



Association of Salmon Fishery Boards

Comments on the proposed national conservation regulation to protect early running spring salmon November 2014

Introduction

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), which have a statutory responsibility to protect and improve salmon and sea trout fisheries. The Association and Boards work to create the environment in which sustainable fisheries for salmon and sea trout can be enjoyed. 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 creates 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. An analysis completed in 2004 demonstrated that freshwater angling in Scotland results in the Scottish economy producing over £100 million worth of annual output, which supports around 2,800 jobs and generates nearly £50million in wages and self-employment into Scottish households, most of which are in rural areas.

Overarching comments

We welcome the opportunity to comment on the proposed regulations. This is an extremely welcome development which will go some way to protecting Scotland's fragile spring salmon stocks. However, we are concerned that the proposal does not go far enough to protect the spring stock component.

Specific comments

1. We support the specific proposals laid out in the notice and believe that this is a positive development. However, we remain concerned about the low numbers of returning spring salmon more generally and believe that further consideration should be given to additional protection of the spring stock component as the effectiveness of the conservation measure is monitored. This is particularly relevant in relation to rivers designated as SACs for Atlantic salmon. In the meantime we would expect the conservation policies of DSFBs, and any existing arrangements designed to reduce exploitation, to fully take into account the fragility of the spring stock component.
2. The notice makes reference to a delay in the start of the net fishing season until 1st April 'across Scotland'. We understand that this includes the nets within the Tweed District. We strongly support this as there is an equally strong case for spring conservation action in the Tweed District, as there is in the rest of Scotland.
3. We recognise that there is a balance between ensuring the conservation of Atlantic salmon whilst also taking into account the financial implications of any such conservation action on those who rely on exploiting such species for their livelihood. However, in order to have sustainable fisheries in the future, whether rod or net based, the future viability of spring salmon stocks must be ensured. We note that the situation in England and Wales is mandatory catch and release in the rod fishery until 16th June, with the opening of the netting season on 1st June.
4. The notice makes reference to 'early running spring salmon'. We remain unclear as to the precise definition of an *early running* spring salmon and whether the conservation status of early running spring salmon is distinct from later running spring salmon. It is our understanding that spring salmon are defined as those salmon returning to freshwater before the end of their winter slow growth period. This can be determined by reading fish scales and on that basis some of our member Boards will provide additional information, which we believe could contribute to the evidence base for any such decisions in future. It is

important that decisions on salmon conservation are based on sound evidence and the evidence from our members suggests that in order to fully protect the spring stock component, it will be necessary to reduce exploitation until significantly later in the season.

5. We would seek further clarification of what should happen to fatally wounded rod caught salmon. We are very happy to discuss this issue further if that would be helpful.

For further information please contact:

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