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Your Ref:

18<sup>th</sup> June 2012

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Dear Sirs,

### **Consultation on Registerable Marine Activities and on Marine Licence Applications requiring Pre-application Consultation**

The Scottish Fishermen's Federation (SFF) represents the nine major fishing associations in Scotland and as a major stakeholder in the Scottish marine environment is grateful for the opportunity to provide a response to the above consultation.

The SFF fully supports the introduction of pre-application consultation, but does not see a need to respond to every question in the consultation so for the sake of brevity will address only those questions of specific interest to it.

#### **Q7: Do you agree that statutory consultees should not be specified in legislation for the pre-application consultations process.**

**Answer:** No, the SFF believes that it would be appropriate to specify statutory consultees at this stage. It would add value to the consultation process, to include national organisations in order to facilitate direct liaison with developers. This would seem a more credible way of dealing with national groups than the proposal for simple advertising and meetings open to the public where we believe a full and proper discussion of local public concerns may take place, but would not necessarily cover the technical concerns of national strategic organisations.

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

**Answer:** The SFF, naturally, would propose that it should be listed amongst the statutory consultees. This list should also probably extend to such as the Chamber of Shipping, the Scottish Salmon Producers Organisation, The Association of Scottish Shellfish Growers and any other properly constituted organisation with members working in the marine environment.

#### **Members:**

Anglo Scottish Fishermen's Association  
Clyde Fishermen's Association  
Fishsalesmen's Association (Scotland) Ltd

Mallaig & North-West Fishermen's Association  
Orkney Fisheries Association  
Scallop Association

Scottish Pelagic Fishermen's Association Ltd  
Scottish Whitefish Producers' Association Ltd  
Shetland Fishermen's Association

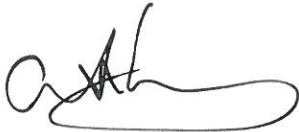
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**Q9: Do you agree with the classes of activity that will be subject to pre-application consultation.**

**Answer:** The SFF agreed with the proposal list, with the proviso that it is kept under review and may be added to at a later date.

These are the key points which the SFF seeks to address in this consultation, and remains happy to engage in further discussion on this subject. It is possible; SFF would appreciate the opportunity at a later date to furnish a form of words which would adequately reflect these points in the developing legislation.

Yours faithfully,



Bertie Armstrong  
**Chief Executive**  
**Scottish Fishermen's Federation**