



## Association of Salmon Fishery Boards

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Fiona Hepburn  
Scottish Government Marine Scotland  
Fisheries Division  
Salmon & Recreational Fisheries Team  
Area 1B South  
Victoria Quay  
Edinburgh  
EH6 6QQ

### **Application for extension to annual close time and salmon conservation regulations for the former district of the river South Esk within the Esk District**

Dear Fiona,

I am writing on behalf of ASFB in support of the above application. There is widespread concern at the decline in multi sea winter (MSW) salmon across Scotland (see below). We believe that the application to extend the close time for the river South Esk, coupled with the associated salmon conservation regulations and the agreement of all proprietors to the size-based conservation policy is the best available management option to protect these iconic fish.

The River South Esk is designated as a Special Area of Conservation (SAC) for Atlantic salmon. In an SAC, member states must take measures to maintain or restore the listed species and such measures may need to be implemented outside the SAC. This may include statutory changes to protect the species, or protect against deterioration of the species' habitat. Currently the conservation status for Atlantic salmon in the River South Esk SAC is '*unfavourable recovering*'. A detailed seasonal analysis of 17 Scottish rivers designated as SACs undertaken by Marine Scotland Science on behalf of the Mixed Stock Fisheries Working Group<sup>1</sup> suggests that there has been a decline in the salmon caught in the spring stock component (Jan-May) in the majority of the rivers, since records started in 1952. The decline in the spring stock component of the river South Esk SAC is illustrated in Annex 1.

A voluntary code promoted by the Salmon Net Fishing Association of Scotland (SNFAS), recommends that nets do not operate before 1 April in order to protect spring fish. However, the Statistical Bulletin for 2009 catches<sup>2</sup> included, for the first time, a monthly breakdown of catch statistics. The declared catches of salmon for fixed engine nets for May and June 2009 were 526 and 1220 respectively (as opposed to the catches of grilse which were 19 and 458 respectively). In the specific case of the South Esk the declared catches of salmon for fixed engine nets for May and June were 246 and 720 respectively (equivalent catches of grilse were 0 and 34). In comparison, for May and June 0 and 52 salmon were caught and retained in the river South Esk. It is therefore clear that the SNFAS voluntary code alone is insufficient to protect the spring salmon stock component.

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<sup>1</sup> *Mixed Stock Fisheries Working Group Paper (MSFWG0910)*

<sup>2</sup> *Statistical Bulletin, Scottish Salmon & Sea Trout Catches 2009*

In the absence of a robust determination of Conservation Limits we support the use of the Stock Assessment Tool, described in the Scottish Focus Area Report to NASCO and recommended by the Mixed Stock Fisheries Working Group. The use of the Stock Assessment Tool for the South Esk indicates that management action to protect stocks should be considered for the period from February to June. ASFB endorse the need for management action to protect stocks from February to June inclusive.

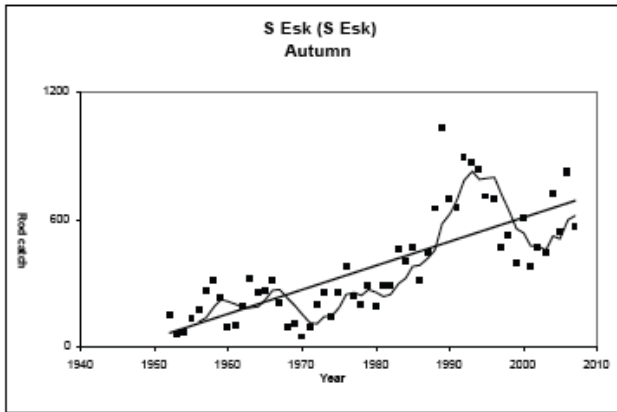
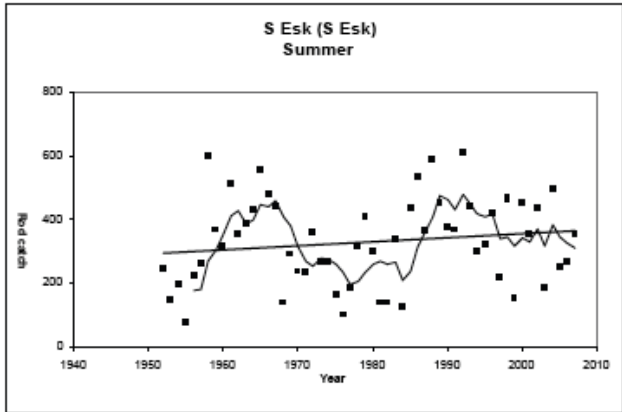
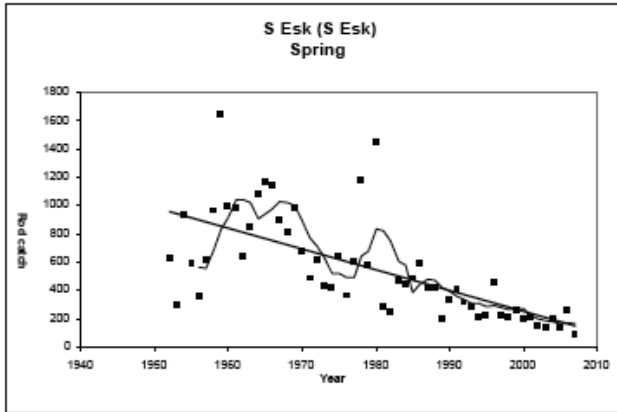
In conclusion, in the light of the declines in MSW salmon we believe that the proposal set out by the Esk District Salmon Fishery Board, including the size-based conservation policy, represent the best available management option and we fully endorse this application.

Yours sincerely,

A handwritten signature in dark ink that reads "Alan Wells". The signature is written in a cursive, flowing style.

Dr Alan Wells,  
Policy and Planning Director, ASFB

### Annex 1: Salmon rod catch trends in South Esk SAC<sup>3</sup>



<sup>3</sup> Mixed Stock Fisheries Working Group Paper (MSFWG0910)