

**Consultation Title:** Conservation of Salmon - Assessment for the 2018 fishing Season

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**To:** Marine Scotland

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Scottish Land & Estates is a membership organisation that represents the interests of land managers and land-based businesses across Scotland with wide ranging interests including the sustainable fishing of salmon. We welcome the opportunity to respond to the proposed conservation of salmon (Scotland) regulations for 2018 made by Scottish Government.

Scottish Land & Estates' members remain concerned about declining salmon numbers and the impact this has on biodiversity and the rural economy. Members recognise the need for action to be taken to protect these vulnerable stocks and it is imperative the right balance is struck between conservation and the interests of those who fish for salmon.

Mechanisms to conserve these vulnerable stocks and encourage sustainable economic growth must be encouraged and are supported by our members. There is however a diversity of opinion in the organisation about the type of mechanism that should be deployed to achieve the objective of wild salmon conservation.

Consequently, we have found that our membership is split and the organisation cannot, therefore, give a definitive response on the proposed regulations.

Scottish Land & Estates are generally supportive of the improvements Marine Scotland and the Salmon Liaison Group have made to the modelling and assessment process for the 2018 season however there is feeling amongst some of our members that further improvements to the model are needed.

There is concern that the assessment still relies very heavily on catch return data which some members feel can be unreliable and misleading in determining actual abundance. For example, the total number of salmon caught by rod and line depends on the number of returning salmon. It also depends on other factors: the ease with which the salmon can be caught (their catchability); the time anglers spend fishing (effort); and the anglers' ability (efficiency). Changes in all three factors is undoubtedly likely to affect the rod catch particularly at the local scale and thus skew abundance

data. It is important Marine Scotland Science recognise these deficiencies in collection of data and going forward establishes an improved model which takes better account of these variations.

Scottish Land & Estates believe the proposals recognise current positive management practices. However, there are members who are opposed to mandatory catch & release and believe consideration should be given to encouraging voluntary compliance which can build on existing high rates of catch & release occurring at present.

Indeed, Fishery Statistics (Marine Scotland, 2016) show the proportion of rod catch accounted for by catch and release is the highest recorded. In 2016, 98% of rod caught spring salmon were released, as were 90% of the annual rod catch. These figures have been steadily increasing since records began in 1994 due to voluntary efforts.

Scottish Land & Estates believes the way to achieve real and lasting change is to win hearts and minds resulting in behavioural change, rather than through the blunt tool of regulation, which only forces people up to a minimum standard and comes with a costly enforcement burden. When people are invested in an outcome, the effect tends to be that of a virtuous circle where expectations are often in time exceeded.

Finally, there is concern that the mechanism of mandatory catch & release only goes some way towards addressing low salmon stocks. Current mechanisms do not address main drivers affecting change in stock and there is a strong feeling that more needs to be done to understand what is causing low return rates from the sea to decline.