Written submission from the Tay District Salmon Fisheries Board

The Tay District Salmon Fisheries Board welcomes the opportunity to comment on the Aquaculture and Fisheries Bill.

However, as our views have been comprehensively addressed by the Association of Salmon Fishery Boards we refer you to that response, which we endorse, rather than repeat them in detail.

In addition we wish to draw attention to the part of Section 20 concerned with Members Interests, particularly the part headed 46E(2)(e). As the majority of members of DSFBs are proprietors of salmon fishing rights with interests in their respective fisheries, a DSFB could not function if members are excluded from taking part in the board’s consideration of all business in which members have relevant financial interests. Clarification of what constitutes a relevant interest is required therefore. A distinction should be made between a fishery interest and a non-fishery financial interest (e.g. where a board member might have an interest in an activity that might impact on the protection and improvement of salmon fisheries such as hydro electric development, agriculture etc). Section (e) should only apply in the latter case.

We also wish to emphasise the concerns raised by the ASFB in relation to Section 25 of the Bill. We do not think it proportionate that a Board, made up of volunteers, should be criminally liable for the failure to monitor certain orders. This would especially be the case where an order was taken out by Scottish Ministers at their own hand. That would clearly be unfair and would, we believe, be a deterrent to volunteers wanting to serve on boards.