

# Consultation on Proposed Conservation Measures to Introduce a Licensing System for Killing Wild Salmon in Scotland, consultation ending 29<sup>th</sup> October 2015.

## Representations made by the River Annan District Salmon Fishery Board

### **Conservation Limits**

As has already been recognised by Marine Scotland Science, the system of using rod catch data to assess adult recruitment and attainment of Conservation Limits has fundamental flaws. It is essential that a model is developed that will not be biased by the intricacies associated with catching Salmon using rod and line. We are not alone in expressing concerns that CLs have the potential to initiate a perpetual cycle where rod effort and resulting catches decline thus preventing an upgrade of the designated category.

The model must be capable of considering a range of biological factors that will vary on a catchment specific basis. The time and resource required to develop a suitable model will be considerable and should not be underestimated by Scottish Government. There is a large body of biological data that has been collected historically by the Board/Trust network and in future these organisations are best placed to collect relevant data to input to the accepted modelling system once it has been agreed fit for purpose. This will place an additional burden on organisations that already operate within tight financial constraints at a time of great uncertainty. We have already experienced difficulty in securing funding for long term projects because of potential changes to our organisations associated with the Wild Fisheries Review.

### **Potential Loss of Income**

Quantifying any loss of revenue from angling as a result of being assigned compulsory C&R is challenging to predict. The River Annan has a positive history of voluntary C&R practice by anglers targeting all species, not just Salmon. Proprietors on the Annan hope (but are by no means confident) that as a category 3 river they will experience only a small decrease in the number of rod days being taken for salmon next season. It is anticipated permit sales would return to normal in future seasons if fish abundance and catches increase.

Our greatest concern is about short term economic impacts and how these could be perceived by fishing proprietors. There is a likelihood that proprietors will feel the value of their fishing has been debased by the new categorisations. The suggestion that there are insufficient salmon throughout a system to which their rights belong could raise questions about the valuations of fishing. Any proprietor successfully challenging the valuation of their rights will decrease revenue to fund Board operations.

It must be recognised that Angling Associations/Clubs are most at risk as they are heavily dependent on membership to raise funds and will cease to function if operating at a loss. The Upper Annandale Angling Association, which operates two beats on the Annan, has already experienced a considerable decrease in revenue as a result of adopting a voluntary C&R code. The loss of Association/Club water would contradict the ethos of 'Angling for All' as described within the review.

Throughout the consultation process, the River Annan District Salmon Fishery Board has been sensitive to the potential cessation of traditional haaf netting operations and subsequent socio-

economic losses in the Annan area. The Board requests that consideration is given to establishing a limited quota for haaf nets, commensurate to projected mortalities associated with fish caught and released by rod anglers.

### **Sea Trout**

As an angling resource sea trout were historically an important species on the Annan and other neighbouring Solway rivers. The Solway region has experienced marked declines in sea trout numbers since the late 1990s. Concerns among proprietors and anglers ultimately led to voluntary C&R code being introduced on the River Annan in Season 2014, demonstrating majority support for precautionary fisheries management approaches within our catchment. While we appreciate the scope of this consultation is to consider measures to protect Atlantic salmon, our concern is that by ceasing exploitation of salmon, there could be an increased burden placed upon sea trout, as anglers substitute the species retained.

It is essential that there is clarification regarding the status of sea trout in conservation proposals now and for the future. This topic will undoubtedly be raised in the near future and it seems prudent to have a definitive answer in place which outlines a strategy for protecting another fragile resource.

As all mixed stock netting will have to cease we assume that commercial fixed engine netting for sea trout would not be possible due to the indiscriminate nature of the method. Therefore, it would only be rod & line and haaf netting exploitation for sea trout within our jurisdiction. It will be necessary for new legislation to be absolutely clear on this matter.

### **Enforcing the New System**

Under the proposals it is likely there will be a necessity for a realignment of bailiff activity to monitor compliance by rod and line anglers. It will be important for fisheries organisations to engage with anglers to communicate and enforce the changes over the coming seasons. By increasing our presence on the banks of rivers it will distract bailiff resources away from other areas of operations (night patrols, coastal patrols etc.). Again, this places increased burden on our Board's resources. However, increasing effort to engage with anglers should not be considered a negative step and could be used to complement marketing of the fishery.

### **Wider Management Issues**

As outlined within the response from the Association of Salmon Fishery Boards, we fully support the need for the Wild Fisheries Review to consider the wider issues affecting salmon and sea trout stocks. Factors affecting migratory salmonids in freshwater and coastal environments are now widely understood and supported by research. Since 2009, at the Governments request, Fishery Management Plans have been produced by the Board/Trust network to identify catchment specific issues and recommend remedial actions.

Our concern is that at this stage of the review it will be very challenging to produce a meaningful document that gives a solid foundation for practical management at the local level when the policy to underpin any strategy is flimsy or as yet undecided. Furthermore, the requirement to produce Conservation Plans with no financial support at a time when the Wild Fisheries Review is rapidly evolving will require even more in-kind contributions from the Board/Trust network.