

Response ID ANON-289T-3MCR-C

Submitted to Salmon fishing: proposed river gradings for 2025 season
Submitted on 2024-09-05 15:11:43

Proposed conservation status for the 2025 fishing season

1 Do you agree with the proposed river gradings for the 2025 season?

I neither agree or disagree with the proposed changes

Please explain your answer:

Our members are better placed to comment on the specific gradings than Fisheries Management Scotland are, but we would like to offer the following comments.

The proposed river gradings show that since 2019, the number of Grade 1 rivers has fallen from 48 to 30, and the number of Grade 3 rivers has increased from 95 to 117. Fisheries Management Scotland is fully supportive of the need to ensure that exploitation within fisheries is properly controlled and sustainable. We take this opportunity to again highlight the considerable efforts by anglers and fisheries managers to protect Atlantic salmon. However, the very low impact the rod fishery has on wild salmon stocks means that the potential for these measures to have a significant effect in addressing the wild salmon crisis is extremely limited. Nevertheless, we continue to press the need for the continuation of proactive conservation action at local level and Fisheries Management Scotland are leading on an initiative to improve fish handling as part of catch and release best practice.

As we highlighted last year, these conservation measures sit in isolation from the wild salmon strategy and do not appear to drive any additional action at a national scale towards protecting and restoring rivers from the wide range of other pressures that salmon face (and that are much more important contributors towards the current declines). Unless and until these conservation measures actually catalyse positive and meaningful action beyond the reductions in exploitation (for example, through regulation that actively drives demonstrable improvements in environmental status), it is likely that stakeholders will continue to feel as if Scottish Government resources have not been used as effectively as they might be to restore Scotland's wild salmon.

With the above points in mind, and in the light of the IUCN classification of wild Atlantic salmon in GB as endangered, we would like to see consideration in the Wild Salmon Strategy Delivery Group about how we can take a more holistic approach to protecting and restoring salmon across Scotland. As we highlighted last year, we believe that the following points should be considered:

What role can the conservation measures play as a positive means to catalyse the restoration of wild salmon populations (recognising that this work is required across all river grades?

How can we measure success or failure?

How can we communicate to stakeholders what the specific grading that a river has, means in practice, and how do we ensure that the gradings are not misunderstood or misused?

What should the ambition for this process be, given that there remain widespread problems on Grade 1 rivers?

2 Please indicate your particular area of interest in the conservation assessment.

I am interested in the whole assessment process, I am interested in the proposed gradings for all of Scotland

Please explain your answer:

As the representative body for Scotland's District Salmon Fishery Boards we take a strong interest in the conservation and restoration of salmon (and other freshwater and migratory species). As highlighted above, our members are better placed to comment on the specific gradings on a district by district basis.

3 If you are mainly interested in a specific region, district, river or area please specify your area(s) of interest. You can use the examples below to help describe your area.

Please give details below:

4 Do you have any concerns about missing or incorrect data, such as catch returns or fish counter information, for your area of interest?

Not Answered

Please give details below:

File upload instructions:

No file uploaded

5 Do you have any concerns about being financially impacted by the proposed conservation status?

Not Answered

Please give details below:

File upload instructions:

No file uploaded

6 Do you foresee the changes to the conservation status having an impact on you or your business?

Not Answered

Please explain:

File upload instructions:

No file uploaded

Annan annual close time

7 Do you agree with the proposed amendment to reinstate the Annan early rod season?

I agree with the proposed amendment

Please explain your answer:

It is extremely unfortunate that the Conservation of Salmon (Annual Close Time and Catch and Release) (Scotland) Regulations 2014 were not amended when the Conservation of Salmon (River Annan Salmon Fishery District) (Scotland) Regulations 2012 expired. However, we strongly support the proposed amendment as it is crucial that this provision is reinstated in time for the 2025 season. This will ensure that a catch and release fishery can continue to take place with effect from 25th February 2025 and future years.

8 Do you have any concerns about being financially impacted by the proposed amendment to reinstate the Annan early rod season?

Not Answered

Please give details below:

File upload instructions:

No file uploaded

9 Do you foresee the amendment to reinstate the Annan early rod season having an impact on you or your business?

Not Answered

Please explain:

File upload instructions:

No file uploaded

10 What, if any, information did we not provide that would have been helpful in preparing an informed response to this consultation?

Please give details below:

Further comments

11 Do you have any further comments that you wish to add?

Please provide any further comments:

About you

12 What is your name?

Name:

Brian Davidson

13 Are you responding as an individual or an organisation?

Organisation

14 What is your organisation?

Organisation:
Fisheries Management Scotland

15 Further information about your organisation's response

Please add any additional context:

16 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

17 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

18 What is your email address?

Email:
brian@fms.scot

19 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

20 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:
Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:
Slightly satisfied

Please enter comments here.: