

Consultation on the 11 Proposed Joint UK Fisheries Management Plans for Demersal Fish Stocks

Respondent Information Form

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy: <https://www.gov.scot/privacy/> Please also see the Joint UK Demersal Fisheries Management Plans Privacy Notice which is included in the Consultation document.

Are you responding as an individual or an organisation?

- ☐ Individual
☒ Organisation

Full name or organisation's name

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

- ☒ Publish response with name
☐ Publish response only (without name)
☐ Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams as well as with fisheries policy teams in Defra, the Welsh Government and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland who may be addressing the issues you discuss. We may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- ☒ Yes
- ☐ No

Questionnaire

Fisheries Management Scotland is the representative body for Scotland's District Salmon Fishery Boards, the River Tweed Commission and charitable Rivers and Fisheries Trusts. Our members work to conserve Scotland's valuable and iconic wild salmon and freshwater fish and fisheries and the aquatic environment on which they depend.

We are limiting our response to the following points:

- Paragraph 3.2.12 of the Joint Fisheries Statement states that “The fisheries policy authorities will also put in place appropriate monitoring and surveillance programmes to improve our understanding of the environmental effects of fishing activities to inform our progress towards achieving GES and the fisheries objectives, including on sustainability, climate change and an ecosystem-based approach”.
- Section 3.1.1.3 of the Nature Conservation Advice from NatureScot and JNCC: Demersal FMPs states that “Demersal trawls and seines present a potential bycatch risk to certain fish species that are integral to the biodiversity of SACs and NCMPAs. Among these, Atlantic salmon, river lamprey, and sea lamprey spend critical parts of their lifecycle within coastal and marine waters protected by SACs in Scottish waters.” Whilst risk is currently assessed as ‘moderate’ the advice is that there are ‘significant gaps in the available evidence’.
- The Scottish Wild Salmon Strategy sets out Scottish Ministers priorities for the protection and restoration of Scotland's wild Atlantic salmon populations – now considered by the IUCN to be an endangered species in Great Britain. The Strategy considers a range of pressures, including inshore fisheries and those on the high seas and makes specific reference to Scotland's Future Fisheries Management Strategy.
- Advances in the technology, particularly the use of eDNA, present new opportunities to assess bycatch of Atlantic salmon in commercial catches.

Given the above, we believe that action to assess the potential impacts of the demersal trawl fleet on Atlantic salmon is not just appropriate but **urgent** and **necessary**. Whilst we consider that bycatch of adult salmon should be considered in full, we believe that in designing a suitable programme an initial focus should be put on understanding levels of bycatch of post-smolt salmon during their migration to their marine feeding grounds.