

Written submission from Tay District Salmon Fisheries Board

The Tay District Salmon Fisheries Board is grateful for the opportunity to provide evidence to the RACCE Committee following its consideration of the final report of the Wild Fisheries Review with stakeholders on 25 February. Several of the questions raised at that meeting had particular relevance to the TDSFB. This short response is limited to these.

1) Thoughts on a centralised levy system with redistribution between areas. Could there be challenges from owners?

This is perhaps the one area which gives most concern and not just the “redistribution” part, as now explained.

It is understood that the proposed “central levy” will be set at the level of non domestic rates (47%). In the Tay district the current assessment rate is 53%. This means, in effect, that almost all of our present assessment would be claimed by the central unit. An unspecified proportion of this money may then be “redistributed” to other rivers and the balance which is to be returned to the Tay, will have to be spent on things which the central unit (in effect the Scottish Government as proposed in the WFR report) wants it to be spent on. At the present time, we have no idea what the Government’s priorities are likely to be, whether they will broadly accord with what we currently spend the assessment on (almost half is currently spent on enforcement, our single largest area of expenditure) or otherwise. If the central unit ends up having totally different priorities then, in effect, the Tay assessment might have to be doubled via the voluntary “top-up” if existing commitments are to continue. Since most of the main big beats on the River Tay already pay between £10,000 and >£20,000 per year in levy that would not be an insignificant consideration. That could well result in adverse consequences. There would be pressure not to use the “top-up” and it is perhaps not inconceivable that beats may seek to cut other costs, which can only be by reducing the number of employees or their hours.

Therefore, it is not just the size of the “redistributive” element that must be considered, but to what extent the Government’s priorities are likely to be different from what DSFBs’ current priorities are. Both require to be known before we can really comment on the likelihood of challenge from owners, but the possibility is there, obviously. Finally, the impact of these two issues will also be dependent on what the current assessment percentage is for any given DSFB. The lower it is, the greater the adverse impact will be (the Tay is likely to be at the lower end of the range). Clearly, all this needs to be modelled out ASAP to determine whether this entire model is likely to be workable or not.

2) Views on Protection Orders

The Protection Order system is widely seen as a valuable thing throughout the Tay catchment where there are four POs in operation (Tay, Earn, Tummel-Garry and part of the Upper Spey). Their value is generally well appreciated both by riparian owners and the angling clubs who administer much of the fishing under the POs. It was suggested at the meeting that there has been a history of problems with the Tay PO. However, it is also worth pointing out that the Earn and Tummel POs do not appear

to have had the same problems, certainly we do not hear of them. It may be that these differences may reflect differences in the ways the various POs are managed.

We agree that POs should be retained but should be streamlined as far as possible as recommended in the report. We broadly support the principle of the recommendations. We also consider that if the administration of POs became part of the remit of all-species FMOs then problems might be resolved more quickly.

3) The need for a separate bailiff force / rod licence enforcement

It is not correct that bailiffs never use or no longer need the full range of powers available to them. Admittedly, the use of such powers has declined as poaching has declined, but such powers are very useful to have when the need arises. As explained at the meeting, Police are not always immediately available in the places where such offences can occur. Furthermore, the Police could not be expected to replace the job of bailiffs. The Police simply couldn't be expected to spend large amounts of resource just monitoring fisheries, for example. It would be unfortunate, therefore, if these powers were lost.

However, we agree with Mr Thin that, where problems exist, they would largely be solved by increased training and better management. That is largely a matter of resources.

It should also be noted that the changes proposed in the WFR report will result in much more need for enforcement, not less. The quota/tagging scheme will create a whole new area to be policed. As would rod licences for non-salmon anglers. Enforcing those could require a significant extra resource, particularly in the Tay catchment. This is a large catchment, with many different types of fisheries, close to the major centres of Scottish population. Indeed, the great bulk of anglers who would be required to buy non-salmon rod licences live in central Scotland, where ironically, the DSFB bailiffing presence is weakest at present. We are aware that the Environment Agency in England appears to spend a significant amount of time checking rod licences, for example.

Another example worth citing is the recent prohibition on killing of spring salmon which the Committee passed only a little over two months ago. As a result of this legislation, our bailiffs have almost continuously been on enforcement duties since 15 January 2015. They would normally be undertaking other environmental tasks at this time of year. Instead, we have had to ensure not just compliance with the new legislation but also to make anglers aware that it exists. Many anglers would not have known otherwise.

4) To what extent would websites help?

It was not mentioned at the meeting, but the committee should be aware of a website called www.fishpal.com and its subsidiary sites such as www.fishtay.co.uk. This existing, privately run, website, provides a very detailed service, mainly but not exclusively covering salmon fishing. Many of Scotland's rivers are involved with this site. The Tay has been involved since 2004 and most of the main fishing beats on the river have a presence on this site. Fishpal provides a wealth of information ranging from daily reported salmon and sea trout catches, twice daily updated

waterlevels from SEPA gauging stations, fishing availability and online booking facilities. It is now the single biggest source of information on Scottish salmon fishing and has become very popular with anglers. It has been a major benefit to the Tay and has made some difficult to access fishing now freely and easily available. The service itself probably could not be massively improved on as a concept but coverage by this or a similar website still has room to increase. Certainly, it would be a mistake to think that web based angling promotion in Scotland requires invention from scratch. That is very much not the case.