



# Association of Salmon Fishery Boards

## Comments on 'The Draft Scottish Marine Regions Order 2013'

December 2012

### Introduction

The Association of Salmon Fishery Boards is the representative body for Scotland's 41 District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), which have a statutory responsibility to protect and improve salmon and sea trout fisheries. The Association and Boards work to create the environment in which sustainable fisheries for salmon and sea trout can be enjoyed. Conservation of fish stocks, and the habitats on which they depend, is essential and many DSFB's operate riparian habitat enhancement schemes and have voluntarily adopted 'catch and release' practices, which in some cases are made mandatory by the introduction of Salmon Conservation Regulations. ASFB creates policies that seek where possible to protect wider biodiversity and our environment as well as enhancing the economic benefits for our rural economy that result from angling. An analysis completed in 2004 demonstrated that freshwater angling in Scotland results in the Scottish economy producing over £100 million worth of annual output, which supports around 2,800 jobs and generates nearly £50million in wages and self-employment into Scottish households, most of which are in rural areas.

We welcome the opportunity to comment on this consultation.

### Specific Comments

#### *Q1. Do you agree with the proposals set out in the draft Scottish Marine Regions Order 2013?*

No.

Comments: We take issue with the boundary between the Argyll and West Highland Scottish Marine Regions. This boundary bisects the Sound of Mull and Loch Linnhe and as a consequence, the boundary bisects three farm management areas for finfish aquaculture. We do not understand how such a boundary would make sense for inshore fisheries, or any other sector either. It would appear to make far more sense for the landward boundary to end at Ardnamurchan point.

#### *Q2. Do you have any further comments? In particular we are seeking views on*

- *the co-ordinates establishing the marine region boundaries;*

The coordinates are fairly meaningless without spending considerable time working through the coordinates. However, we understand that there were significant technical challenges in drafting this order, and as long as the illustrative map is included in the same document as the order itself, we are content.

- *the boundaries outlined at paragraph 8 above;*

Please see our specific comments to Q1.

#### *Q3. Do you believe that the creation of Scottish Marine Regions discriminates disproportionately between persons defined by age, disability, sexual orientation, gender, race and religion and belief?*

No

### For further information please contact:

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## RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

### 1. Name/Organisation

Organisation Name

Association of Salmon Fishery Boards

Title Mr  Ms  Mrs  Miss  Dr  *Please tick as appropriate*

Surname

Wells

Forename

Alan

### 2. Postal Address

Capital Business Centre

24 Canning Street

Edinburgh

Postcode EH3 8EG

Phone 0131 272 2797

Email alan@asfb.org.uk

### 3. Permissions - I am responding as...

Individual

/ Group/Organisation

*Please tick as appropriate*

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

*Please tick as appropriate*  Yes  No

- (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

*Please tick ONE of the following boxes*

Yes, make my response, name and address all available

Yes, make my response available, but not my name and address

Yes, make my response and name available, but not my address

(c)

The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

*Please tick as appropriate*  Yes  No

- (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so.

Are you content for Scottish Government to contact you again in relation to this consultation exercise?

*Please tick as appropriate*

Yes

No