



# 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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