

# **FIRST DRAFT**

## **SUBMISSION**

**To: Jackie McDonald, Marine Scotland, Salmon and Recreational Fisheries Team**

**From: Scottish Anglers National Association (SANA)**

### **CONSULTATION ON PROPOSED SALMON CONSERVATION MEASURES TO INTRODUCE A LICENSING SYSTEM FOR KILLING WILD SALMON IN SCOTLAND**

#### **Introduction**

1. SANA is the recognised governing body for game angling in Scotland. This submission has been prepared by SANA's Migratory Fish Committee.
2. This proposal is most welcome and is in line with previously expressed concerns from SANA about the need to conserve stocks of salmon, especially early running fish. However, we have some concerns about the detail of how the measures may be implemented.

#### **Summary**

- Costs of the licensing and tagging arrangements must be minimised. (ref. paragraph 28 of the consultation)
- Sea trout should not be excluded from the proposed measures. (ref. paragraph 27 of the consultation)
- More thought is required as to what angling equipment might be proscribed as part of the proposals. (ref. paragraph 24)
- Returning mortally wounded salmon to the water is not good practice. (ref. paragraph 20)

#### **Principles**

3. Creation of new powers to license killing of wild salmon is a logical precondition for implementation of controls that ensure escapement of sufficient fish to fulfil conservation limits. However, excluding sea trout from these measures creates an anomaly. Salmon may be caught on netting equipment that is intended for capture of sea trout, and vice versa. Similarly, rod and line equipment that is designed nominally to capture sea trout can capture salmon, and vice versa. (We deal with the latter issue at paragraph 10 below.)

4. As well as regulation of numbers of fish that may be killed, the process should admit the possibilities for introduction of short-term catch quotas, even to the extent of temporary fishing closures. Both in respect of interpreting conservation limits and imposing quota/closure, there must be public confidence in the Regulators. There will be considerable delays and disputes unless there are centrally imposed rules of conduct for whatever body/bodies are charged with this function. Clarity will be especially needed if action is required on a precautionary basis, as opposed to being based on best available scientific evidence. [Sea trout should be treated similarly, although their stock assessment may have to be treated separately from salmon and by less direct methods (e.g. biochemical).]
5. With licensed killing for salmon and none for sea trout, there would be a clear incentive to report salmon as being sea trout. Indeed, many people are hard pressed to distinguish between the two – as may be evidenced by photographs in the angling press. However, our main concern is the possibility that netmen may pass off smaller salmon as being sea trout. Indeed, the measures as stated could lead to greater targeting of netting effort on sea trout.

### **Tagging**

6. SANA has supported the principle of carcass tagging for some time. Without tagging there is no real check on the accuracy of catch statistics, as reported by the netting industry, and without it, salmon caught elsewhere might be passed off as being Scottish. SANA accepted that evenhanded treatment of the netting and rod and line fisheries would be equitable.
7. Carcass tags must be individually numbered and tagging records should identify the location and dates of each fish killed legally. Some remotely identifiable security tags could be used as a crosscheck. Costs of monitoring this tagging system and prosecuting offenders should be wholly a Government responsibility.
8. However, while tagging of carcasses provides a check on accuracy of reported catches of retained fish, it doesn't help check on the accuracy of Catch & Release (C&R) catch reports from rod-caught fish. C&R exaggeration may inflate true catches and add extra pounds to weights.

### **Administration of Licensing System**

9. Imposition of new costs on fishery owners is bound to result in their cost recovery through higher permit charges. All other things being equal, those charges will result in fewer rod days being leased and an additional round of cost increases, to the detriment of recreational activity by anglers. Therefore, the issue of cost recovery in licence charges demands that those costs are kept to the minimum. Whether that might be best achieved by local or national administration should be investigated.

### **Equipment Restrictions**

10. There are no lures used to target sea trout that will not also catch salmon, on at least some occasions. Therefore, only proscribing tackle used to catch salmon would be ineffective.

Taking both species together, there may be some benefit for catch and release survival in limiting what hooks should be used. However, the issue is not as straightforward as has been described in the consultation paper. Both barbless hooks and debarbed hooks (barbs squashed by pliers) cause deeper wounds in fish than barbed hooks. Damage to fish is most clearly evident in cases where treble hooks have been used (with or without barbs) and both jaws have been punctured. Single barbless hooks are probably easiest to release but cause the deepest wounds. On balance, we recommend investigation of barbed double hooks as offering relatively easy release and shallowest wounds.

11. Any proscription of angling equipment must be founded on substantial evidence that the measure will help conserve endangered fish stocks, e.g. barbed against barbless hooks, handling or non-handling release methods etc. Likewise, where commercial netting is licensed, i.e. subject to catch quotas, there should also be consideration of net materials and mesh sizes.

### **Mandatory Catch and Release**

12. There may be occasions where revival of rod caught fish is impractical. Returning severely damaged fish to the water could present a vector for spreading fungal fish disease in the wider stock. We recommend that the Scottish Government designate routes for disposal whereby carcasses are available as food to good causes.

*Craig Campbell*

*19 February 2015*