**Response to the Scottish Government Proposals on a proposed ban on the killing of wild salmon except under licence**

As a member of the Loch Lomond Angling Improvement Association (LLAIA) I fully support Marine Scotland’s Salmon and Recreational Fisheries Team in its efforts to review policy and revitalise the populations of wild fish. However, it is my opinion that the implementation of any policy change should be based on sound scientific evidence, provided in an open and transparent manner. While the current proposals were produced with the best of intentions I believe they are based on flawed and inaccessible data which should not be deemed as supporting ‘evidence’ and cannot be used to usher in the proposals outlined.

I am a member of an Association that welcomes anglers from all walks of life into its ranks and I am proud that our club membership includes substantial numbers of people who are disabled and/or elderly. These members gain enormous health and well-being benefits from angling, enabling them to stay fit and active for longer throughout their lives. Significant numbers of my fellow members volunteer to improve habitats, they also support the monitoring of fish stocks through electro-fishing and redd-counting. Our bailiff’s operate to high standards and have greatly reduced poaching in recent years in the Clyde estuary and the waters of the Lomond system, additionally providing important support to SEPA and Scottish Water regarding pollution incidents.

The fisheries of the Lomond System and River Endrick SAC have been extensively studied and surveyed over recent years through close collaboration with Loch Lomond Fisheries Trust and the University of Glasgow’s Scottish Centre for Ecology and the Natural Environment (SCENE), and there are several national and international designations that demonstrate the importance of this region. Recent surveys indicate there is a healthy population of juvenile migratory fish stocks throughout the system and average rod catches per member has risen significantly over the last 15 years.

From 2013 the LLAIA has made positive contributions to stock conservation and sustainable harvesting of migratory fish through a raft of conservation measures implemented in the light of local scientific evidence of fish numbers. A long-standing ban on killing any sea trout before 1 May each year was expanded in 2013 to a mandatory salmon tagging scheme and a prohibition of taking salmon in October. This has led to a fall in the number of salmon being killed and it is now rare for anyone to declare killing more than a few salmon in a season

I strongly believe that imposing a grade 3, 100% catch and release, regime on the Lomond catchment and Endrick River SAC will lead to a collapse of the LLAIA and as a direct consequence this will lead to unrestrained poaching and a sharp decline in stock numbers. This will be a disaster for our members and fish stocks alike.

In view of the current data available on the juvenile fish populations, increases in average catch per angler and the improvements to riverine management, in combination with the inherent financial and ecological management risks associated with 100% catch and release, I ask Marine Scotland to consider either:

1. Reclassifying the Lomond System and Endrick River SAC to be a Category 1 or 2 system, or
2. Allowing the LLAIA to continue to implement their proposed tagging system until 2020 within a framework of agreed conservation measures – no salmon to be taken before 1 June or after 30 September; no more than 1 salmon to be taken on any day, no more than 3 tags to be issued to each member - with a commitment to continue to work with the LLFT to monitor fish numbers, subject to a further conservation review in 2020.

In terms of the specific proposals I offer the following comment:

1. To prohibit the taking of Atlantic salmon out-with inland waters which will be reviewed after 3 years

**Agreed**

1. To permit the killing of wild salmon within inland waters where stocks are above a defined conservation limit

**Disagree**

I fundamentally disagree with the approach taken by Marine Scotland and challenge the data used by Marine Scotland to calculate the conservation status of Scottish waters; the associated methodology is generally accepted as fundamentally flawed, rendering the results meaningless.

I believe that investment should continue to be made by Scottish Government to maintain ongoing assessment of salmon populations so that there may be long term evaluation of stocks backed by proper scientific evidence in order that conservation limits be defined..

1. To introduce mandatory catch and release in areas which fall below their defined conservation limit following the annual assessment of salmon stocks

**Disagree** as current conservation limits are based on the flawed data model used by Marine Scotland (See answer to 2 above)

4) To require the production of a conservation plan in conjunction with Marine Scotland in areas which fall below their defined conservation limits following the annual assessment of salmon stocks i.e. in areas where the conservation limit has been met in 3 out of the 5 years or less.

**Disagree** with limiting the areas requiring conservation plans. Conservation plans should be in place for all systems in Scotland.

Signed