



## 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