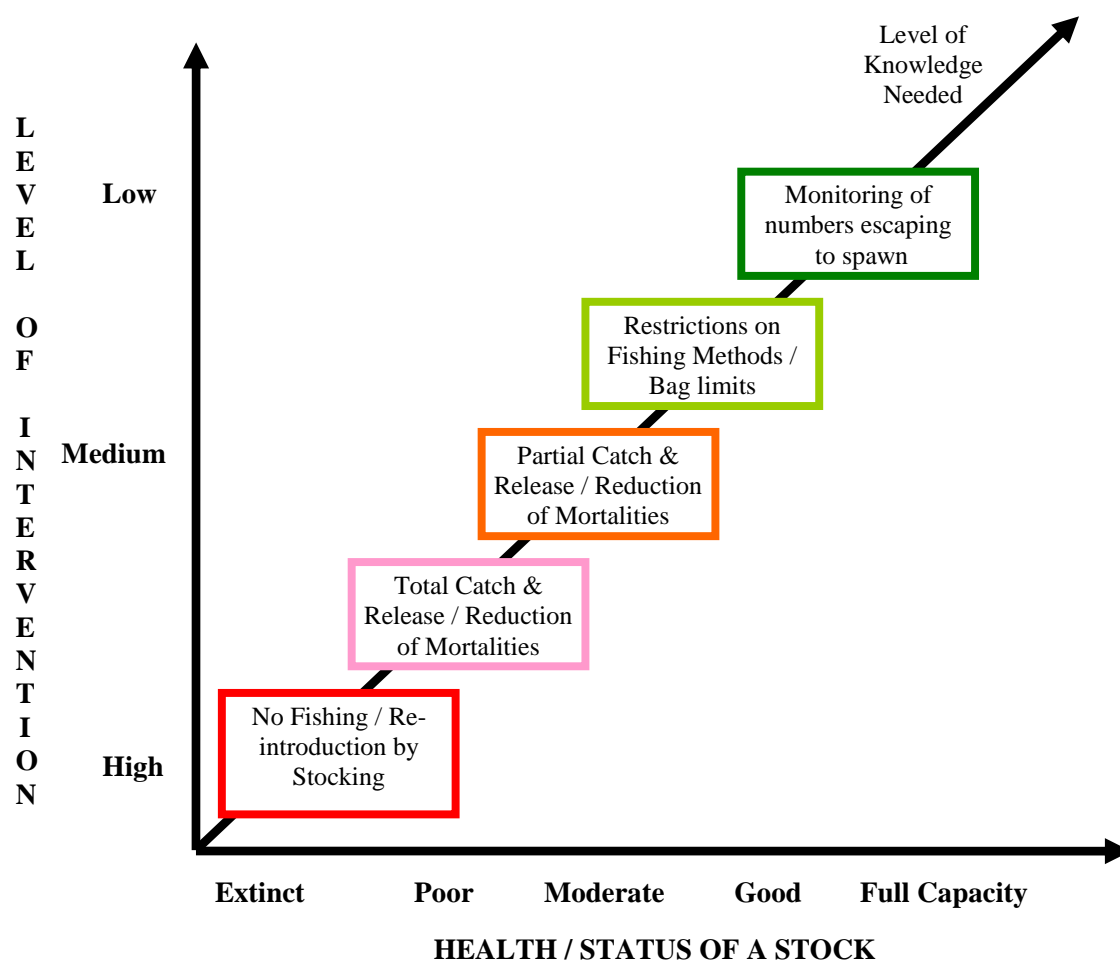


Annan DSFB has sought comments on their plan to introduce 100% catch and release for sea trout in the Annan District. Having read the accompanying document which clearly shows a worrying recent severe decline in recorded catches; the DSFB has a responsibility to act.

I have been asked to respond quickly to this consultation and I refer to IFM’s recently published Code of Good Practice of Fisheries Management (concentrating on Salmon and Trout) where the following diagram appears – showing the status of the stocks against the type of management intervention required. I would suggest the Annan sea trout stocks are probably at poor status (they are not extinct) and therefore require some significant management intervention to help. There is very little that can effectively be done to reduce exploitation and mortalities apart from closing the fishery or introducing compulsory catch and release.

I also agree C&R is the right measure on the Annan because the sea trout are multi spawners and by returning the fish (usually hens) one is not just protecting the spawning stock in a particular year but potentially over a number of years. The Annan stock is more typical of the long lived multi spawning West coast sea trout as opposed to some of the East coast fish that return less often to spawn and are short lived.

In addition to C&R other factors need to be addressed; habitat enhancement work which I believe the Annan DSFB is already addressing; reduction in predation of sea trout smolts and immature fish by sawbills and cormorants, which can have massive impacts especially in dry springs.



October 7th 2013

Dear Mary,

I am writing in support of the Annan & District Salmon Fishery Board's decision to apply for an order to make it compulsory for both rods and nets to return sea trout alive to the water in its jurisdiction for the next five years.

Firstly, please accept my apologies for this email being late, but the consultation was brought to my attention only recently and I have been making enquiries as to the reasons for the application, and the possible repercussions on fisheries.

The Salmon & Trout Association (S&TA) strongly supports the principle of sea trout conservation. Locally, official figures show that catches on the Annan have gradually declined over the past two decades, with five of the lowest annual catches on record being between 2006 and 2011. It is clear, therefore, that management intervention is required if the downward trend is to be halted. If it is not, the Annan's sea trout population is in jeopardy of complete collapse.

S&TA is an NGO party to the North Atlantic Salmon Conservation Organisation (NASCO) – I am co-Chair of the NASCO NGOs – and we are especially supportive of the use of a decision process in this instance that is based on a NASCO protocol. That protocol has been established after consulting the knowledge and experience of all Northern Hemisphere countries with wild salmon populations, and is considered as relevant to sea trout as to Atlantic salmon. If the decision process points to a diminishing population, then management intervention is a priority.

There will be economic consequences but, frankly, that has little relevance if the future prognosis is for a collapse in the sea trout population, which would lead to a zero economic input from the species. There is evidence that rod numbers are diminishing anyway, and this trend would almost certainly continue alongside a degrading sea trout population, as would catches in the net fishery. However, there is ample evidence that limiting exploitation through catch and release leads to increased spawning success of salmonid species. That, we believe, must be the logical starting point for management intervention to restore the Annan's sea trout population to a status which sustains the species into the future, and thus provides maximum benefit to the local economy as well as benefits to the aquatic ecosystem.

S&TA therefore strongly supports a five year moratorium on killing Annan sea trout in both the net and rod fisheries. Alongside that, we would support a monitoring regime which could track the population performance over the next five years and report as to the effectiveness of the catch & release order, which would form the basis of a review at the end of the 5 year term.

Once again, my apologies for being late with this consultation response, but I do hope you will see fit to include it in your deliberations.

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