

## Consultation on wild fisheries reform in Scotland

### CONSULTATION QUESTIONS – RESPONSE TEMPLATE

#### SUMMARY OF MAIN CONCERNS OF THE TAY DSFB

- *The Fisheries and Data Strategies should have been published before the WFR process got to the stage of this consultation. This consultation would have been much more meaningful had there been a clear view of the work the Scottish Government considers needs to be done.*
- *Future fisheries management organisations, whatever form they take, should still have a significant input from salmon proprietors and salmon anglers, particularly if they are having to pay for the system.*
- *It is a matter of top priority that the costs of the functions which Scottish Ministers consider essential are modelled for the entire country.*
- *We agree in principle that maximising local buy-in etc is preferable when setting FMO boundaries etc, but we think that this may sometimes have to be overridden by financial realities. We consider that shortage of funding may require the removal of duplicated effort, creation of economies of scale etc.*
- *We are content that salmon proprietors should continue to pay for local salmon management work, as at present. However, we do not agree that they should pay for other species work, non local (i.e. government only) priorities or subsidies to less affluent FMO areas (particularly as the Tay might be considered a major potential donor). The result of that might mean cutbacks in other aspects of angling businesses, e.g. losses of ghillies' jobs.*
- *Scottish Ministers must ensure that Rateable Values of fishings are consistent across the whole country, taking into account the cost of running fisheries. We consider this to be a particular issues because we suspect such running costs are relatively high on the River Tay owing to the need for boats with ghillies.*
- *We perceive there will be a greater requirement for enforcement functions in future as a result of the various measures being proposed. We question how this could be funded if salmon levies from a river like the Tay were to be used to pay for new functions and redistribution to other areas.*
- *We do not agree with imposition of rod licences, which would essentially be a “poll tax” on anglers. As for salmon, there is a levy already in existence which is a relatively “progressive” form of taxation. In this case there is no sensible reason to add an additional form of taxation which will be more “regressive” in its effect.*

**Q1.** Do you agree with the balance of functions as set out in Table 1?

Yes

**Comments:**

*Broadly speaking, irrespective of what type of organisations are responsible for implementation, the split of functions between local and national responsibility would appear logical.*

**Q2.** Do you consider that any main functions are missing? If so, please state what these are. Do you think that any of these functions might be best fulfilled at a different level?

**Comments:**

*While it could be covered under “delivering local management priorities”, we think that enforcement / protection of fish and fisheries interests should be explicitly listed as a local function in Table 1. Enforcement is a major part of fisheries management and may require to be even more prominent should many of the proposals of the WFR be implemented (e.g. licences to kill, rod licences). As a function it appears to be underemphasised. We do not think this should be the case.*

*As a more general point, we think we would have been able to provide more meaningful answers to this consultation had the fisheries management and data strategies had already been produced. In some ways we feel there is an element of cart before the horse with this process.*

**Q3.** Do you agree that FMOs should be charitable bodies?

Don't know

**Comments:**

*While we see the obvious financial advantage in some form of charitable bodies continuing to have a significant role in the fisheries management sector, from the limited information available, we are not convinced that the best model would be for there only to be charitable bodies. It may be preferable to continue, as present, with both fisheries trusts performing certain functions with DSFBs being replaced by some form of non charitable FMOs that are financed by the “levy”, performing non charitable functions.*

*At present, the act provides DSFBs with the power to concern themselves with a very wide range of issues and activities under the banner of “protection and improvement of salmon fisheries”. Some activities that are, or could be, done might not be considered charitable. For example, some are clearly performed for the benefit of fishing businesses. Locally, we have and still are promoting initiatives which help market angling businesses. Enforcement is another. We understand that*

*it has been suggested that enforcement might be conducted by charitable bodies under warrant from Scottish Ministers as the SSPCA operates currently. However, we understand that a charity might take on such a role for the conservation of species and habitats or research and monitoring, but that would not cover activities associated with the protection of private fishing rights.*

*We consider that enforcement is a major element of fisheries management and will become even more significant if enforcement roles have to be expanded (all species protection, rod licence enforcement, licences to kill etc). If enforcement functions are not all compatible with charitable status then another type of body or arrangement will need to be considered.*

**Q4.** Do you have any comments about the WFR's view that FMOs should be Scottish Charitable Incorporated Organisations rather than charitable companies?

Yes

**Comments:**

*If it is not appropriate for FMOs to be charitable bodies, it would follow that they should not be SCIOs. However, if Scottish Ministers do consider FMOs should be charitable then we consider they ought not to be SCIOs because if they lose their charitable status SCIOs must be wound up and cannot continue to operate.*

**Q5.** Do you agree that in order to ensure appropriate governance and fitness for purpose, FMOs should operate to a model constitution?

Yes

**Comments**

*With the qualification that certain aspects of the constitution might need to differ in different parts of the country, reflecting differences in local fisheries and issues.*

**Q6.** What do you consider is an appropriate balance of interests on the board and wider membership of FMOs?

**Comments:**

*If such a model is adopted, we consider it would be essential that there continues to be a significant involvement of salmon angling proprietors and salmon anglers, at least in areas where salmon angling dominates. This is not just because of their knowledge and the fact that they will be the ones responsible for putting a lot of fisheries management into practice, but also because it seems that much of the burden of paying may fall on salmon proprietors. We are most concerned about this suggested mode of finance, particularly from a River Tay perspective (see answers*

to questions 15 to 20). Those who pay must be in a strong position to prevent their exploitation.

**Q7.** Do you agree that bodies wishing to become FMOs should do so through seeking approved body status from Scottish Ministers?

Don't know

**Comments:**

*While “approved body status” might, in principle, be one method of ensuring that a fisheries management body is considered fit for purpose by Government, we cannot with certainty answer this question owing to the lack of information on what approved body status might actually require.*

**Q8.** Do you agree that the cornerstone of the relationship between national and local management bodies should be the proposed plan-led approach? If not, why not?

Yes

**Comments:**

*We think it entirely logical that the work of any form of future fisheries management organisations should be based around a plan as far as possible. This is what we try to do already, a three year work plan based on the term of each Board. However, we use terms such as “as far as possible” because, in this business, priorities can be blown off course by “events” which have to take precedence sometimes.*

*As we know others have said, we cannot stress enough that such plans should be a synergy of local and national ideas and that a wholly top down approach from the National Unit must be resisted. However, we do recognise that the value of some types of local work (particularly monitoring) might be enhanced if part of well designed national plans. Although such coordination of monitoring has been a long term aspiration (e.g. as far back as Lord Nickson’s Task Force in the 1990s), it has never really happened.*

*Under the funding model that has been proposed by the WFR, we think it is likely to be the case that many of the aspirations, particularly of local FMOs, might not be affordable through “core” levy funding. If some areas of Scotland are required to suffer a disproportionate burden of paying for the “core” funding, particularly if there is some competition for the national core resource pot, then we think it is only reasonable that the proposed plans of all FMOs should be available for scrutiny and comment from all other FMOs as well as Government. The money from those who contribute most into the system must not be squandered.*

**Q9.** Do you agree that the proposed package of measures in terms of constitution, governance and a plan-based approach provides an appropriate framework for decentralised delivery of fishery management functions?

No

**Comments:**

*“Core” funding will effectively be controlled by central government and we think there will not be enough of that to satisfy every FMO’s wish list. We presume that Government priorities may take precedence, leading to a more centralised structure, not less. The Tay is likely to be a worst case scenario because we would most likely have part of our local levy siphoned off. If so, we may have little money left to develop work on local priorities, which quite possibly will reduce local interest and appetite to do things.*

*We will be better able to answer this question when we see more definition of what the Government proposes FMOs do and the cost of that modelled across the country, with redistribution factored in. We recommend that such an exercise must be done as an immediate priority.*

**Q10.** Do you agree that the FMO network should cover the whole of Scotland?

Yes

**Comments:**

*It is essential that there should be some form of effective fisheries management in place throughout the country, at least the ability to maintain vital functions, particularly fisheries protection and enforcement. A lack of effective policing in an area can lead to problems not only in that area but potentially also in neighbouring districts or even further afield.*

*However, if in reality, there is not an appetite to form FMOs in some areas, some form of arrangement needs to be put in place to ensure at least a required level of enforcement is carried out, as a minimum.*

**Q11.** Do you agree that Scottish Ministers, following discussion with stakeholders, should set out the boundaries of FMO areas?

Yes

**Comments:**

*Ideally, we consider it would be preferable for local stakeholders to design their own preferred management areas on the basis it is likely to achieve more local buy-in. However, we fear that the financial realities of what has been proposed may mean*

*that hard decisions will have to be made that may not always be popular locally (i.e. savings may have to be made through economies of scale). It may be that, in some circumstances, Scottish Ministers may be forced to decide. Therefore, Scottish Ministers should perhaps have this power but should not seek to use it, except as a backstop.*

**Q12.** What factors should be considered in determining the number and optimal coverage of FMOs?

**Comments:**

*The overarching comment to be made in this regard is that, if the system is to be part based on “redistributed” money, we consider it would be essential that FMOs deliver value for money and are as efficient in this regard as possible. As we explain under questions 15 to 20, money will be tight, particularly in our case.*

*With the above in mind, we consider that the approach to delivering numbers of FMOs would have to be based around the work to be done, or might be done, rather than trying to satisfy any local desires to have as many FMOs as possible. The process might be something like this.*

- 1) Based on the fisheries and data strategies, place desired fisheries management outcomes on a sliding scale from the absolutely necessary to the just desirable on a national basis.*
- 2) For each activity, identify the minimum number of staff that would be required in a regional team and then consider what size of an area a single regional team might be able to cover.*
- 3) The number of teams required to deliver each type of outcome across the country would then fall out.*
- 4) Some rationalisation might then be required on the basis of cost, until an affordable number of regional teams is identified. Obviously, some tweaking of boundaries might then ensue according to local circumstances.*

*We also suggest that, in the interest of reducing costs, if some functions are common to all areas and there is duplication of function, consideration might be given to sharing such functions in some way.*

**Q13.** Do you agree that bodies designated as FMOs should be able to deliver analogous work on behalf of local or national interests?

Yes, but with qualification

**Comments:**

*We consider that if the link between such work and fisheries management is tenuous or not genuinely demonstrated to be so and such work diverts resources from more important fisheries management priorities, such work should not be considered to be*

*priorities for FMOs. Bearing in mind our previous answer, we would be concerned if “redistributed” “core” funds are used to fund expanded management for non priority issues. Any such work would then have to be totally self funded.*

**Q14.** Are there any potential conflicts of interest in this approach?

Yes

**Comments:**

*There could potentially be issues if projects with a very tenuous link to fisheries management were to become the primary focus of FMOs, say just because funding is more available for such. The existence or expansion of FMOs should not become an end in itself to the neglect of fisheries management and care needs to be taken to ensure this does not happen.*

**Q15.** Do you agree that funding raised from proprietors should continue to provide the core strand of revenue for local fishery management?

Yes

**Comments:**

*As the current system works for us, we agree that it would be acceptable for funding from proprietors to continue as a source of revenue for local salmon fisheries management priorities. However, we do not agree that a salmon levy should pay for other species management or for National Unit priorities. Salmon work is underfunded as it is. Salmon proprietors could not or indeed should not be expected to pay for other species or non local priority work. If they have to, then sacrifices may have to be made elsewhere in the salmon sector (e.g. ghillies jobs).*

**Q16.** Do you agree that we should explore the potential for extending the responsibility for paying the levy to the owners of all fishing rights?

Yes, with qualification

**Comments:**

*As salmon owners pay a levy already, we see no reason why, in principle, owners of other fishing rights should not do so also. Therefore, we have no issue with Scottish Ministers exploring this issue. However, in practice, we are sceptical as to how much funding this might raise. Salmon levies are based on estimated commercial letting value. Compared to salmon, we do not think there is much letting value in the other wild fisheries, in this district at least. As for commercial stocked fisheries, again we question whether there is that much value. Certainly, some might have a significant turnover, but we understand that most stocked trout fisheries have high overheads*

*and tight margins. We would also caution that extending a levy to such fisheries might have the effect of their collapsing.*

**Q17.** Do you agree that responsibility for collecting and distributing resources from fisheries proprietors for the purpose of delivering the national strategy at a local level should rest with the national unit?

No

**Comments:**

*Given few details have been provided as to what delivering the National Strategy at local level might entail, it is not possible to answer this question except in broad terms. However, as explained in the previous question, we do not believe that salmon proprietors will be willing or indeed able to fund work on national priorities as well as local priorities, that is if national priorities are anything other than a small proportion of the levy. The alternative may be that savings may have to be made in other parts of the fishing business (e.g. ghillies jobs).*

**Q18.** Do you agree that we should explore the recommendation that redistribution of funds should form part of the new management system?

No

**Comments:**

*This is an area which causes us major concern. We are especially concerned that the Tay is likely to be seen as a major potential donor rather than a recipient. Money taken from this district will threaten existing initiatives and even quite basic core functions like enforcement (for which there may be a greater need in future if various licensing proposals are brought in). The Tay is in a potentially vulnerable position as we have a relatively low assessment rate (53%) which may mean a disproportionate amount of our present levy may be taken by the NU. We note that the WFR recommended this level should be the same as non domestic rates (48%), but the consultation does not specify any particular level. We are concerned therefore that it might be set even higher. Should the overall assessment level increase significantly over the present, we consider proprietors may be forced to cut back on expenditure elsewhere (i.e. loss of ghillies jobs etc).*

*We have also noted that by comparing rateable values against salmon catches for some major beats on the Tay and the Dee, for an equivalent salmon catch the R.V. of a Tay beat is about twice that of a Dee beat. We find this surprising because Tay beats most likely have greater costs (more ghillies are required per beat because of the need to fish from motor boats safely). We are concerned that rateable values might not be worked out in a consistent manner across Scotland. It is absolutely essential that Scottish Ministers investigate this possibility and act if there are*

*disparities. Otherwise this will put some rivers' proprietors at a serious disadvantage. Possible differences will be strongly disputed and appealed.*

*As happens at present, we recommend that money raised locally should only be spent locally. Where local funding is insufficient to cover core work, Scottish Ministers need to find new funding sources. We would welcome the exploration of this issue as a matter of urgency.*

*Should such an arrangement be the ultimate will of Scottish Ministers, then it would be essential that the amounts redistributed should be minimised. If other acceptable sources of funding are not found, this will have to mean finding significant cost savings from rationalisation throughout the entire FMO system (see Q12).*

*Again, as a matter of top priority, Scottish Ministers must consider what the core functions of FMOs are and then model the funding requirements across the country. We cannot move forward one way or the other until this is done.*

**Q19.** If not, what other means might be used for funding local fisheries management at appropriate levels across the country?

**Comments:**

*Again, as mentioned above, Scottish Ministers need to define local fisheries management at appropriate levels across country and estimate how much this is likely to cost and work out what might be achievable with the resources available.*

*If Scottish Ministers wish to maintain some minimum level of service to meet national priorities and obligations, we see no alternative to Scottish Ministers providing funding for it.*

**Q20.** Do you agree that we should explore the recommendation for a two-tier levy system?

Yes – with qualification

**Comments:**

*We would welcome an exploration of this issue as part of wider modelling of funding requirements. However, that does not necessarily mean we agree with the principle. Our big concern on the Tay is that, if much of the lower tier of the levy is used up by NU priorities and redistribution, we will require to use the top up to maintain existing functions. We do not perceive any appetite for an assessment hike, therefore such an idea is likely to be opposed on this river.*

**Q21.** Do you agree that Ministers should have powers to control harvesting of all fish species on the grounds of conservation and be able to do so in line with the precautionary principle?

No

**Comments:**

*We do not see why Scottish Ministers require extra powers in this area. S. 24 of the Aquaculture and Fisheries (Scotland) Act 2007 gave Scottish Ministers the power to make regulations if they consider that it is necessary or expedient to do so for the conservation of freshwater fish. Scottish Ministers surely have all the powers they need, as illustrated by the fact that these powers were used to bring in a complete ban on fishing for or taking eels in Scotland (The Freshwater Fish Conservation (Prohibition on Fishing for Eels) (Scotland) Regulations 2008). We presume that was done under the precautionary principle since it cannot be construed that the widespread decline in eels in Europe has realistically had anything to do with fishing of eels in Scotland.*

**Q22.** If not, what other mechanisms should exist in order to ensure a flexible regulatory system which can ensure delivery of legal obligations and policy priorities for management of species and is capable of responding to future changes?

**Comments:**

*As explained in answer to Q21, sufficient powers exist already.*

**Q23.** Do you agree that, in the context of the wider proposals in this paper, the creation of an offence of reckless or irresponsible exercise of fishing rights should not be pursued?

Yes

**Q24.** Do you agree that data collection priorities and processes for fisheries management at a local and national level should be predicated on a consistent approach and that this should be via a national research and data strategy?

Yes

**Comments:**

*We consider this to be an essential aspect. Indeed, such a strategy should have been the first priority of this whole fisheries reform process and should have been completed before design of fisheries management structures was even contemplated. If this had been done, the form of fisheries management organisations would have more obviously fallen out. As it is, we are being asked to comment on a*

*proposed organisational structure without knowing what the demands on it are going to be.*

**Q25.** Do you have any suggestions for additional means to ensure that evidence-based decision making is embedded within the fisheries management system?

**Comments:**

*Because of cost, data collection is not always accorded the highest priority. There is a danger, despite good intentions, that it may still be under funded under the system proposed. If Scottish Ministers could find additional resources to underpin such work then we could have more confidence that the collection of such data could be “embedded”.*

**Q26.** Do you have any suggestions for additional skills areas which might usefully be covered in training and CPD programmes?

**Comments:**

*Enforcement is an area, not listed, where training is vital.*

**Q27.** Do you agree that annual and weekly close times should remain a key part of the management system for wild fisheries?

Yes

**Q28.** Do you agree that the proposed local management organisations should have responsibility for considering such close times in line with the national strategy and the local fisheries management plan?

No

**Comments:**

*While local MOs could obviously consider such issues, we prefer that the responsibility for setting close times should continue to be a national function. It should not be devolved to local fisheries management organisations which could lead to a confusing proliferation of different practice throughout the country.*

**Q29.** Do you agree that the purpose behind Protection Orders can be achieved via the design of the new management system in line with the fundamental principles set out in chapter 2?

No

## Comments:

*The first issue here is, what is the actual purpose behind POs? The consultation document states that this “is to secure responsible access to sustainable fishing for non-salmonid species” (in fact it also includes non migratory trout). However, S. 48 of the SFFCSA (2003) is actually headed “Increased availability of, and protection for, freshwater fishing”, i.e. it is also to give protection to freshwater fishing rights.*

*We understand that it is Scottish Ministers’ suggestion that POs should be replaced by introducing a criminal law requirement that all freshwater fishing would require permission from the owners of fisheries. That would cover that part of the purpose concerned with protection of freshwater fishing. However, there is nothing in the consultation document that gives any indication as to how Scottish Ministers intend to go about securing responsible access to fishing so protected. The fundamental principles referred to in chapter 2 would suggest they may wish to do so, but we cannot answer the question without knowing what this intention is. Therefore, our answer here has to be NO.*

**Q30.** Do you agree that the principles of the existing bailiffing system should be retained, but with amendment to set compliance within an appropriate framework of accountability with warrants issued by the national unit?

Yes

## Comments:

*We believe it is vitally important that the principles of the current bailiffing system should be retained, although some tweaks might improve it as the WFR suggested. We have no issue with the principle of warrants etc being issued by the NU. However, in practice, we question whether that will make much difference. The NU will not be able to manage bailiffs on the ground day to day. Local management will continue to be key to ensuring appropriate accountability etc.*

*One important function an NU might provide, however, is reporting of offences. For example, formerly, when DSFB bailiffs charged someone with a fisheries offence, it was a relatively simple procedure for a report to be written up and a paper copy was submitted to the local PF’s office. However, as a result of the Integration of the Scottish Criminal Justice Information Systems (ISCJIS) initiative in the 2000s, non-police reporting agencies must submit reports through a specialised and secure computer system. Since that time we have relied on the Police to report charges on our behalf as we felt the system was too onerous to set up for the small number of cases we generally obtain. To our knowledge, only the Tweed has installed this system, and we understand it causes issues. Given the likely annual volume of cases throughout Scotland we think that a single facility that can directly report cases for all bailiffs in Scotland would be a major help, making it easier for cases to be reported and improving consistency. Police are not always available and their time is wasted by doing this work when bailiffs could do it themselves.*

*Finally, we would like to stress again that we are concerned as to how a bailiffing system is to be funded within the proposed structure. For example, at the moment, bailiffing costs amount to more than half our expenditure. If money is to be redirected from the Tay to other rivers and if the NU has different priorities with respect to the use of core funding (e.g. say that we should be doing more monitoring work than we do), we cannot see how the current level of enforcement service could be maintained without a damaging increase in the salmon levy.*

**Q31.** Are there other mechanisms for enforcing fisheries legislation that should be considered?

**Comments:**

*We think it vital that Police Scotland should continue to be a major enforcer of fisheries law and to continue to closely cooperate with bailiffs. If required, more involvement could come from Marine Scotland Compliance. However, we consider that given their specialist knowledge etc, bailiffs will continue to be the main enforcement mechanism.*

**Q32.** Do you consider that there are advantages in the bodies involved in recreational fishing being able to come together to speak through one lead body?

Yes, but we understand it happens already

**Comments:**

*It already happens. There is an existing forum - The Angling Development Board of Scotland, sponsored by Sport Scotland. In this respect the WFR is inaccurate and incomplete.*

*The Scottish Anglers National Association Ltd (SANA) is recognised by Sport Scotland as the national body which represents game anglers. It is a membership based organisation with individual and club membership throughout Scotland. Along with coarse angling and sea angling they form the Angling Development Board which is partly funded by Sport Scotland. Consultation with Sport Scotland and the Angling Development Board may provide information to show whether the Angling Development Board is capable of adaptation to perform the functions envisaged.*

**Q33.** If so, do you have views on how this could be facilitated and in what timescale?

**Comments:**

See answer and comments to Q32.

**Q34.** Do you agree that promotion of opportunities and access should be a central theme for the strategy?

Yes

**Comments:**

*We agree that promotion of fishing opportunities should be a priority. Here, in the Tay district there is a great amount of fishing of several types and a range of prices available. This is not by any means fully utilised.*

*For example, even as of 6 August, one website alone ([www.fishtay.co.uk](http://www.fishtay.co.uk)), is advertising 2,349 rod-days of salmon angling in the Tay district for the remainder of August alone. That website does not even sell fishing for the majority of salmon beats in the district. There are also hundreds of brown trout permits available on a daily basis, mostly not taken up, and considerable numbers of coarse fishing availability too. For example, Dunkeld and Birnam Angling Association sell tickets for trout fishing to the general public from three retail outlets. Pitlochry Angling Club have a similar arrangement. This is not exceptional. Throughout Scotland there are a vast network of angling clubs, democratically formed and elected who control and make available fishing to the general public.*

*A lot of this mass of available fishing is hardly known. We strongly agree therefore that promotion of this resource is essential. Perhaps a national and easily recognised sign could be developed to display showing the outlets that sell permits.*

*However, we do draw attention to the fact that such involvement could conflict with charitable status.*

**Q35.** We are interested to hear views on how increasing opportunities and access to fishing can be embedded within the fisheries management system.

**Comments:**

*If resources can be found, fisheries development officers might be employed within the fisheries management system, as some rivers already do. Such people can perform a range of functions from producing real time reports on what is being caught on websites, organising and running events to introduce people to angling, advising fishery owners on promoting their fisheries etc.*

**Q36.** Do you support the concept of the angling sector coming together to develop a programme for development of angling (Angling for All), including an emphasis on opportunities for young people and promoting social and economic benefits?

Yes, but see the answer to question 32.

## Comments:

*We consider that encouraging new entrants to angling, particularly young people, is essential for the future of angling in Scotland. In this connection the work of the Angling Development Board for Scotland in promoting angling in schools and national coaching is an excellent example. We are aware of widespread concern over reducing participation. We agree that the angling sector seems overly fragmented and that some form of structured introduction to angling / coaching could play a part in encouraging new people to take up the wide variety of angling opportunities available.*

*However, we should also like to emphasise that we believe that it is essential to remove as many barriers as possible to new entrants. We should certainly not seek to erect more. We believe that rod licences, kill licences, tags etc could all have some deterrent effect on some young and casual anglers. The introduction of any such might prove counter productive and require very careful consideration.*

**Q37.** Should funding for Angling for All come from a rod licence? If not, where should resources be found to support the programme?

No

## Comments:

*We do not see any justification for the introduction of a rod licence on salmon / sea trout anglers, for anything. Salmon anglers already contribute to the levy and this should continue as the funding source from this sector. The salmon levy essentially operates by taxing those anglers who fish the more expensive beats more. A rod licence charges everyone the same. It might be described as more “regressive” than the current levy. Indeed, it is a “poll tax”.*

*In practical terms, rod licences might be one of the few options of taxing non salmon anglers, but this might prove highly unpopular. However, the imposition of such licences may backfire by deterring some people from fishing, e.g. families that might have had a go at fishing when a casual opportunity arises. There may well be significant evasion and a high cost of enforcement, particularly in the first few years. We are particularly concerned that enforcement costs might be significant in a large catchment like the Tay close to main centres of Scottish population. Where will the enforcement costs fall? How will they be impacted by changes in levy funding – redistribution and changed priorities?*

*We consider that public funding must be found for Angling for All.*

**Q38.** Do you agree that a rod licence should only be used to fund Angling for All, rather than also being used to support wider management activity?

No

**Comments:**

*As stated above, we do not believe in rod licences. We think they will prove very unpopular and much of the income may be lost through evasion and enforcement costs.*