

Response ID ANON-3RAY-84WP-J

Submitted to Salmon fishing: proposed river gradings for 2026 season
Submitted on 2025-09-05 14:04:08

Proposed conservation status for the 2026 fishing season

1 Do you agree with the proposed river gradings for the 2026 season?

I neither agree or disagree with the proposed changes

Please explain your answer:

We are pleased to see a small improvement in the overall conservation status over the previous year (Improved for eight stocks compared to the previous year).

However, the proposed river gradings show that since 2019, the number of rivers classified as good has fallen from 48 to 32, and the number of rivers classified as poor has increased from 95 to 115.

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 – the vast majority of salmon caught and released in Scotland are done so on a voluntary basis. 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.

It is important that the Scottish Government place the impact of angling into context compared with the range of other pressures that wild Atlantic salmon face. It is clear that many stakeholders do not understand this context. Stakeholders should be given clear information as to the relative conservation impact of taking (possibly mandatory) action to reduce the remaining 2% of salmon killed by anglers (emphasising that this is 2% of the salmon caught, as opposed to 2% of the salmon returning to that river), in comparison with addressing the known and substantial impacts of barriers to fish migration, hydro-electricity, salmon farming, predation by birds and seals, agricultural and forestry impacts, water scarcity, mitigation of climate change impacts and a host of other developments and human activities. Far more needs to be done to address these pressures, coordinated across Government, if the wild salmon crisis is to be addressed.

We are concerned about inconsistency in the current approach to estuary netting, where killing of salmon is not permitted in category 3 estuarial waters (but still occurs), but killing of sea trout remains legal. This is an important issue that needs further consideration. In the light of the biodiversity crisis, significant and concerted action is required, not just to address pressures on the environment, but to fundamentally re-think how we license and regulate proposed activities and ensure that we properly address and regulate existing activities. In our view, the impact of anglers is insignificant in comparison with those other pressures and the consultation document has failed to recognise this point.

Nevertheless, we continue to press the need for the continuation of proactive conservation action at local level and Fisheries Management Scotland have delivered new guidance and a film resource to promote improved fish handling as part of catch and release best practice. We are pleased to see this referenced in the consultation.

As we have previously raised with officials, we are extremely concerned about the use of the conservation gradings system for other purposes, and we believe that there is a general lack of understanding on what the river gradings are telling us about the health of salmon populations. River gradings were designed to support decisions relating to exploitation within fisheries, rather than as a measure of general population health. It is vital that all government departments and agencies understand how these gradings should be interpreted, and whether or how they should form part of any decision-making process.

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

I am interested in the whole assessment process

Please provide further comments:

As the representative body for Scotland's District Salmon Fishery Boards, the River Tweed Commission and Rivers and Fisheries Trusts 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 provide further comments:

N/A

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 provide further comments:

N/A

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No file uploaded

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

Not Answered

Please provide further comments:

N/A

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

Not Answered

Please provide further comments:

N/A

Here you are able to upload a file to support your response'::

No file uploaded

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

Please provide details:

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

Please provide further comments:

About you

What is your name?

Name:

Brian Davidson

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Fisheries Management Scotland

Further information about your organisation's response

Please add any additional context:

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

Publish response only (without name)

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

Yes

What is your email address?

Email:

brian@fms.scot

Where did you hear about this consultation?

Scottish Government website

If other, please say where::

Evaluation

How satisfied were you with this consultation?

Very satisfied

Please enter comments here.:

How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?

Very satisfied

Please enter comments here.: