



# Association of Salmon Fishery Boards

## Comments on 'Consultation on registerable marine activities and on marine licence applications requiring pre-application consultation'

March 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. What are your views on the overall costs and savings identified in the Business and Regulatory Impact Assessments?*

No comment

*Q2. Do you agree with the registration process as described?*

Yes

*Q3. If not, what changes would you propose to the process?*

N/A

*Q4. Do you agree that the listed activities should be registerable, rather than licensable?*

Yes

*Q5. Do you have further comments regarding the activities listed above?*

No

*Q6. Are there any other classes of activity that should be registerable?*

No

*Q7. Do agree that statutory consultees should not be specified in legislation for the pre-application consultation process?*

Our answer is a qualified yes. However a number of the listed activities have the potential to impact upon migratory fish and therefore we would expect District Salmon Fishery Boards and Fishery Trusts to be consulted as early in the process as possible. Should the consultation exercise result in statutory consultees being specified in legislation, we would expect DSFBs to be included.

*Q8. If not, which persons or bodies do you believe should be specified as statutory consultees for the pre-application consultation process?*

See answer to Q7, above.

*Q9. Do you agree with the classes of activity that will be subject to pre-application consultation?*

Yes, on the understanding that 'Renewable energy projects over 30 MW or developments that increase the output of an existing project to over 30 MW' includes all intra-array cabling.

*Q10. If not, what activities would you add or remove from the list?*

No comment

*Q11. Do you believe that the above proposals discriminate disproportionately between persons defined by age, disability, sexual orientation, gender, race and religion and belief?*

No comment

*Q12. If you answered yes to Question 11, in what way do you believe the proposals to be discriminatory?*

N/A

**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

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### 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

or

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

or

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