

Submitted to Salmon fishing: proposed conservation status for 2027 season
Submitted on 2026-09-04 07:36:23

Proposed conservation status for the 2027 fishing season

1 Do you agree with the proposed changes for the 2027 season?

I neither agree or disagree with the proposed changes

Please explain your answer.:

The proposed river gradings show that since 2022, the number of rivers classified as good has fallen from 37 to 32, and the number of rivers classified as poor has increased from 101 to 123.

Anglers, proprietors and fisheries managers make a considerable effort to protect Atlantic salmon – the vast majority of salmon caught and released in Scotland are done so on a voluntary basis. We welcome the reference to the best practice catch and release guidance, published by FMS and partners, within the consultation document. It is, however, important to emphasise the very low impact the rod fishery has on wild salmon stocks. This means that the potential for conservation measures to have a substantive positive impact in addressing the wild salmon crisis is limited.

It is important that the Scottish Government place any impacts from angling into context compared with the range of other pressures that wild Atlantic salmon face. It is clear that some 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 all Government Directorates, if the wild salmon crisis is to be addressed.

In addition to the above fundamental point, we would like to reiterate that we remain very 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 must be addressed. 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.

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 conservation statuses for all of Scotland

Please explain your answer.:

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.

We are aware that the Marine Directorate is working to review and update assessment methods, with the aim of incorporating angling effort data to better inform estimations of salmon numbers. In the light of recent and future significant water scarcity issues, sometimes with associated high-water temperatures and consequential reduction in angling effort, we believe that the use of effort data is becoming increasingly important. Continuing to use catch data as a metric without an evaluation of effort will potentially lead to localised issues with the accuracy of the assessments. In turn, when rivers are re-categorised to moderate or poor, this can potentially affect the likelihood of anglers continuing to frequent these rivers, which will further exacerbate the issue. A number of our members have highlighted declines in angling effort which may have had an impact on conservation assessments.

To support this, we would reference a particular example of a small salmon river in south-west Scotland. This river comprises 36 fisheries, with 21 of those fisheries (comprising 36% of the available salmon fishing on the river) not currently being fished. Rod catch has not exceeded 30 fish in the last 3 years, and it is difficult to discount low rod fishing effort as a significant contributing factor to the low rod catch.

With the increasing likelihood of water scarcity, low water levels and higher river temperatures (a feature in both 2025 and 2026), angler effort is likely to be an ongoing issue for the future. River managers are also observing changes in run-timing of Atlantic salmon coinciding with increasing episodes of summer water scarcity. In instances where there are significant numbers of fish present in river systems, these fish will be less susceptible to angling in periods of low, warm water. We believe that further consideration should be given to how such (increasingly frequent) situations can be factored into the overall assessment process.

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(s) of interest?

Yes

Please give details below.:

Please see our point about rod effort data in Q2

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

No file uploaded

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

Not Answered

Please explain.:

N/A

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

No file uploaded

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

Yes

Please give details below.:

We touch on this point in Q2. We are concerned about the medium/long-term economic impact of declining salmon populations and the need for concerted action, beyond the activities of anglers, to reverse these trends. Where the conservation status of rivers is changed to moderate or poor, it has potential to influence anglers' perceptions about the appeal of a fishery and could impact the local economy through a reduction in fishing lets and income. As highlighted in a specific workstream of the wild salmon strategy, the funding mechanism by which DSFBs undertake essential management, conservation and protection activities is based on this declining resource and is coming under increasing strain.

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 give details below.:

Further comments

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

Please provide any further comments.:

About you

9 What is your name?

Name:

Brian Davidson

10 Are you responding as an individual or an organisation?

Organisation

11 What is your organisation?

Organisation:

Fisheries Management Scotland

12 Further information about your organisation's response

Please add any additional context:

We consulted with our member organisations, the 39 district salmon fishery boards and 27 rivers and fisheries trusts prior to submitting our response. Our response incorporates some points reflected by our members as part of this engagement process.

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

Publish response with name

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

Yes

15 What is your email address?

Email:

brian@fms.scot

16 Where did you hear about this consultation?

Other

If other, please say where::

by email from officials

Evaluation

17 How satisfied were you with this consultation?

Slightly satisfied

Please enter comments here.:

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

Very satisfied

Please enter comments here.: