

## Response ID ANON-Q324-7J8U-R

Submitted to Salmon fishing: proposed river gradings for 2023 season  
Submitted on 2022-09-09 17:14:39

### Proposed river gradings for the 2023 fishing season

1 Do you agree with the proposed river gradings for the 2023 season?

Not Answered

If you selected other, please explain:

We have been closely involved in the development of the river gradings process, but specific input on the proposed river gradings will come from members of Fisheries Management Scotland.

2 Do you have an interest in the river assessment as a whole?

Yes

If you selected other, please explain:

3 If you are mainly interested in a specific river or area please select the river(s) or river areas from the following list.

I am interested in :

4 With reference to the answers you have given in questions 1 – 3 above, please use the space below to tell us more about why you have answered in the way you have.

I answered in this way because:

### Proposals on measures to enhance catch and release rates

5 Do you think 100% catch and release of Atlantic salmon should be encouraged through the use of voluntary measures for the whole of Scotland?

Not Answered

Please explain your answer:

It is important to put the current situation in context here. Fisheries Management Scotland and our members have been highlighting the wild salmon crisis, and the need for coordinated action to address this, for many years. We welcome the fact that the perilous situation faced by our wild salmon is now widely recognised and we are committed to work with the Scottish Government and Agencies to improve the situation. In order to address the wild salmon crisis, action is required across a wide range of pressures and exploitation within fisheries has been no exception. However, as the consultation document recognises, catch and release now accounts for 95% of the total rod catch of salmon and 99% of the rod catch of spring salmon. Indeed on some rivers, 100% catch and release throughout the season has been adhered to voluntarily for many years. The fact that catch and release has steadily increased since 1994 is also mentioned in the consultation. This has been a transformational change in attitude and practice in a relatively short period of time which should be celebrated. It is important to emphasise that these (largely) voluntary actions by anglers, often delivered through the conservation policies of DSFBs and Fisheries Trusts, were initiated and delivered at a time when the Scottish Government was reluctant to take action, despite many requests and formal applications for statutory conservation measures. This early action meant that catch and release is now widely accepted.

The conservation of wild Atlantic salmon is a critical priority for Fisheries Management Scotland and our members. Our network is committed to ensuring that fisheries for wild Atlantic salmon are sustainable and are striving to improve the rates of catch and release. However, with a very high level of catch and release already being achieved voluntarily, we are very much into the law of diminishing returns and any gains are likely to be marginal from a salmon conservation perspective. There is a risk that stakeholders will become disenfranchised should there be a disproportionate emphasis on further angler effort on catch and release, without unambiguous and meaningful action to address the other pressures that salmon face. Feedback we have received suggests that this may be a particular issue for local angling associations and angling clubs, many of which are only just surviving as things stand. Whilst we don't represent anglers directly, we recognise that angling is a vital and affordable leisure activity which is accessible to a broad cross section of society. It is difficult to see how mandatory catch and release will significantly improve the current situation.

It is important to place the impact of angling into the context of the range of other pressures that wild Atlantic salmon face, and it is equally important that the Scottish Government make this clear, not least so that the wide range of interested stakeholders can understand the full context. Stakeholders should be given clear information as to the relative conservation impact of taking (possibly mandatory) action to reduce the remaining 5% of salmon killed by anglers (emphasising that this is 5% of the salmon caught, as opposed to 5% 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, agricultural and forestry impacts, water scarcity, mitigation of climate change impacts and a host of other developments and human activities. We are also 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. If we put angling to one side, we are facing a much wider biodiversity crisis, and 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. Fisheries Management Scotland are working through the Wild Salmon Strategy Implementation Plan, to highlight the scale of action that is required, and we will continue to do so.

Despite our comments above, we recognise that anglers, proprietors and fisheries managers have an important and continuing role to play in ensuring that exploitation within fisheries is sustainable. If there are specific rivers or beats which are consistently well below the current national average, we recognise that there is a stronger case to require progress towards a greater proportion of catch and release. It is our view, that the vast majority of fisheries and fisheries managers have long understood the necessity to optimise the number of fish that are returned. We are therefore happy to commit to undertake specific engagement with Fisheries Management Scotland members with a view to improving catch and release levels in Scotland where these are lagging, and further demonstrating our continuing commitment to the conservation of this iconic species. In doing so, it is also our expectation that Scottish Government and Agencies, will move beyond the status quo, at pace, to take meaningful and coordinated action to address the range of identified pressures impacting on Atlantic salmon.

6 Do you think mandatory measures for the whole of Scotland should be introduced to achieve 100% catch and release of Atlantic salmon?

Other - please explain

Please explain your answer:

We believe that there is good evidence that voluntary measures, sitting alongside the current conservation measures, can work well. It is important to emphasise that angling is not only important economically, it is also important from a social and environmental perspective. Anglers have recognised the need to take action and are often the eyes and ears on our riverbanks, reporting pollution incidents, fish poaching and other impacts. We have sympathy with the view that the actions of anglers have received a disproportionate focus in relation to the other pressures that salmon face. We do not consider that a blanket approach to catch and release is the correct course of action. Should the Scottish Government choose to use mandatory measures in future, we would expect the conservation benefit of this course of action to be clearly set out against the conservation benefit of addressing other pressures. We would also expect that in addressing any remaining impact of angling (currently less than 1% of salmon entering our rivers, taking into account current best estimates of catch and release mortality) the Scottish Government would take a fair and consistent approach and apply the same threshold of 'acceptable' impact to all other pressures on wild Atlantic salmon.

We are also of the view that more can be done to ensure that best practice in catch and release is followed in Scotland, particularly in relation to air-exposure of fish and fishing in high temperatures. We have previously worked with organisations across the UK to develop and circulate guidance on best practice in catch and release. We also contributed to the baits and lures workstream under Wild Fisheries Reform. We would welcome the opportunity to work with the Scottish Government and our partners in the Missing Salmon Alliance to develop new guidance and accompanying resources to further raise awareness of the need to follow best practice in catch and release.

7 If mandatory catch and release measures were introduced across the whole of Scotland, how often should they be re-evaluated?

Not Answered

Please explain your answer:

8 Do you have any concerns about being impacted by a 100% catch and release policy, either through the use of voluntary or mandatory measures?

Please give details below:

If you would like to submit further evidence to support your answer, please upload your information in .pdf format. If you wish to include more than one file in your response to this question, please send these to [salmonandrecreationalfisheries@gov.scot](mailto:salmonandrecreationalfisheries@gov.scot):

No file uploaded

## Use and accessibility of information supporting this consultation

9 How useful did you find the following sources of information to make an informed response to this consultation?

Q9. How useful did you find the following sources of information to make an informed response to this consultation? - Proposed river gradings tables:  
Useful

Q9. How useful did you find the following sources of information to make an informed response to this consultation? - River grading information by region (e.g. Clyde Coast):  
Useful

Q9. How useful did you find the following sources of information to make an informed response to this consultation? - Interactive summary app for 'Salmon Conservation Regulations' (simple):  
Useful

Q9. How useful did you find the following sources of information to make an informed response to this consultation? - Detailed interactive app for 'Salmon Conservation Regulations' (more detailed):  
Useful

Q9. How useful did you find the following sources of information to make an informed response to this consultation? - 'Conserving Our Salmon' YouTube video explaining the annual assessment process:

Not used

Q9. How useful did you find the following sources of information to make an informed response to this consultation? - Method paper on 'Estimating abundance of adult salmon':

Useful

Q9. How useful did you find the following sources of information to make an informed response to this consultation? - Method paper on 'Transportation of egg requirements':

Useful

Q9. How useful did you find the following sources of information to make an informed response to this consultation? - 'Summary of conservation regulation methods' paper:

Useful

Please use the space below to tell us more about what you found useful from the information sources provided:

10 How well did the following sources of information meet your accessibility needs?

Q11. Matrix answers - Proposed river gradings tables:

Q11. Matrix answers - River grading information by region (e.g. Clyde Coast):

Q11. Matrix answers - Interactive summary app for 'Salmon Conservation Regulations' (simple):

Q11. Matrix answers - Detailed interactive app for 'Salmon Conservation Regulations' (more detailed):

Q11. Matrix answers - 'Conserving Our Salmon' YouTube video explaining the annual assessment process:

Q11. Matrix answers - Method paper on 'Estimating abundance of adult salmon':

Q11. Matrix answers - Method paper on 'Transportation of egg requirements':

Q11. Matrix answers - 'Summary of conservation regulation methods' paper:

Please use the space below to tell us more about how, if any, these sources of information did not meet your accessibility needs:

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

Please answer in the space below:

Further comments

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

Please provide any further comments here:

About you

What is your name?

Name:

Alan Wells

What is your email address?

Email:

alan@fms.scot

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Fisheries Management Scotland

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

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They 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

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

## Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Please enter comments here.: