RTC RESPONSE TO THE SCOTTISH GOV SEA re LICENCING CONSULTATION

**FROM:  N Yonge**

Since my last email to you, the Scottish Government has now issued a second consultation on licensing, so there are two consultations.

1.       Kill Licence Consultation – (sent previously)

This is a public consultation on statutory measures to introduce a licensing system for killing wild Salmon with associated carcass tagging, baits and lures regulations and a provision for charging. It asks six questions and the email I sent gave the RTC position on each question.

2.       Strategic Environmental Assessment Report – second (NEW) consultation

This report sets out the results of the possible environmental effects of the proposed licensing system. This is a new consultation. It is very long and is mostly a briefing paper on Salmon knowledge. It has only one question which asks for comments on the report. However it is important, especially section 8 starting on page 53. Our observations are on the following sections:

**5.1.23**  We disagree that *catch and release inflates the reported rod catch data.*

Marine Scotland’s modelling is: purely theoretical,  uses assumptions we do not believe are valid and is contrary to Tweed’s own research which uses actual data. Tweed’s data from tagged fish shows that the catchability of Salmon declines rapidly once they are in fresh water so few are caught after more than two months in the river which limits the chances of recapture, especially when added to the “shock” of capture, which must also delay any recapture.

**8.1.1** We disagree that only protecting spring stocks, as we already do, should be discounted as *it would not act to protect other stocks or spring salmon later in the year*.

Again, Tweed data shows:

1.       less than 5% of fish are killed by rod and line, in most years significantly less

2.       that catchability of fish declines rapidly once they are in fresh water, so that few are caught after more than two months in the river

3.       the nature of the fish caught by rods changes markedly after June - Grilse and Summer Salmon take over from Spring Salmon as the source of the catches. Spring Salmon are therefore unlikely to be caught after the period of C & R to protect them ends but even if they are:-

a.       they could still be killed under the proposed licencing system although,

b.      the existing legal ban on the killing of “*unclean and unseasonable”* fish would still protect them, as it always has.

**8.1.3** We disagree that *a licence system would reduce the risk of rivers failing to reach their conservation limits*

There is no recognised method of calculating Conservation Limits for Scottish rivers.  In England and Wales, Conservation Limits are used only to provide threshold targets for management purposes, not for determining the number of Salmon that can be killed because their accuracy is not good enough for this. Conservation Limits are based on retrospective data so they cannot give any protection if there is an unanticipated poor run ( “Past performance is no guarantee of future results.”)

**8.1.4**     We disagree that the *proposed measures around gear (rod and line tackle) would increase the survival rate of Salmon caught using catch and release strategies* over those that already exist in the Tweed; there is no evidence for this.

**8.3.1**      We disagree that licencing the rod fisheries would *give benefits to, and improve the sustainability of, Scottish Salmon*.

Too small a proportion of the fish coming in to Scottish rivers is killed by anglers for the reduction in such killing to have any effect. In Autumn, too, most fish killed are males, females being protected by angling custom. There is no evidence that the present rate of killing is having any effect on the numbers of juvenile Salmon being produced in Scottish rivers.  On the contrary, the work being done by Fishery  Boards and Trusts throughout the country has increased juvenile production, mainly through the removal of barriers to spawning fish increasing the area of spawning ground.

**8.3.2**     We do not agree that *the iconic status of the salmon would also be more likely to be secured* by a licensing system; indeed it may well be damaged though a negative impact on the angling sector.