

Board,

It is clear from the numbers that action needs to be taken to protect and promote Sea Trout on the river Annan and it is pleasing that the board is taking action in this regard. I am therefore happy to support the proposals.

Notwithstanding this, I do urge the board to consider the following:

- will a compulsory policy lead to an issue of unrecorded catches?; and
- given a high proportion of rod caught Sea Trout caught over the last 5 years have been returned, does the board consider this policy is likely to have a material impact?

I think it important that this policy is implemented as part of a suite of measures including investing in research to better understand the issue and promoting breeding habitats.

Kind regards

(Angler)

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Thank you for this opportunity to allow the angler some sort of input in the regeneration of once such a prolific sea trout river as the Annan.

Would it be too much to ask the board, for them to stop all fishing, for as many seasons as required and concentrate on the cleaning and preparation of feeder streams and spawning grounds, to enable fish stocks to grow with limited disturbance to the main river and *then* impose a catch and release period.

Or on the other hand, introduce a voluntary maintenance programme to all the anglers who wish to fish the river, where they may have an input in the improvements required, not only to the preservation of fish stocks but if so desired help to maintain the paths and access routes to and from the riverside.

Thanks again and

best wishes

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I would be happy with catch and release for everything.

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Mary, I am only an occasional visitor to the Annan catchment but I would completely support a move to catch and release for sea trout to conserve and replenish stocks. Personally I would also like the catch and release regulations to be extended to grayling which provide winter sport on the river (although I realise that this is not the purpose of this current consultation)

Thank you,

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Hello,

Two of us have fished the Annan for the past six or seven years with varying degrees of success. I fully agree with the board's intentions. Thank you.

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Dear Sirs

Thanks for the e-mail - not sure who or where to e-mail based on this e-mail.

I have fished for sea trout and steelhead in both Iceland and North America and in all locations catch and release is practised to a far greater extent. Iceland in particular are world leaders in the conservation of their fish stocks and this is the only logical solution to the sea trout problem given the fishing pressure on rivers such as the Annan. Additionally you should be pushing for a "fly only" policy on sea trout and salmon as this will significantly reduce the damage to the fish and by definition will improve the fishing and environment for all participants both human and natural.

Let me know if this needs to be sent on anywhere else.

Regards

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Mary, cc Nick,

This is a comprehensive report and I wholly support the push for catch & release on the Annan. Great work by all those who have helped to put this together.

Best regards

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Hi Nick,

There's no email address included for the clerk of the board, but I'd just like to say that I think that C&R is a great move for the river. Anyone who has an objection to it is obviously too caught up in their perceived self interest to realise that the move is, in fact, being done in their interest by preserving the wild fish stocks.

If you don't allow the stocks to re-establish while they have the numbers to do so naturally, it will be a massive mistake, potentially losing the resilience and individuality of your native Annan population. I only hope that when you say, across all fisheries you include trout and grayling too. You state that there is already a very high C&R rate for them, but I bet the trout fishery improves further still, if that too becomes 100% C&R.

If exploitation on any fishery reaches an unsustainable level, whatever other impacts may be in effect, I for one would much rather see healthy, wild C&R fisheries that can still provide enjoyment for many, rather than needless exploitation by a few.

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Mary

To clarify the situation re Sea Trout restrictions

1. I personally am in favour
  2. The Upper Annandale AA is in favour.
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Dear Sir,

As a riparian owner on the adjacent River Nith I would like to fully support the initiative taken by The Annan Board to implement a Catch and Release compulsory policy for the River Annan. On our beat of the River Nith the Sea Trout catches have crashed in the last 20 years to a point where we are less than 10% of what we used to catch. I have implemented 100% catch and release on the Dalswinton beat and I am working hard to make the Nith catch and release record improve.

We are limited in the way in which we can help this endangered species and if a sea trout were a bird there is no doubt it would be protected.

Well done the River Annan and I hope you are successful in your conservation policy.

This is consultation response is written as a private reply as a riparian owner and not as a result of being part of any organisation.

Regards,

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In response to your letter of 6th September 2013 I can confirm that the owners of the Warmanbie Beat on the River Annan strongly agree with your proposal to request the Scottish Government to introduce regulations to make catch and release of all sea trout compulsory across the Annan Fishery.

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Nick,

Thank you for your letter dated 6th September 2013 in connection with the above.

On behalf of The Crown Estate I am able to report that they support your Board in addressing this important and sensitive issue. In the normal course of events The Crown Estate prefer the voluntary rather than the regulatory approach however if your Board conclude after the consultation that regulation is the only effective mechanism then The Crown Estate will support that decision. Associated with that decision however we would want to understand the timescales for the regulation to be in force and the milestones that need to be achieved for the regulation to be lifted. This being the case we would ask that we have an opportunity to discuss the outcome of the consultation with you before the Board take a final decision.

I look forward to hearing from you in due course.

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Hi Mary,

As a regular angler on the Annan, I would be in favour for catch and release for sea trout. Also I think the river Annan should be catch and release for all species. Lets keep the river thriving with life.

Cheers

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Thank you for the opportunity to comment on the Sea trout situation. personally i only fish for salmon on the Annan, but i have caught 2 herling over the last 5 years which i returned. I think as a first step catch and release must be tried, but also the nets must be persuaded to go that way also.

many thanks

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Dear Ms Colville,

Please include this response in the above consultation.

I have fly fished for Sea Trout in the river Annan on the Dormont Estate for a week in every year for the last 33 years, usually at the beginning of July.

I have read the published consultation documents, and I support the proposed Application, although I don't think it goes far enough.

It is clear that urgent legislation is needed to protect fast dwindling Sea Trout stocks which have been declining steadily for the last 30 years. The cause is not clear in my opinion. There is no evidence that I have seen to support the proposition that line caught fish has made any significant contribution to the decline in stock. I know from my own experience that Sea Trout are difficult to hook, and on average I have not landing netted more than 50% of fish hooked because of the soft mouths of fresh run fish and the vigorous fight they give. I also know from association with other regular line fishermen and records that Salmon stocks and line caught Salmon are burgeoning in that part of the river where I fish.

I have for the above reasons always suspected that commercial netting has been the principal cause and despite what I have now read, I am still of that opinion.

I have been glad to note that the proposed legislation would ban all removal of fish, but I am worried that the ban would be restricted to the Annan District fishery. The first page of the consultation paper indicates that the Solway is the source of many destination Sea Trout rivers, and the penultimate page states that the current sustained decrease in stocks extends to the whole of the Solway. Would it not be better and more effective conservation to ban all nets in the Solway from removing Sea Trout during the life of the order, and perhaps for a shorter period?

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Hi

I am emailing you instead of the Annan seatrout forum as it is a huge file and my PC will not accept it. Not ideal to encourage responses.

20 years ago 4 of us caught 100 seatrout in 6 days at the end of June. This year we fished the same beat for 6 days (Cleuchead) and caught 2. We hardly saw any fish but the 2 we caught were in good order but under 2lbs. It is an absolute tragedy and I agree there should be compulsory catch and release all season.

The decline of seatrout stocks nationally is an issue which needs addressing urgently.

Hi Mary.

After receiving the email on the sea trout consultation, i agree that something has to be done to protect the sea trout in the river Annan, and therefor agree wholeheartedly on a 100% catch and release for this species.

It is my honest opinion that this catch and release rule should be extended to salmon also.

Good luck.

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Hello Mary

Yes i think all sea trout must be returned to preserve them. Could we do more to encourage more anglers to return salmon there are a good number that do but we need more to return them. And to get more anglers on to fly fishing rather than spinning i know this will be difficult but we need to make a start at some point All the best

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I agree with the proposal for compulsory catch and release on the Annan but believe that more should be done to protect the spawning areas.

There should be a cull in the large number of fish eating birds on the river.

The river has seen an increase in large brown trout and a increase in grayling fishers at the same time as a decrease in Sea trout numbers.

I'd consider a change to the brown trout catch and release. These large trout must be causing damage to the number of young fry in the river. Do the large brown trout take the best spawning areas ?

There should also be tighter controls on anybody keeping rainbow trout anywhere near the Annan catchment area to stop any chance of them getting into the river system.

I'd also consider a stop to the grayling fishing to protect the spawning areas. Give the late running fish a chance to spawn with no disturbance. Only having compulsory catch and release is not enough.

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I agree with the Annan Board's application for compulsory catch and release for all sea trout caught in their area of jurisdiction by rod and by net fisheries, to be introduced on a sensible precautionary basis while annual catches remain so low. Similar concerns about low sea trout abundance are being expressed in several other areas of the country and anglers are now far more used to C&R being almost the norm. I think the Board can present a very credible case that voluntary measures are now seen as insufficient and more drastic action needs to be taken urgently to help conserve adult spawning stocks.

No doubt there are many factors involved in the sea trout decline in the Annan, as elsewhere, but compulsory C&R seems to me at any rate to be a sensible holding measure

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With the

(seemingly) sensitive C&R proposals live presently it seems vital to me that emotion is put aside and people understand that with the stock under threat the first step in securing its future is to stop killing it.

Regards

02/10/2013

Dear Mary,

I would like to write in support of the proposal by the River Annan District Salmon Fishery Boards proposal to apply to the Scottish Government to make catch and release of sea trout on the river compulsory for a fixed time period.

The River Annan used to be one of the finest sea trout fisheries in Scotland and large numbers of anglers used to visit from afar to enjoy the sport. There has however been a significant reduction in the numbers of these fish being caught over the last 15 or so years. This is starting to affect the number of anglers visiting the area which will have a significant effect on the local economy. In a rural economy like Annandale the fishery is an important economic driver that supports jobs in a wide variety of service sectors. My own fishery has been 100% catch and release for a number of years now and the anglers continued coming until recently. It is not putting fish back that has been the issue it is the relative scarcity of the fish that has turned them away. We still have anglers fishing for other species, again largely catch and release and have found that the visiting anglers we have are more than happy to return them.

It is essential that we ensure as many sea trout as possible survive to spawn and catch and release is the only way that this can be achieved. It is also essential that this is applied fairly across all of the fisheries, rod and line and net.

There are international success stories where this practice has been one of the factors that has turned around sea trout fisheries. The classic example is in Chile where the catch and kill fishery only provided marginal economic benefit to the local economy of Southern Patagonia. Since the advent of largely catch and release policy this fishery has become one of the most important sea trout fisheries in the world and the area derives a huge amount of inward investment from overseas fishermen.

We all want the sea trout fishery on the Annan to be of major economic importance to the area, it is difficult to see how this will happen if we do not allow sufficient fish to spawn to replenish the stocks. There are of course other measures that need to be undertaken in particular we need to invest in the habitat of the fishery and remove barriers where appropriate. This work appears to be ongoing, catch and release should be regarded as an **essential** part of a suite of measures.

Mary Colville, Clerk  
RADSFB Office  
St Ann's  
Lockerbie  
DG11 1HQ

Dear Mary,

**PROPOSED FIVE YEAR BAN OF THE KILLING OF SEA TROUT**

I am writing to add my strong support to the sea trout legislation proposed by the River Annan and District Salmon Fishery Board.

**The numbers speak for themselves** – the steady decline over many years must be arrested if possible and whilst we can't influence what happens to migratory trout in the sea, we can try and protect them in the river system.

At the recent Celtic Sea Trout Project presentation in the Easterbrook Hall when asked the question "what can we actually do to make a difference and halt declining sea trout stocks?" the panel answered "practice catch and release". Virtually all "sea run trout" are female, so the benefits of release are obvious.

Humans have a huge influence over nature and from time to time we must show constraint. Stocks have declined to a level beyond introducing a voluntary code, and it is therefore time to be responsible and introduce compulsory C&R for five years to give sea trout numbers a chance to recover to the levels of 15 years ago. If it doesn't succeed, at least we tried.

If our sea trout numbers keep declining the rod anglers will get bored and drift away. That would be very bad news for a local economy that is already depressed enough.

A five year moratorium will be to the benefit of all, but most of all, our sea trout.

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2.10.13

Dear sir/madam,

Firstly, thank you for providing the opportunity to comment on the proposed compulsory catch and return for sea trout on the river Annan by rod and net fisherman.

I resolutely support this proposal, and would like to congratulate all who have been involved latterly in nurturing the Annan game fishery. Having lived and worked in the region for 27 years, including a considerable spell as the Head of the Fisheries Department of Barony College, it is heart warming to see that the Solway fisheries, and particularly the Annan, are being managed with such dedication, good sense and consideration to the angler. Most importantly, 'sound fishery science' as opposed to folk lore and hearsay has underpinned the entire management plan for many years.

However, it is clear to anyone with a basic knowledge of fishery management when judging the facts, that the Annan's sea trout stocks are perilously close to collapse, and therefore radical action must be now be taken urgently. The imposition of compulsory catch and return is the most important fishery management policy required to 'catalyse' a recovery phase for the sea trout fishery, and a logical next step. This action will provide the bedrock upon which the the other excellent management practices being rigorously pursued, such as mink control and habitat improvement, to bear fruit more quickly. For the foreseeable future, every spawn bound female must get to the spawning redds, so as every ova can be fertilised and laid down by the fish as the seed corn of recovery.

The Annan Fishery Management team have always attempted to be fair to all parties. They encouraged the net fishery to cooperate with sea trout catch and return in the past, and to their great credit, the net fishery responded. What a missed opportunity it was that anglers did not fully reciprocate in 2006. To have done so would have supported the dedicated Annan team who work so hard on their behalf of anglers. They deserve no less. Catch and return could have become universally recognised as the way forward, voluntarily. Unfortunately, the world is rarely so Utopian. It has been commendable that the Annan team made all attempts to introduce voluntary catch and release to date, to avoid what may be seen as 'Draconian action'.

However, with the scientific evidence pointing to 5 of the worst catch returns on record all falling within the last 6 years, voluntary action is clearly no longer sufficient, and I urge all involved to make the decision to adopt compulsory catch and return immediately, and to uphold this policy until it is clear that stocks have risen back to a level where by a sustainable yield can be reasonably expected. In other words, when there are significantly more returning adults than are needed to fully stock the spawning redds and nursery streams with viable ova and fry. As the sea trout fishery currently stands, it is likely that the redds and nursery streams are vastly underutilised, as there will be

insufficient brood stock to recharge them each year. Continued cropping of a diminishing brood-stock under these conditions will maintain the current low stocks at best, or drive them down even further at worst. That is an avoidable travesty, and it must not be allowed to happen. The impact of catch and return on the Annan Brown trout stocks ought to be sufficient evidence alone to convince any doubters of the impact catch and return can have on stocks. The data speaks for itself.

The former Barony College (currently SRUC Barony campus) have been actively involved over the years assisting the Annan with habitat surveys and hatchery work. I fully agree with the switch of emphasis to habitat creation, but would like to explore how we create greater incentives to match the 'can do attitude' of many American fisheries, and get more anglers and their friends and families out to help with practical fishery improvement works. Once compulsory catch and return is established, hopefully with the blessing of both anglers and nets men, the debate needs to quickly move on. What can be done to engage communities in proactive management of their local freshwater fishery resource? Community engagement including very good work at school level has been growing markedly in the Annan locale. With recruitment of more man and woman power, and by distributing the leadership, can we raise more hands on deck to help to clear the mink and build new habitat than is currently the case? Let's hope so, as then catch and return can bear even greater fruits.

In summary, I believe that the River Annan is a true jewel, and I would dearly love to see the sea trout fishery rise to the same heights as the brown trout fishery has. If the brown trout fishing on the river Annan in the spring and early summer were complemented by the return of strong runs of their flashy, temperamental and exciting sea fed cousins, just imagine what the game fishing standard could become. Bearing in mind the unusual tendency for the Annan sea trout to actively feed and rise to the fly during the day time, as well as move to the wet fly at night, the wonderful spring dry fly fishing for large Brown trout and the back end salmon run, the fishing could become a national and international treasure.

Aiming to attract a growing interest from serious British resident game fisherman is a start, but the Annan should be aiming to increase its share of global angling tourist market. The economic 'multiplier' effects of serving this fraternity of well healed, 'globe-trotting' anglers are well proven, and many SMEs within the region's service sector would share the spoils, directly or indirectly. The recovery of the sea trout has a big part to play in achieving this vision.

Thank you again for the opportunity to contribute to this consultation, and I wish you well with this very sound proposal, and look forward to the introduction of compulsory catch and release of sea-trout across the entire Annan system and the salvation of the silver tourists.

Dear Ms Colville,

I write in response to the consultation on the proposal for compulsory release of all sea trout in the Annan District.

The Wild Trout Trust is a registered charity dedicated to the conservation of the trout *Salmo trutta*, in its various life history forms, including sea trout, across the British Isles; we have worked with angling, fisheries and conservation groups north and south of the Solway. The Trust seeks to apply science to protecting and improving trout populations, especially through habitat enhancement.

It is becoming ever-more apparent that a trout is not just a trout and that there is tremendous variety in the genetic make-up of trout populations around the British Isles, quite possibly a reflection of local adaptation. There is evidence through the Celtic Sea Trout Project that this is the case in the Irish Sea, including the Solway Firth (<http://celticseatrout.com/project-updates/a-short-summary-of-the-celtic-sea-trout-project-at-august-2013/>). Furthermore, where studies have been conducted (e.g. on the Dart in S-W England or Lough Corrib in Western Ireland), it appears that within a given waterbody (for example, different tributaries of the same river) trout populations are genetically different, perhaps adapting to the very specific, local environment. Practically, this could mean that a particular population of trout can survive in a particular burn because they can cope with the acidic conditions that that burn has, whereas the trout in a nearby burn with different water chemistry could not live in the more acidic burn. Something happening in that burn (e.g. destructive dredging or a pollution event) could seriously endanger the locally-adapted population with limited chances of recolonisation. The sea trout's life history is designed to counteract such events by putting some of the population out to sea, but survival of locally-adapted populations requires numbers of those sea trout to make it back to spawn (mostly) in their home river. In the case of the Solway, it is likely that a sea trout is not just a sea trout but that fish from different rivers (and maybe individual home burns) are moving around and feeding in the same area of sea. So, net fisheries are taking fish from (possibly) many rivers but it is also very possible that sea trout are being taken from populations that are already facing severe challenges to their survival. Within a single river, rod fisheries could be catching returning sea trout that are heading upstream to burns where every single fish is needed to spawn and contribute to subsequent generations. Currently, very little is known about the make-up and relative strength of sea trout populations in the Solway.

The status of sea trout populations in the Solway can only be gleaned from net and rod catch statistics and anecdote and whilst hard evidence is scant and equivocal, the general picture is of decline. The North Atlantic Salmon Conservation Organisation (NASCO) defined the *precautionary principle* whose requirements include

- a) consideration of the needs of future generations and avoidance of changes that are not potentially reversible;
- b) prior identification of undesirable outcomes and of measures that will avoid them or correct them;
- c) initiation of corrective measures without delay, and these should achieve their purpose promptly;
- d) priority to be given to conserving the productive capacity of the resource where the likely impact of resource use is uncertain;
- e) appropriate placement of the burden of proof by adhering to the above requirements.

NASCO note that "the absence of adequate scientific information should not be used as a reason for postponing or failing to take conservation and management measures" and this principle has been widely welcomed in fisheries management, not simply for salmon. Therefore, in protection of Solway sea trout, mandatory catch-and-release makes complete sense in the application of the requirements of the precautionary principle.

There are genuine concerns amongst fisheries and conservation interests along much of the west coast of Scotland (and in many other areas of the British Isles) that sea trout populations are in peril; we have seen that sea trout populations can be extremely vulnerable to harm, as evidenced by population crashes at various times along the west coasts of Scotland and Ireland. There are some population pressures about which we can do something immediately (e.g. exploitation from rods and nets) and some large-scale pressures where high-level, long term political solutions are required (e.g. catchment land use or climate change). Survival rates of salmon and sea trout handled and released carefully after rod capture are high and catch-and-release of salmon has become accepted and standard practice in many parts of the British Isles as a stock protection measure. Whatever evidence is available suggests that sea trout populations in Solway are in decline. Whilst that picture is made clearer and other work is ongoing to improve life for sea trout (e.g. habitat work in rivers), the Wild Trout Trust fully supports the introduction of mandatory catch-and-release for both the net and rod fisheries.

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Hi there,

I believe that any body who fishes the Annan should support this proposal as a necessary conservation method and dare I say it should be looked at for salmon as well, however, I do feel strongly that the anglers and to some extent the haaf netters are easy targets in this proposal as it would appear the data has been gathered from the main culprits in the decline of west coast fisheries, the governments of both parliaments. What an opportunity was missed/ignored by the Scottish parliament to reverse the decline of a precious natural resource instead of decimating it further still.

I have fished the RFT stretch for 10+ years and have noticed a mark decline in each year of both sea trout and salmon, despite what is read on fish pal and in trout and salmon, this is born out by fishing, in the case of sea trout, 2 nights a week when I appear to be the only person out, as between may and July I never met another sole. My observations are borne out of bitter experience, though I was happy with the quality of the brown trout fishing which was excellent.

A start has to be made somewhere though and as long as everybody enters into the spirit of the trial, and more pressure brought to bear on, in my opinion, the main culprits, hopefully numbers will recover.

Yours sincerely

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Please quote the reference number below when contacting the office:

Our ref: RY/S205



Nick Chisholm  
Director  
River Annan DSFB  
Annandale Estates  
St Anns  
Lockerbie  
DG11 1HQ

3 October 2013

Dear Nick

**Re:- Sea Trout Conservation Measures**

I write on behalf of Fish Legal in support of the Board's application for sea-trout conservation measures in the Annan District.

It is regrettable that there is the need for such measures but the evidence presented strongly suggests that sea trout stocks are at dangerously low levels. In the circumstances compulsory return of all sea trout may be a decisive factor in helping numbers to recover to a level where a sustainable harvest can once again be taken. In short we believe that the 'short term pain' of such a conservation measure is more than justified by the 'long term gain' of the prospect of recovery of sea trout stocks. We would expect that suitable monitoring will be put in place to ensure that this measure is in place for no longer than is necessary.

Salmon Fishery Boards are obliged to protect and enhance salmonid stocks in their districts and we believe that this application is consonant with this obligation.

Yours sincerely,

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I wanted to drop you a note to give a view on your proposed catch and release initiative for Sea Trout in your catchment area.

AS CEO of FishPal I am in constant communication with River Boards, River Trusts, Owners of beats on rivers and of course, anglers themselves. A common theme of late has been the alarming reduction in Sea Trout catches in rivers across Scotland in recent years.

Early problems in the North West of Scotland rivers where previously there was undeniably some of the finest Sea Trout fishing in the world are now being seen in other once prolific Sea Trout rivers across Scotland, not least the Annan.

Anglers who were once dedicated Sea Trout fisherman are no longer fishing for their beloved Sea Trout in the way they once did. Declining catches are at the heart of this problem and of course, the loss of revenue to any one rivers infrastructure as a result of anglers not returning to fish, is extremely worrying.

Sea Trout stocks are now at an all time low and I would go as far as saying that the very future of Sea Trout being in our rivers is something we should all take seriously.

I appreciate that there are many initiatives that can help increase the number of Sea Trout in our rivers from the very habitat that they survive in through to educational programmes to anglers, owners and beyond. One of the most obvious actions we can all take is to introduce a 100% catch and release policy for all net and rod caught Sea Trout - surely when the very existence of a species is in question this is the very least we can do and an obvious first step?

I would whole heartedly support a 100% catch and release policy for Sea Trout. We have seen the benefit to Salmon fishing in introducing a similar approach at certain times in the year and we must surely learn from this best practice.

Regards,

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Dear Mrs Colville

I wish to comment on the River Annan DSFB consultation regarding compulsory release of all sea trout. I have fished on the Annan for sea trout and salmon over a number of years. Sea trout stocks, as illustrated in the provided graphs, have fallen in recent years and now are at a historical low. This trend is common across Scottish rivers (and I believe UK wide) suggesting a common problem presumably in the marine environment. If, by returning rod caught sea trout, roughly an additional 500,000 eggs will be spawned into the river and its tributaries then I think this is an excellent conservation measure. These eggs will be naturally spawned which will give the best overall survival rates. It is well known that sea trout life history is very complicated and there is a risk that well intended actions may discourage trout from migrating to the sea and instead remain as brown trout in the river. Keep things as natural as possible! The fish will naturally utilise available habitats themselves.

If it does become compulsory to release sea trout then I do feel that it is important that the Annan DSFB put into place a robust monitoring strategy to understand how these measures impact on the sea trout population over the 5 years. Presumably densities of juvenile fish and size of adult sea trout should start to increase. I know that these proposed measures will not be supported by all anglers but I am sure that if it can be shown that real recovery does occur then it will be worthwhile to help return the river as a top destination for sea trout anglers.

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2<sup>nd</sup> October

Dear Sir,

I would like to write to the Annan Fishery Board to lend my support to the initiative to bring in catch and release for all sea trout caught in the River Annan.

I believe that it is a valid measure to preserve and enhance these stocks of wild fish

yours Sincerely

Mary Colville  
Clerk, River Annan and District Salmon Fishery  
Board  
Fisheries Office  
St Ann's  
Lockerbie  
DG11 1HQ

Dear Mary,

**Consultation on sea trout conservation measures**

Formed in 2005, Rivers and Fisheries Trusts of Scotland (RAFTS) is an independent freshwater conservation charity representing Scotland's national network of 25 rivers and fisheries Trusts and Foundations. Our members work across over 90% of Scotland's freshwaters to protect and develop our native fish stocks and populations by undertaking a range of activities including freshwater and river habitat restoration, fish and fisheries monitoring, research and education programmes. RAFTS is the membership organisation of the fisheries and rivers trusts operating in Scotland and is, itself, a charity and company limited by guarantee.

RAFTS are aware of on-going regional problems with sea trout populations in parts of Scotland. We fully support the application of conservation measures on fisheries where this is justified; RAFTS wish to support and endorse the approach proposed by the Annan District Salmon Fishery Board (Annan DSFB) in its consultation on proposed compulsory catch and release of sea trout in the Annan District. In supporting this proposal, RAFTS notes that the Annan Board and Trust have considered a range of issues and evidence which have supported the decision to consider compulsory catch and release – these include:

- The reference to historic catch data from both rod and net fisheries and the trends identified within those;
- The effectiveness of catch and release on the Annan brown trout fishery;
- The use of the methodology contained in the rod catch assessment tool which clearly demonstrates a need for management action;
- Evaluation of the contribution catch and release would make to the Annan sea trout population.

RAFTS recognise that the cause of population declines with fish populations is often multi-factorial, and that any conservation response will have to be strategic and deal with a range of factors. It is clear from the consultation that the Annan DSFB, in conjunction with specialist advice from the Annan Fisheries Trust, are looking at this holistically, and that the strategy includes a range of other measures, including habitat restoration, barrier removal and control of invasive, non-native species.

As such, RAFTS support the proposals contained in the consultation as an important component of a wider strategy to conserve the sea trout populations in the Annan catchment. Should the proposals move to a formal application to Scottish Ministers, RAFTS again would be minded to support and endorse this at that formal stage.

Yours sincerely,

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**4 October 2013**

Mary Colville  
Clerk, River Annan and District Salmon Fishery Board  
Fisheries Office  
St Ann's  
Lockerbie  
DG11 1HQ

Dear Mary,

The Association of Salmon Fishery Boards is the representative body for Scotland's 41 District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), who have a statutory responsibility to protect and improve salmon and sea trout fisheries. Conservation of fish stocks, and the habitats on which they depend, is essential and many DSFB's operate riparian habitat enhancement schemes and have voluntarily adopted 'catch and release' practices, which in some cases are made mandatory by the introduction of Salmon Conservation Regulations. ASFB create policies that seek where possible to protect wider biodiversity and our environment as well as enhancing the economic benefits for our rural economy that result from angling.

ASFB wish to support and endorse the approach proposed by the Annan District Salmon Fishery Board (Annan DSFB) in its consultation on proposed compulsory catch and release of sea trout in the Annan District. In supporting this proposal, ASFB notes that the Annan Board and Trust have considered a range of issues including: an analysis of the trends from historic catch data from both rod and net fisheries; the effectiveness of catch and release on the Annan brown trout fishery; use of the rod catch assessment tool; and evaluation of the contribution catch and release would make to the Annan sea trout population.

ASFB recognise that the pressures underlying population declines in fish populations are often multi-factorial, and that any conservation response should deal with a range of factors. However, it is sensible to consider reduction in exploitation in the first instance, whilst also taking steps to ensure that other pressures are identified and ameliorated where possible. It is clear from the consultation that the Annan DSFB, in conjunction with the Annan Fisheries Trust, are taking a holistic approach to management, and that a range of other measures, including habitat restoration, barrier removal and control of invasive, non-native species have been identified and action is being taken to mitigate these issues.

On that basis ASFB support the proposals contained in the consultation as an important component of a wider strategy to conserve the sea trout populations in the Annan catchment. Should the Annan DSFB elect to move to a formal application to Scottish Ministers, ASFB would be fully supportive of such action.

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Mary Colville  
RADSF B Office  
St Ann's  
Lockenore

3<sup>rd</sup> October 2013

Dear Ms Colville,

Proposed Ban on the Killing of Sea Trout.

With reference to the recommended ban on the killing of sea trout proposed by the Annan and District Salmon Fisheries Board I writing to give this my strong support.

The decrease in numbers over the years can only be corrected by strong action as proposed by the five year moratorium proposed by the Board

Yours sincerely,