Response ID ANON-YFFV-NP7P-Z

Submitted to **Managing salmon fisheries in England and on the Border Esk**
Submitted on **2017-10-09 14:01:09**

1. Your details

Please tell us which one of the following categories best describes your primary interest in salmon/sea trout. Please select one option.

I represent a salmon/sea trout conservation or environmental conservation organisation (please use the box below to tell us the name of your organisation)

Name of group, organisation or other primary interest:
Fisheries Management Scotland

If more than one of these categories applies to you please tell us which of the others do in the box below.:

What part of the country do you have an interest in? Please tell us where you primarily fish for salmon/sea trout or where the salmon/sea trout that support your business are from. You can select more than one option.

National, Other e.g. Scotland / Wales

If other, please specify:

Are you a member of a salmon/sea trout fishing club/organisation or an organisation that represents anglers, net and fixed engine fishermen or the interests of salmon/sea trout/wider conservation?

Not Answered

Please tell us which organisation you are a member of.:

What is your email address?

Email:
brian@fms.scot

Can we publish parts of your response that are not personally identifiable or contain financial information?

Yes

If no, please explain why.:

Please tell us how you found out about this salmon consultation:

From another organisation

If other, please specify:

2. The Salmon Five Point Approach

Q2.2a To what extent do you agree with the summary of the current state of salmon stocks and the supporting information provided in Appendix 2?

Wholly

Please give your reasons and any evidence you have to support your answer.:
Whilst we do not have a strong insight into the situation in England, the information provided in Appendix 2 is broadly consistent with the situation in Scotland, particularly in relation to marine survival and the observed decline in grilse numbers.
In Scotland, The Conservation of Salmon (Scotland) Regulations 2016 set out a system whereby the killing of Atlantic salmon in inland waters is managed on an annual basis by categorising the conservation status of their stocks. These Regulations:
• prohibit the retention of salmon caught in coastal waters
• permitted the killing of salmon within inland waters where stocks were above a defined conservation limit i.e. those rivers accorded category 1 or 2 status
• required mandatory catch and release of salmon in areas which fell below their defined conservation limit following the assessment of salmon stocks i.e. those rivers accorded category 3 status

3. Deciding which salmon stocks need further protection

Q3.2a To what extent do you agree that a salmon stock should be subject to additional protection from net/fixed engine and rod exploitation if it is classified as either At Risk or Probably at Risk of failing to meet its Management Objective?

Wholly

Please give your reasons and any evidence you have to support your answer. If you would like to provide us with an alternative approach then please do so.:
Whist the designation of rivers in England as ‘at risk’ or ‘probably at risk’ is different from the approach taken in Scotland, the principle of protecting stocks that are below their conservation limits from exploitation in fisheries is consistent with International best practice and is the approach that has been adopted in Scotland. That said, we continue to work with the Scottish Government to ensure that the models which underpin such calculations reflect, as closely as possible, the situation in the rivers.

4. Review of existing National Salmon Byelaws

Q4.2a Do you agree with the proposal to renew without amendments the existing National Salmon Byelaws to protect spring salmon stocks?

Wholly

Please give your reasons and any evidence you have to support your answer. :
As stated in Appendix 2, the estimated abundance of salmon at sea has reduced by around 50% since the early 1970s. Whilst there has been an increase in the numbers of multi-sea winter fish, it is recognised that the marked decline in grilse will mean that multi-sea winter fish have a disproportionate effect on egg deposition. This in turn poses a risk to the sustainability of salmon stocks, as any reductions in the survival of multi-sea winter salmon will result in proportionally greater reductions in egg deposition. On that basis, any relaxation of the current (spring) salmon bylaws would not be sensible. As an organisation representing rivers in Scotland, our focus here is on mixed stock fisheries which intercept fish destined for Scottish rivers.

5.2. Possible options for salmon net and fixed engine fisheries - across England and the Border Esk

Q5.2a (This question is for net and fixed engine fishermen) If you were no longer able to fish for salmon or sea trout, what would be the consequences for you?

Please provide us with details of both financial and cultural (i.e. traditions within your community and / or how you spend time within your local environment). Ideally, please use the last 5 years of income to support your answer.:

Q5.2b (This question is for net and fixed engine fishermen) What are the opportunities for you to fish for other species if you could no longer fish for salmon or sea trout (e.g. white fish or crustaceans)?

If there are any please provide us with an estimated breakdown of the costs you would incur to switch to a different target species. Please indicate whether you would need to purchase quotas / different equipment.:

Q5.2c (This is for businesses that are supplied with wild salmon and sea trout from English and Border Esk fisheries) Please provide details of the impact of stopping the supply of salmon and sea trout from the English fisheries that you buy from.

These impacts could be either financial and / or social. Ideally, please use the last 5 years of income to support your answer.:

Q5.2d (This is for net and fixed engine fishermen) Please provide any other options for reducing the exploitation of salmon by your fishery that you would like us to consider.

Please provide details of these and why you would find them preferable to the possible options set out in Section 5.2: Table 2.:

Q5.2e (This question is for net and fixed engine fishermen) Do you consider that your fishing gear and how it is fished enables salmon to be released alive immediately after capture?

Not Answered

If you wish, please provide us with your reasons for this answer.:

Q5.2f (This question is for net and fixed engine fishermen) Do you fish in attendance with your nets or do you set them and return?

Not Answered

Q5.2g (This question is for net and fixed engine fishermen) Do you currently release salmon as a result of existing controls on your fishery?

Not Answered

If yes, please provide us with details of why this is.:

Q5.2h (This question is for net and fixed engine fishermen) What type of gear do you use when fishing for salmon and/or sea trout? Please provide details.

Please provide details of the gear that you use.:

Q5.2i (This question is for net and fixed engine fishermen) Do you consider that your fishing gear and how it is fished enables salmon to be released with minimal damage?

Not Answered

Please provide us with information of the type of damage (e.g. scale loss or fin damage) that you see on the fish that you catch.:

Q5.2j (This question is for net and fixed engine fishermen) Would altering your gear make it easier to release and/or cause less damage to salmon?

Not Answered

Please provide details and an estimate of the cost if you consider this an option.:

Q5.2k (This question is for net and fixed engine fishermen) If you could release salmon and continue to take the sea trout that you catch would you continue to fish for sea trout?

Not Answered

If you wish, please provide us with your reasons for this answer.:

Q5.2l (This is for businesses that are supplied with wild salmon and sea trout from English and Border Esk fisheries) Please provide details of the impact of stopping the supply of salmon only from the English and Border Esk fisheries that you buy from.

These impacts could be either financial and/or social/cultural. Ideally, please use the last 5 years of income to support your answer.:

Q5.2m (this question is for both businesses and net and fixed engine fishermen that are supplied with / catch wild salmon and sea trout from Fisheries in England and on the Border Esk) If fishing for salmon was required to cease, is there a date later than 2018 that would be economically easier to work towards?

Not Answered

If yes, what date would you suggest?:

Please provide details of why a later date would reduce the impact of closure. These impacts could be either financial and/or social/cultural.:

Q5.2n (this question is for both businesses and net and fixed engine fishermen that are supplied with / catch wild salmon and sea trout from Fisheries in England and on the Border Esk) How long do you consider the measures covering a fishery should be in place for?

Not Answered

If other, please specify.:

Please provide details of why you have given this answer.:

5.3. Possible options for salmon net and fixed engine fisheries - North East Coast Net Fishery

Q5.3a (This question is for North East Coast drift net licence holders) What implications would the closure of the drift net fishery prior to the end of the 2022 season have for you?

Please provide details of the impact (whether this is financial and/or social) on an annual basis. Ideally, please use the last 5 years to support your answer.:

Q5.3b (This question is for North East Coast drift net licence holders) Are there opportunities for you to fish for other species (e.g. white fish or crustaceans) if the drift net fishery closed prior to the end of the 2022 season?

Not Answered

If there are please provide us with an estimate of the cost you would incur to switch to a different target species. Please indicate whether a change would require you to purchase quotas as well as any expenses around equipment.:

Q5.3c (This question is for North East Coast beach net licence holders) Do you consider that your fishing gear and how it is fished enables salmon to be released alive immediately after capture?

Not Answered

Please provide details of the gear that you use and whether you currently release salmon as a result of existing controls on your fishery.:

Q5.3d (This question is for North East Coast beach net licence holders) Do you consider that your fishing gear and how it is fished enables salmon to be released with minimal damage?

Not Answered

Please provide us with information of the type of damage (e.g. scale loss or fin damage) that you see on the fish that you catch.:

Q5.3e (This question is for North East Coast beach net licence holders) With regard to the release of salmon and any damage that is caused, is there a difference in damage if it is grilse or multi sea winter salmon that are caught?

Not Answered

If you have answered yes please provide details.:

Q5.3f (This question is for North East Coast beach net licence holders) Would altering your gear or the way it is fished make it easier to release and/or cause less damage to salmon?

Not Answered

Please provide details and an estimate of the cost if you consider this an option.:

Q5.3g (This question is for North East Coast beach net licence holders) If you could release salmon and continue to take the sea trout that you catch would you continue to fish for sea trout?

Not Answered

If you wish, please provide us with your reasons for this answer.:

Q5.3h (This question is for North East Coast beach net licence holders) What implications would the closure of the beach net fishery have for you?

Please provide details of the impact (whether this is financial and/or social) on an annual basis. Ideally please use the last 5 years earnings to support your answer.:

Q5.3i (This question is for North East Coast beach net licence holders) Are there opportunities for you to fish for other species (e.g. white fish or crustaceans) if the beach net fishery were to close?

Not Answered

If there are please provide us with an estimate of the cost you would incur to switch to a different target species. Please indicate whether a change would require you to purchase quotas as well as any expenses around equipment.:

Q5.3j (This is for businesses that are supplied with wild salmon and sea trout from the North East Coast Net Fishery) Please provide details of the impact of the stopping of supply of salmon only from the North East Coast fishery.

These impacts could be either financial and/or social/cultural. Ideally, please use the last 5 years of income to support your answer.:

Q5.3k (This question is for North East Coast drift and beach net fishermen and the businesses that they supply to) If fishing was required to cease, is there a date later than 2018 that would be economically easier to work towards?

Not Answered

If yes, please provide an alternative date and details of why a later date would reduce the impact of closure. These impacts could be either financial and/or social/cultural.:

Q5.3l (This question is for North East Coast drift and beach net fishermen and the businesses that they supply to) Are there other options for reducing the exploitation of salmon by your fishery that you would like us to consider?

Not Answered

Please provide details of these and why you would find them preferable to the options that we have provided.:

5.4. All consultees' views sought on the options for net and fixed engine fisheries

Q5.4a (Seeking all consultees' views on the options for net and fixed fisheries in England and on the Border Esk (except North East Coast Net Fishery Options)) Which is your preferred option for net and fixed engine fisheries as set out in Section 5.2: Table 2?

Option 1

Please provide details of why you have given this answer.:
As an organisation representing rivers in Scotland, our focus here is on mixed stock fisheries which intercept fish destined for Scottish rivers. As this question does not include the NE nets, our focus here is on the Solway Rivers. The following rivers on the Scottish side of the Solway Firth are provisionally graded as grade 3, requiring mandatory catch and release: River Bladnoch, Water of Fleet, River Dee and River Annan.

Whilst we have indicated that Option 1, which would remove exploitation by net and fixed engine fisheries on all salmon fisheries, is our preferred option, any option that would remove exploitation in the Solway District would be acceptable from a Scottish perspective.

If you would like to suggest a different approach and your reasons for suggesting it, please do so here.:

Q5.4b (This question is for all consultees to answer and is in reference to the answer that you have given to Q5.4a) What are the benefits, if there are any, which you would see from your preferred option for net and fixed engine fisheries?

These could be economic as well as social/cultural, please provide details if you are able.:
The benefits of removing exploitation by net and fixed engine fisheries would be a greater chance of several Scottish and English rivers meeting their conservation limits, and England meeting its international obligations under NASCO. An economic impact assessment of Scotland's wild fisheries indicates around £135m of angler expenditure, 4,300 FTE jobs and £79.9m Gross Value Added in 2014. With more salmon available to anglers, the economic value to Scotland and England could be increased.

Q5.4c (Seeking all consultees' views on the options for net and fixed engine fisheries in England and on the Border Esk (except North East Coast Net Fishery)) How long do you consider the measures covering a net and / or fixed engine fishery should be in place for?

Other

If other, please specify:

Please provide details of why you have given this answer.:
Whilst we would support periodic review of any conservation measures, we consider that conservation measures should remain in place until such time that all rivers potentially exploited by the nets in question (including those in Scotland) are demonstrably above their conservation limits.

Q5.4d (Seeking all consultees' views on the options for the North East Coast Net Fishery) Which is your preferred option for the North East Coast Net Fishery as set out in Section 5.3: Table 3?

Option NE1

Please provide details of why you have given this answer.:
Option NE1 is consistent with the approach adopted in Scotland and given the confirmed mixed-stock nature of the fishery, this is the only option that is compatible with the United Kingdom's international commitments. It is our view that any decisions on mixed stock fisheries in England must take account of the conservation status of Scottish rivers which will also be impacted by the netting of salmon. We emphasise that the NE drift nets and T & J nets have been shown to exploit a significant number of fish destined for Scottish Rivers, as recognised in the consultation document. However, we do not consider that Table 4 in section 5.3 gives an accurate picture of the conservation status of Scottish rivers. In addition to the rivers set out in that table, the following rivers (which are all south of the Aberdeenshire Dee) are provisionally graded as Grade 3 for the 2018 season. River Tyne, River Almond, River Avon, River Carron, River Devon, River Leven, River Eden, River Earn, Bervie Water and Cowie Water. With regard to the Forth District, the estuary area, and any other river, sub-catchment or coastal burn not individually assessed are all also Grade 3. It is likely that the NE nets will take fish destined for all of these rivers, and therefore Option NE1 is the only option that is compatible with the stated aim of complying with NASCO guidelines to ensure that the weakest stocks could be safeguarded.
We do not consider that any increase in the exploitation of sea trout, as a result of the proposals set out in the consultation would be acceptable. Sea trout are an important species in their own right and have been designated in Scotland as a priority marine feature - the habitats and species of greatest conservation importance in inshore waters.
We are concerned that relatively little is known about the stocks of sea trout and thus the impact of commercial fisheries on those stocks. We also consider that the ongoing use of coastal nets to intercept sea trout, will have a significant impact on salmon, either through damage in the nets or through predation damage from seals. For this reason, sea trout fishing in coastal fixed engine nets has not been undertaken in Scotland to date, as it would not be possible to avoid damage to salmon.

If you would like to suggest a different approach and your reasons for suggesting it, please do so here.:

Q5.4e (This question is for all consultees to answer and is in reference to the answer you have given to Q5.4d) What are the benefits, if there are any, which you would see from your preferred option for the North East Coast Net Fishery?

These could be economic as well as social/cultural, please provide details if you are able.:
The benefits of NE1 would be a greater chance of several Scottish and English rivers meeting their conservation limits, and England meeting its international obligations under NASCO. An economic impact assessment of Scotland's wild fisheries indicates around £135m of angler expenditure, 4,300 FTE jobs and £79.9m Gross Value Added in 2014. With more salmon available to anglers, the economic value to Scotland and England could be increased.