹

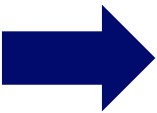
#	Page	Recommendations	Outputs	Impacts (Long-Term Change)
5	22	Scottish Government should collect a fisheries assessment in areas of Scotland which do not have a DSFB. ¹³	Districts without DSFBs contribute to formal management structures, creating greater fairness.	Fisheries contributions are collected across Scotland, improving fairness, and consistency in local management.
4	22	Scottish Government should investigate mechanisms to incentivise and ensure there is full coverage of DSFBs in all of Scotland's fisheries districts. ¹²	New DSFBs are established in districts without DSFBs, strengthening local management and accountability.	

CHALLENGE

5

Securing and Sustaining Public Funding

Public funding remains essential for fisheries managers, but ongoing challenges related to availability, stability, and accessibility present challenges to long-term fisheries management.

#	Page	Recommendations	Outputs	Impacts (Long-Term Change)
10	25	Scottish Government should establish a dedicated funding mechanism to provide core funding to DSFBs and the RTC where fishery assessment income is demonstrably insufficient.	DSFBs and Trusts receive essential core funding to deliver management actions, increasing stability and resilience across the sector.	 The wild fisheries sector is supported by sustained public investment, core public funding and benefits from ringfenced funding derived from regulatory action.
16	30	Scottish Government should ensure that relevant environmental fines, particularly those impacting the freshwater environment, are ringfenced for projects which would protect and restore river catchments.	Funds from regulatory breaches are directed into local catchment restoration.	
17	31	SEPA should develop a mechanism for engaging with local fisheries managers in negotiating Enforcement Undertakings with polluters, using Fisheries Management Plans as a starting point for identifying and delivering restoration projects.	Voluntary enforcement mechanisms are aligned with catchment priorities, maximising outcomes for the freshwater environment.	
19	33	Scottish Government should work with agencies to expand public funding opportunities to support the development of projects that are prepared to enter nature finance markets.	Public support accelerates project development, building a pipeline that unlocks larger flows of private capital.	

20	34	Scottish Government should urgently convene a specific working group tasked with prioritising the development of metrics that are relevant and contribute to the restoration of freshwater and river systems as an integral part of the development of biodiversity and nature related units, credits and codes.	→	Clear freshwater metrics position DSFBs and Trusts to attract investment from biodiversity and nature credit schemes.
11	26	Scottish Government should review existing public funding mechanisms to ensure they are accessible, cross-compatible, flexible, and aligned with the long-term needs of DSFBs, the RTC, trusts and other beneficiaries.	→	Greater access to existing funds; unlocks more efficient and long-term delivery of projects

Appendix A: Wild Salmon Strategy – Policy Framework and Financial Review Group Members

Alan Wells, Fisheries Management Scotland (Chair)

Alison Baker, Angling Scotland and Atlantic Salmon Trust

Antje Branding, Scottish Government (Until February 2025)

Steven Dora, Scottish Government

Chloe Grant, Fisheries Management Scotland

Jim Henderson, Nith DSFB

Roger Knight, Spey Catchment Initiative

Alasdair Laing, Findhorn DSFB

Alexa MacAuslan, Northern DSFB

Jamie Ribbens, Galloway Fisheries Trust

Paul Sizeland, Fisheries Management Scotland

Jamie Stewart, River Tweed Commission and River Tweed Foundation

Peter van der Meulen, Scottish Government

Appendix B: Survey Results

Responses: 16 organisations

Challenges

Challenge 1: Dependence on the Fishery Assessment as an Unsustainable Funding Model

Respondents said that reliance on the Fishery Assessment is increasingly unsustainable, particularly where declining catches leave proprietors unwilling or unable to pay levies. They highlighted that charging the same rate for fisheries with no viable stock is seen as unfair, especially given the high cost of enforcement. While some Trusts succeed in securing additional funding, the Assessment remains essential core funding for many—supporting basic staff capacity without which it is difficult to pursue external sources. Many DSFBs continue to operate on minimal budgets and lack the resources needed to deliver meaningful management.

Challenge 2: Capacity

Respondents said that modern fisheries management now requires a broader skill set beyond enforcement, including environmental expertise, financial management, and community engagement. While some agreed that legislative constraints may limit capacity building, others felt that the main barriers are financial and resource-based rather than legal, noting that DSFBs have adapted by learning new skills on the job.

Challenge 3: Governance and Constitution

Respondents said that the DSFB governance model presents practical challenges, especially due to its lack of standard organisational structures, which can hinder engagement with suppliers, funders, and banks. Some felt that modernising the structure is essential to improve operational flexibility. Others noted that while the creation of Trusts has helped overcome some governance issues, DSFBs remain constrained by legislation that limits them to specific statutory functions, with other activities falling outside their legal remit. This structural ambiguity can complicate funding and delivery, even if it does not always prevent access to external support.

Challenge 4: Ensuring Sustainable Fisheries Contributions Across Scotland

Respondents said that the current levy system disproportionately benefits catchments with strong fish returns, while under-resourced areas with the greatest need struggle to raise sufficient funds. Some noted that this challenge is less relevant in regions like the Highlands, where DSFB coverage is already comprehensive, though amalgamation may offer a solution for smaller DSFBs. Others highlighted confusion and inefficiencies arising from the overlap of multiple organisations operating within catchments, including DSFBs, Trusts, and various environmental or community groups.

Challenge 5: Securing and Sustaining Public Funding

Respondents said that DSFBs should also receive public funding, as they deliver multiple public service functions—such as supporting regulatory bodies like SEPA—and contribute to broader environmental and community outcomes.

Challenge 6: Structural Issues with Public Funding

Respondents said that accessing public funding is increasingly difficult, with many funders prioritising short-term or fashionable projects over the sustained work required in fisheries management. They emphasised that securing core funding for long-term staffing would be transformational. While several respondents stressed that these funding challenges are not unique to fisheries—reflecting wider pressures across all sectors—this only heightens the competition for limited resources and reinforces the need for a more stable and strategic funding approach.

Recommendations

Do you agree with the recommendation? - Reform the way fisheries are valued

Respondents had mixed views on whether the current valuation and funding model remains appropriate. Several respondents defended the existing system, highlighting its historical basis, fairness in distributing the funding burden through relative differentials, and the fact that DSFBs can adjust the rate locally to meet budget needs. They stressed that the cost to DSFBs is minimal, and the current model supports engagement with anglers—who are results-driven and view rod catch as a meaningful and established measure of salmon abundance.

Many respondents expressed strong concerns about using rod days sold as a replacement metric, arguing that it would penalise fisheries that actively market their rods while rewarding those that do not. They also noted that ticket sales do not necessarily reflect a fishery's financial capacity or conservation need.

Those who supported reform highlighted that the current model fails to reflect where need is greatest—fisheries with the lowest returns often generate the least income, despite requiring the most support. Others pointed out that catch-based valuation is unreliable, given reduced fishing effort and inconsistent reporting, and argued that income-based valuation could be more logical but also difficult to define and police.

Some respondents questioned the fairness of expecting statutory bodies like DSFBs to self-fund entirely, and proposed that the Scottish Government develop a mechanism to channel public funding into fisheries management in a more proportionate and strategic way.

While there was no clear consensus on a better alternative, there was broad support for commissioning an independent review to explore viable funding models—drawing on solutions used in other sectors and ensuring any future system supports equity, accountability, and long-term sustainability.

Do you agree with the recommendation? - Reform the appeals process

Respondents said that there is general support for reforming the appeals process, with most highlighting the need for greater transparency, clearer timelines, and faster resolution. Several noted that delays in processing appeals—particularly under the new three-year valuation cycle—create significant uncertainty for DSFBs and proprietors, sometimes requiring retrospective adjustments to assessments and budgets. Some described the current system as confusing and overly complex, with insufficient explanation of how values are determined, which can lead to automatic appeals out of frustration or lack of clarity.

Others suggested that improvements to the process, including fixed response times and a clear appeals window, should be incorporated into a broader review of the assessment system.

However, a small number of respondents felt that the current process works adequately and at minimal cost to DSFBs, and cautioned against unnecessary reform unless linked to wider changes in the funding model. A few were unsure, noting that the need for reform may depend on whether a new valuation or funding system is introduced.

Do you agree with the recommendation? - Develop centralised catch data system

Respondents said there was broad support for a centralised catch data system, recognising that accurate and timely reporting is essential for effective fisheries management. Several noted that online systems could streamline reporting and bring salmon fisheries in line with other sectors (e.g. deer management), with expectations that data should be submitted within a month of the season's end and published by government far earlier than is currently the case. Some respondents felt a centralised system could also help enforce more honest and consistent reporting across fisheries.

However, concerns were raised about data reliability, with some highlighting that underreporting remains common due to fears it could affect rents or rates. Others questioned whether real-time reporting is practical or necessary, especially given the current administrative challenges with annual returns.

Some respondents also warned that a new centralised system could introduce a significant management and administrative burden, especially for smaller fisheries. A few questioned whether this investment should be a priority, given other pressing needs in fisheries management. Several emphasised that while useful, catch data should not be the sole metric

for determining fishery value, and that other indicators—such as electrofishing or habitat quality—should be considered to gain a fuller picture of river health.

Do you agree with the recommendation? - Collect a fisheries assessment in areas without a DSFB

Respondents said there was general support for introducing a fisheries assessment in areas without a district salmon fishery board (DSFB), recognising that these areas often lack oversight and may be more vulnerable to pressures on the fishery. Several respondents agreed that all fisheries should contribute to management costs, and suggested that assessments could be built into permit prices or collected centrally, with funds ring-fenced for use within the local area.

However, respondents also raised important questions about governance and implementation. Concerns included who would determine how the funds are used, how consistency would be ensured given that DSFBs operate differently across regions, and what fisheries would receive in return for their contribution if no formal DSFB exists. Some also warned that this could become an administrative burden with minimal benefit, particularly in areas where a DSFB has not been formed due to a lack of engaged or willing proprietors.

Overall, while the principle of ensuring fair financial contribution across all areas was widely supported, respondents emphasised the need for a clear, transparent framework for collecting, managing, and allocating funds in the absence of a formal DSFB structure.

Do you agree with the recommendation? – Provide core public funding where fishery assessment income is insufficient

Respondents said there was strong support for providing core public funding to supplement the fishery assessment, recognising that assessment income alone is no longer sufficient to deliver effective fisheries management—particularly given declining salmon populations. Many agreed that public investment is essential to underpin professional delivery, protect a nationally important species, and ensure long-term sustainability.

Several respondents proposed that public funding could be linked to the development and implementation of Fisheries Management Plans (FMPs), providing a transparent and outcome-focused mechanism for accountability. Others suggested that a matched funding model or a basic, proportionate allocation per catchment could help balance national consistency with local flexibility. Some respondents proposed that every district should receive a baseline level of public support, for example, enough to fund at least one full-time staff member, regardless of the size or fundraising capacity of the local DSFB or Trust. This would help ensure that all areas—particularly smaller or less well-resourced catchments—have the minimum capacity required to carry out essential fisheries management functions. Respondents emphasised that such funding should not be based on organisational size,

historical capacity, or subjective assessments of need, but instead follow a clear and equitable formula to avoid reinforcing existing disparities.

However, respondents also highlighted potential risks. Some cautioned that introducing public funding could inadvertently lead to reduced levies, resulting in no overall increase in available funds. Others raised concerns in areas where DSFBs and Trusts operate independently or interpret core functions differently and suggested that each organisation be assessed for core funding in their own right. There were also warnings that too centralised a model could undermine local ownership and engagement, which many see as the foundation of an effective DSFB.

Finally, some respondents felt that the solution should go beyond public funding, proposing that other water users and beneficiaries—such as Scottish Water or river-based tourism and commercial enterprises—should also contribute to the cost of managing Scotland's rivers.

Do you agree with the recommendation? – Improve accessibility and flexibility of public funding schemes

Respondents said that funding opportunities need to be more accessible, better publicised, and aligned with actual on-the-ground needs. Short funding cycles, tight deadlines, and complex application processes often force DSFBs and Trusts to shape projects around funding criteria rather than local priorities. Many highlighted challenges in covering staff costs, securing match funding, and competing for limited resources—particularly for smaller organisations with limited capacity. Longer timelines, clearer guidance, and greater coordination across the sector were seen as essential to improving access and effectiveness.

Do you agree with the recommendation? – Expand public funding to support development of nature finance projects

Respondents said there was broad support for expanding public funding to support the development of nature finance projects, recognising the growing importance of alternative funding streams for long-term river restoration and conservation. Many agreed that public investment is needed to help Trusts and DSFBs build capacity, upskill staff, and develop viable projects—particularly as early-stage project development currently poses a financial risk with no guarantee of return.

Others warned that current application and audit requirements for public funding are too onerous and exclusionary, making it difficult for smaller organisations to participate.

Do you agree with the recommendation? – Provide support to upskill DSFBs and Trusts in delivering nature finance projects

Respondents said there was strong support for providing training and support to upskill DSFBs and Trusts in developing and delivering nature finance projects. Many highlighted that

nature finance is a complex and emerging area, and most DSFBs and Trusts currently lack the in-house expertise to navigate it effectively without structured support.

Respondents emphasised the need for practical, phased training—starting with awareness-raising presentations, followed by guidance on accessing funding, legal considerations, project delivery, and long-term maintenance. Upskilling was seen as essential in a range of technical areas including ecological survey techniques, biodiversity net gain, carbon schemes, land management, and data analysis, with some calling for standardised methodologies and legal commitments to long-term monitoring in development and restoration projects.

Some noted that small organisations with limited staff may struggle to take advantage of training without dedicated capacity, and that any upskilling initiative must reach more than just one individual per organisation.

Do you agree with the recommendation? – Support DSFBs and Trusts to access commercial opportunities through training and accreditation

Respondents said there was strong support for providing training and accreditation to help DSFBs and Trusts access commercial opportunities and diversify their income streams. Many noted that DSFBs and Trusts already have skilled personnel capable of delivering ecological and environmental services, and that with the right support, these organisations could expand their role beyond fisheries to offer surveys, habitat assessments, and advisory work across broader catchment-related issues.

Respondents highlighted the need for accredited training in a wide range of skills, including law, hydromorphology, electrofishing, invertebrate surveys, water quality assessment, and habitat condition monitoring, as well as practical qualifications like chainsaw use and powerboat operation. Some also suggested that professional bodies could offer more accessible accreditation pathways, especially for staff not yet at chartered or senior professional levels.

There was a call for a more formalised approach to continuing professional development (CPD) within the sector, and for SFCC or a similar organisation to act as a central hub for training delivery and recognition. Respondents felt this would not only improve competence but also increase credibility when bidding for contracts or forming partnerships.

While a few respondents noted this may not be a top priority compared to other reforms, most agreed that increasing the commercial capacity of DSFBs and Trusts could reduce reliance on levies, spread financial risk, and strengthen the sector's long-term resilience.

Do you agree with the recommendation? – Compile a skills register for the sector

Respondents said that compiling a skills register for the sector was broadly supported, with many viewing it as a tool for good governance, improved coordination, and better strategic

planning. A register or skills matrix could help identify existing expertise, highlight gaps, and inform future training or recruitment needs.

Some respondents noted that much of the required expertise already exists within local Fisheries Trusts and one respondent questioned whether creating a skills register should be a priority, suggesting that efforts might be better directed toward funding and delivering training, as the primary constraint is lack of financial capacity, not willingness or interest in development.

Do you agree with the recommendation? – Create a national consultancy or special-purpose vehicle to deliver services across Scotland

Respondents said there was support for the idea of a national consultancy or special-purpose vehicle to deliver fisheries-related services across Scotland, particularly where it could help support under-resourced areas or deliver projects in catchments without active DSFBs or Trusts. Some saw potential for such a body to fill gaps, expand capacity, and reduce inequality in service delivery across regions.

However, many respondents emphasised the need to avoid duplication, added bureaucracy, or competition with existing DSFBs and Trusts. Several stressed that local organisations should be given first refusal on work in their area and that any national mechanism must be designed to complement—not replace—local delivery and expertise.

There was also concern that introducing a new national body could increase costs or administrative complexity, and that greater efficiency might be achieved by better supporting and coordinating existing Trusts. A few respondents suggested that a register of Trusts offering consultancy services could serve a similar purpose while preserving local leadership and avoiding friction between organisations.

Overall, respondents agreed that more thought and detail are needed.

Do you agree with the recommendation? – Explore options for DSFBs to support enforcement of environmental regulations

Respondents said there was strong support for enabling DSFBs to play a greater role in the enforcement of environmental regulations, recognising that SEPA is under-resourced and that DSFB bailiffs are often the first responders on the ground in cases of pollution, illegal activity, or environmental harm. Many felt that giving trained water bailiffs formal powers to check permits (e.g. CAR licences), collect water samples, and enforce local conservation measures would be beneficial.

Respondents highlighted that DSFBs and Trusts already carry out enforcement-adjacent work, including providing advice to developers and responding to environmental incidents—often without formal recognition or adequate funding. Several argued that any expanded

enforcement role must be properly resourced and supported by training, and that such responsibilities should be accompanied by legal authority and clarity around governance and accountability to avoid conflicts of interest.

However, some respondents raised concerns about feasibility and capacity, especially in areas where bailiffing is already difficult to maintain due to funding constraints or reliance on volunteers. A few cautioned against expanding responsibilities before securing core fisheries management funding.

Do you agree with the recommendation? – Ringfence environmental fines into a Catchment Restoration Fund

Respondents said there was overwhelming support for ringfencing environmental fines into a dedicated Catchment Restoration Fund, with many endorsing the principle that "the polluter pays" and that funds should be reinvested in the catchment where the offence occurred. Others suggested that fines could be managed centrally but distributed to the most impactful projects, provided there is support available for catchments that lack the capacity to develop and deliver proposals.

Several respondents stressed the importance of having a transparent and accessible application and allocation process, with proportional auditing that does not create an administrative burden outweighing the benefit of the funds.

While support was strong, some respondents emphasised that prevention should remain the priority, and that fines must serve as a credible deterrent rather than be seen as a routine cost of doing business. A few suggested that clear communication of penalties—through signage and public engagement—could help establish stronger environmental responsibility, drawing inspiration from other regions such as British Columbia.

Do you agree with the recommendation? – Expand the use of Enforcement Undertakings and use FMPs to guide restoration

Respondents said they supported the expanded use of Enforcement Undertakings (EUs), especially where they result in clear, local environmental benefits aligned with Fisheries Management Plans (FMPs). Many agreed that FMPs should guide how reparation funds are used, though some noted that these plans need to be more locally refined.

Several respondents emphasised the importance of consistency and transparency in how SEPA manages EUs, noting past experiences where agreements were unclear or reversed. Prevention of damage was widely seen as the priority, with some expressing concern that EUs may offer developers an "easy way out" if not carefully regulated.

One respondent suggested that EUs should be subject to review following post-incident survey work. Where surveys reveal more significant environmental impacts than initially

assessed, there should be an option to appeal and increase the original compensation, ensuring the final outcome provides maximum benefit to the affected river or catchment.

Do you agree with the recommendation? – Conduct a feasibility study on water user levies

Respondents said there was strong support for conducting a feasibility study into introducing levies on water users, particularly industries and businesses that profit from Scotland's rivers and lochs, such as abstractors, commercial operators, and recreational users. Many agreed that these groups benefit from healthy freshwater systems without currently contributing to their management, and should therefore share responsibility for their upkeep.

Respondents stressed that the system must be fair, proportionate, and affordable, with a levy structure that reflects the scale and nature of use—for example, higher charges for abstraction, and accessible rates for recreational users to encourage compliance. Suggestions included using water flow rates or user categories to guide contributions, and regulating the system through existing enforcement structures like bailiffs.

There was also a call for the feasibility study to take a comprehensive and inclusive approach, considering all water users—from farmers and paddle sport operators to larger industries—and ensuring that the administrative cost of the system doesn't outweigh the revenue it generates.

One respondent opposed the idea with no additional comment, and a few were unsure about how a levy could be implemented in a way that remains equitable and avoids unintended consequences, but the overall sentiment was that a study is worth pursuing as a first step toward broader, fairer funding of freshwater conservation.

Do you agree with the recommendation? – Introduce a rod licence in Scotland

Respondents said there was broad support for introducing a rod licence in Scotland, viewing it as a fair way for anglers to contribute to the conservation of Atlantic salmon and freshwater ecosystems. Many felt that anglers currently benefit from the work of DSFBs and Trusts without making a direct financial contribution, and that fishing for an endangered species should come with some responsibility.

However, respondents emphasised that the design, cost, and structure of the licence would be critical to ensure fairness and avoid discouraging participation. There was strong support for a tiered or differentiated approach. One suggestion was higher charges for salmon anglers on major rivers and less for a coarse angler. Another respondent highlighted that anglers will expect to see lower or discounted fees for anglers on Category 2 and 3 rivers.

While reduced rates for local or senior anglers was broadly supported, several respondents raised concerns about declining fishing effort and an aging angling population, warning that any new charge must be carefully framed to avoid deterring new or younger anglers from

entering the sport and reducing the income from the rod license in the future. It was also suggested that a specific licence fees for visiting anglers, who may be better able to absorb the cost would be a better option.

Respondents also stressed that licence revenue must be used transparently and reinvested in fisheries management, rather than absorbed by the cost of administering the system. There were concerns about whether the necessary enforcement capacity exists, and a recognition that previous attempts to introduce a rod licence in Scotland faced strong resistance. It was recommended to look at the effectiveness of rod licenses in England as a starting point.

Do you agree with the recommendation? – Broaden DSFB membership and review election rules

Respondents had mixed views on the need to change the current governance rules for DSFBs and Trusts. Some felt that the existing system works well and questioned whether there would be significant benefit in altering the model. Others cautioned that any governance changes must be simple and not burdensome, particularly in areas where lack of fish and funding has already led to disengagement, warning that further complexity could cause some DSFBs to collapse.

Some responses supported the principle of reform, with many highlighting that DSFB memberships are often narrow which can discourage broader participation and limit DSFB effectiveness. Several respondents expressed concern that some DSFBs are seen as “closed shops” and noted difficulties in attracting new members due to a lack of incentives or clear roles.

Suggestions for improvement included allowing DSFBs to co-opt members with relevant skills, such as expertise in science, finance, or land management; expanding eligibility to riparian landowners and conservation-focused community representatives; and encouraging the inclusion of organisations like SEPA in governance structures.

Do you agree with the recommendation? – Review good governance provisions

Respondents said there was general support for reviewing the good governance provisions for DSFBs, with many agreeing that improvements could strengthen compliance, clarity, and accountability. Some noted that while the current requirements are not overly burdensome, they depend heavily on individual DSFB members and Clerks to ensure they are followed correctly—making the system vulnerable to inconsistency and error.

Several respondents pointed out that the provisions in the Act can be difficult to interpret, often requiring clarification from external bodies like Fish Legal or FMS, which suggests a need to simplify and clarify the legislative framework. Others highlighted that the rules around the formation and alteration of DSFBs or Districts can be prohibitive, and that greater flexibility may be warranted.

While broadly supportive, a few respondents expressed caution, warning that any review should not result in additional administrative burdens for DSFBs already struggling with limited capacity. One noted that time might be better spent on other priorities.

Do you agree with the recommendation? – Allow more flexibility around DSFB election timing

Respondents said they supported allowing greater flexibility in the timing of DSFB elections. While the current three-year term was seen by some as reasonable, several respondents noted that rigid timelines can be impractical, especially when unexpected circumstances arise.

It was widely felt that DSFBs should not be forced to disband due to unavoidable delays in holding an election. Instead, a more pragmatic approach would allow DSFBs to continue operating with appropriate justification and oversight, such as submitting a formal explanation and securing approval to postpone elections until the earliest practical opportunity.

Respondents also pointed out that, in practice, election dates often shift year to year due to scheduling requirements, which supports the case for built-in flexibility within governance provisions.

Do you agree with the recommendation? – Introduce an asset lock or allow DSFBs to become Community Interest Companies (CICs)

Respondents had mixed views on the proposal to introduce an asset lock or allow DSFBs to register as Community Interest Companies (CICs). Some supported the idea, highlighting that it could enhance credibility with funders and open up access to financial borrowing, particularly as many DSFBs currently lack a formal legal status and credit rating, which limits their ability to secure loans or be recognised by financial institutions.

However, others expressed concern that such a move could deter volunteer participation, particularly in smaller DSFBs already struggling to retain members. Some feared that new structures might be intimidating or overly complex, potentially leading to further disengagement.

One respondent argued that the focus should instead be on broadening DSFBs' statutory powers and strengthening enforcement, rather than altering their governance structure. Several others said they were open to the idea in principle but lacked enough understanding of CICs to make a firm judgement.

Appendix C: Models of Local Fisheries and Catchment Management

Primarily DSFB-Derived Income Model

The DSFB is in a position to raise enough money through its fishery assessment to provide core funding for the DSFB and a grant or donation to the Trust.

Benefits	Challenges
Alignment between Trust charitable objectives and DSFB priorities Historically stable funding when DSFB revenue is consistent.	Financial dependence on DSFB income makes Trusts vulnerable to fluctuations in fishery assessments.

Primarily Trust Derived Income Model

Rivers and Fisheries Trusts in this model primarily depend on grant or charitable funding or undertake contract work to support local fishery management. This is often because the Trust covers single or multiple small boards with limited financial resources. The Trusts often take on the majority of restoration work as well as monitoring and education.

Benefits	Challenges
Diversified external grants can reduce reliance on local levy systems Charities can attract diverse external funding for large-scale habitat restoration/conservation projects Securing high-profile grants may raise the profile of Trusts, encouraging wider community support and involvement.	Vulnerability to grant funding cycles and competition for limited resources. Uncertainty in stable core funding Limited funding available to meet statutory objectives as often these cannot be funded through these wider income sources Risk of having to "chase" available funding which may be restricted to funder priorities rather than local priorities

Mixed Model

This model balances DSFB funding with diversified income sources, such as grant and charitable funding, consultancy and contract work, and supplemental income sources. Both DSFBs and Trusts may undertake contract work to deliver monitoring, habitat restoration, or advisory services for external clients.

Benefits	Challenges
Combines the stability of DSFB funding with the flexibility of additional income sources Can leverage diverse external funding for large-scale habitat restoration/ conservation projects Supports gradual capacity building and reduced long-term reliance on DSFB contributions	Requires deliberate effort and resources to build and sustain diversified income streams High demand on staff resources and expertise for consultancy or contract work Risk of prioritising revenue-generating activities over core statutory or conservation objectives Risk of having to "chase" available funding which may be restricted to funder priorities rather than local priorities

Independent DSFB and Trust Model

In this model, district salmon fishery boards and Rivers and Fisheries Trusts function entirely independently from a financial perspective. This may also occur in districts where there is no established DSFB or no established Trust.

Benefits	Challenges
Clear responsibility and accountability Ensures fisheries management activities occur in areas without district salmon fishery boards	Potential for divergence in priorities within the same catchment In areas without DSFBs, there is no formal responsibility for fishery owners to contribute to management In areas without DSFBs, Scottish Ministers warrant bailiffs without associated oversight of enforcement activities In areas without Trusts, there may not be as much capacity to address wider conservation or education in the catchment

Catchment Partnership Model

This model involves coordinated efforts among multiple organisations to address regional ecological goals.

Benefits	Challenges
Broad collaboration fosters holistic river restoration, ecosystem and community benefits Can attract diverse external funding for large-scale habitat restoration/ conservation projects	Complex coordination among stakeholders, unclear accountability and role confusion can make it difficult to assign responsibility for specific outcomes, increasing the risk of delivery gaps or duplication of efforts Risk of uneven engagement or funding among partners Risk of having to "chase" available funding which may be restricted to funder priorities rather than local priorities Potential for 'drift' away from original intention at the point of set-up Potential for organisations to compete for the same limited funding resources

Scotland's fisheries management landscape is marked by significant variation in capacity, priorities, and collaboration across district salmon fishery boards (DSFBs) and Fisheries Trusts. This variety reflects the adaptability of management models to regional needs and conditions but may have also evolved due to the underlying weaknesses in resourcing local management identified throughout this document. There is an opportunity to test and identify effective strategies that can inform broader regional or national efforts and allow for cross-pollination of ideas and practices. Despite this variation, there is an underpinning issue across Scotland which is that there are insufficient resources to deliver the scale and ambition that is required.

Appendix D: DSFB Statutory Duties and Powers

District salmon fishery boards (DSFBs) in Scotland operate under a framework of statutory duties and powers as defined in the legislation.

DSFB Duties: These are the things set out in legislation that DSFBs **must** do. These include requirements for public accountability and governance, such as holding annual public meetings (Sections 46B and 46C), and preparing and publishing annual reports and audited accounts (Section 44(1)). DSFBs must also maintain proper arrangements for handling complaints (Section 46D) and ensuring transparency through the registration and declaration of members' financial interests (Section 46E). These duties are mandatory and are designed to ensure that the boards operate transparently, engage with stakeholders, and maintain accountability in their operations.

RTC Duties: These are the things set out in legislation that RTC **must** do. The RTC is required to exist by law. (Section 5 (1)) the RTC is required to elect 81 Commissioners, appoint a Clerk (Section 11 (1) (a)) and a Superintendent of water bailiffs, together with such other water bailiffs (Section 11 (1) (b)). The RTC has the power to impose and recover fishery assessments (Section 18 (1)) and authorise expenditure for purposes outlined in the 2006 Order. Other duties include requirements for public accountability and governance, such as holding annual public meetings Sections 12 (1) and 20 (a)), and preparing and publishing annual reports and audited accounts (Section 20 (b)). The RTC has the Power to prosecute in England and Wales (Section 74).

The RTC maintains proper arrangements for handling complaints and ensuring transparency through the registration and declaration of members' financial interests. These duties are designed to ensure that the RTC operates transparently, engages with stakeholders, and maintains accountability in their operations.

DSFB Powers: Statutory powers enable DSFBs to take proactive measures for the management and funding of fisheries. DSFBs have the power to impose and recover fishery assessments (Section 44(2)-(5)), borrow funds within specified limits (Section 44(7)), and authorise expenditure for purposes outlined in the 2003 Act. They may undertake actions to protect, improve, or stock fisheries within their districts (Section 45(1)). They may also appoint water bailiffs and other personnel (Section 45(3)). These are discretionary powers set out in legislation that DSFBs **may** do, but are not required to. Water bailiffs operate under the powers conferred by the 2003 Act to prevent the illegal taking of salmon or sea trout. These powers are discretionary and allow DSFBs to tailor their activities to the specific needs of their districts.

RTC Powers: The RTC may undertake actions to protect, improve, or stock fisheries within their districts (Section 9 (a) (b) (c)). These powers are discretionary and allow RTC to tailor their activities to the specific needs of their districts.

For more information on the statutory duties and powers of DSFBs and the River Tweed Commission, please refer to the [Salmon and Freshwater Fisheries \(Consolidation\) \(Scotland\) Act 2003](#) and [The Scotland Act 1998 \(River Tweed\) Order 2006](#), respectively.

DSFBs as Statutory Consultees

DSFBs are statutory consultees for aquaculture. However, they also play an important role in the planning process for a range of other developments that have the potential to impact fish or fisheries. They are also considered “competent authorities” under EU-derived regulations for managing Special Areas of Conservation (SACs) where Atlantic salmon are a qualifying species.