

CONSULTATION QUESTIONS

The Pike Anglers Alliance for Scotland (PAAS) does not feel a need to respond to Section 1 Questions 1-17, Section 5 Questions 37-45, Section 6 Questions 46-48 of the consultation document.

SECTION 4 - SALMON AND FRESHWATER FISHERIES MANAGEMENT

Modernising the Operation of District Salmon Fishery Boards

23. Do you agree that we should introduce a specific duty on Boards to act fairly and transparently? (Page 29)

YES

The current situation where boards are given powers to make management decisions to enhance migratory fisheries undoubtedly has a detrimental impact on non-migratory species where they exist together and the ability of anglers to fish for them. Not only should boards act fairly and transparently but there must be an obligation to formulate and implement appropriate management plans for mixed fisheries where every species is given equal importance and value.

24. Do you agree that there should be a Code of Good Practice for wild salmon and freshwater fisheries? (Page 29)

YES

25. If yes, should such Code of Good Practice be statutory or non-statutory? (Page 29)

The code should be **statutory** and where possible help **protect coarse fish populations** and to promote access to angling. In addition to this the current state of **protection orders** requires a complete overhaul in that it affords little or no actual protection to the species that exist under the order. There must be a requirement for improvement associations and Liaison committees to seek guidance firmly based on sound science to improve and enhance the fisheries they are designed to protect for the benefit of all species not just salmonids. This should be in fair collaboration/consultation with boards and Trusts whose directors should have a broad representation and appreciation of all fish species.

Statutory Carcass Tagging

26. Do you agree that Scottish Ministers should have powers to introduce a statutory system of carcass tagging for wild Atlantic salmon and sea trout? (Page 31)

NO COMMENT

Fish Sampling

27. Do you agree that Scottish Ministers should have powers to take or require fish and/or samples for genetic or other analysis? (Page 32)

NO COMMENT

Management and Salmon Conservation Measures

28. Do you agree that Scottish Ministers should have powers to initiate changes to Salmon District Annual Close Time Orders? (Page 32)

29. Do you agree that Scottish Ministers should be able to promote combined salmon conservation measures at their own hand? (Page 32)

30. Do you agree that Scottish Ministers should be able to attach conditions, such as monitoring and reporting requirements, to statutory conservation measures? (Page 32)

NO COMMENT

Dispute Resolution

31. Do you agree that we should introduce statutory provisions related to mediation and dispute resolution, to help resolve disputes around salmon conservation, management and any related compensation measures? (Page 33)

YES

In the case where there were salmonids conservation measures had a negative impact on other freshwater species e.g. coarse fish. Dispute resolution would also be helpful in cases between proprietors and other angling interests or between differing angling interests in areas where there is a protection order in place.

Improved Information on Fish and Fisheries

32. Do you agree that there should be a legal requirement to provide comprehensive effort data for rod fisheries? (Page 34)

YES

As this relates to the collection of data on salmonids there should be a requirement to collect such data, and that it be used to establish the correct rateable value of that fishery the status of fish stocks to provide information to determine whether there is an exploitable population, to then provide guidance on catch and release and other enhancement /conservation measures.

33. What additional information on the fish or fisheries should proprietors and/or Boards be required to collect and provide; and should this be provided routinely and/or in specific circumstances? (Page 34)

Additional information preferred on poaching activity, habitat improvements, predator control. Electrofishing activity and results.

34. Should Scottish Ministers have powers to require Boards and/or proprietors or their tenants to investigate and report on salmon and sea trout and the fisheries in their district? (Page 34)

NO COMMENT

Licensing of Fish Introductions to Freshwater

35. Do you agree that Scottish Ministers should have powers to recall, restrict or exclude the jurisdiction of Boards in relation to fish introductions, in certain circumstances? (Page 35)

YES

36. If so, why and in what circumstances? (Page 35)

Powers should be restricted or excluded on the grounds of accountability and biosecurity of other species.

SECTION 7: ANY OTHER ISSUES

**PROTECTION OF COARSE FISH.
PROTECTION ORDERS OVERHAUL TO MAKE ACCOUNTABLE
PREVENTION OF MASS CULLING OF COARSE FISH BY FISHERY
PROPRIETORS
IMPROVED ACCESS TO ANGLING FOR COARSE FISH.
SECTION 2(4) SALMON AND FRESHWATER FISHERIES
CONSOLIDATION ACT 2003 MUST BE CHANGED. REMOVE THE
ABILITY OF ANY OWNER OR OCCUPIER TO FISH FOR OR TAKE
FRESHWATER FISH OTHER THAN TROUT BY NET OR TRAP. THIS IS
DRACONIAN AND SHOULD BE CHANGED TO MAKE IT AN OFFENCE TO
CAPTURE ANY FRESHWATER FISH OTHER THAN BY ROD AND LINE.**

The Pike Anglers Alliance for Scotland have seen the SFCA response to this consultation and we fully support the detailed arguments presented.