

Scottish Branch response to Wild Fisheries Review – July 2014

The Institute of Fishery Management's Scottish Branch (IFM) welcome the opportunity to comment on the Wild Fisheries Review.

IFM is an international independent professional body representing the interests of fishery management. Scottish Branch exists to promote sound, evidence-based fishery management in Scotland, promoting best practice in all areas of management. IFM has no vested proprietorial or economic interest in fisheries, and as such is able to take an objective view based on good science and best practice.

Our over-riding interest is that fundamentally, all fisheries must be managed on a sustainable basis, using the best available data and information to support management decisions. We are aware that some decisions may, at times, compromise the economic and social benefits of fisheries; however we emphasise our view that for fishery management to continue to progress, any new management system must have at its core the key principle of sustainable management of Scotland's native fish stocks. The economic and social benefits will be a natural consequence of well-managed fisheries.

Leadership and Governance

At the heart of an effective management system is its governance structure (the central coordinating mechanism). This needs to be able to provide strategic leadership, direction and monitor progress in a manner that links clearly to the outcomes sought.

Question 1 – Please give us your thoughts on the kind of governance structure that you believe might best achieve this, including how best to ensure a direct line of sight back to Scottish Ministers and the national public interest. Thoughts on whether there may be an existing public body or similar organisation that might be adapted to assist with this task would be helpful.

IFM supports the concept of a central and national governance structure which works in two directions – 1) to provide strategic direction to local, all-species fishery management delivery in Scotland, and 2) is also positioned to provide international accountability in relation to wider management issues. This would be most effectively delivered through 2 levels of management. As the top tier, a national, central unit would promote national priorities. We would view these 5 priorities as – applied fisheries science – data collection – fisheries enforcement – marketing and promotion – licensing of management activities and other interventions. We would anticipate that the national priorities would be delivered regionally through local organisations (see Q.2), which would achieve local buy in. We do not view the central unit as identifying priorities in isolation or promoting these in a top-down manner. Priorities should also be identified regionally and co-ordinated centrally. Through appropriate centrally-driven protocols, incentives, planning and co-ordination, national co-ordination of priority should ensure efficient, consistent and accountable regional fishery management. The central body should have the power to intervene if a regional body does not deliver.

There needs to be sufficient expertise at any Central Fishery Unit and it needs to be truly independent, and not acting under the authority of any existing agency – for example MSS, SEPA or SNH – none of which have a formal remit for fisheries management. To accommodate the above there needs to be adequate funding available to deliver a system “fit for purpose” in the 21st century.

The local management units also need to be staffed effectively to deliver meaningful management. The number of these FMOs should be significantly smaller number than the current number of DSFBs – maximising economies of scale. This needs to be balanced against the potential loss of local support.

Management and Delivery

There is no reason to assume that delivery of wild fisheries management on the ground needs to be through the same organisation as higher level leadership and governance. Indeed the current DSFB system benefits from significant delivery through trusts and other mechanisms, often harnessing considerable voluntary effort.

Question 2 – Please give us your thoughts on the sort of delivery mechanism/s (public, private and/or third sector) that might be appropriate here, with particular emphasis on the characteristics highlighted in the April progress bulletin. Thoughts on how this might link back to the governance structure would also be appreciated.

The strategic priorities identified nationally should be mirrored in regional bodies. Both central and regional bodies must have adequate staff and resources to service each of the 5 priorities identified above.

To deliver accountability and consistent regional management, IFM consider that an incentivised form of fishery management planning, developed by the regional body and promoted by the central unit, would be appropriate. Funding to support the delivery of national priorities could be provided on the basis that these priorities were delivered regionally to acceptable standards and reported back to the national body. A planning cycle of reasonable duration (ie 5 years) could give funding security to those delivering regionally, and allow sufficient time for management to be evaluated and audited.

In terms of the constitutional make-up of the regional bodies, it must clearly be capable of providing both accountability to local interests and to the national body. It is critical that it must maintain and develop local support and participation, and be given support by the national body. We believe that the constitution of all regional bodies should be consistent, and we are attracted to the idea of bodies with charitable status or a charitable arm, but must clearly be able to deliver statutory duties. Charitable structures are already governed by regulation so there would be no need to prescribe new legislation. A more detailed prescription on what these bodies should do could be prescribed through memorandum or protocols, with bodies satisfying those protocols being incentivised with funding support.

IFM strongly support the inclusion of the SFCC in helping to support the collection/collation and dissemination of fishery data in the future. The SFCC needs to be managed under the new central fisheries unit and supported to do so.

Resourcing

Integral to effective governance and delivery is the matter of resourcing. Several options are possible for income generation, including modifying existing mechanisms and/or creating new ones. On the expenditure side a number of issues need to be considered, including those defined in the April progress bulletin and the wider issue of how best to ensure effective coordination of resource deployment.

Question 3 – Please give us your thoughts on both income generation and resource deployment, bearing in mind the characteristics implied in the April progress bulletin. Ideas about potential new income sources, and suggestions about how best to ensure that resource deployment aligns fully with national and regional strategic priorities, would be much appreciated.

An ambitious funding and resourcing strategy for any new structure is absolutely critical if Scotland is to improve the way we manage all freshwater fisheries. We believe that a multi-faceted approach should be taken to achieve this. We have summarised this below:

- A national rod licence/levy to fund certain core activities which fall within the national interest. This could include fisheries promotion and development, involving social aspects of angling and encouraging participation amongst young people. Purchase of a licence might confer the right to fish on certain waterbodies (ie Scottish Canals) and would allow an unrivalled opportunity to both collect and disseminate information to many thousands of anglers and support tourism. The rod

licence would have a number of key benefits on top of the funding issue; a) clarify the policing of the resources, b) provide better data on the use of the resources (all species), c) Catch Per Unit Estimates, d) feedback mechanism for users and e) provide representation to non salmon anglers.

- An appropriate levy on fishery owners to support key management priorities as identified by the national and regional bodies.
- Funding support from other institutions where fishery management actions are in harmony with these – for example the Water Environment Fund and SRDP for habitat projects, Visitscotland for marketing and promotion work, SNH for conservation work, SportsScotland for angling and youth development, Industry – for example renewable energy providers (ie current contribution from SSE) etc. Clearly, viable and productive partnerships would need to be developed (where they do not exist already), however there is huge potential for the regional bodies to act as delivery agents for these funding programmes.
- Charitable monies raised by regional bodies to deliver regional/local priorities.

Crosscutting Issues

A number of issues that we will need to consider do not fall neatly under any of the above headings. The system adopted must have international support and confidence. Working relationships across the system must be constructive and collaborative. The system must encourage greater public awareness and participation.

Question 4 – Please give us your thoughts on these and any other issues that you think are of relevance.

Training and Continued Professional Development - We believe that there is a clear role to ensure that national co-ordination of training and continued professional development are given a high priority. This will be pivotal in ensuring that the new structure is supported by professional standards. IFM has undertaken work in this area and has already developed and operates a CPD system – as such, the experience of IFM in this area would be useful.

Commercial Stillwater Fisheries - We fully support management of all fish species being delivered through this structure. We also believe that this should include commercial still waters in terms of the opportunities they provide for angling development.

Salmon Conservation and international obligations - To gain international support, Scotland needs to look at what is required internationally. NASCO has asked for all nation states to produce Conservation Limits (CLs) – Scotland has notably failed to produce CL limits on over 99% of all our rivers. This situation could be improved if we moved from an academic science perspective to a more pragmatic fishery management approach using the data that exists and the precautionary principle to deliver solutions. Working relationships across the system could be massively improved nationally by recognising the huge benefits of resourcing and supporting the Scottish Fisheries Coordination Centre (SFCC). The SFCC was established in 1997 to bring together the best of the private and public sectors to deliver better local fisheries management and simultaneously provide data to allow for better national decisions from an evidence based approach.

To underpin the SFCC and the collection, collation and dissemination, a number of protocols have been developed- these need to be added to and appropriate training maintained and developed.