# SANA RESPONSE, sent 4/9/22

# Salmon fishing: proposed river gradings for 2023 season

## Respondent Information Form and Consultation Questionnaire

**Please Note** this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy: <https://www.gov.scot/privacy/>

Are you responding as an individual or an organisation?

[ ]  Individual

\* Organisation

Full name or organisation’s name

Scottish Anglers National Association

Phone number

01577861116

Address

KY13 8UF

The National Game Angling Centre, The Pier, Loch Leven, Kinross,

Postcode

admin@sana.org.uk

Email Address

**Information for organisations:**

The option 'Publish response only (without name)’ is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

The Scottish Government would like your

permission to publish your consultation

response. Please indicate your publishing

preference:

[ ]  Publish response with name

\* Publish response only (without name)

[ ]  Do not publish response

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

[ ]  No

# Overview

We are seeking views on the proposed river gradings for the 2023 fishing season, which have been calculated from the annual assessment of the conservation status of wild Atlantic salmon populations in rivers across Scotland.

Additionally, we are seeking views on proposals for achieving higher rates of catch and release and post-catch survivability. These include encouraging voluntary measures and the potential of mandatory measures through legislation change which would apply across the whole of Scotland.

# Why your views matter

Your views inform the process of finalising the river gradings for the 2023 fishing season, which are used in the annual amendment to The Conservation of Salmon (Scotland) Regulations 2016.

Additionally, your views on proposals to enhance catch and release and post-catch survivability rates across the whole of Scotland will contribute to policymaking that further protects and restores wild Atlantic salmon populations.

# Proposed river gradings for the 2023 fishing season

An [assessment of the conservation status of salmon](https://www.gov.scot/publications/salmon-fishing-proposed-river-gradings/pages/background/) in inland waters in Scotland is carried out each year and each river or assessment group is assigned a grading depending on the outcome of that assessment. As a result of the latest assessment, we are proposing that the grading of a number of rivers or groups of rivers will change for the 2023 fishing season. A [summary of these changes](https://www.gov.scot/publications/salmon-fishing-proposed-river-gradings/pages/changes-from-last-year/) and a [full overview of the proposed river gradings](https://www.gov.scot/publications/salmon-fishing-proposed-river-gradings/pages/overview-and-gradings/) for the 2023 fishing season are available.

## Question 1

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

\* Yes

[ ]  No

[ ]  Other – please explain

If you selected other, please explain

## Question 2

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

\* Yes

[ ]  No

[ ]  Other – please explain

If you selected other, please explain

## Question 3

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

[ ]  River Dee SAC

[ ]  River Earn

[ ]  River Forth

[ ]  River Garnock

[ ]  River Irvine

[ ]  River Spey SAC

[ ]  River Tay SAC

[ ]  River Tweed SAC

[ ]  Other

If your specific river or area is not listed please use the space below to specify your area(s) of interest

I am interested in

## Question 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.

You may wish to include any additional resources such as catch information to support your views on the assessment or any financial implications you feel may arise from the river grading assigned.

I answered in this way because

The evidence of catch returns confirms the parlous state of salmon populations throughout Scotland.

In addition, SANA wishes to see attention to sea trout populations. In this regard, we regard the North East of England net fisheries to present a particular pressure on Scottish stocks. We ask that the Scottish Government make representation on this subject.

# Proposals on measures to enhance catch and release rates

The Scottish Government are also seeking views on what further actions should be encouraged or taken to safeguard wild Atlantic salmon populations. This would include the encouragement of voluntary measures, such as highlighting good practice guidance, to promote higher rates of catch and release and post-catch survivability. Please see the [proposal on achieving higher catch and release rates](https://www.gov.scot/publications/salmon-fishing-proposed-river-gradings/pages/proposal-on-catch-and-release-rates/) for further details.

The [official statistics](https://www.gov.scot/news/salmon-and-sea-trout-fishery-statistics-updated-for-the-2021-season/#:~:text=An%20Official%20Statistics%20Publication%20for%20Scotland%20Scotland%E2%80%99s%20Chief,began%2C%20and%2075%25%20of%20the%20previous%20five-year%20average.) for 2021 were published by the Scottish Government on 1 June 2022. In summary:

* The reported rod catch of salmon (35,693) is the lowest since records began, and 75% of the previous five-year average.
* In the proposed river gradings for the 2023 season 113 out of 173 stocks have been assessed to be in poor conservation status (65%).
* Please see [changes from the 2022 assessment](https://www.gov.scot/publications/salmon-fishing-proposed-river-gradings/pages/changes-from-last-year/) which explains the methodology and the impact of Covid on the assessments in more detail.

These figures form part of a long-term trend in the decline of salmon populations over the past few decades. An overview of this trend and further information on the [stock status of wild Atlantic salmon](https://www.gov.scot/publications/salmon-fishing-proposed-river-gradings/pages/additional-information/) in Scotland has been provided by Marine Scotland Science for the purposes of this consultation.

Catch and release in 2021 accounted for 95% of the total rod catch of salmon and 99% of the rod-caught spring salmon (taken before 1 May). Catch and release rates have steadily increased since 1994, when such information was first recorded.

Due to the current state of wild Atlantic salmon populations in Scotland, we are considering options with a view to improving salmon stocks. We are seeking your views on whether voluntary catch and release should be more widely encouraged for the whole of Scotland. This would mean that all rivers, regardless of their river assessment grading, would be recommended to practice voluntary catch and release. The aim of this would be to achieve 100% catch and release for the whole of Scotland in order to further protect and restore salmon populations.

## Question 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?

\* Yes

[ ]  No

[ ]  Other – please explain

Please explain your answer

The historic pressures on salmon stocks include damming of rivers (loss of habitats), pollution, predation, excessive commercial exploitation of stocks and the impacts of fish farming. Anglers were a pressure on stocks but now kill very few salmon. SANA’s annual analysis of salmon and sea trout rod and net catches has been supplied previously.

A very high level of catch and release has been achieved without mandatory measures. Anglers have demonstrated a willingness to apply the measure in places where it is not already compulsory. Therefore, there would be no meaningful change by making it compulsory relative to other, more significant, pressures on salmon stocks. It is a pity that the “pressures tools” analysis was not issued at the same time as this consultation.

## Question 6

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

Should voluntary measures be unsuccessful in achieving 100% catch and release across the whole of Scotland, we are also seeking views on the prospect of using mandatory measures in future to achieve 100% catch and release. Mandatory measures would potentially involve amending legislation to prohibit the retention of Atlantic salmon on all rivers in Scotland, regardless of their river grading.

[ ]  Yes

\* No

[ ]  Other – please explain

Please explain your answer

A voluntary extension to all rivers is preferable because, when justified, it would take time to reverse a legal prohibition on killing salmon.

In any event, current levels of catch and release leave such a small anglers’ impact on stocks that the benefit would be minimal relative to other pressures. Also, we are confident that most anglers would respond to 100% catch and release as a voluntary measure.

## Question 7

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

[ ]  Annually

[ ]  Every 3 years

[ ]  Less often than every 3 years

\* Unsure

Please explain your answer

The persons who are best placed to evaluate the degree of stock recovery and whether a sustainable harvest in a river system, or part of a river system, is viable are fishery scientists employed by national government, District Salmon Fishery Boards and Fishery Trusts. They are best placed to devise a process of assessment. That process should govern how often the evaluation is undertaken.

We hope that it would be less often than every three years but recognise that population dynamics are on a longer timeframe than every three years.

Typically, multi-sea-winter salmon smolt at up to three years and can spend two, three or more years at sea.  A three year cycle is only relevant to 1.1+, 2.1+, 1.2 and 1.2+ fish.

## Question 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

Recruitment of new participants to salmon angling is likely to be affected.

Our greater concern is what is going to happen to the commercial and quasi-commercial pressures on salmon and sea trout from netting. We suggest that the net fisheries be closed down in these straightened times - both north and south of the border. It seems like nonsense to operate them on a catch and release basis for salmon.

Again, sea trout stocks are also a matter of concern. Would voluntary or mandatory measures on salmon lead to a targeting of sea trout by rods and/or nets? There is already some evidence in the 2021 catch statistics of nets concentrating on sea trout.

If you would like to submit further evidence to support your answer, please send this to salmonandrecreationalfisheries@gov.scot in .pdf format. Please include your unique ID, which will be provided once you have submitted your response.

Please make sure your file is under 25MB. If you wish to send material larger than 25MB then please break this into two or more files (each under 25 MB) and send these across in multiple emails.

# Use and accessibility of information supporting this consultation

We are seeking views on the user experience and accessibility of the [information provided in support of this consultation](https://www.gov.scot/publications/salmon-fishing-proposed-river-gradings/pages/additional-information/). This will help us to identify what information is most useful to you and how we can improve the presentation and accessibility of this information in the future.

## Question 9

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

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **Very useful** | **Useful** | **Slightly useful** | **Not useful** | **Not used** |
| **Information sources** |  |  |  |  |  |
| Proposed river gradings tables | \* | [ ]  | [ ]  | [ ]  | [ ]  |
| River grading information by region (e.g. Clyde Coast) | \* | [ ]  | [ ]  | [ ]  | [ ]  |
| Interactive summary app for ‘Salmon Conservation Regulations’ (simple) | [ ]  | [ ]  | [ ]  | [ ]  | \* |
| Detailed interactive app for ‘Salmon Conservation Regulations’ (more detailed) | [ ]  | [ ]  | [ ]  | [ ]  | \* |
| ‘Conserving Our Salmon’ YouTube video explaining the annual assessment process | [ ]  | [ ]  | [ ]  | [ ]  | \* |
| Method paper on ‘Estimating abundance of adult salmon’ | [ ]  | \* | [ ]  | [ ]  | [ ]  |
| Method paper on ‘Transportation of egg requirements’ | [ ]  |  [ ]  | [ ]  | \* | [ ]  |
| ‘Summary of conservation regulation methods’ paper | [ ]  | \* | [ ]  | [ ]  | [ ]  |

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

## Question 10

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

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Met my needs** | **Partially met my needs** | **Didn’t meet my needs** | **Not used** |
| **Information sources** |  |  |  |  |
| Proposed river gradings tables | \* | [ ]  | [ ]  | [ ]  |
| River grading information by region (e.g. Clyde Coast) | \* | [ ]  | [ ]  | [ ]  |
| Interactive summary app for ‘Salmon Conservation Regulations’ (simple) | \* | [ ]  | [ ]  | [ ]  |
| Detailed interactive app for ‘Salmon Conservation Regulations’ (more detailed) | [ ]  | [ ]  | [ ]  | \* |
| ‘Conserving Our Salmon’ YouTube video explaining the annual assessment process | [ ]  | [ ]  | [ ]  | \* |
| Method paper on ‘Estimating abundance of adult salmon’ | \* | [ ]  | [ ]  | [ ]  |
| Method paper on ‘Transportation of egg requirements’ | [ ]  | [ ]  | \* | [ ]  |
| ‘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

We have assumed that the question was intended to ask whether the published sources were sufficient or helpful in compiling our answers.   On that basis, some of the materials were impenetrable to a lay audience. In future it would be helpful to have, at least, a summary explanation of the subject matter in plain English.

It has been noted above, that a perspective on the relative importance of angling as a pressure on stocks would have been provided by publication of the “pressures tools” analysis of the many factors affecting the situation.

## Question 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

Regrettably, output from the “pressures tool” project has not yet been published. This would have provided some perspective on the place of anglers in helping to restore stocks, relative to the more substantial pressures that are listed above and should be highlighted by the pressures tool.

Anglers have been as a freshwater conservation force over the last two centuries and not simply exploiters of our fish resources. Over many years anglers also highlighted the need for much greater access to Scottish rivers and lochs fragmented by landowners that used to be available to the public.

It is very sad to see how much fishing for wild fish has declined in recent years. We seem to be heading inexorably towards the replacement of all wild salmon and trout populations with their domesticated stocked ‘equivalents’, assuming that hook and line fishing is allowed to continue at all.

As noted in response to question 8, we fear that imposition of mandatory catch and release will discourage new entrants to angling. Without an active angling community, stock assessment would become more difficult and require substantial spending on fish counters.

# Further Comments

## Question 12

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

Please provide any further comments here

SANA has noted elsewhere that good practice in how catch and release is conducted is important for survival of captured fish.

Our view is that time spent out of the water may be critical to survival rates.

If a fish is netted or beached and kept in the water when being unhooked, common sense suggests that it will recover quickly.

It should be noted that recording a catch by taking a photograph can be undertaken with the fish in the water. However, anglers have been encouraged to display fish out of the water by the influence of the angling media. A quick lift of a fish by a few feet by the captor and replacing gently in the water takes seconds and probably does no harm. However, too many of the photographs in the newspapers and magazines show fish out of the water and away from the water.

Getting the angling media on-side to show good practice would be a focussed way of getting the message across.

# Thank you for providing your views

Should you wish to provide further information you can contact us via email at salmonandrecreationalfisheries@gov.scot or write to:

Wild Salmon and Recreational Fisheries

Marine Scotland

Area 1B North

Victoria Quay

Edinburgh

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